

Plumpton Parish Council

**Plumpton Neighbourhood
Development Plan Revised Pre
Submission Document - Regulation
14 Consultation**

Representations submitted on behalf of:

Cala Homes (South Home Counties) Ltd

July 2017



1.0 INTRODUCTION AND SCOPE OF REPRESENTATIONS

A Introduction

- 1.1 These representations on the Plumpton Pre Submission Neighbourhood Plan have been prepared on behalf of Cala Homes (South Home Counties) Ltd. The company has a controlling interest in 1.5ha of land to the rear of Oakfield which has been identified as a deliverable and developable site in the Lewes District Strategic Housing Land Availability Assessment (SHLAA). It is now included as a potential housing allocation for 20 dwellings in the revised Pre Submission (June 2017) Plumpton Neighbourhood Plan Policy 7.4 and Cala Homes support the allocation.

B Scope of Representations

- 1.2 Cala Homes submitted representations to the last Pre Submission Neighbourhood Plan in June 2016. The representations objected to the Plan because its proposed residential allocations had been informed by a flawed Site Assessment and Sustainability Appraisal (SA). It was pointed out that the inconsistencies in the way the sites were appraised led to the selection of the wrong sites and land at Oakfield being overlooked as a proposed housing site altogether.
- 1.3 Cala Homes is therefore pleased that the content of the SA and the Site Assessment after correction, has led to the identification of land to the rear of Oakfield as a preferred residential allocation for 20 dwellings after all. Accordingly **Cala Homes supports the residential allocation in policy 7.4.**
- 1.4 The Plan now appears to meet the basic conditions for Neighbourhood Plan preparation and Cala Homes support it.

2.0 POLICY CONSIDERATIONS FOR THE DRAFT NEIGHBOURHOOD PLAN

A The Basic Conditions

2.1 The Localism Act 2011 inserts provisions into the Town and Country Planning Act 1990 (“the Act”) in relation to neighbourhood development orders and into the Planning and Compulsory Purchase Act 2004 in relation to neighbourhood development plans. Paragraph 8(2) of Schedule 4B of the 1990 Act sets out the basic conditions a Neighbourhood Plan must meet and which an examiner must consider before it can go to referendum. The statutory test is:

- Having regard to national policies and advice, whether it is appropriate for the Neighbourhood Plan to be made
- Having special regard to the desirability of preserving any listed building or its setting or the character or appearance of any Conservation Area
- Contribute to the achievement of sustainable development
- Be in general conformity with the strategic policies of the development plan for the area
- Be compatible with the European Union (EU) and European convention on human rights (ECHR) obligations

National Planning Policy Framework

2.2 The National Planning Policy Framework (NPPF) (paragraph 14) defines sustainable development. For plan making it states that this means meeting the objectively assessed needs of an area with sufficient flexibility to adapt to rapid change unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

2.3 Paragraph 110 -111 advises that in preparing Plans to meet development needs the aim should be to allocate land with the least environmental or amenity value and policies should encourage the effective use of land by reusing previously developed land.

2.4 Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan and should not promote less development than set out in the Local Plan or undermine its strategic priorities.

Planning Practice Guidance

2.5 The on line Planning Practice Guidance (PPG) provides further guidance on Neighbourhood Plan making. It confirms that a Plan can allocate sites for development and an appraisal of options and

an assessment of individual sites against clearly identified criteria should be carried out including consideration of how sites can contribute towards sustainable development.

- 2.6 The PPG therefore advises that the preparation of a Sustainability Appraisal may be useful in demonstrating how a Plan can achieve sustainable development. Where a Plan is expected to have significant environmental effects a Strategic Environmental Assessment (SEA) may also be required. Paragraph 46 (id:11-046-20150209) states that this may arise where a Plan allocates sites for development or the Neighbourhood Plan area contains sensitive natural or heritage assets that might be affected by the proposals in the Plan.
- 2.7 The SEA process is explained in the PPG (paragraph 38 id: 11-038-20150209) and it requires proposals in a Neighbourhood Plan to be considered against reasonable alternatives to assess the likely significant effects of the available options. The PPG says it should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives including those selected as the preferred approach in the Neighbourhood Plan.

The Adopted Lewes District Local Plan

- 2.8 The Plumpton Neighbourhood Plan is required to be in general conformity with the strategic policies of the Local Plan and should not promote less development than set out in the Local Plan or undermine its strategic priorities.
- 2.9 In this regard the Lewes Local Plan was recently adopted in May 2016. The Plan provides for a minimum of 6,900 net additional dwellings District wide in the period 2010-2030 with some sites being allocated in the Council's Site Allocations Document and in Neighbourhood Plans.
- 2.10 Policy 2 deals with the distribution of housing and a minimum of 50 dwellings are identified as planned housing growth at Plumpton Green and a further 200 dwellings in as yet undetermined locations. Policy 2 and its lower case policy text in paragraph 6.37 states that Neighbourhood Plans could be used to identify sites to meet the extra 200 dwellings in the as yet unnamed locations and if Plumpton is selected then it can be expected to find significantly more than the minimum 50 dwellings.

Summary

- 2.11 For the Plumpton Neighbourhood Plan to be considered properly prepared and proceed to referendum, the following considerations will therefore apply:
- **That all the basic conditions for Neighbourhood Plans have been satisfied;**

- **This includes proper consideration of the selected sites against reasonable alternatives to assess whether it can deliver sustainable development in accordance with national policy;**
- **And the Plan is in general conformity with the strategic policies of the Lewes Local Plan**

3.0 THE PLUMPTON SITE ASSESSMENT AND SUSTAINABILITY APPRAISAL

3.1 The revised Pre Submission Plan 2017 version at paragraphs 4.37-4.42 explains why the original 2016 Pre Submission Plan was withdrawn and the residential development sites reconsidered again principle. In assessing the site options for development in the Plumpton Neighbourhood Plan the Parish has revised its Site Assessment Report and its Sustainability Appraisal incorporating a Strategic Environmental Assessment.

The Site Assessment Report

3.2 The revised Site Assessment Report has informed the inclusion of development sites in the 2017 Neighbourhood Plan and is therefore a highly relevant part of the evidence base for the Plan.

3.3 **Site 8 – Land to the rear of Oakfield** was reconsidered by the Neighbourhood Plan Steering Committee and the Site Assessment pro forma states:

‘The site assesses poorly against environmental objectives, due to presence of protected species, trees and hedges on the site, and its partial visibility from the Downs.

Mitigation measures would be needed to manage surface water flood issues on the site and to protect species and habitats.

Its proximity to Site 7 means that careful planning will be needed to manage the density of development, in association with Site 7. The two developments should not be built to their respective boundaries and should preserve a green landscape buffer between them, incorporating any existing boundary hedgerows.

The site’s development would mean the loss of the garage business. However, the garage is understood to be on a short-term lease.

However, the site is recommended for inclusion in the Neighbourhood Plan, subject to necessary mitigation of these adverse impacts, as it scores well on sustainability, due to its proximity to the village centre’.

3.4 We agree that the site has absolute geographical advantages being centrally located within the village close to the village hall and other facilities. We disagree however that it assesses poorly in terms of biodiversity. For instance, a phase 1 habitat survey has already been carried out on the site and concluded there are no ecological impacts that cannot be adequately mitigated and should not therefore preclude its residential development. It found:

- The loss of the semi-improved grassland on the site to development does not represent a loss of an important habitat.
- Key mitigation measures related to bats can be undertaken including the provision of bat boxes and a lighting strategy carried out to limit light spill;
- Reptile habitat focused on the site fringe can be enhanced and not lost as a result of development;
- A badger Settle on adjoining land can be protected during construction; additional planting and the provision of bird boxes can be provided for the bird population.

3.5 Surface water can be adequately mitigated. The density of 20 dwellings on a site of 1.5ha is equivalent to just 13dph and there is more than enough space to provide a landscape buffer with the adjoining site 7 to the north. In short, taking all these factors into account, our view is the site actually performs better than the Site Assessment findings indicate.

The Sustainability Appraisal and Strategic Environmental Assessment

3.6 The revised Sustainability Appraisal (incorporating SEA) has reconsidered the overall housing distribution and the site options themselves. The housing distribution options are:

- Option 1 - Expanding the centre of Plumpton Green
- Option 2 – Expanding to the north and south of Plumpton Green
- Option 3 – A combination of small-scale pockets of development within Plumpton Green

3.7 It concluded that a combination of Option 1 and 3 best met the objectives and Vision for the future of Plumpton. It would mean most of the sites would be within the central area of the village, which is more sustainable as it would reduce car use within the village and give better pedestrian access to village facilities and services. Small-scale pockets would spread the development across the village, avoiding a concentration of new-build housing and mitigating impact on the village’s rural character.

3.8 The SA also considered the 11 residential site options. In the event, bearing in mind the distribution preferences for a combination of Option 1 and 3 and the merits of the sites themselves it recommended the following for allocation in the Plumpton Neighbourhood Plan:

- Site 1 – Riddens Lane (16 units);
- Site 6 – Wells Close (12 units);
- Site 7 – The Glebe (20 units);
- Site 8 – Land rear of Oakfield (20 units); and
- Site 11 – Racecourse land as a reserve (19 units).

- 3.9 **Site 8 – Land to the rear of Oakfield** scored well against the social objectives, due to its central position, within walking distance of village facilities. Existing surface water flood risk, potential biodiversity and landscape impacts including the site’s visibility from the Downs were concerns. It stated that ‘development would need to be clearly separated from the contiguous (allocated Site 7) reflecting the parish preference for small scale pockets of housing’.
- 3.10 We would comment that consultants acting for Cala Homes have already demonstrated that landscape and biodiversity impacts and concerns about flood risk can all be mitigated. Cala Homes can deliver a scheme that meets the above considerations. It has already provided a draft layout Plan to the consultation events for the revised Neighbourhood Plan. It will consider further revisions that maintains individual site character with Site 7 prior to the submission of a planning application.
- 3.11 The Policy 7.4 Neighbourhood Plan allocation for land to the rear of Oakfield already proposes wording that alludes to the green landscape buffer with site 7. However to strengthen this objective and to reflect the likely phasing of the 2 sites separately given the differences in ownership we propose the following minor amendments:

Policy 7.4: Land to the rear of Oakfield, Plumpton Green

The land, as shown on Policy Map E amounting to 1.5ha, is allocated for residential development of around 20 dwellings, with open space and a new access from Station Road.

In addition to conforming to the policies contained in the PPNP, LDC District Local Plan, SDNPA Development Plan and all other applicable statutory requirements, development in this location will:

- 1. Be designed to include landscape buffers and open space with a layout that can secure the separation with the site allocated for residential development in Policy 7.3;**
- 2. Be designed to avoid proximity of houses to existing properties along Station Road.**
- 3. Subject to the above no phasing restrictions shall apply and the sites can come forward independently of each other.**