

**PLUMPTON PARISH DRAFT NEIGHBOURHOOD PLAN RESPONSE FORM**

Thank you for taking the time to feedback on the draft Neighbourhood Plan.

Some guidance notes to help you complete it in a way that will assist the Steering Group in finalising the document:

- While the final referendum will only be open to registered voters, at this stage the Steering Group are keen to get the widest range of input. To achieve that, this form is available to all individuals (i.e. not simply one per household), regardless of age, but only one form per individual will be accepted.
- Please note that anonymous forms cannot be considered and will therefore be ignored.
- If you choose to feedback, then please complete Part A and Part B – while this exercise is primarily qualitative in that it seeks your views, it is also useful to take the opportunity to gauge the overall support for the draft plan.
- Part C is optional, but must be completed if you have indicated in Part B that there are specific policies you do not support – the Steering Group need to know **why** a policy is not supported in order to consider any amendments to it.
- It would assist the Steering Group in collating responses if you would use the electronic version of the form, available from the Neighbourhood Plan website ([www.plumptonpc.co.uk/neighbourhood-plan/](http://www.plumptonpc.co.uk/neighbourhood-plan/)), and keep your comments constructive and as concise as possible. If you wish to make several comments on the electronic form, please insert additional rows in Part C as required. For paper forms, simply use as many copies as required.
- The closing date for responses is 31 July 2017. Please return the form by one of the following methods: a) dropping into the box at Plumpton Post Office and Store, b) by email to [np@plumptonpc.co.uk](mailto:np@plumptonpc.co.uk), c) or by post to the Parish Clerk: Anita Emery, Plumpton Parish Council, Elm Cottage, Church Street, Hartfield TN7 4AG

**PART A – Respondent details (must be completed)**

<b>Name:</b> Martin Page, Complete Land Management Ltd on behalf of Shaw Farm (Plumpton) Ltd	
<b>Postcode:</b> Complete Land Management Ltd, Sackville House, Hartfield, East Sussex <b>TN7 4AW</b>	
<b>Connection to Plumpton:</b>	<b>Resident in Parish</b> YES
	<b>Business within Parish</b> .....YES
	<b>Landowner of Land within Parish</b> .....YES
	<b>Other (e.g. a planning consultant or similar representing any of the above) – Please specify below</b>
	Planning Consultants and Agricultural Advisors representing the landowners Shaw Farm (Plumpton) Ltd

**PART B – Summary of overall support**

<b>Do you support the draft plan? (Please delete the answer that does not apply)</b>	No
<p>If you answered 'Yes' to the above, then the Steering Group will presume you support all the policies within the plan, but if that is not the case, then you can indicate so below. You are also free to add comments in Part C.</p> <p>If you answered 'No', then the Steering Group need to know which policies you do not support (and why)? Please make that clear below (on the electronic form, simply delete all the policies that you are happy with, to leave those you do not support. On the paper form, just indicate [e.g. by ticking, circling or similar] those policies that you do not support). Then complete section C to provide the reason why you do not support that policy.</p>	
<p><b><u>Policy 13: Local Green Spaces and Open Spaces</u></b></p>	

**PART C – General**

Comments on general sections of the documents	Page and/or paragraph number	Comment	Suggested improvement
Comments on specific policies in the draft plan	Policy and/or page or paragraph number	Comment	Suggested improvement
	<p><b>Policy 13 LGS6</b></p>	<p><b>The Site</b></p> <p>This objection seeks removal of Local Green Space Policy LGS6 from the farmland north of ‘Trillium’, west of Station Road, Plumpton Green. This is a field with a roadside hedge and which has a track and barn in the south. It is on rising land and to the north is bounded by the wooded surrounds of Inholms Farm, Station Road.</p> <p><b>Rationale for the Local Landowner/Business Objection and Summary</b></p> <p>Local Green Space allocations are said by Government in the NPPF (paras 76 - 78) to be a designation intended to last beyond the end of the plan period. Our clients do not wish to stand in the way of the community’s wishes for the NP generally and have noted, without further comment, the deletion of a draft</p>	<p><b>Change the <u>Policies Map</u> to remove notation LGS6 entirely and leave the Site as general countryside outside the planning boundary of Plumpton. Renumber Site LGS7 accordingly.</b></p> <p><b>Delete from <u>Policy 13</u> the following text:- ‘Site: LGS6 – Field between Trillium and Inholms Farm, west of Station Road;’.</b></p> <p><b>Re-number Site 7 accordingly.</b></p>

	<p>housing allocation in the southern part of the LGS6 policy area now proposed. However our clients do not wish to have their land blighted in the long term – i.e. beyond 2030 - by a Local Green Space policy that is not soundly arrived at.</p> <p>In summary LGS6 the draft NP is not sound as it stands because the application of Policy 13 to the Site is not based on sound evidence, conflicts with Government policy in the NPPF, and is not supported either by the relevant policies of the saved 2003 Local Plan or adopted Joint Core Strategy (JCS).</p> <p>Conclusively in this case, the draft designation is superfluous. There is adequate protection from development outside the planning boundary of Plumpton via the last sentence of Policy 1 without use of Policy 13 in this case. As shown below it is clear that the NP simply seeks an extra layer of protection from development and is not able to offer any creative or policy-relevant future for the field in question.</p> <p><b>Lack of Soundness Due to Conflict with NPPF and Lack of Evidence</b></p> <p>The rationale for LGS6 fails to reflect the purpose of Local Green Space as set out in the NPPF. To explain, the NPPF at Para 77 says:-</p> <p><i>'The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:</i></p> <ul style="list-style-type: none"><li>● <i>where the green space is in reasonably close proximity to the community it serves;</i></li><li>● <i>where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i></li><li>● <i>where the green area concerned is local in character and is not an extensive tract of land.'</i></li></ul> <p>The relevant extract from the PPNP Local Green Space evidence report (2017) supporting the draft plan, says of</p>	
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		<p>this site:-</p> <p><b>'Value to the community:</b> <i>The site is proposed primarily to maintain an east-west open area across the north end of the proposed development area centred around Plumpton Green. With site LGS7 it would provide a corridor as a contribution to Green Infrastructure. The view from the 15 road by the top of this field looks across the top of the village to the South Downs; that view has been highlighted as important to many people and should not be impaired by development.'</i></p> <p>There is in effect no value to the community because the justification set out in the evidence report is a functional one – i.e. to maintain an open east-west area and to prevent development that might affect a view from the roadside (there being no footways or footpaths on or near the field). The evidence has jumped direct to justification of the outcome of the policy (i.e. to rule out development) without first assessing why that policy should be applied, if at all.</p> <p>The lack of significance of the Site is borne out in so far as there is no mention of it in the April 2014 consultation summary report, the September 2014 Analysis of Feedback report and few if any discernable references in any of the Question 7 responses that are logged in the PPNP Village Questionnaire – Complete Raw Data (2015). The Brief Outline of Results 2015 report bears this out as it shows that the Site did not feature as significant in the Q7 response. Even though the foreword to the Draft Plan refers to a green gap important to many residents (pp.4) the evidence is thus that the Site is not locally important.</p> <p>The evidence in fact shows clearly that there is nothing <i>'demonstrably special'</i> to the local community about this field as is required by the NPPF. For that reason the evidence for the policy allocation is absent and the lack of an evidence-based justification for it means the neighbourhood plan is not sound.</p> <p>The draft policy as applied to this site conflicts with the</p>	
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Government's recognised use of Local Green Space policy in plan-making, because Test 2 of the three NPPF para 77 prerequisites is not passed. The conflict with Government policy again makes this allocation fundamentally unsound. It is instead a NPPF paragraph 77 case where "*The Local Green Space designation will not be appropriate for most green areas or open space...*"

**PPNP Objective for Local Green Spaces Not Served**

PPNP Objective 7 at para 5.2 is '*to plan for increased public access to and enjoyment of local green spaces and the SDNP as a recreation, education and leisure amenity.*'

Our clients' field has no public access and is part of a farming operation. It has no hope whatsoever of contributing to the otherwise laudable aspirations of this Objective. For that further reason LGS6 as a policy is not based on any prospect of a positive role for the land and is again a superfluous designation.

**No Contribution to Green Infrastructure**

The field cannot contribute to green infrastructure as it does not pass the definition of that term. It is incapable of being part of a '*...Strategically planned and delivered network...*' nor can it '*...thread through and surround the built environment and connect the urban area to its wider rural hinterland..*' as per the Natural England Definition on pp 3 of the PPNP Local Green Spaces evidence report 2017.

**Joint Core Strategy 2016 Policy CP8 and Lewes District Local Plan 2003 Saved policy RES19 and RE2**

JCS Policy CP8 refers to green infrastructure as '*... a connected network of multifunctional green infrastructure..*' and at para 7.80 sets out 11 specific categories of land that comprise green infrastructure. Not only does our clients' site have no connection to any other network, but it does not fall within any of the

		<p>categories set out. As a result even though the PPNP makes the claim, LGS6 cannot be regarded as an allocation in pursuance of development plan policy CP8.</p> <p>The draft PPNP at para 5.103 also seeks to justify Local Green Spaces Policy 13 in pursuance of LDLP 2003 Saved policy RES19, but this policy relates to the provision of playing space and is thus irrelevant to our clients' agricultural field. The PPNP also refers in part to Saved policy RE2 but again this is not relevant as the policy is specific to existing recreational open spaces.</p> <p>For these reasons PPNP policy 13 as it would otherwise apply to the Site is completely without justification arising from the development plan, the policies of which are uniquely related to green areas with public access.</p> <p>We therefore respectfully request that changes are made to the PPNP as set out in the next column. END</p>	
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**OUR VILLAGE – OUR COMMUNITY.**

**Help shape its future.**