

**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> Mr M Hull (KLW Ltd ) on behalf of Mrs E Whitehouse and Mr G Thomas	
<b>Postcode:</b> c/o KLW, Ridgers barn, Bunny Lane, Eridge TN3 9HA	
<b>Connection to Plumpton:</b>	<b>Resident in Parish</b> <del>YES</del> /NO
	<b>Business within Parish</b> .....YES/NO
	<b>Landowner of Land within Parish</b> .....YES/ <del>NO</del>
	<b>Other (e.g. a planning consultant or similar representing any of the above) – Please specify below</b>
	Planning consultant representing the landowners

**PART B – Summary of overall support**

<b>Do you support the draft plan? (Please delete the answer that does not apply)</b>	Yes/No
<b>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.</b>	
<b>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.</b>	
<b>Policy 1: Spatial Plan for the Parish Policy 7: New Housing Policy 13: Local Green Spaces and Open Spaces</b>	

**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
	Policy 1	<p><b>This policy does not accord with sustainable development objectives at paragraph 14 of NPPF and so is not sound. If, in the future, the District cannot deliver a 5 year housing land supply or further sites are needed for whatever reason, then it is possible that sustainable sites that are not allocated and are outside the planning boundary for Plumpton will need to be considered for housing. In such circumstances the last criteria “new development outside the planning boundary will not be supported” is overly protectionist and contrary to paragraph 14 of NPPF since it prevents the consideration of sustainable development adjacent to the planning boundary of Plumpton. Such an approach would prevent the delivery of housing and other development and so potentially harm matters relating to social and economic sustainability.</b></p> <p><b>In addition the policy prevents any form of development outside the planning boundary and this could include replacement dwellings, extensions, agricultural buildings or recreational development.</b></p> <p><b>Consequently the Plan does not meet the basic condition of contributing to sustainable development and neither does it accord with National Policies.</b></p>	<p><b>Delete last sentence and replace with a suite of criteria for judging the suitability of housing sites that might come forward on land outside the village planning boundary.</b></p> <p><b>Introduce a second policy which addresses the requirements of other forms of development outside the planning boundary.</b></p>

	<p>Policy 7</p>	<p>This policy is principally based upon the housing site allocations and its criteria cannot readily apply to windfall sites located either within the planning boundary or indeed those outside the planning boundary. If our representations on Policy 1 are successful then this policy will need to be amended.</p> <p>Notwithstanding, Criterion 4 is overly restrictive and does not accord with the principles of sustainable development (see our representations on Policy 1 above). If a new housing need emerges then sites away from the village centre may need to be found. The correct approach is to allow such site proposals to be tested by an appropriately worded policy.</p> <p>Criterion 8 is considered unreasonable because if a windfall development came forward for redevelopment of a brownfield site then there may not be a need for a habitat assessment. Replacement dwellings would also be caught unnecessarily. There is no evidence published on the Parish web site that explains why all proposals must be accompanied by an archaeological desk based assessment. It would seem odd to require it of a replacement dwelling scheme or a redevelopment of previously developed land. Generally this policy would need to tie in with the comments we make in relation to Policy 1 .</p>	<p>Create two policies, one which deals with allocated sites and one which deals with housing development on unallocated sites.</p> <p>This may require the deletion of references to windfall development so the policy is related to just allocated sites.</p> <p>Criterion 8 is overly prescriptive and must clearly distinguish between allocated greenfield sites where wildlife is important and other windfall sites where wildlife may not be an issue.</p> <p>Criterion 9 is overly prescriptive as not all windfall development will require a heritage or archaeological assessment. For example redevelopment of disturbed land, previously developed land or simple replacement dwellings.</p>
	<p>Policy 13 (site LGS7)</p>	<p>The landowner of the identified site raises objection to the inclusion of the site as a local green space and open space. The site is a paddock and has been used by the owners for grazing of animals. It is not an open space nor is it a green space able to be used by the public and the owners would no accept any public access across their land in the future nor the use of this land by the public. NPPF paragraph 76 to 78 are meant to be designations which last beyond the Plan period. Although the land owners respect the decision to remove the housing allocation, the introduction of a Local Green Space designation would effectively blight the site in the long term.</p> <p>The identification of site LGS7 as open space has only occurred because the site</p>	<p>Delete policy and instead rely on the existing policies in the District wide plan, which controls development in the countryside.</p>

was promoted as a housing allocation. It is interesting to note that the Local Green Spaces assessment was published in 2017 whereas the site was promoted for development during 2016 and no issues were raised at that time about its open space benefits. In fact it was a preferred housing site in an earlier draft of the Plan. The identification of the site as a green and open space must have come about as a result of the removal of the site as a draft housing allocation and not because of any assessment of its community, environmental or landscape benefit/contribution.

It is noted that the Parish have not protected other paddocks and agricultural fields around the village, particularly those behind Chapel Road, Woodgate Meadow and east of Whitehouse Farm. It is noted that in the Joint Core Strategy 2016, Policy CP8 and in the Lewes District Local Plan 2003 Saved policy RES19 and RE2 green infrastructure is referred to as ‘... a connected network of multifunctional green infrastructure..’ and at para 7.80 sets out 11 specific categories of land that comprise green infrastructure. The LGS7 site does not connect to any other network, and it does not fall within any of the categories set out in that Plan. To illustrate this we note that other proposed open spaces are inconsistent with this policy. Only a short section of the Bevern Stream is protected under LGS2. Consequently the methodology for choosing sites is very unclear and at best sporadic. The Local Green Space report refers to the connectivity of green infrastructure but none of the identified sites link together particularly well and there is no clear evidence as to what the Parish is trying to achieve by identifying these spaces. LGS2 is a good example, where the policy fails to protect the whole length of the stream as it runs through the village. For example, unidentified parts of the Bevern Stream which link King George’s Field Recreation Ground and Ridens Farm, along the length of Bevern Stream are simply omitted for no reason yet are just as ecologically important as the identified section of stream.

The Local Green Spaces report explains that initiatives to improve access to open spaces increases their use, however, the LGS7 land is private land as are other identified open spaces. Section 2 of the Local Green Spaces report begins to hint at a methodology for choosing sites and refers to NPPF criteria for choosing sites. In relation to these criteria, the LGS7 site does not serve the community as it is

private land. Secondly there is no local significance – it has no special beauty, recreation value, historic significance nor is there any evidence of a rich wildlife. Any drove route related matters quoted in the Local Green Spaces report are acknowledged to lay outside the site. Finally the land is not local in character but a simple agricultural field used for grazing. It is well enclosed by hedging and so it is not widely visible nor is it necessary to identify a protectionist policy.

The specific assessment of LGS7 relies on the drove road outside the site. The site has not been surveyed for biodiversity reasons and the extent to which it provides an open gap is not in itself a reason to impose a planning policy , which prevents any use and development apart from open space.

A rigorous assessment should have considered all these criteria carefully and a balanced decision taken on their results. However that has not happened. Other locations around the village should also have been assessed (as noted above) even if they were eventually discounted. Not to do so is unsound and indicates that the assessment has been superficial and based on a desire to prevent further development at certain locations rather than a fair assessment of the village environs. The Local Green Spaces report lacks robust and proportionate evidence to support Policy 13 and specifically to identify this LGS7 site as a green and open space. As such the green space policy is being misused.

The last sentence of Policy 13 does not accord with NPPF paragraph 14 and the representations we make regarding Policy 1 and providing a criteria based approach for judging future housing or other development needs. Whilst the owners of the site accept and respect the wishes of the community regarding the previously proposed allocation for housing, if future sites need to be found in sustainable locations then LGS7 could be one such site. The policy wording prevents this site from being considered should a future need arise. The policy also prevents other forms of development such as field shelters or agricultural buildings or stables to support its current use as a grazing field. In these circumstances, and given the wider countryside policies which exist in the District wide Development Plan, a Local Green Space designation is considered unnecessary and a hindrance to the on-going agricultural use of the field.

	<p><b>In particular the last sentence of Policy 13 is unacceptable to the land owners as it implies that the land in question is already a public recreation use which it clearly is not. In any event the policy is too restrictive and provides no scope for its continued use as either a paddock or for agricultural grazing land where support buildings might be needed.</b></p> <p><b>We have reviewed the Wantage Neighbourhood Plan Examination Report produced by the Examiner John Parmiter in 2016. Some of the issues contained in that Examination are relevant to this Neighbourhood Plan. Section 9 of that Examination report is a warning signal to Plumpton Parish and should be reviewed. Examiners are not content to allow Plans which are overly negative or not based on sound evidence. Currently Policy 1 and 13 fall into this category.</b></p>	
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**OUR VILLAGE – OUR COMMUNITY.  
Help shape its future.**