

**Plumpton Parish Neighbourhood Plan 2017-2030**  
**Pre-submission Plan Working Draft Consultation**

**EAST SUSSEX COUNTY COUNCIL RESPONSE –JULY 2017**

Thank you for the opportunity to comment on the Plumpton Parish Neighbourhood Plan. The following are officer comments from East Sussex County Council (ESCC) which have been sub-divided into the respective disciplines for ease of reference. Where appropriate the specific section, policy or document within the consultation documents has been referred to.

If you have any queries on the County Council's comments please contact:

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**1. Transport Development Control (Highways)**

- 1.1 The response provided below follows on from comments that were previously made by Transport Development Control (TDC) in June 2016 and is based on the limited information provided, along with the information and knowledge held by the TDC team.
- 1.2 As stated in our comments of June 2016, should planning applications be submitted for sites in Plumpton, it is likely that we will request further information to be provided that enables us to fully consider the highway implications of the proposals. In this regard, we would suggest that reference is made to the relevant pages of the County Council's website (see: <https://www.eastsussex.gov.uk/environment/planning/applications/developmentcontrol/tdc-planning-apps/>), which provide information on what matters we would wish to see addressed in any applications.

**Newly proposed allocations: Glebe Land (Policy 7.3) & Land rear of Oakfield (Policy 7.4)**

- 1.3 It is noted that the sites are within the village centre, close to amenities (school, shop, station etc.) so can maximise the opportunity for sustainable travel to and from the sites, although improvement to footway links and bus stops will be required.
- 1.4 The County Council's Transport Development Control team has recently provided pre-application advice/comments on these two sites for the prospective developers. The consultation was received from one agent acting for both developers so our comments covered both sites in one response.
- 1.5 The pre-application advice was as follows:
- The Highway Authority would prefer to see one access serving both sites.

- However, a separate access to each of the two sites may be possible provided they are far enough apart and an assessment is provided to ensure no conflict with other junctions.
- The NDP states that the sites should be separated by a landscape buffer - presumably in the case where separate vehicular accesses are provided, alongside the landscape buffer, there will be no non-car links between the two sites. While the Highway Authority would accept separate accesses subject to suitable access design, it is recommended that in order to provide the most direct and attractive routes for sustainable trips (walking and cycling trips to local facilities, bus stops and station), that footway and cycleway connections between the two sites and linking to Station Road should be provided. A landscape buffer incorporating pedestrian links could still achieve a suitable balance between landscaping and accessibility.
- Please note that if the shared access onto Station Road to the site is provided at Glebe Land that pedestrian access to Station Road from Land at Oakfield will be required.
- Such facilities will improve the sustainability of these sites.
- Any application(s) should be supported by a Transport Report and Safety Audit (for the access proposals). It is recommended that the need for highway improvements is made clear in the policy.

**Policy 7.1: Riddens Lane**

- 1.6 In the May 2016 consultation this was a reserve site but is now a proposed allocation for 16 homes. As concluded in the previous comments, the allocation of this site is acceptable in principle in highway terms. It is noted that upgrading the construction of Riddens Lane and the introduction of traffic calming measures is included in the policy. Riddens Lane is currently a private road and any such works would need agreement with land owners rather than the Highway Authority.

**Policy 7.2: Wells Close ('Land at Strawlands'/Wells Close)**

- 1.7 This site was proposed in the previous iteration of the Neighbourhood Plan as an allocation for 6 to 10 housing units. This has increased to a maximum of 12 one and two bed units specifically designated for older people. This site was previously considered acceptable in principle in highway terms and this small increase in units does not raise concern.

**Policy 7.5: Land at Plumpton Racecourse**

- 1.8 The Highway Authority has previously made comments on this site, in particular highlighting concerns over the ability to achieve safe vehicular and pedestrian access to the proposed development. At this point in time, these concerns remain and until it can be demonstrated otherwise, significant doubts remain as to whether the proposed vehicular access onto Plumpton Lane can be provided to the satisfaction of the Highway Authority (particularly in terms of ensuring that the required visibility splays are provided), as well as the pedestrian access into the site.
- 1.9 Although the policy refers to the need to satisfy the Highway Authority with regards to pedestrian access, we request that the policy is also explicit in the need to satisfy the Highway Authority when it comes to vehicular access to and from the site. Until such satisfaction has been provided it should be recognised that the deliverability of this reserve allocation should be in doubt.

#### **Policy 4: Provision of adequate parking**

- 1.10 In principle this policy is considered acceptable. However, the policy refers to 1 parking space per 1-2 bed unit being only applicable to older person units. The parking standard of 1 parking space should apply to any 1-2 bed unit and the policy should be amended as such.
- 1.11 It should be made clear in the policy that all parking provision will be in accordance with ESCC guidance, and not just visitor and cycle parking.
- 1.12 It should be noted that the ESCC guidance not only covers an appropriate number of spaces but the size and location of spaces, and includes advice on garages and car ports.

## **2. Landscape**

#### **Policies 7.3 (The Glebe) and 7.4 (Land at Rear of Oakfield, Plumpton Green)**

- 2.1 From a landscape perspective the inclusion of these policies is supported - as they are enclosed sites close to the built up area boundary. The existing well treed eastern boundary would make a defensible new edge to the village development. The well-defined field boundaries and trees within these sites should be retained as part of any development proposals (this is covered by the new Policy 5). The southern edge of the site covered by Policy 7.4 would need to be reinforced with tree planting – it is suggested that this is made a policy requirement. In landscape terms, these two sites are good replacement suggestions for the 3 sites which have now been omitted. All of those would have extended the village boundary outside the current footprint and they did not have clearly defensible boundaries with the countryside.
- 2.2 As outlined above, the omission of sites 3, 5 and the one south of the railway (not shown on map E) is welcomed. The changes to the policies 7.1 and 7.2 are supported. The public footpath which crosses the northern part of site 6 Wells Close should be accommodated in a generous green corridor of at least 5 m wide, or as advised by ESCC Rights of Way Team. It is suggested that this is referred to in the policy.

#### **Policy 4: Provision of Adequate Parking**

- 2.3 Policy 4 is supported in landscape terms, in particular the reference to the need for parking to be appropriately located or screened to minimise landscape impact.

#### **Policy 10: Plumpton College**

- 2.4 Policy 10 is supported in landscape terms.

#### **Local Green Space (LGS) Policy**

- 2.5 LGS: Various changes have been made which largely reflect previous landscape comments on these designations. It is noted that the original LGS1 is omitted and this is welcomed as the previous reason for designation was in relation to proposed development in this area.
- 2.6 The numbering of the remaining LGS has changed to reflect this. The original LGS 7 and 8 are now 6 and 7. These have both been extended to protect the extent of the gap between the

settlements which makes sense. LGS 5 has been reduced in area and this reflects my previous comments with regard to the local value of the fields and justification of the designation.

### 3. **County Ecologist**

#### **Policy 7.3: Glebe Land**

- 3.1 NPPF states that *“the planning system should contribute to and enhance the natural and local environment by... minimising impacts on biodiversity and providing net gains in biodiversity where possible...”* (paragraph 109). The NPPF also sets out principles that LPAs should seek to apply when determining planning applications in order to conserve and enhance biodiversity in and around developments, and refusing planning permission for developments that would result in the loss or deterioration of irreplaceable habitats, unless the need for, and the benefits of, the development in that location clearly outweigh the loss (paragraph 118).
- 3.2 The Glebe Land site is not designated for its nature conservation value but there are multiple records of protected and notable species in the local area, including bats (European Protected Species). There are known roosts nearby, and the habitat on and surrounding the site, most notably trees, hedgerows and ponds, are likely to provide foraging and commuting habitat as well as possible roosting habitat for bats, as well as potential habitat for other notable species.
- 3.3 Any development of the site (and indeed any of the proposed allocation sites) would need to be accompanied by an Ecological Impact Assessment (EclA) carried out in line with BS42020:2013 and best practice guidelines. Ecological impacts should be assessed, and recommendations for appropriate mitigation, compensation and enhancement made, following the mitigation hierarchy. The EclA should consider the existing nature conservation resource of the site, identify impacts and assess the need for avoidance, compensation and new benefits for biodiversity, including the need to create and/or strengthen connectivity between existing habitats. It is suggested that the policy and/or the supporting text refers to this.
- 3.4 The cumulative and in combination effects of the development with other local developments/plans/projects should be considered. Of particular relevance is Policy 7.4 which relates to the adjacent site. If impacts are identified that cannot be adequately mitigated or compensated, permission should be refused.
- 3.5 Potential impacts that will need consideration include, but are not limited to, habitat loss, fragmentation of habitats, isolation of populations, light and noise pollution, changes to hydrology and increased predation.
- 3.6 The proposed layout shows that hedgerows and treelines within and adjoining the site would be severed, which could have significant impacts on biodiversity. The layout also shows no open space within the site and no buffer between the development and boundary habitats. Whilst it is not possible to provide specific comments on the impacts of the proposed allocation on biodiversity, from the information available, it is considered likely that a development of this scale could have significant impacts.

#### **Policy 7.4: Land rear of Oakfield**

- 3.7 As for the adjacent site, the proposed allocation site is not designated for its nature conservation value but there are multiple records of protected and notable species in the local area, including bats (European Protected Species). There are known roosts nearby, and the habitat on and surrounding the site, most notably trees, hedgerows and ponds, are likely to provide foraging and commuting habitat as well as possible roosting habitat for bats, as well as potential habitat for other notable species.
- 3.8 Any proposed development should be accompanied by an EclA and if impacts identified cannot be adequately mitigated or compensated, permission should be refused. As with Policy 7.3, it is recommended that the policy and/or supporting text refers to the need for an appropriate EclA to be accompanied by any planning application on this site.

#### **4. Archaeological Heritage**

##### **Policy 7.3: Glebe Land and Policy 7.4: Land rear of Oakfield**

- 4.1 The group of buildings comprising All Saint's church, The Rectory, Strollings and the site of the former Private Chapel (Episcopal) to the south could potentially be of heritage / archaeological significance. None of the above are presently listed, though arguably they could be, in particular Strollings which appears to be at least of early 18<sup>th</sup> century date, if not earlier and is a relatively rare surviving example in Plumpton Green of the farm houses adjacent to the main routeway.
- 4.2 Further assessment should be undertaken of the significance of the buildings (and in turn, their settings), which we would suggest is discussed with the Conservation Officer at Lewes District Council in the first instance. Any such assessment should further inform the proposed allocations of the Glebe Land and Land rear of Oakfield.
- 4.3 In addition, the two areas of land (Glebe land and rear of Oakfield) being proposed for development, would appear to be part of the former farm land of 'Upper Strollings Farm' and as such consideration should be given to the impact on the significance of the surviving farm house of any change to its setting through the loss of surviving farmland.
- 4.4 Neither site is presently within an Archaeological Notification Area and there are no immediate designated heritage assets with the exception of the Archaeological Notification Area immediately adjacent to the South West corner of the Oakfield proposed site. However, both sites may have below-ground archaeological interest, particularly towards the stream to the east. This potential archaeological interest would need to be evaluated through the use of geophysical survey and trial trenching. Ideally this should be undertaken before the proposed allocations are confirmed. If this is not the case, then such an evaluation would need to be undertaken in support of a planning application(s) on these sites – this should be made clear in the relevant policies. It should be recognised that there is a risk in not evaluating these sites before they are allocated, that in the event that significant below ground archaeological remains were found to exist, these might preclude development or put high costs on to any development in order to mitigate impacts through recording before loss.

## 5. **Flood Risk and Drainage**

- 5.1 East Sussex County Council is the Lead Local Flood Authority for the county and as such has responsibility for managing flood risk arising from surface water, ground water and ordinary watercourses. It is also a statutory consultee to the planning system on drainage and local flood risk matters insofar as they relate to development proposals.
- 5.2 Paragraph 3.10 of the Neighbourhood Plan provides a selective list of Joint Core Strategy policies that are considered as having an important part to play in shaping the parish. It is not clear why certain policies are not mentioned, such as Core Policy 7 (Infrastructure) and Core Policy 12 (Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability). Within this context, we are minded to question what additional value Neighbourhood Plan policies 3 and 6 will bring, as they seem to just reiterate the aforementioned Joint Core Strategy policies and are not particularly locally distinctive. Hence, although the Neighbourhood Plan policies do not cause us any undue concern, we would question their value as an overall part of the development plan.
- 5.3 Neighbourhood Plan Policy 6 can be split into three parts: 1. The requirement for SuDS, 2. securing adequate sewerage capacity and 3. infrastructure provision. With regard to part 1 it should be recognised that the Lead Local Flood Authority is consulted on major planning applications (10 or more residential units) and provides a technical review of the adequacy of drainage proposals as part of a planning application. All the proposed sites in the NP cross this threshold and therefore we would be consulted on applications made in pursuant of the proposed allocations. Should the Parish Council wish to retain Neighbourhood Plan Policy 6, you may wish to add, in the supporting text, that the Lead Local Flood Authority has produced advice and guidance which is available on the ESCC website on the use of SuDS and that we would expect this to be utilised in designing the drainage proposals for the proposed housing allocations.

## 6. **Infrastructure**

### **Paragraphs 6.4 - 6.9: Infrastructure Projects**

- 6.1 We would welcome the opportunity to work with and assist the Parish Council, alongside Lewes District Council, on the prioritisation and the identification of appropriate infrastructure schemes / projects that could be funded or partly funded using the Parish Council's 25% share of Community Infrastructure Levy (CIL) monies.