

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/), 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, 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)

Name: K Roger-Jones FRICS, Clifford Dann LLP, Albion House, Albion Street, Lewes	
Postcode: BN7 2NF	
Client's connection to Plumpton:	Resident in Parish YES
	Business within Parish.....YES
	Landowner of Land within Parish.....YES
	Other (e.g. a planning consultant or similar representing any of the above) – Please specify below
	Planning consultant representing a landowner.

PART B – Summary of overall support

Do you support the draft plan? (Please delete the answer that does not apply)	No. Comments are confined to policy 13 and policy 7. None of the other policies in the plan had been considered in detail and are not being commented on.

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.

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.

- Policy 1: Spatial Plan for the Parish
- Policy 2: New-Build Environment and Design
- Policy 3: Associated Infrastructure
- Policy 4: Provision of Adequate Parking
- Policy 5: Landscape and Biodiversity
- Policy 6: Sustainable Drainage and Wastewater Management
- Policy 7: New Housing**
- Policy 8: Local Employment
- Policy 9: Plumpton Village Centre
- Policy 10: Plumpton College
- Policy 11: Plumpton Racecourse
- Policy 12: Community Facilities
- Policy 13: Local Green Spaces and Open Spaces**

PART C – General

Comments on general sections of the documents	Page and/or paragraph number	Comment	Suggested improvement
	Policy 13: Local Green Spaces and Open Spaces	<p>These comments specifically relate to LGS5 and LGS6. LGS5 forms the major part of Little Inholmes Farm. The access road and land to the south which form part of LGS6 also forms part of Little Inholmes Farm.</p> <p>The second paragraph of the Local Green Spaces and Green Infrastructure Study gives examples of Green Spaces as being parks and allotments, and water courses. Paragraph 013 Reference ID: 37-013-20140306 of the National Planning Policy Guidance (NPPG) gives examples of green areas as possibly including land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.</p> <p>Green Infrastructure is by Natural England’s definition, as set out in the Draft PPNP, strategically planned and delivered network comprising the highest quality green spaces and other environmental features.</p> <p>The land at Little Inholmes Farm is of a different nature to the examples given in the NPPG and by Natural England being private farmland and is considered to be unsuitable for designation under policy LGS.</p> <p>Both paragraph 77 of the National Planning Policy Framework (NPPF) and the NPPG (015 Reference ID: 37-015-20140306) make it clear that designation should not be used where the green area concerned is an extensive tract of land. LGS 5 is an extensive tract of land.</p> <p>The same paragraph of the NPPG states that: “... blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a “back door” way to try to achieve what would amount to a new area of Green Belt by another name.”</p> <p>Designating land as ‘Local Green Space’ simply as a tool to sterilise the land from development without justification should be resisted. It is clear from comments which</p>	Deletion of LGS5 and LGS6.

	<p>made by local residents that the respondents view the designation as a means by which development can be prevented. LGS 5 includes the fields which had been put forward as a candidate site for residential development (site 2).</p> <p>Paragraph 77 of the NPPF provides that Local Green Space designations will not be appropriate for most green areas or open space. Paragraph 77 requires the local community to demonstrate why proposed designations are demonstrably special and hold particular significance due to their beauty, historic significance or recreational value or tranquillity or richness of its wildlife.</p> <p>In relation to the PPNP assessment of LGS5, much emphasis is placed on the experience of using the public footpath which crosses the northern edge of the land. This is no justification for designating all of the land to the south.</p> <p>In relation to LGS6 a reason for designation is given as “...primarily to maintain an east-west open area across the north end of the proposed development area centred around Plumpton Green.” This is tantamount to a “...Green Belt by another name...”</p> <p>The draft PPNP fails to demonstrate why the sites are demonstrably special. It is apparent that the community is focussing on preventing development contrary to guidance.</p> <p>The assessment of the site (LGS6) within the Local Green Spaces Study cites a number of reasons for designation including the presence of ditches and small ponds; hedgerows and biodiversity. The report does not provide a detailed assessment or justification for inclusion and therefore fails to meet the tests set out in the NPPF and NPPG.</p> <p>The assessment makes a number of claims in relation to ecological species present at the site, without reference to where this evidence was derived from (it does not feature within the Biodiversity report forming part of the evidence base). The ecology report carried out by Ecology Solutions in October 2011 which was submitted in June 2016 by Barton Willmore set out the findings of species on site, and opines that the land is of low ecological value. Higher value areas within the site such as the woodland, hedgerows and ponds would all be retained and opportunities for biodiversity enhanced through development. Ecology Solutions re-visited the site in May 2016 and confirmed that there</p>	
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		<p>had been no material changes to the habitats present.</p> <p>There is nothing so special about either LGS5 or LGS6 that would warrant or justify their designation as 'Local Green Spaces' having regard to the advice and requirements of the NPPG and NPPF. Neither area should be so designated.</p>	
Comments on specific policies in the draft plan	Policy and/or page or paragraph number	Comment	Suggested improvement
	Policy 7: New housing	<p>In June 2016 Barton Willmore for Glenbeigh Developments Ltd submitted detailed comments in support of the allocation of land at Little Inholmes Farm (Site 2 on Map E) on behalf of the landowners. Extensive studies and reports were submitted and there had been widespread engagement throughout the process of producing the PPNP.</p> <p>One of the reasons for opposing the allocation was that “the site would not represent the preference for linear growth of the village, nor is it considered small in scale and nature.” (Site assessment report Site 2-Little Inholmes Farm).</p> <p>That is what the PNNP now proposes through the allocation of sites 6, 7 and 8 on the east side of the village. These sites will give rise to an eastwards extension of the village to a far greater extent than would have been the case with the land at Little Inholmes Farm. Moreover the combination of sites 7 and 8 will give rise to development of a scale and nature far more extensive than in the case of Little Inholmes Farm.</p>	

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Help shape its future.