

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: JULIAN BLACK | |
| Postcode: BN27 3AL | |
| Connection to Plumpton: | Resident in Parish NO |
| | Business within Parish NO |
| | Landowner of Land within Parish NO |
| | Other (e.g. a planning consultant or similar representing any of the above) – Please specify below |
| | PLANNING CONSULTANT REPRESENTING PLUMPTON RACECOURSE |

PART B – Summary of overall support

| | |
|--|---|
| Do you support the draft plan? (Please delete the answer that does not apply) | Yes – please see further comments below |
| | |

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

The Neighbourhood Plan’s approach to support and distribute new development proposals within the planning boundary for Plumpton Green is welcomed. It is also acknowledged that the planning boundary will be extended to incorporate the sites allocated for residential development: to include the allocation at Plumpton Racecourse. In addition, we suggest that the Plan’s spatial approach should be more flexible towards other sites that are outside the planning boundary, but are suitable for development and are well related to the planning boundary. This would enable for sites with good access to existing services and facilities and with potential to create sustainable links with the core of the settlement to come forward.

Policy 7: New Housing

The criteria set out in Policy 7 that need to be met in delivering new housing on sites allocated in the PPNP, and also on any small windfall sites are supported in general. The policy highlights important environmental considerations that need to be taken into account as part of any scheme.

As far as the affordable housing provision is concerned, Point 5 of this policy requires affordable housing to be included in line with the requirement of the Lewes District Joint Core Strategy. The adopted affordable housing policy (Core Policy 1) in the Lewes District Joint Core Strategy requires 40% affordable housing for schemes consisting of 10 or more units. It also seeks affordable units for smaller schemes (i.e. 1 affordable unit for 3 – 4 unit scheme, 2 affordable units for 5 – 7 unit scheme, and affordable units for 8 – 9 unit scheme). These thresholds set out in Core Policy 1 of the Core Strategy do not reflect the

affordable housing requirements as set out by the National Planning Practice Guidance (NPPG). The NPPG clarifies that, in light of the order of the Court of Appeal, dated 13 May 2016, which give legal effect to the policy set out in the written ministerial statement of 28 November 2014, contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1,000 sq metres. It is only in designated rural areas that Local Planning Authorities may choose to apply a lower threshold of 5-units or less. This part of the policy should therefore be reworded to also reflect the affordable housing provision threshold set out by the Government.

Para 5.35 of the PPNP, which supplements the context of Policy 7, states that 68 units will be delivered through the allocated housing sites. This is supported.

However, there has been no real progress with the District's Council's Local Plan Part 2 since the last public consultation in 2014 on the Issues and Options Stage. The 2017 Strategic Housing and Economic Land Availability Assessment (SHELAA) is expected to be published shortly following two stages of "call for sites" exercise, which took place and ended in April 2016 and April 2017 respectively. The District Council's Strategic Housing Market Assessment (SHMA) is dated 2008. Thus, the District Council remains to have a duty to update its evidence base, and establish its objectively assessed housing need as a matter of urgency. There is a strong likelihood that this will result in a higher number of units being required under the duty to co-operate. In light of this, whilst it is welcomed that Policy 7 does not specify a figure for the housing delivery, para 5.35 of the PPNP should have regard to potential increase in the housing figures to be delivered during the Plan period.

Policy 7.5: Land at Plumpton Racecourse, Plumpton Green

The allocation of this site for housing development in the PPNP is fully supported, and Policy 7.5 should be retained in the adopted PPNP.

There already has been a detailed and rapid progress in shaping the scheme for the development of the Plumpton Racecourse site since the publication of the first draft PPNP in June 2016. This process has involved ongoing liaisons with the Steering Group, Lewes District Council, and East Sussex County Council, as well as relevant sub-consultants for their input in establishing the development of this site in principle.

As also acknowledged in the current draft PPNP, the allocation and development of the land at Plumpton Racecourse is essential for the retention of the Racecourse. The need for the enabling development opportunity on this land has been triggered by the challenges being proposed and implemented by the Government, which has announced plans to reduce the horse betting levy payable to the racecourse. The combination of limited race meets (16 meets per year), restrictions to the winter months only (national hunt racing) and the Government's plans to further cut the horse betting levy, has forced the owners of the course to review their options. The enabling development opportunity as proposed for this site in Policy 7.5 will improve the quality of the existing facilities offered by the Racecourse for race-goers, owners, trainers and visitors. It will help implement the much needed improvements to the Racecourse and the associated infrastructure, enabling the Racecourse to remain successful and viable in to the future.

The PPNP highlights in para 5.88 that Plumpton Racecourse is the second biggest local employer. The housing development of the land allocated in policy 7.5 is fundamental to the retention of the employment opportunities offered by the operation of the Racecourse, and with the allocated site, the level of employment provided by the Racecourse will be higher.

The benefits of the parking space to be provided for commuters are significant given the most appropriate and convenient location of the car park in relation to the existing railway station.

Any scheme for the development of the land at Plumpton Racecourse would incorporate the necessary landscaping defining the boundaries of the site. With detailed consideration in the design of the scheme and the development of a site/area-specific landscape strategy, the new homes and the car park area can be assimilated into the sensitive environment. The proposed layout of the site will enable the car parking area to be “broken up” further with the introduction of landscaped areas of indigenous species. In a similar vein the southern edge of the new northern access lane to serve the houses and car park will be defined with a combination of native hedging interspersed with trees.

Through a combination of careful design, consultation and undertaking revisions to the spatial arrangement and access arrangements to serve the development of the site allocated through Policy 7.5, new village homes and a commuter car park will be an important part in shaping the future of the village, whilst improving and protecting the future of the Racecourse as a regional attraction for formal and informal sporting recreation and tourism activities.

We also suggest that the wording of Policy 7.5 be revised. The minor amendments in the suggested wording are underlined. It is considered that the suggested wording of “in consultation with the Highway Authority” is more appropriate as this better reflects the role of the Highway Authority in resolving any highway related matters. It should also be taken into account that the principle of the new access arrangements and car park for commuters are agreed in principle with the Highway Authority. Any further details for the provision of safe pedestrian access will be discussed and agreed through appropriate “consultation” with the Highway Authority.

Policy 7.5: Land at Plumpton Racecourse, Plumpton Green

The land, as shown on Policy Map E amounting to approximately 0.7ha, is allocated as a reserve site for residential development for up to 19 new homes and for the provision of extra car parking spaces.

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. include measures to prevent parking on Plumpton Lane and along the new access road;

2. include landscaping to clearly define the boundaries of the development.

This site will be released by the Local Planning Authority for development if safe pedestrian access can be provided between the site entrance and local facilities, in consultation with the Highway Authority.

Policy 8: Local Employment

The PPNP's approach in protecting local employment and existing businesses, unless proven unviable, is fully supported. Paragraphs 2.9 and 5.92 of the PPNP acknowledge the important role of Plumpton Racecourse in providing the majority of local employment. This will be retained and increased through the enabling development opportunity given to the Racecourse in Policy 7.5 of the draft Plan.

Policy 11: Plumpton Racecourse

We welcome the Parish Council's support for the appropriate development of the Racecourse within the context of its wider estate and business plans, which will positively contribute to the rural economy and sustainability.

The acknowledged importance of the facilities and services offered by the Racecourse further emphasises the need for enabling development opportunity to secure the future of the Racecourse. Policy 7.5 of the PPNP will help to meet these aims.

**OUR VILLAGE – OUR COMMUNITY.
Help shape its future.**