

SDNPA response to Plumpton pre-submission Neighbourhood Development Plan

The comments set out below are South Downs National Park Officers views only under Delegated Powers.

All references to emerging South Downs Local Plan policies relate to the Preferred Options rather than any subsequent revision (unless specified). All text to be added is underlined, all deleted text is ~~struck through~~.

Ref	Comment	SDNPA Recommendation
General Comments	The parish council should be congratulated on producing a comprehensive and locally-distinctive neighbourhood plan. The plan is well-presented, well-written and clear. However we have made some suggestions in the table below to help refine policies further to ensure that they are more effective in meeting the aims and objectives of the Neighbourhood Plan; and respect the purposes and duties of the South Downs National Park Authority (SDNPA). We also have concerns regarding the allocation of the site at Plumpton Racecourse which will be seen in views, from and towards the SDNP, as an incongruous extension beyond the railway line, contrary to the established settlement pattern. Our comments on this particular site are outlined in more detail in the table below.	N/A
Green Infrastructure	We welcome the recurrent theme of Green Infrastructure throughout the document. However, there is a reliance on Core Policy 8 of the Lewes JCS to set out the GI policy requirements for the NDP. We suggest that more should be stated at an NDP level about GI in the Parish, and what are the key types of assets, where they are located, and how enhancements could be achieved.	Provide more specific details about GI in the parish, what enhancements could be provided and where and how this could be delivered.
Chapter 3 – para 3.5 The Joint Core strategy (Local Plan part 1) (JCS)	A legal challenge was made by Wealden District to the Lewes Joint Core Strategy. The judicial review centred on the methodology for the Habitat Regulations Assessment (HRA). The High Court ruled that in-combination assessments of development plans with other plans and projects is required in relation to air quality impacts on SAC's. The neighbourhood plan group should seek advice from Lewes District Council with regard to this.	It is recommended that the Neighbourhood Planning Group seek advice from Lewes District Council with regards to the implications of the High Court ruling and how this might impact on the Plumpton Neighbourhood Plan. This issue will also need to be referenced in the Sustainability Appraisal.
Chapter 3 para 3.11 – The South	A significant part of the neighbourhood plan area lies within the SDNP. We welcome the mention of the importance of the National Park to the parish in the Neighbourhood Plan. However we consider, that the SDNPA's purposes	Include reference to the fact that nearly half of the parish lies within the SDNP as well as reference to the SDNPA's purposes and duties. As required by section 62 of the

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Downs Local Plan	and duty should be expressed on more occasions throughout the Neighbourhood Plan, including within this section. All bodies and organisations have a duty to have regard to National Park purposes when carrying out their functions.	Environment Act 1995, all relevant authorities or public bodies have a duty to have regard to the National Park purposes.
Chapter 5 - Vision	We welcome the mention of the relationship of the village with the SDNP in the vision and to the provision of a more integrated access network with a desire to improve and extend the network and in particular links into the National Park. Delivering this could have a positive impact on young people's travel behaviour in particular as the consultation noted many young people are put off walking and cycling through the lack of safe facilities and by speeding traffic (pages 27/28).	
Chapter 5 - Objectives	<p>We consider that the protection of the special qualities of the South Downs National Park, which is a national designation, should be included in the objectives.</p> <p>We are surprised that there isn't a specific policy in relation to Objective 7 in para 5.2 p28. This would support the Local Green and Open Spaces policy 13.</p>	Include protection of special qualities of National Park within Environment objectives and consideration of specific policy relating to protection and enhancement of rural lanes, footpaths, bridleways and cycle routes.
Policy 1: Spatial Plan for the Parish	We have some concerns that the last paragraph of this policy is overly prohibitive and will prevent sustainable rural development taking place. In some respects it is contrary to policies 10 and 11 of the NDP relating to Plumpton College and Plumpton Racecourse.	<p>Amend last paragraph to say:</p> <p>New developments outside the planning boundary will not be supported. <u>will be permitted where they comply with the relevant policies contained in the development plan.</u></p>
Policy 2: New-build environment and design	<p>Our Design Officer has looked at this policy and suggests a number of revisions to the text to improve its effectiveness and clarity in delivering high quality, contextual design.</p> <p>In terms of street lighting and other forms of outdoor lighting, such as security lighting, you may wish to look at SD8: Dark Night Skies Policy and supporting text in the emerging South Downs Local Plan. The whole of the SDNP has been designated as an International Dark Sky Reserve. Given the proximity of Plumpton to the National Park, and that the settlement can be seen from the top of the scarp slope, it is important to ensure that development does not cause light pollution and harm the quality of dark night skies.</p>	<p>Amend text to say:</p> <p>New developments, including alterations to existing buildings, will complement the architectural and historic character of the surrounding area. This will be achieved by reflecting the scale, density, massing, landscape design and material of the surrounding buildings (as set out in the published Design Statement) and by ensuring new developments:</p> <ol style="list-style-type: none"> 1. use high-quality building materials <u>and construction methods</u> reflecting the local vernacular finishes and landscaping that complement the surroundings; 2. are no more than two storeys in height, although this

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		<p>would not preclude the use of roof space;</p> <p>3. do not use street lighting, <u>and avoid other forms of external lighting</u>; to avoid prevent light pollution;</p> <p>4. in the areas within, and in the setting of, the South Downs National Park, avoid any detrimental impact on its landscape and natural beauty;</p> <p>5. where development sites are adjacent, maintain a clear separation between them by means of a green landscape buffer. Replace with: <u>Proposals for new woodland and hedgerows as 'landscape buffers' should be designed to be consistent with local landscape character in terms of species, scale and pattern and should be incorporated into the GI plans for the site;</u></p> <p>6. <u>provide locally appropriate and characteristic landscape features which deliver multiple benefits for people and wildlife (such as integrated SuDS, wildlife habitats/corridors, improved visual amenity and local greenspaces)</u></p>
Policy 3: Associated Infrastructure	There is no mention of Green Infrastructure or Community Infrastructure Levy (CIL) in this policy or supporting text. This section should distinguish between infrastructure that will be delivered through the (CIL) and infrastructure required to make the development acceptable in planning terms. It is suggested that this section is linked to the section in Chapter 6 on Community Infrastructure.	Consider inclusion of the mention of green infrastructure and CIL and linking this to the section in the NDP on Community Infrastructure projects.
Policy 4: Provision of adequate parking	We suggest some revisions to the wording of this policy. The 'form' or type of new parking may need to be specified so as to avoid tandem and triple parking courts which will bring their own issues. Reference should also be made to appropriate landscaping of parking areas and cycle parking should be secure covered parking. In relation to bullet point 1 of this policy this statement needs to be re-worded. Car parking should always be located sensitively, in terms of minimising landscape and visual effects.	Consider revisions to policy text relating to the form or type of parking required, appropriate landscaping and covered cycle parking.
Policy 5: Landscape and	We are supportive of this policy which seeks to protect landscape and biodiversity. Given that a significant part of the parish lies within the National Park, we suggest that this policy also refers to the conservation and	Amend policy text to say: <u>Layout and landscape schemes of new development should be informed by the landscape character of the area, seek to</u>

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Biodiversity	<p>enhancement of the landscape of the South Downs, and its special qualities. New development should avoid causing harm to these qualities of the National Park, including through development in its setting.</p> <p>We also suggest a number of specific revisions to the policy to improve its effectiveness in help to conserve the special qualities of the South Downs.</p> <p>In terms of criteria 2 we do not think that ornamental planting is appropriate in in most rural planting schemes and the term ‘in harmony’ is very difficult to define. We recommend that reference to these terms is removed. In rural settlements we advise that all species are locally appropriate, native and of local provenance, otherwise schemes begin to appear urbanised.</p> <p>It is suggested that Policy 5 (landscape and biodiversity) & policy 6 (SUDS) should cross reference each other in terms of creating multi-functional landscapes.</p>	<p><u>achieve landscape and biodiversity enhancements and will have regard to the following principles:</u></p> <p><u>Where they are located within the South Downs National Park or its setting, they will conserve and enhance its special qualities:</u></p> <p>1. Trees and hedges make a valued contribution to the local landscape. Existing trees and hedges, including those that are not covered by relevant protection, should be retained and protected. Where this is not feasible, they should be replaced with native species of local provenance that reflect the <u>local landscape character</u>.</p> <p>Remove criteria 2</p> <p>3. We suggest the word natural is changed to characteristic landscape features instead;</p> <p>5. Developments must retain existing green corridors, ponds and other wildlife habitats and be landscaped to provide green corridors <u>to connect the scheme with the between open countryside and existing wildlife habitats and which incorporate new SUDS features (as set out in policy 6) and PROW/permissive paths where possible, to create a network of multi-functional landscapes.</u></p> <p>6. We suggest that landscape screening is replaced with <u>should provide appropriate and characteristic landscape features which mitigate landscape and visual effects.</u></p>
Policy 6: Sustainable drainage and wastewater management	<p>We consider that the word feasible in this policy is not a strong enough as sustainable drainage systems should be a standard requirement in new developments. Where SuDS are used they should be integrated with the landscape scheme in new developments and have a vegetative element, in order to be able to deliver other benefits such as amenity space, habitats etc.</p>	<p>Amend policy text to say:</p> <p>These should be designed to manage the risk of flooding, groundwater flooding, flash flooding and surface water run-off over land, and the impact on the sewerage network <u>and naturalised in design terms wherever possible as part of a network of multi-functional landscapes.</u></p>
Policy 7: New housing	<p>We suggest that the NDP might wish to include more specific guidance on the design of new developments addressing issues such as contextual contemporary architecture v traditional approach. Guidance on appropriate boundary</p>	<p>Amend policy text to say:</p> <p>New housing on sites allocated in the PPNP, and ideally also on any small windfall sites, will conform to the following:</p>

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	<p>treatments, external storage and the spaces between buildings should also be provided.</p> <p>In terms of criteria 7 'Landscape buffers and screening' we recommend that any mitigation measures must be landscape-led, characteristic and appropriate. They should deliver multiple benefits e.g. restoration of landscape character/SuDS/habitats etc. not just screening.</p>	<p>3. Housing will be sympathetic to the scale, topography and setting of the parish <u>and respond to its local context, character and traditional materials. Housing development schemes within the SDNP will take a landscape-led approach to the layout and design of the scheme</u></p> <p>6. Appropriate <u>sustainable</u> surface water drainage <u>such as SuDS</u> will be provided so there is no increased risk of flooding to properties downstream of any site;</p> <p>8. Proposals for new housing will be expected to be accompanied <u>by a landscape and visual impact assessment (LVIA) to inform location of access roads, layout and design as well as landscaping</u> and by a comprehensive assessment of the impact of the proposal on wildlife. All protected and wider species and their habitats will be accommodated, and any ancient hedges on a site will be preserved;</p> <p>9. <u>Opportunities for new footpaths/bridleways including connections to the existing PROW networks should be sought at the masterplanning stage as part of a green infrastructure network.</u></p>
Policy 7.3;The Glebe, Plumpton Green	This site is adjacent to Policy 7.4: Land rear of Oakfield and together they represent a large development. It is suggested that a detailed design brief is prepared for the two sites in order to ensure that a well-considered relationship between the two sites is achieved based on GI planning principles and a landscape led approach.	Include additional criteria for sites Policy 7.3 and 7.4 that a detailed design brief is prepared to cover the relationship between the site, their design, landscaping and layout.
Policy 7.4 Land rear of Oakfield	Please see comments above relating to Policy 7.3: The Glebe.	Please refer to comments relating to Policy 7.3.
Policy 7.5: Land at Plumpton Racecourse	<p>We have concerns regarding the allocation of this site for residential development.</p> <p>We understand some of the reasoning behind its allocation, in that it is proposed as a form of 'enabling development' to deliver additional income to support the racecourse business. However, the SDNPA must give primacy to its</p>	<p>It is the recommendation of officers at the SDNPA that the site is removed from consideration as a potential site allocation for the Plumpton Neighbourhood Plan.</p> <p>It is suggested that as a way of supporting Plumpton Racecourse, Policy 11 is amended to propose a masterplan or</p>

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	<p>first purpose and duty. This is to conserve the natural beauty, wildlife and cultural heritage of the National Park's landscape, including its setting. The racecourse site is very open and exposed and is also visible to the public from the trains and in views from Footpath 24 within the National Park Boundary, as well as at the top of the scarp slope.</p> <p>New housing development at this location would have the potential for significant visual impact on the setting of the National Park, particularly in views of the backdrop of the elevated Downs to the south, in views from the top of the scarp towards the village and from the footpath. The new housing would not be physically related to, and would be somewhat separated from, the long established settlement pattern of Plumpton village, which is located on the north side of the railway line. As a result, the development will be seen as a clear encroachment across into land that has a very different character to the main settlement of the village and would be contrary to the existing settlement pattern. It would bring development closer to the National Park in an area of mainly rural buildings and agricultural and other countryside uses. This, would impact on the transitional countryside land between the built up area of Plumpton up to the boundary of the National Park, detrimental to the setting of the South Downs National Park.</p> <p>In addition it would set a precedent for further expansion of additional residential development in this location. We recommend that any future development for housing should be restricted to land north of the railway line, within the planning boundary. We refer you to section 62 of the Environment Act 1995, where all relevant authorities or public bodies proposing development outside of the National Park, but which may impact the National Park, have a duty to have regard to the National Park purposes.</p> <p>It is suggested that Policy 11 provides scope for a much more holistic approach to future development at Plumpton Racecourse. This should be identified through a wider estate or masterplan for the site that proposes a landscape led approach to the consideration of the type, scale and location of any new development that is clearly justified to sustain the racecourse.</p>	<p>estate plan approach to the consideration of future development at the Racecourse, that is landscape led, in order to protect the rural setting of the village and the setting of the SDNP.</p>
Policy 10:	We welcome this policy. Estates and farms across the National Park have an	Amend last paragraph of policy as follows:

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Plumpton College	<p>important role to play in the conservation of the landscape, the development of a sustainable rural economy and ecosystem services. The emerging SDNP Local Plan recognises the importance of estate and farm plans and offers a degree of flexibility in the consideration of development proposals. We suggest some minor changes to the policy as paragraph 3 of this is not technically correct. While the gap between the two areas to the east and west is important, there is no specific policy in the Local Plan that mentions this. In addition, being so categorical might prohibit an acceptable form of development coming forward as part of any masterplan that still allows the appreciation of this separation. We suggest instead the policy is worded to recognise the importance of this gap in understanding the historical evolution and origins of the site and how the appreciation of this should be retained as part of the masterplan/ estate plan for college.</p>	<p>In accordance with SDNPA policy, <u>The gap between the two areas to the east and west of the church is important in helping to understand the origins and historic development of the site. The masterplan or estate plan for this site should identify how the appreciation of this separation will be retained in any future development proposals. All Positive regard will be given to development proposals for the site that are in accordance with a masterplan/estate plan for the college that has support from the SDNPA.</u> should be submitted against a full estate plan for the college</p>
Map H: Assets map	<p>The assets map could show the network of footpaths which is referred to in the list of assets on P60 but not actually mapped. However, ideally we think that the extensive access network merits separate mapping.</p>	<p>Annotate assets map to show network of footpaths.</p>
Community Infrastructure Projects	<p>We are pleased that this section is included in the Plan and are particularly supportive of reference in 6.4 to: a cycle path network to connect the railway station and South Downs National Park; additional footpaths at the north and south of the parish to provide safer pedestrian access where there are no pavements; and a bridleway network at the north and south of the parish.</p> <p>In respect of para 6.4, work did start last year with the parish and SDNPA looking at a route from the bottom of the scarp slope through Plumpton College and ending at the Railway Station. This is a vital route that could make the college much more sustainable with students using the train rather than all being bused in. It would be great to setup a free cycle hire at the station and the college for the students or even the public to access the foot of the downs.</p> <p>We are also supportive of para 6.9 which will ensure new development links to the existing access network and that improvements are delivered, including links to local green spaces. This approach is welcomed. It is compatible with the SDNPA Cycling and Walking Strategy Objectives and in line with current government policy and plans.</p>	<p>Consider inclusion of the restoration of Novington Quarry/Sand Pit to provide a local green space/nature reserve/country park as a community infrastructure project.</p>

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	<p>While not specifically mentioned in the NDP, another potential infrastructure project could be achieved at Novington Quarry/Sand Pit. The main entrance and site office are within the parish of Plumpton, with the main quarry pit and lakes in the adjacent East Chiltington parish. The operator of the site has planning permission until 2026 for Sand abstraction which will start shortly. Following completion of the extraction works, Plumpton and East Chiltington parishes could work together to achieve the restoration and planting of the site to provide an incredible green space/local nature reserve for the community.</p>	
<p>Policies Map page 64</p>	<p>While the policies map shows Local Green Space and housing sites, the network of routes both existing and aspirational that will join these together is missing. The plan would be enhanced if it included a map of footpaths and cycle paths along these lines, in particular the proposed route between the South Downs, Plumpton College and the railway station. This would help to ensure that CIL gets spent on the infrastructure identified on page 62 and page 63. This approach is supported by government advice which recommends that local areas produce Cycling and Walking Infrastructure Plans (CWIP). ESCC is undertaking work on a district level with respect of this. Plumpton could consider a simplified version of such a plan to support their policies and implementation of CIL.</p>	<p>Annotate map to show to show all existing and aspirational access networks or provide a separate map of this.</p>
<p>Other</p>		
<p>SA/SEA</p>	<p>As stated above, the Sustainability Appraisal may need to be updated to reference the High Court ruling relating to the methodology for the Habitat Regulations Assessment (HRA) in regard to in combination effects, and how this might impact on the Plumpton Neighbourhood Plan.</p>	<p>It is recommended that the Neighbourhood Planning Group seek advice from Lewes District Council with regards to whether there are any implications for the Plumpton Neighbourhood Plan in respect of the High Court ruling.</p>