



PLUMPTON PARISH COUNCIL

Plumpton Parish Council
13 May 2021

Andrew Hill
Senior Specialist Advisor Planner
Lewes District Council

Dear Mr Hill,

Re: LW/21/0262

Land Adjacent Nolands Farm Station Road Plumpton Green East Sussex BN7 3BT

Plumpton Parish Council objects in the strongest possible terms to this proposed development, on grounds of both principle and practice. If approved, it will not only undermine the inherent rural character of the Parish by extending greenfield development to the Parish boundary, but more significantly it also effectively undermines all made plans across the district and consequently erodes trust in local democracy and planning within Lewes District Council in particular.

In principle, the application is manifestly speculative, in that it does not accord with any of the relevant made plans, namely LPP1, LPP2 and the PPNP. It is opportunistic as these plans are not inherently failing as the government's latest figures show Lewes District Council is delivering to 100% of the plan target, but unfortunately have been made to fail by changes in planning policy which dramatically change the future 'need'.

The application therefore relies not on true need and consensus, but instead on specific and narrow interpretations of uncertain and evolving planning policy and appeal decisions. Whilst it naturally exploits the unfortunate NPPF policy revisions (notably paragraph 14) that reduce the weight of democratically made plans, the result of this interpretation is contrary to the governments stated aim that the policy changes would reduce speculative developments and ensure that communities are not disadvantaged by unplanned growth.

The applicant simultaneously dismisses the made plans to justify the application, but then uses the content to support this development. If any weight is to be given to the made plans, then it is clear that this site has already been assessed and rejected. This was fundamental to the refusal of the previous application LW/17/0885, a decision that was clearly acknowledged by the applicant in 2019 in that no appeal was forthcoming.

Whilst there is still obvious uncertainty on what the district need actually is, Lewes District Council has commenced activity to resolve that and update the plan. At the very local need level it should be noted that only one of the four allocated PPNP sites is currently in the process of build out, which is a good indication of demand.

The initial call for sites has identified potential land offering many thousands of dwellings across the district. Plumpton Parish Council is not blind to the sustainability merits of this particular site if developed more sympathetically to respect residents wishes, and subject to an appropriate access solution. However, in principle a development of this size relative to



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the target community should be plan led, allowing consideration of all sites, whilst prioritising brownfield over greenfield. In the absence of any compelling reason to the contrary, to proceed outside of district and neighbourhood plans is simply undemocratic and delaying the economic gain of a developer for a relatively short period to allow meaningful consultation within the plan process should not be regarded as compelling.

The applicant states in the Planning Statement (8.10) “There is no defensible reason why ‘in principle’ the application site cannot deliver 89 No. new homes, a business hub and associated green infrastructure.” Plumpton Parish Council would respectfully suggest that respecting democracy is a fundamental British value, and in Lewes of all locations that principle should be defended.

In practice, the proposed development is nearly twice the size of the previous application LW/17/0885 which was refused as recently as 2019, and for which the refusal reasons substantially still apply. At up to 89 new units, the development is utterly out of scale with not only the allocated housing target set by Lewes District Council in LPP1 and maintained in LPP2 (a minimum of 50 for the plan period, for which 70 are planned), but also anything that has gone before in the village; the assertion to the contrary by the applicant is clearly incorrect as the largest PPNP site is 20 and developments in the last 30 years have been limited to 12 (Sun Close) and 33 (West Gate). Density at the stated “25 – 26 dwellings per hectare” may be “policy compliant” but is approximately double that of the immediately adjacent PPNP site to the north that is currently in build out.

The applicant also does not consider this application in the context of planned development, and therefore understates the growth impact. The net result of its approval would be a 128% increase over planned growth, meaning that Plumpton would have to accommodate village expansion of 25% over a much shorter timespan than the original plan period, threatening community cohesion. The planning boundary would also be extended significantly to the east, opening up the potential for further speculative applications.

As the only ‘non reserved matter’, the chosen access to the site can only be made safe by fundamentally altering the character of the single rural road that serves the Parish – for the avoidance of doubt, and contrary to the applicants documented discussions with ESCC Highways officers, Plumpton Parish Council has not requested and does not support the wholesale changes proposed to several road junctions, nor the introduction of access build out priority junctions that simply inconvenience the vast majority of drivers that use the roads safely whilst doing nothing to increase enforcement for the very small minority who do not. The applicant’s analysis that these measures are in keeping with the existing village character is manifestly incorrect – Station Road has none of the proposed features currently, and these were not required for access to the one plan site that is currently being built out.

Infrastructure in Plumpton is acknowledged as having capacity and reliability issues, especially around water, sewage, and electricity services. There is scepticism based on experience that existing services will cope as suggested. Whilst this development would more than double the planned growth, there is still no confidence in how the governments ‘infrastructure first’ commitment is to be realistically met for the expected growth, let alone any substantial



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unplanned additions, thus leaving residents to suffer more failures in water, sewage, surface water drainage, and electricity services, as well as endure slow broadband. As a further indication of infrastructure maturity, Plumpton was never even connected to a mains gas supply. It is also worth noting that there is no current fibre provision to residents of Plumpton, but this development will apparently benefit from that, further increasing the sense of creating a 'village within a village'.

This is greenfield development that removes and/or displaces community amenity and activity, including the highly valued Scouting activities. As a greenfield site it is difficult in isolation to accept the analysis that this type of development actually improves the landscape environment, ecology and biodiversity as suggested by the applicant. When viewed through the lens of the cumulative impact of this site alongside the three planned sites to the eastern side of Plumpton Green it represents an unacceptable pressure on open countryside and the inherent rural character of the area. It underplays the fact that the Parish is partly within the SDNP and this site is only 1km from the boundary, so the soft barrier and the world-renowned dark skies biosphere would inevitably be eroded.

The applicant states (section 9.2) that "This Planning Statement has demonstrated that there are no significant issues preventing approval for the principle of up to 89 No. new dwellings on the Application Site with detailed consent for the access from Station Road". Plumpton Parish Council has identified that there are significant issues.

Whilst the NPPF revisions reduce the weight of current plans, LPP1, LPP2 and PPNP, it does not render them redundant, and all remain significantly aligned to policies within the NPPF. Since this application falls under the 'decision taking' clauses of paragraph 11, Plumpton Parish Council considers that paragraph 11 clause d ii applies, and refusal is required as, especially when considered in the wider context of the profound implications for the district, the adverse impacts of approving this application in isolation "*would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole*".

Accordingly, Plumpton Parish Council would request that Lewes District Council planning officers honour the stated commitment to provide 'high' weight to the made plans as permitted under the NPPF, refuse permission again for this application and direct this site through the plan making process so that it can be properly considered in the district and Parish context and not act as an unwanted precedent for further speculative development, in Plumpton or beyond.

This would also better serve local democracy across the district, as it would free parish councillors, largely unpaid volunteers, from the significant cost, time and effort expended responding to speculative development to the detriment of more positive community activity.



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In summary:

The Parish Council wishes to **OBJECT** to the planning application reference LW/21/0262 and makes the following observations:

- The determination of this application raises issues of strategic concern relating to housing numbers across the district and the relative age of the Lewes Local Plan. This application, unless recommended for refusal should not be determined under delegated powers and should be brought to Committee for determination, in which case the Parish Council would still recommend refusal.
- The Parish Council considers that this application has not overcome the reasons for refusal related to Application Reference LW/17/0885 which was for a significantly lower amount of development. The Parish Council considers the urbanising impact of 89 dwellings will be most keenly felt in the Parish and will result in harm to the landscape setting not only of the village but the South Downs National Park.
- The Parish Council considers that this application added to the cumulative impact of other planned sites to the eastern side of Plumpton Green would represent an unacceptable impact and pressure on the open countryside and the intrinsic rural character of the area.
- The Parish Council considers that the application represents a quantum of development that is manifestly out of keeping with the nature of the Parish because if this application were to be approved it would represent a 25% expansion of the Parish over a relatively short period of time.
- The Parish Council acknowledges the current uncertainty surrounding the number of houses that the District Council are expected to provide and notes the contents of the Interim Policy Statement for housing delivery. However, the Parish Council also notes that the Council stated: *"It is important to note that the IPS will be published as informal guidance and will not alter the statutory planning framework for the district. Nor does it set out the full range of relevant national or local planning policy and practice that may be applied by the Council when considering applications for housing development outside of the planning boundaries."*
- The Parish Council acknowledges that Lewes District Council planning officers have stated that high weight will be accorded to both the Neighbourhood Plan policies and the Local Plan policies even though these are both now 'aged' according to revised (in 2019) Paragraph 14 of the NPPF and that the made Neighbourhood Plan along with the policies in the Lewes District Local Plan Part 1 and Part 2 still comprise the development plan for the application site, and should still be considered the starting point for determination of the application according to Paragraph 12 of the NPPF which states that *"The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making."*
- The planning application is in outline form with all matters reserved except for access. The Parish Council considers that Lewes District Council should seek additional information up to and including a full application to allow Councillors to make an informed decision with all the information before them for their consideration. This



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application only seeks to determine the principle of development and not the details including the final number of dwellings to be provided. Without this information the accompanying assessments cannot be considered to be based on accurate information. The application seeks up to 89 dwellings with a similarly indicative notion of the make up of dwellings. It must be considered that there is the potential for a development of 4 bed+ houses which would have much more of an impact on traffic, layout, landscaping, visibility from the national park etc than an application of 89 dwellings of up to 2 bed houses or flats.

- The Parish Council considers that the applicant's description of the development proposal and its impact underplays the fact that the Parish is essentially rural, with a very limited range of amenities, with a significant part lying within the South Downs National Park; by the applicant's own description this development is within 1km of the South Downs National Park border. The Parish Council also considers that the impact of this proposal would severely erode both the soft border and the renowned dark skies biosphere as it appears to introduce street lighting in a village that has none currently.
- The Parish Council considers that the applicant has misrepresented the discussions that have been carried out with the Parish Council during the pre-application process. Furthermore, the Parish Council would respectively remind Lewes District Council that pre-application advice is not binding on the authority in the determination of the application. The pre-application page on the Lewes District Council website states "The advice we give at pre-application stage does not provide a formal legal opinion" and this allows for an application to be refused by Councillors.
- The Parish Council considers that the proposed access for the site can only be made safe by fundamentally altering the character of the single rural road that serves the Parish. The Parish Council wishes to stress that it has not sought and does not agree with the wholesale changes proposed to several road junctions or the creation of access build out priority junctions. The applicant appears to believe that the measures are in keeping with the village character, but the Parish Council believes this statement is manifestly incorrect as Station Road has none of the proposed features currently.
- The Parish Council has concerns that infrastructure in Plumpton has widely acknowledged capacity issues across all services, and that would only be exacerbated by this development proposal. Further indications of the lack of infrastructure maturity in the village is the lack of a connection to mains gas.
- Of concern to the Parish Council is the statement that the development will benefit from fibre broadband provision to which the village does not have access. The Parish Council considers this runs contrary to the government's proposals to 'level-up' and would create a 'village within a village'.
- The Parish Council raises concerns about the level of car parking proposed with an additional 210 spaces being provided and would ask Lewes District Council to seek further clarification from the Applicants that the correct numbers have been used in the assessments.
- Given the outline nature of the application there is a lack of detail about what the 'Business Hub' will comprise in built form. The Parish Council would ask Lewes District



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Council to seek further information on this element of the proposal prior to determining the application.

- The planning application form in Section 12 would appear to indicate that trees or hedges adjacent to the application site do form an important part of the local landscape character. In this instance Lewes District Council do have the ability to seek a full tree survey and the Parish Council would strongly recommend this.
- The Biodiversity Impact Calculation submitted alongside the application is based on the provision of a number of matters that are not the subject of the application i.e. the final number of houses, provision of landscaping etc. The Parish Council considers that this is another reason why Lewes District Council should require a full application.
- The Parish Council considers that the development proposal would remove and or displace community amenity and activity especially with regards to the highly valued Plumpton Scout Group.
- The proposed construction access via North Barnes Lane cannot be supported given the experience and impact evidenced during the much smaller Sun Close construction.

Therefore, in conclusion the Parish Council objects to this application and would ask that Lewes District Council planning officers honours the commitment to give high (i.e. substantial) weight to the Neighbourhood Plan and Local Plan as the adopted development plan for the area.

The Parish Council considers that the policies within the adopted development plan for the application site are in broad conformity with the NPPF and that the application should be refused as to approve this application in isolation “Would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework when taken as a whole.” (NPPF Para 11.d.ii)

The Parish Council would also recommend that Lewes District Council planning officers seek additional information in order to allow Councillors to make an informed decision, up to and including requiring the submission of a full application including all appropriate supporting documentation.

Nick Beaumont

Chair: Plumpton Parish Council

cc: Leigh Palmer Head of Planning, LDC
Cllr Rob Banks, LDC
Councillors – Plumpton Parish Council
Anita Emery – Clerk to Plumpton Parish Council