



PLUMPTON PARISH COUNCIL

Plumpton Parish Council
21 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 (PPC) feels compelled to respond to the policy response posted after the originally communicated deadline for public comments, and without apparent reference to the comments submitted by PPC.

PPC considers that the strategic context for the policy conclusions is premature, and that some interpretations are flawed. The conclusions do not address the reality that in February 2019 LDC refused the application for a development half the size on the basis that it was unplanned, represented an unacceptable incursion of development and urbanisation of open countryside, resulting in harm to the rural and natural character of the landscape around Plumpton village, and could not demonstrate safe access.

- Regarding the primary justification for considering the application, namely that the council cannot demonstrate a 5-year housing supply, it has been most recently stated by Maria Caulfield (19th May 2021) that *"I have had confirmation from the Government department that there is no increase in housing numbers for the local area and the housing need calculation is a guidance figure only and not a target. Once the South Downs National Park figure is taken out the guidance is 600 a year but if the district council can evidence why this is not achievable, they can set their own housing number. In addition, the current local plan still carries legal weight in planning terms and so the current figure can be used as there is a five-year land supply via the part 2 document."* It is therefore manifestly premature to justify unplanned development based on uncertain need figures, especially when this runs contrary to the stated aim of the NPPF policy revisions to avoid communities being subject to unplanned development. LDC planning officers should put the plan process before any individual speculative development.
- Use of 'moderate' weight for made plans is a breach of trust as LDC planning officers have reassured PPC in writing that LPP1/2 and the PPNP will be given 'high' weight; this is regarded as obvious as the interim policy statement clearly cannot carry the same weight as the legally made and adopted plans. Policy DM1 is clearly a very material policy within LPP2, adopted as recently as February 2020, and should be given substantial weight accordingly. Policy 1 is the major policy within the PPNP.



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- PPC respectfully challenges the opinions on the interpretation of the sustainability criteria in the interim statement. In particular:
 - 2 – the scale of the development is manifestly not appropriate and does not take into account extant unimplemented permissions as required; Table 2 in LPP1 states that a service village should take 30-100 units. Policy SP2 allocates a minimum of 50 to Plumpton Green, and that number is confirmed in LPP2 where it is acknowledged that the adopted neighbourhood plan more than meets that target at 68 (now 70 with approved applications). When considered against planned growth, this application would therefore exceed the policy maximum significantly over the plan period and would constitute a single development greater than the total of all planned developments over the plan period, and greater than anything ever seen in the village, with overall growth of 25% in the plan period.
 - 4 – this statement would be accurate except for the fact that it excludes consideration that extending the eastern building boundary to the parish boundary whilst LDC planning officers are in active discussion under a Planning Performance Agreement with another developer for a significantly larger development risks coalescence that should be considered in a planned way, and not in isolation.
 - 5 – whilst inevitably subjective as to what constitutes an adverse impact, given the magnitude of this development within 1km of the SDNP it is disappointing that SDNP appears not to have been consulted to date. PPC has particular concerns regarding the impact on the world renowned dark skies biosphere as Plumpton currently has no streetlighting, but would draw attention to the relevant policy statement “*Within the setting of the South Downs National Park, an assessment is undertaken to demonstrate that the proposed development will conserve the special qualities of the National Park. This assessment should be informed by the SDNP View Characterisation & Analysis Study 2015, the SDNP Tranquillity Study 2017, and the SDNP Dark Skies Technical Advice Note 2018. Relevant Local Plan Policies: APPENDIX 1 5 · LPP1 Core Policy 10 (Natural Environment & Landscape Character) · LPP1 Core Policy 11 (Built & Historic Environment and High Quality Design) · LPP2 Policy DM25 (Design)*”
 - 6 – PPC is taking specialist advice on this point, but it is regarded that to support the developers claim that a biodiversity increase will result from development is open to challenge; the reality is that any biodiversity increase could be much more sustainably achieved without building on green fields.



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- 7 – PPC does not consider that the development responds sympathetically to the existing character of the village; it is too large in scale, too dense in development, and requires wholesale changes to the single rural road to facilitate safe access, introducing features that do not exist currently and are not otherwise required. Whilst not always a concern of planners, many parishioners share PPC concerns regarding the impact on community cohesion by such a large development.

PPC has separately invited Mr King to discuss the above, but in the meantime we would kindly request that Mr King re-visit his policy advice, specifically replacing “the balance may be in favour of approval” with a clear statement that refusal is required under made plans.

Regards

Nick Beaumont

Chair: Plumpton Parish Council

cc:
Maria Caulfield M.P.
Leigh Palmer Head of Planning, LDC
Robert King Planning Policy LDC
Cllr Rob Banks, LDC
Councillors – Plumpton Parish Council
Anita Emery – Clerk to Plumpton Parish Council