



The Planning Inspectorate
Temple Quay House
2 The Square
Bristol BS1 6PN

20 July 2022

PLANNING APPEAL APP/P1425/W/22/3300691 NOLANDS FARM PLUMPTON GREEN

Plumpton Parish Council offers the following objection comments on the above appeal which is against the refusal of outline planning permission for the demolition of 2 No. existing dwellings and outbuildings and the erection of up to 86 No. residential dwellings, including 40% affordable housing, provision of pedestrian and vehicular access, open space, associated infrastructure and landscaping at Nolands Farm, Plumpton Green, all matters reserved except access.

Objections

This development has rightly been refused twice, once in its original form and again when returned at almost twice the size. It would appear indefensible to overturn those decisions for a development that is so clearly contrary to NPPF paragraphs 15 and 47 as it is not plan led. It is also considered to fail the presumption of sustainable development test under NPPF paragraph 11.d).ii. as whilst there will be some generic benefits associated with any development on a greenfield rural site, the disbenefits are many, vastly outweighing the benefits. The specific disbenefits are listed here: -

- The application does not conform to NPPF paragraphs 15 and 47 and is not objectively assessed against need, or alternative sites. The developers say that Plumpton was only allocated a 'modest' housing target by Lewes District Council (LDC) and can take more. Modest is not defined in planning. In fact, we were allocated a minimum of 50, and our Neighbourhood Plan will deliver 72. Similar 'service villages' outside of the SDNP were only allocated a minimum of 30 against a suggested range of 30-100. If this development goes ahead that would mean a total of 158 new houses which is clearly excessive.

The cumulative impact of growing a small rural community much more rapidly by a single development representing 170% of the allocated housing target (or 120% of the Neighbourhood Plan) over the plan period is not considered.

- It is an unacceptable incursion into open countryside contrary to NPPF paragraph 174.b, extending the villages eastern built boundary significantly and unnecessarily to the edge of the parish boundary. The scale of the development is not sensitive to its surroundings, contrary to NPPF paragraph 85.

It would be the largest development in the history of the village, almost 3 times larger than anything in the last 30 years, contrary to NPPF paragraph 130.c.

- The Neighbourhood Plan sites already in build out require fossil fuel LPG heating systems due to inadequacies in available electricity supplies; extending that to a significantly larger site is irresponsible in terms of climate impact and is regarded as unacceptable under NPPF paragraph 154.b.



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- The sewage infrastructure is inadequate both locally and at the treatment plant site and there are frequent discharges of foul water into local waterways. These would inevitably increase under this development which would be contrary to NPPF paragraph 174.e.
- The sustainability of Plumpton as a location is grossly overstated, and East Sussex CC research confirms it is a highly car-dependent location, contrary to NPPF paragraph 105. Health services cannot be accessed by foot as is suggested.
- The road access on a bend near the brow of a hill requires radical highway changes that are unwanted and out of character with the village, again contrary to NPPF paragraph 130.c.

Appellant Statement of Case

The Parish Council notes that the appellant relies heavily on policy which our MP* tells us is about to change. The proposed changes most relevant here are: -

- Strengthening Local Plans - if an application is not in it, it shouldn't be approved
- Ending the five-year land supply requirement which puts local plans out of date
- Ending the current housing target methods which put so much pressure on us locally.

Whilst our response is based on current policy, it is clear that this policy is deeply flawed and will change. Is it right that an application should be judged on a set of rules that are about to change? Notwithstanding the above, Plumpton Parish Council takes issue with a number of points made by the appellant in their Statement of Case.

In their statement the appellant states: -

That Plumpton Green is unique amongst LDC service villages in having a train station. Whilst true, it ignores other local villages like Cooksbridge for example, which also has a station. Having a train station does not guarantee a reduction in car dependency and we see regular reduction in the Bus timetable. Many essential services like the surgeries, hospitals, dentist and so on are not accessible by train or public transport in general, so car dependency is high. The developer knows this which is why the proposal delivers so many car parking spaces.

That Station Road severs the community from facilities like the primary school and shop and needs narrowing to improve safety in crossing it. This statement is plainly ridiculous, and the road narrowing is manifestly out of character for the village and unlike anything that exists already or is needed for the Neighbourhood Plan sites. The appellant conflates parking management, which would be beneficial at certain locations like the primary school, and is already in hand, with traffic calming; Station Road does not need traffic calming as many speed studies have illustrated. We would suggest these road changes are only included in their plans to allow the development to use an otherwise unsafe access solution.

*Maria Caulfield MP Constituency Newsletter July 2022



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That Plumpton Green is short of children's play facilities, and these will be delivered within the new estate. We believe Village cohesion is undermined if play facilities are built outside of the central recreation ground, which the study selectively quoted by the appellant acknowledges is in the top 25% of facilities in the district. Our Neighbourhood Plan already identifies the potential to deploy CiL to improve the King George V facilities, especially for teenagers and we would prefer a solution that maintains the integrity of the pre-school and all the sports and casual users of the recreation ground, not a partial solution elsewhere.

That they would fund upgrades to wastewater infrastructure services. Plumpton Parish Council simply do not believe Fairfax would be able to spend the funds necessary to replace the main sewer for the length of Station Road and upgrade the Barcombe sewage treatment plant since that is what is required now. Infrastructure should be fit for purpose for existing residents and not conditional on accepting unplanned large developments.

That the development will provide significant Community Infrastructure Levy money to Lewes District Council and to the Parish. This is fact, but we wonder why the appellant felt the need to include this point in their statement. Our view is that being paid to take a large car-based estate in the village does not justify approving unplanned development.

That the development will increase biodiversity by more than 10%. It is clearly the case that new houses do not directly increase biodiversity. This can be achieved by separate work that could be carried out regardless, and should not be used as a justification for unplanned development

Appeal decisions

A number of recent local appeal decisions in the local district would appear relevant: -

- 3273883 – Land at Coldharbour Lane, North Chailey

This is a very recent decision – January 2022. This appeal against the refusal of planning permission for 18 dwellings was dismissed. Like the site at Nolands Farm, this site was in the countryside, outside any development boundary.

The decision found at para 24 “.....*Despite the intervening field boundary, the innate openness of the site and its rural nature are an integral overall part of this natural green gap. It is therefore important for this reason.*”

This decision also states at para. 36 that there is no 5-year housing land supply shortfall.

- 3268428 and 3271620 – Former Woods Fruit Farm

In October 2021, an Inspector dismissed these appeals against the refusal of planning permission for 69 dwellings on grazing land partially beyond the settlement boundary of Newick. The appeal was dismissed due to the impact on the landscape, with the Inspector noting at para 9 of the decision that:

“Indeed, notwithstanding the appellants’ ‘Landscape and Visual Assessment’ or the contiguous location adjacent to the settlement boundary, the appeal site provides a soft and important buffer space at the settlement edge between the surrounding built form and the countryside beyond...”



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The Noland's site is similar, being grazing land outside the development boundary which forms a buffer at the edge of the village and is visible from a number of vantage points.

- 3119171 – Land at Mitchelswood Farm, Newick

In February 2021 The Secretary of State dismissed this appeal against the refusal of outline planning permission for 50 dwellings on land beyond the settlement boundary of Newick. The Secretary of State found that the development's effect would be to cause substantial visual harm to the character and appearance of the landscape and village setting. The lack of a 5-year housing land supply was acknowledged but this did not outweigh the harm that would be caused to the landscape.

This is again a similar situation to the Land at Nolands Farm

- 3234824 – Land to the rear of The Oaks, Newick

In November 2019, this appeal against the refusal of planning permission for 3 houses was dismissed. Like the site at Nolands Farm, this site was in the countryside, outside any development boundary. The decision found at para 8 that:

"..... The development would represent the encroachment of built form onto the currently vacant site which would erode the contribution that the site makes to the rural character of the locality."

- 3145053 – Land East of Ditchling Road, Wivelsfield

In March 2017, the Secretary of State dismissed this appeal against the refusal of planning permission for up to 95 dwellings. It was found that the proposal would be contrary to the Wivelsfield Neighbourhood Plan and that the material considerations weighing in favour of the appeal scheme were not sufficient to outweigh this conflict.

The proposal for housing at Nolands Farm is also contrary to the Plumpton Parish Neighbourhood Plan.

Plumpton Parish Council would respectfully request that the appeal is refused, and the site is directed through the local plan process along with all its competitors.

Yours Sincerely

Plumpton Parish Council