

**PLUMPTON NEIGHBOURHOOD PLAN  
PRE SUBMISSION PLAN 2016 -2030**

**EAST SUSSEX COUNTY COUNCIL RESPONSE – JUNE 2016**

**1. Introduction**

1.1 Thank you for the opportunity to comment on the Neighbourhood Plan for Plumpton. The following are officer comments from East Sussex County Council (ESCC) which have been sub-divided into the respective disciplines for ease of reference. Where appropriate the specific section, policy or document within the consultation documents has been referred to.

1.2 If you have any queries on the County Council's comments please contact:

Chris Flavin  
Senior Strategic Planner  
Infrastructure and Development Team  
Economy, Transport & Environment Department  
East Sussex County Council

01273 481397  
chris.flavin@eastsussex.gov.uk

**2. Transport**

2.1 **Comment: Page 28, Paragraph 4** - suggest "to the village centre." is added to the end of the sentence.

2.2 **Comment: Page 31, Paragraph 5** – suggest "to the village centre." is added to the end of the sentence.

2.3 **Comment: Page 35, Paragraph 5** -suggest the word 'approximately' is added (this would correspond with LDC's suggestion in bullet point 5).

*Of particular benefit to the Parish is the fact that, because the site is close to the railway station, development would include a drop-off point and **approximately** 20 car parking spaces.*

2.4 **Policy 2.1: Land at Plumpton Racecourse** -This site has not been previously considered by the Highway Authority. From the Neighbourhood Plan it seems that vehicular access is proposed to be via the existing main southern access road to the Racecourse. This access road, known as 'Streat Forge', at its junction with the public highway [Plumpton Lane] is within the national speed limit of 60mph whereby visibility displays should be 2.4 metres x 215 metres. Visibility for egress is substandard and falls far short of this requirement. The access is therefore in its current form unsuitable to serve further vehicular traffic due to the restricted visibility.

2.5 The Plan states that '*the proximity to village amenities would provide easy access for residents with mobility restraints and minimise the necessity to use motor vehicles*'. The accessibility of a site is an important factor, and is a key objective of East Sussex Local Transport Plan 2011 – 2026. However, the only pedestrian access to the village from this site

would be via footpath 17a which is via steps up over a bridge over the railway and onto East View Fields. This footpath is not lit and does not lend itself to be used all year round or at night or by pushchairs, mobility scooters etc.

- 2.6 Due to the position of the racecourse itself it does not appear that a suitable alternative link could be provided. The site itself is approximately 0.8 miles from the public highway along a private road and therefore alternative pedestrian routes to the south are limited and would mean a convoluted route to the village amenities. Therefore the site is not acceptable in terms of accessibility for non-car modes of transport.
- 2.7 We welcome in principle the idea of the commuter car park but there are areas of concern, including vehicular and access to the station, which would need to be resolved before it could be implemented.
- 2.8 In summary, we have significant concerns regarding the site access and the transport issues associated with the proposed Plumpton Racecourse housing site. We would welcome the opportunity to discuss these matters further with yourselves and the developer however if these issues cannot be addressed then we would strongly suggest that the site (Policy 2.1) should be removed from the Neighbourhood Plan.
- 2.9 **Policy 2.5 – ‘Land South of Railway’** (situated to the east of Plumpton Lane -please note these comments were also provided in 2015).

The difficulty of this site is that although it is close to the railway station, there is no safe route for pedestrians to reach it. On the east side of Plumpton Lane there is scope to provide a footway along the site frontage but then there is no land availability as there is no verge present to incorporate a footway.

On the west side there is a good width of verge which could become a footway but there would be a need to provide a safe crossing point to reach it. It was noted that there is insufficient visibility due to the bend, and furthermore the verge ‘runs out’ towards the racecourse service access and there is nowhere for pedestrians to go.

- 2.10 The same principles would apply for any area to be proposed as a parking area for the station. It is difficult to see how footway provision could be made as there is no preliminary plan to demonstrate this. The railway alterations to the gates/barrier have been carried out, and although pedestrian access has been improved as a result by provision of a footway link, this is on the western side of Plumpton Lane and is only across the railway crossing itself. Therefore footway connection/crossing point of Plumpton Lane would still need to be provided. It has still not been demonstrated how this site/proposed car park connect to pedestrian links. As previously mentioned in order to promote this site further, a detailed drawing plan is required.
- 2.11 Furthermore, the highway requirements would include a Traffic Regulation Order (TRO) for the extension of the 30 mph speed restriction – this is subject to a rigorous consultation process and is not guaranteed. The footway and crossing point will be subject to a S278 agreement which would involve a safety audit. There are highway safety issues associated with this site that can only be overcome through the TRO and S278. Without further work on both these elements, it is not currently clear whether they are necessarily deliverable.

- 2.12 We therefore have significant concerns regarding the pedestrian accessibility of the site and the transport issues associated with the Policy 2.5 site. We would welcome the opportunity to discuss these matters further with yourselves and the developer however unless these issues can be overcome, we strongly suggest that the site be removed from the Neighbourhood Plan.
- 2.13 **Section 3. Planning & Policy Context** –It is suggested that reference is made to East Sussex Local Transport Plan 2011 –2026 and how the neighbourhood plan aligns to this, see attached link below. The East Sussex Local Transport Plan Implementation Plan 2016 – 2021, page 35, outlines the transport approach for the north Lewes district.
- <https://new.eastsussex.gov.uk/roadsandtransport/localtransportplan/ltp3/downloadltp3>
- 2.14 **Paragraph 3.4** - Welcome the reference to Local Planning Policy (Lewes Local Plan 2003, Policy T7) on the provision for cyclists, which is in alignment with ESCC Local Transport Plan 2011 – 2026, and the County Council’s emerging Cycling & Walking Investment Plan. However, as you are probably already aware, the Lewes Local Plan (2003) Policy T7 has been replaced by new policies from the recently adopted Lewes Local Plan Part 1: Joint Core Strategy (adopted May 11<sup>th</sup> 2016). The new policy from the JCS, which is relevant to cycling, and promotes and supports development that encourages travel by cycling is Core Policy 13 ‘Sustainable Travel’.
- 2.15 **Paragraph 5.1** Support the vision, particularly improvements to connectivity to residential development and key local services.
- 2.16 **Paragraph 5.2: Objective 2** – Suggest that the need to ensure connectivity from new development to enhanced local services and amenities to support a thriving village centre could be included.
- 2.17 **Policy 1** – Support the preservation of the linear nature of the settlement, to enable links from the existing transport network in the village to be developed, where appropriate, particularly to improve connectivity.
- 2.18 **Policy 2: New Housing** – Support the preferred option for growth to the north and south of the planning boundary, to reduce the impact of traffic on the village centre.
- 2.19 **Policy 3: Design** – When carrying out further work on any transport proposals within the areas of Plumpton that are inside the South Downs National Park (SDNP) boundary, it is suggested that reference is made to the SDNPA Highways Guidance.
- <https://www.southdowns.gov.uk/wp-content/uploads/2015/09/Roads-in-the-South-Downs.pdf>
- 2.20 **Paragraph 6.4: Infrastructure Projects** - Support the use of Parish Council’s Community Infrastructure Levy (CIL) funds (25% of total collected CIL monies) to develop a cycle network to connect through to the railway station and the SDNP, together with improved pedestrian access to the north and south of the Parish.
- 2.21 **Paragraph 6.7: Infrastructure Projects** -Support the statement that new development will ‘make use of existing footpaths and the development of new pathways which link with the existing network’.

### 3. Landscape

- 3.1 The background paper *A Living Landscape, The state of the parish* provides a useful summary of the character and value of the landscape of the parish.
- 3.2 **Vision and Objectives:** -The Plan includes objectives for the protection and enhancement of countryside and natural beauty in accordance with NPPF policy and these are supported.
- 3.3 **Policy 2: New Housing in the parish** -This policy is supported as it would help to ensure that the character of the parish is conserved and enhanced.  
The principle of supporting low numbers of houses in small clusters is supported as this type of development would be easier to mitigate and integrate into the existing settlement pattern.
- 3.4 **Policy 2.1: Land at Plumpton Racecourse** -The proposed housing site to the south of the railway is isolated from the rest of the built up area. This would potentially detract from local landscape character and views. The site does need to be considered in the context of the racecourse infrastructure.  
The release of this site for development could set precedence for future housing development on the racecourse land. The policy should therefore be very clear that this is an exception site and the boundaries to the proposed development need to be clearly defined with appropriate landscape treatment.  
This policy is supported subject to the conditions outlined above.
- 3.5 **Policy 2.2: Land South of Inholms Farm and Policy 2.3: Land North of Old Police Station** - The extension of the village edge northwards into these very open fields will have an adverse impact on local landscape character and views. However it is recognised that this landscape is less sensitive than some of the other areas which have been considered in the assessments and particularly those to the south of the railway. The development of these sites would provide an opportunity to create a new and well defined edge to the built up area. The landscape masterplan for these sites should include a substantial tree belt of locally characteristic native species on all boundaries with the countryside.
- 3.6 The intention in the policy is to only develop parts of these sites. In this context the allocation for 2.3 is very extensive. It is suggested that the northern part of this site is included in the LGS 8 allocation (east of Station Rd & between Old Police House & Lentrige Barn) to ensure that a sufficient green gap is retained.
- 3.7 **Policy 2.4: Land at Strawlands/Wells Close** This policy is supported.
- 3.8 **Policy 2.5: Land South of Railway** -This policy is **not** supported as the site is of moderate to high landscape character sensitivity to new development as a large field in a countryside setting with a weak landscape structure where the historic landscape structure has been lost to some extent. It would appear from the air photograph that this large field would once have been subdivided into smaller plots with defined field boundaries. The proposal to include this site for housing development would go against the grain of the historic landscape field patterns.
- 3.9 The site is of moderate to high visual sensitivity as there are views across the area from the surrounding residential properties and the road. There would be views into the area from the SDNP which lies to the south and east and from public footpaths. The site is outside the

core development of the village, which lies to the north of the railway. The proposed development would not be in character with the pattern of the existing settlement. The introduction of houses with associated garden paraphernalia and fences would urbanise this open rural setting.

- 3.10 It is recommended that this site is not considered for development as this would have an unacceptable impact on the local countryside and the SDNP.
- 3.11 The proposed use of part of this land for a car park would also be of concern as the need for an access, boundary fencing and hard surfacing would urbanise the rural character of the area.
- 3.12 **Policy 2.6: Reserve Site at Riddens Lane** -The landscape and visual impacts of developing this site would be acceptable. It is recommended that this site is not allocated as reserve but as a firm allocation.
- 3.13 **Policy 3: Design** -This policy is supported. With reference to bullet three the comments from Lewes District Council are noted.  
A suggested replacement bullet could be:  
  
“Trees and hedges which make a valued contribution to the local landscape should be retained and protected where practicable. A comprehensive landscape scheme will be required to support new development.\*”  
  
“\* Ornamental plantings may be acceptable within the development providing they are in harmony with local landscape character. Planting on the boundaries to the countryside and within areas provided for wildlife mitigation should be planted with native species of local provenance.”
- 3.14 **Policy 9: Local Green Spaces (LGS)** –Sites LGS 1, 2 and 3 are clearly of significant local value and are supported.
- 3.15 The justification for LGS 7 and 8 do not currently have demonstrable value and the designation could be difficult to justify if considered in isolation. However, long term protection of these sites as open gap and GI would justify the designation as LGS. In this context LGS 8 should perhaps be extended south to incorporate the landscape buffer and open space which would be provided as part of the development of site 2.3 (see comments on 2.3 above).
- 3.16 The designation of LGS 5 (Riddens Wood) is supported.
- 3.17 The designation of LGS 6 (fields on Little Inholmes Farm to the north of West Gate) is supported, however this could be challenged if a strong justification and demonstration of local value is not provided.
- 3.18 The designation of LGS 1 would appear to be for similar reasons as LGS 7 and 8. It is not clear that this site is of demonstrable value to the local community and it is currently remote from the community. The guidance states that LGSs need to be in close proximity to the community. Arguably if LGS1 is of sufficient value for designation then the proposed housing site in Policy 2.5 should also be designated as LGS.

- 3.19 **Policy 10: Landscape and Biodiversity** -This policy takes into account the protection and enhancement of local landscape character and this is welcomed. As with Policy 3 (Design) a suggested replacement bullet could be:

“Trees and hedges which make a valued contribution to the local landscape should be retained and protected where practicable. A comprehensive landscape scheme will be required to support new development.\*”

“\* Ornamental plantings may be acceptable within the development providing they are in harmony with local landscape character. Planting on the boundaries to the countryside and within areas provided for wildlife mitigation should be planted with native species of local provenance.”

#### **4. Historic Environment including Archaeology**

- 4.1 It would be helpful if the NP used information about the historic environment and archaeological interest from the Historic Environment Record (HER) to clearly set out the key characteristics of the Parish.

Attached is a guidance note from Historic England with some key questions in a checklist that need addressing.

- 4.2 Plumpton Parish includes examples of:

- Scheduled Monument
- Listed Building
- Registered Park and Garden
- Archaeological Notification Area
- Non-designated heritage assets identified on the HER

- 4.3 Policy 2 -it would be helpful to identify mitigation of archaeological impacts as one of the key principles to be included.

#### Rapid appraisal of the historical and archaeological interest of the proposed sites:

- 4.4 Policies 2.1 to 2.5 –No known designated or non-designated heritage assets on the sites related to these policies. These sites might have archaeological interest which would require field evaluation to understand.
- 4.5 Policy 2.6 -This site was subject to archaeological evaluation in 2014 which demonstrated that the site has archaeological interest with evidence for Neolithic, Bronze Age, Late Iron Age/Romano-British and post-medieval activity. This knowledge contributes to our understanding of the antiquity of settlement within the parish. This understanding could be noted in the background information to the NP (this information is available from the Historic Environment Record – [county.HER@eastsussex.gov.uk](mailto:county.HER@eastsussex.gov.uk) )
- 4.6 The archaeological information from this site highlights the need for archaeological interest to be considered for the Policy 2.1 – 2.5 sites. Further archaeological work will be required at this and the other proposed sites.

- 4.7 Policies 6, 7 & 8 – Consideration of the historic environment could be included to ensure no adverse impacts.
- 4.8 Policy 9 – where relevant the value to protect, enhance and value the historic environment could be included in reasons for why these areas are considered special to the local community.
- 4.9 Policy 10 – this policy could include the historic environment as the aims expressed in Policy 10 would apply broadly to the historic environment but it would be preferable to consider a specific policy for the historic environment of the Parish in the NP. We would be happy to provide further guidance on the development of such a policy with data held within the HER.

## 5. Ecology

- 5.1 It is very positive to hear that 90% of residents want to see wildlife and habitat conservation measures incorporated into new developments.
- 5.2 Policy 2: New Housing in the Parish – proposal that developments should not include street lighting is welcomed. It would be good if this policy could include some mention of biodiversity to help deliver the desires of the majority of the local community as well as the duties and responsibilities of the NERC Act and NPPF. For example, the bullet point that deals with key principles could be expanded to include opportunities for wildlife enhancement.
- 5.3 Policy 3: Design – the proposal to replace any trees and hedges with native species of local provenance is welcomed.
- 5.4 Policy 9: Local Green Spaces & Open Spaces – the proposal to designate and protect Local Green Spaces is supported (although please note that the acronym is that same as that for Local Geological Sites). Care should be taken to ensure that public recreation is not detrimental to wildlife.
- 5.5 Policy 10: Landscape and Biodiversity is welcomed and supported.
- 5.6 Policy 11 – the proposal to include green roofs within sustainable drainage is welcomed. It is recommended that these are biodiverse rather than sedum green roofs, as these tend to be lower maintenance plus they are multifunctional, benefitting, wildlife as well as reducing flood risk (plus other benefits).
- 5.7 It is recommended that management of existing (Local Wildlife Sites/SNCIs etc.) and new wildlife habitats should be included in the list of projects for investment from CIL.

## 6. Infrastructure

- 6.1 **Paragraphs 6.4 - 6.7: Infrastructure Projects** – We would welcome the opportunity to work with and assist the Parish Council, alongside Lewes District Council, on prioritisation and the identification of appropriate infrastructure schemes/projects that could be funded or partly funded using the Parish Council's 25% share of CIL monies.