

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 Pre-submission Local Plan. All text to be added is underlined, all deleted text is ~~struck through~~.

| Ref | Comment | SDNPA Recommendation |
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| General Comments | Plumpton Parish Council should be congratulated on turning this plan around so swiftly following the last Pre-submission (Regulation 14) consultation. The neighbourhood plan is locally-distinctive and clearly written. We are very pleased that that the majority of our comments made on the Pre-submission plan have been taken into account in this Submission version and in particular, that the site at Plumpton Racecourse, which would have been seen in views from and towards the South Downs National Park (SDNP), is no longer included as an allocation in the Plan. We repeat below some of the previous comments we made at the Regulation 14 stage which have not been taken on board. We also set out below where we are particularly supportive of the approach proposed. | N/A |
| Chapter 3 – para 3.5 The Joint Core strategy (Local Plan part 1) (JCS) | A legal challenge made by Wealden District to the Lewes Joint Core Strategy (JCS), and a subsequent High Court ruling, resulted in the quashing of policies SP1 and SP2 of the JCS in relation to the National Park. While this does not technically affect this Plan in terms of the housing requirement set out for Plumpton in the JCS, from a factual point of view and in the interests of accuracy it may be advisable to include as a footnote that as a result of this ruling policies SP1 and SP2 of the Lewes JCS do not apply in the National Park. | It is advised that this paragraph of the Plan (or a footnote is included) that makes reference to the High Court ruling resulting in the quashing of policies SP1 and SP2 of the Lewes JCS with regards to the National Park. |
| Chapter 3 para 3.11 – The South Downs Local Plan | A significant part of the neighbourhood plan area lies within the SDNP. We would welcome the inclusion of the SDNPA’s purposes and duty within this section and mention that all bodies and organisations have a duty to have regard to National Park purposes when carrying out their functions. | 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 Environment Act 1995, all relevant authorities or public bodies have a duty to have regard to the National Park purposes. |

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| Chapter 5 - Objectives | We consider that the protection of the special qualities of the South Downs National Park should be included in the objectives. | Include protection of special qualities of National Park within Environment objectives. |
| Policy 2: New-build environment and design | We are pleased our previous comments on this policy have been included in the revised plan, including new development avoiding light pollution as the whole of the SDNP has been designated as an International Dark Sky Reserve. | N/A |
| Policy 4: Landscape and Biodiversity | We welcome the inclusion of our suggested wording for this policy in that that layout and landscape plans of new development are informed by landscape character and achieve landscape and biodiversity enhancements. We are also supportive of the provision of, where possible, the creation of multifunctional green networks. | N/A |
| Policy 10: Plumpton College | We welcome this policy. Estates and farms across the National Park have an important role to play in the conservation of the landscape, the development of a sustainable rural economy and ecosystem services. While our previous comments have largely been taken on board in this policy, we remain concerned that the policy is not flexible enough as it has not included the word ‘appreciation’ and instead without this it is interpreted as there is a requirement to maintain a rigid physical gap between the two areas to the east and west. While the gap between these areas is important in helping to understand the origin and historic development of the site, being so categorical might prohibit an acceptable form of development coming forward as part of any masterplan that still allows the appreciation and understanding of this separation. We feel these nuances are important to allow a high quality design to come forward and suggest instead the second sentence of this policy is worded to say “The masterplan/estate plan for this site should identify how the understanding and appreciation of this separation will be conserved and enhanced in any future development proposals.” | Amend second sentence of last paragraph to say: “The masterplan/estate plan for this site should identify how the understanding and appreciation of this separation will be conserved and enhanced in any future development proposals.” |
| Community Infrastructure Projects | 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. | N/A |

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| | <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 pleased that the parish council has taken on board our suggestion of the inclusion of the restoration of Novington Quarry/Sand Pitas a Community Infrastructure project, Following completion of the extraction works, Plumpton and East Chiltonton 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> | |
| Policies Map page 62 | <p>While the policies map shows Local Green Space and housing sites, the network of cycle routes and footpaths 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 60. This approach is supported by government advice which recommends that local areas produce Cycling and Walking Infrastructure Plans (CWIP). ESCC is undertaking work at 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> | Annotate map to show to show all existing and aspirational access networks or provide a separate map of this. |