

Maylea
Ashcombe Lane
Kingston
Lewes
BN7 3JZ

29th November 2018

Dear Sirs,

Position statement in regard to Local Plan Policy SD77: Castelmer Fruit Farm, Kingston near Lewes

Firstly I would like to add my support to the points raised in the position statement submitted by the Kingston Parish Council (KPC) in noting the failure of the SDNPA to engage adequately and effectively in consultation with the village with regards to the Castelmer fruit farm site.

Secondly I'm submitting the following comments for the attention of the inspector which are a point by point response to the Statement of Common Ground between Devine Homes and the South Downs National Park Authority in regard to Local Plan Policy SD77: Castelmer Fruit Farm, Kingston near Lewes

The following points are taken from the statement of common ground and my responses to the statement are in italics.

4 SD77: Castelmer Fruit Farm
Location of site and adjoining land

4.3 It was also recognized that the site was well-related to the village...

The site is not well related to the village. It is on the outskirts of the village in a rural setting with no through road access.

4.4 Four alternative sites were identified in the SHLAA in Kingston near Lewes. Three of these were unsuitable in landscape terms as they had a high landscape sensitivity. The fourth at Wellgreen Lane, while having a medium landscape sensitivity, was discounted due to the response from feedback from the Parish Council at the Parish Workshops in Winter 2016....

At the time that the Wellgreen Lane site was dismissed the Castelmer site was not known to be a viable option. The KPC and villagers have not have the opportunity to consult on both sites and their relative merits as the SDNPA only included Castelmer as their preferred site but there was no opportunity for the village to consult and decide a preferred site.

4.5 Due to the location and landscape character of the site it presents a number of constraints and opportunities for any future allocation. The site comprises a number of redundant structures, and buildings which have a negative impact on landscape character. Redevelopment of the site therefore offers the opportunity to improve the appearance of the previously developed part of the site.

I would argue that what presents the most constraints to any future allocation on the site is not the location and landscape character but this heavy handed statement in the allocation policy found on page 285 of the local plan pre-submission document

Land at Castelmer Fruit Farm, Kingston near Lewes is allocated for the development of 10 to 12 residential dwellings (class C3 use). **Planning permission will not be granted for any other uses.**

The location and landscape is suitable for other types of housing development but can any consultation be seen as adequate and effective with a pre-determined outcome - only confidentially consulted on without the inclusion of the villagers - already stated in the plan?

The pre-submission plan also states:

Detailed proposals that meet the following site specific development requirements will be permitted:

a) The woodland within the northern portion of the site shall be made publicly accessible;

This first condition is not able to be met as DMH Stallard stated on behalf of the Sharp family in the letter of 21st November 2017

...it is the intention of the Sharp family to maintain and conserve this area as a woodland, and they would be happy to discuss this matter further with the SDNPA going forward.

It should be noted that this woodland has never been open to the public. The main reason for this is that the mother of the site owners is buried within this part of the wider site (with the benefit of all the necessary permissions and permits), and ideally they would like to maintain this area as private land for their personal use.

The statement of common ground refers to this northern portion being retained as a local wildlife site but with no mention of ownership going forward or public access which is stated as a specific development requirement in the pre-submission plan.

4.6 The land immediately adjacent to the north of the site, Kingston Hollow is designated as a Local Wildlife Site for its chalk grassland. This is within the same land ownership as the site allocation and offers the opportunity for improvements to its management to achieve ecological enhancements. The land has remained unmanaged for a number of years and is now reverting to woodland, so whilst the effort needed to re-create solely chalk grassland habitat would be significant, the site could more easily become a mosaic habitat with open areas and scrub and managed as such, perhaps with seasonal conservation grazing.

In addition to this the Sharp family have stated that opening up the footpath to provide links to Lewes is undeliverable.

d) Highway issues

5.4 The prospective developer and the SDNPA agree that in principle suitable access to this site can be achieved.

I am concerned that I have not seen any evidence of how SDNPA and Devine homes will meet the requirements set out by ESCC in the pre-application highway advice. Specifically with the regard to

...

“The existing access would need to be improved to provide for a two way flow of traffic [ideally 5 metres wide for 10 metres into the site] at its junction with Ashcombe Lane”

At the entrance to the site there is a large electricity sub-station limiting the width at the junction of Ashcombe Lane so it is not possible for two cars to pass by each other at the entrance of the lane. This is already dangerous but manageable with the minimal traffic that currently passes through. Additionally I support my neighbour Lindsay Alexander's observations on the safety of the access due the vertical and horizontal alignments, the steep narrow blind bend as well as the concerns on the intrusion of privacy due to more traffic. We have not seen any layout plans for access to the site and what impact this will have on access to Badgers, Maylea and Orchard House and character of the area with regard to the removal of mature trees.

e) Affordable Housing

5.5 The prospective developer and the SDNPA agree that in principle affordable housing

A statement in principle does not guarantee affordable housing will be built. We are yet to see the criteria of the affordability which is so key to building this high density development. With plans going ahead on the neighbouring site of Audiburn for 4 new homes is it really necessary to have 11 new homes crammed into this site if they are not destined to be affordable homes? This would be at the expense of a development which would be in keeping with the existing adjacent homes of Badgers, Maylea and Orchard House as well as the new homes at Audiburn.

5.8 The prospective developer and the SDNPA agree that a land contamination survey is required as part of the evidence studies for this site...

It is unacceptable to include the Castelmer site in the plan without the land contamination survey results. If the site is contaminated, assessment and planning for decontamination should be in place to evidence the viability of building affordable housing which will need to be mortgaged. It is very hard to source mortgages for property on contaminated land. The interest rates for these mortgages are at a premium and not associated with affordable housing.

Along with my grave concerns over the safety of the access to this site, overall since the pre-submission I believe on studying the statements from the landowners, SDNPA and developers the goal posts have moved significantly. From a community development of affordable housing with access to a locally important wildlife site, liveable open spaces and improved footpath links to a poorly accessible closed in development of small houses crammed into a plot which has no relevance to its surrounding neighbours.

Yours sincerely
Fiona Mostyn