



Lewes District Council

**Lewes District Council
Ringmer Neighbourhood Plan Regulation 16 Consultation**

November 2014

The following page presents a summary, written by Officers at Lewes District Council, of the comments made during the Regulation 16 consultation on the Ringmer Neighbourhood Plan, which took place between Monday 22nd September and Monday 3rd November 2014. The summary is written to provide assistance to the Examiner and to allow anyone who wishes to see some of the issues raised. It does not contain every point a consultee has made. The Examiner will read the comments of each consultee in full.

Number	Consultee	Comments
1	South Downs National Park Authority (SDNPA)	<p>The SDNPA supports the Ringmer Neighbourhood Plan and welcomes the progress that has been made to reach publication. Some minor modifications were recommended:</p> <ul style="list-style-type: none"> - Concern was raised over some of the employment policies (EMP8, EMP16 and EMP17) and the potential impacts on views from the SDNP - Amending the wording of policy 7.6 by removing “useful remaining life” - Additional criteria could be added to some of the housing allocations (Appendix F) which are within or border the SDNP to strengthen the consideration of the SDNP purposes and duty. - Development briefs for RES2 and RES32 could be amended to further reference the SDNP location and design consideration.
2	Hilary and John Luck	<p>The following concerns were raised, some being general in nature, others being in relation to Westbourne:</p> <ul style="list-style-type: none"> - The neighbourhood plan has not addressed the issue of infrastructure sufficiently - The inclusion of Westbourne as an area for development which received a number of objections during the Regulation 14 consultation. - The area of development has been extended, more houses allocated and it has been moved from Phase 2 to Phase 1 without any consultation - The inclusion of Westbourne is contrary to Policy 4.8
3	Councillor Peter Gardiner	<p>Congratulated the Parish Council on their efforts which succeeds in balancing the many demands made on the village and the surrounding countryside.</p>
4	James Dale	<p>Raised objections to the proposals for Westbourne which is deemed an over-development of the site and would impact on the character of the village, cause further drainage problems in the area and significantly increase traffic on Sadlers Way.</p>
5	Tony Charles, Croudace Strategic Limited	<p>A number of representations were received relating to individual policies and wording in support of a site (Broyle Gate Farm) that the developer is promoting. A summary of some of those objections are as follows:</p> <ul style="list-style-type: none"> - Policy 5.4 – No justification or national planning policy support for a ‘strategic gap’ between Ringmer and Broyle Side. - Policy 6.5 – The policy as worded is ‘undeliverable’ and a mix-use scheme is the only way of delivering the open space, sport and leisure facilities. - Policy 7.1 – There is no reasoned justification (set out in the plan or supporting appendices) for the housing target which does not meet the basic conditions. The target is set in line with the Joint Core Strategy which has not yet been examined and has numerous unresolved objections and so little weight can be attached. Either a higher target should be included or the target should be deleted altogether. - Policy 7.4 and 7.5 – Broyle Side is unsustainable and the 40 dwellings should be reallocated to Ringmer - Policy 7.7 – The policy is too restrictive and does not meet the basic conditions. Large sites need to be delivered in line with market conditions for practical and commercial reasons. - Policy 7.8 – There is no need to phase delivery of new houses – should be deleted.

		<ul style="list-style-type: none"> - Policy 7.9, 7.10 and 7.11 – Do not represent the most appropriate strategy – Land at Broyle Gate Farm should be allocated - Delete Policy 8.4 and allocate Land at Broyle Gate Farm for mixed-use development including open space, sport and leisure facilities which would meet the outdoor sports facilities needs of the village. - Policy 9.1 - Unrealistic as necessary infrastructure is likely to be funded through new development - Policy 9.10 – The policy covers matters that are the responsibility of other statutory bodies. - Policy 10.1, 10.2 and 10.3 – Restricting the height of new housing to two storeys, the density range and preferred materials suggested in these policies are overly prescriptive. - Policy 10.4 – Introducing a space standard adopted by another Local Authority is inappropriate. - Policy 10.7 – The policy does not have regard to local housing need and is too prescriptive.
6	Barry Wilson	General support for the Ringmer Neighbourhood Plan which is a balanced and comprehensive statement of the village's needs and aspirations.
7	Sy Morse-Brown	Commended the work of the parish council in producing the plan which will ensure that development will proceed at a pace and manner appropriate to preserving the village feel and when sufficient infrastructure becomes available.
8	Maureen Jackson	General support for the plan and in particular how it will manage new development and allow new residents to be absorbed into the community.
9	Jacques and Nicolette Mawas	Strongly support the neighbourhood plan, and in particular, the following aspects: <ul style="list-style-type: none"> - Maintaining the village feel - Provision of affordable housing - Provision of adequate services and facilities to support additional housing
10	Ken Humm	Supports the neighbourhood plan
11	Colin Moore	Supports the neighbourhood plan
12	Janet Twaite	Object to Westbourne allocation for the following reasons: <ul style="list-style-type: none"> - Lack of engagement with local residents - Would be out of character with surrounding properties - Would cause further drainage problems in the area - Would increase traffic on Sadlers Way
13	Jennifer Barrett and John Robert Young	<p>A number of objections to the plan were made which are summarised as follows:</p> <ul style="list-style-type: none"> - The level of development set in the neighbourhood plan is not in line with the wishes of the community and exceeds the housing target set for Ringmer in the Lewes District Core Strategy. - The sites allocated have not been chosen in line with the opinions of local residents. - General infrastructure issues have not been sufficiently addressed (sewerage, schools, road congestion, employment) <p>A number of objections were made to the allocation of the Westbourne site:</p> <ul style="list-style-type: none"> - The allocation has not been subject to engagement and consultation with the local community

		<ul style="list-style-type: none"> - The access point identified is inappropriate and the site is landlocked. - The allocation is contrary to Appendix I which states “development should respect the scale, massing and character of the existing neighbouring development” - No consideration has been given to objections made during the Regulation 14 consultation. - Developing garden land is contrary to national policy <p>Support was also raised for the development of Broyle Gate Farm which has been identified as a favoured site by residents.</p>
14	Patrick and Pamela Fleming	Same comments as Consultee 13.
15	Mr and Mrs T Russell	<p>The following comments were raised:</p> <ul style="list-style-type: none"> - Do not feel the plan is wholly representative of the views of Ringmer residents - The village infrastructure is not sufficient to accommodate the additional development proposed - Do not agree with the site allocations – most obvious sites have been excluded (for example Broyle Gate Farm) - Object to Westbourne allocation - The plan lacks transparency and has not followed a democratic process
16	Kirsten Williams, East Sussex County Council	<p>Raised a number of points which had been made at previous consultations:</p> <ul style="list-style-type: none"> - Object to EMP13 and EMP14 which would impact on the local landscape character and visual amenity - All site allocations should make reference to current biodiversity value and landscape character - Note that some comments from previous consultation stages have been taken on board - Policy 4.4 – the policy should focus on how to ensure quiet lanes are maintained for recreational use. Final two sentences (after “will be avoided”) are not necessary. - Policy 4.5 – No evidence to quantify “country lanes with limited capacity for additional larger vehicles” statement - Policy 4.6 – Parking standards seems to be too rigid and no guidance for cycle parking. - Section 9.1 and Appendix 9 – Feel the wording is still too stringent - Section 9.5 – Diverting Uckfield buses via Ringmer will lead to increased journey times for other passengers – the wording needs to reflect this - Appendix 9 – in general the appendix does not include the relevant sources or statistics to support many of the statements made about the transport network in Ringmer and the plan has misunderstood the role of the A26 in the road hierarchy.
17	Lucia Simpson	Object to omission of Broyle Gate Farm (East of Ringmer College) which would be a logical site with suitable access, utility provision and near to village services and facilities. Also, drainage problems need to be addressed before further development is approved.
18	Sport England	Submitted general information about the organisation and their role in the planning system.
19	John Robbins	Feels that the Westbourne Development is undesirable and the process by which it has been included is flawed for the following reasons:

		<ul style="list-style-type: none"> - There are alternative, more suitable sites, which if chosen there would be no need for Westbourne. - Access has not been properly considered - Demolition of existing houses would impact on the character of the road – which the Plan recognises needs to be protected.
20	GWJ Almond	<p>Stated that they were the owner of site RES32. Disagrees with the statement that “the owners have confirmed to the Steering Group that it will become available at an unspecified date within the Plan period” and seeks the removal of the site from the plan.</p> <p>Also states that ‘our field is identified as a potential site for the cemetery’ and seeks an update on what actions are proposed.</p>
21	Homes and Communities Agency	Provides some limited comments that the principles in the Neighbourhood Plan are supported.
22	Highways Agency	<ul style="list-style-type: none"> - Provided general information about their role - Don’t wish to make representations but would request Transport Assessments/Statements for planning applications ‘exceeding the scope of the Lewes Local Plan Transport Assessments’.
23	Ringmer History Study Group	Supports the Neighbourhood Plan, particularly policies 5.1-5.10
24	Marine Management Organisation	<p>Provided general information about the MMO and notes that the Neighbourhood Plan relates to the River Ouse and Glynde Reach.</p> <p>Explains that a marine licence may be required for works within the UK marine area (such as those outlined on page 23 of the plan)</p>
25	Mr and Mrs J Naylor	Similar comments to Consultee 13 were raised in opposition of the Westbourne site and claiming that the neighbourhood plan is flawed
26	Martin and Hutchakorn Chanthawong-Weld	<p>Similar comments to Consultee 13 were raised in opposition of the Westbourne site and claiming that the neighbourhood plan is flawed</p> <p>Also, a number of objections to the level of consultation and engagement with the local community were raised.</p> <ul style="list-style-type: none"> - The plan does not represent the views of village residents who have had little influence over the neighbourhood plan - The majority of Regulation 14 comments were in opposition to the Westbourne allocation
27	Natural England	<p>Made comments, including:</p> <ul style="list-style-type: none"> - Screening mentioned in section 4.3 needs to be carefully considered as screening itself may be intrusive in the local landscape. - Welcome policies 5.9 and 5.10 - Issues in relation to residential development also bear on the outdoor sports facility shown in Map 8.1

28	Robert Ramsay	<p>Believes that the plan is flawed for the following reasons:</p> <ul style="list-style-type: none"> - Not representative of the views of most residents - Broyle Gate Farm not included in the plan though an exhibition indicated support for a scheme. - Development off Bishops Lane would destroy the laneway that links northern Ringmer to the countryside - The plan would increase traffic when there are existing sustainable transport issues. - There is a site earmarked for the development of a sports facility but the Football Club don't want to move. - The inclusion of various gardens for development is inappropriate and increases densities to that of a densely populated town. - The Parish Council should have pursued a Care Home at Harvard Road and Springett Avenue should be considered for development now.
29	Collins Planning Services Limited	<ul style="list-style-type: none"> - Does not believe the plan meets the basic conditions. Queries the housing figures, suggesting the plan should plan for higher numbers - Believes plan has been dictated by requirement for green gap between Ringmer and Broyleside, where at a public meeting the majority of votes were in favour of developing land within the green gap. <p>Comments on specific sites, including:</p> <ul style="list-style-type: none"> - RG3 is further from other sites allocated - RES12/15 are a long way from services - Lower Lodge Farm "is clearly unsustainable for development" - Caburn Field is included in district housing forecasts and questions whether it is double counting. - There is uncertainty on availability of many sites - Allowing development on RG3 would help bring forward outdoor sports/college facilities. - Numbers for RES1/2/3 are excessive given adjoining densities - RES11/12/18 are "completely unsustainable", with RES 11 being an afterthought. <p>Further comments included that</p> <ul style="list-style-type: none"> - Sites within the planning boundary, sites relating to agricultural dwellings and development of barn conversions should not be included as allocations as they can come forward within current planning legislation - Sites included as part of the District Council's SHLAA have been excluded - Further greenfield sites need to be identified to meet housing targets.
30	Tal Kleiman, Lewes District Council	<p>Set out the views of officers at Lewes District Council that have been agreed by the Lead Member for Strategy and Development, Councillor Tom Jones</p> <ul style="list-style-type: none"> - Ultimately believe that the neighbourhood plan, with some modification, meets paragraph 8 of schedule 4B to the 1990 Planning Act

		<ul style="list-style-type: none"> - Although it is clear that consideration has been given to the SEA Directive, the SA/SEA Report does not present the analysis as to why choices have been made. The Inspector may wish to consider whether further information is required to justify why the plan would not cause significant environmental effects. - Whilst not the fault of the Parish Council, a change in circumstances has resulted in site RG1 of the 2003 Lewes District Local Plan being included in the Core Strategy as a housing 'commitment' and so its inclusion in the Ringmer Neighbourhood Plan amounts to 'double counting' – therefore the site should be removed. - The neighbourhood plan process is a good example of community engagement and welcome that many of LDCs comments at the Regulation 14 consultation stage have been taken into account in the final version of the plan.
31	Mrs Anna Beck	<p>Objects to the inclusion of the Westbourne as a housing allocation on the following grounds:</p> <ul style="list-style-type: none"> - Lack of consultation with local residents - The allocation of 12 dwellings would not be in keeping with surrounding development - Access would be via a private road and there has been no consultation with the owners of the road. - Developing the site would also impact neighbouring properties in terms of the visual impact, noise and disturbance, over-looking, loss of privacy and light.
32	Councillor Chris Bowers	<p>Supports the neighbourhood plan and the opportunity it will give to plan development in the parish. Also, supports the preservation of the green gap between Ringmer and Broyle Side. However concerns were raised regarding the housing target for the parish of 240 new dwellings which it is felt is far too high and ought to be set between 150 and 170 over the plan period.</p>
33	Steve Ankers, South Downs Society	<p>Support the neighbourhood plan and in particular the following policies – Policy 4.1, 4.2, 4.3, 4.4, 4.7, 5.5, 6.2, 9.3 and 10.1. Further detail was given on the following two policies:</p> <ul style="list-style-type: none"> - Policy 7.5 - The Society support the policy but wish to emphasise that some brownfield sites in the countryside will not be suitable for development. - Policy 7.6 – The policy must be strong enough to guard against such conversions taking place with the subsequent erection of new agricultural buildings.
34	Helen Bradwell	<p>Same comments as Consultee 13.</p>
35	Claire Temple, Planning Potential	<p>Comments were submitted in support of the Caburn Field allocation which is considered to be the most sustainable and accessible site within Ringmer.</p> <ul style="list-style-type: none"> - The site is allocated for 40 dwellings within the 2003 Lewes District Local Plan – Site RG1 - The 2014 Lewes District SHLAA classifies the site as suitable, available, deliverable and achievable. - The site is now available with Ringmer Football Club exploring options to relocate. - Support for policies 7.1, 7.5 - Concern raised to policy 7.7 (Scale of new development) which is not viable for moderate sized developments such as Caburn Field. An alternative wording for the policy was proposed. - Policy 7.8 – Caburn Field could be allocated in 'Sites allocated for development within Phase 1, 2010-2015'
36	Mike Pickup,	<p>Planning solution submitted a number of comments in support of the Bishops Lane site and objecting to the limitations</p>

	Town and Country Planning Solutions on behalf of Gleeson Developments Ltd	<p>imposed on the development and which result in the neighbourhood plan failing the basic conditions (a), (d) and (e):</p> <ul style="list-style-type: none"> - The neighbourhood plan housing target is in line with the spatial strategy of the Core Strategy which is not adopted, does not meet the district's objectively assessed housing need and is subject to objections. - In the absence of a 5 year housing supply within the district, the settlement boundaries contained in the adopted Local Plan (which the neighbourhood plan must be in conformity with) are out of date. - Should the neighbourhood plan be made in advance of the adoption of the Core Strategy, if the housing targets were to increase at examination, the Ringmer Neighbourhood Plan would fail to be in general conformity with the strategic policies of the adopted Local Plan – the neighbourhood plan should be deferred until the Core Strategy has been adopted. - Due to the shortfall in the district's housing land supply, the whole site (Bishops Lane) should be released now. - There is no justification for the exclusion of the north eastern part of the Bishops Lane site from RES15 - If the three Bishops Lane sites (RES15, RES31 and RES35) were developed they would deliver only 86 units which would not be making efficient and effective use of the site. - Developing the whole site at a higher density would bring about a higher affordable housing provision. - The development of the whole of the Bishops Lane site (up to 110 units) would enable funding for key infrastructure - The neighbourhood plan is not in conformity with national policy (basic condition (a)), the constraints the neighbourhood plan places on the release of the land would not contribute to the achievement of sustainable development (basic condition (d)) and the proposed limit to the amount of development would be contrary to the reserve allocation in the adopted Local Plan (basic condition (e)). - Policy 7.7 which creates a ceiling on new housing development is objected to and should be removed. - The whole of the Bishops Lane site (as per Submission Core Strategy SP5) should be allocated
37	South East Water	<p>Provided general information in relation to their recently published Water Resource Management Plan (WRMP) and explain that they will be able to satisfy demands for water resources in the district, taken into account of growth identified in the district and in Ringmer Parish. Additionally, they indicate support for policy 9.9 of the neighbourhood plan.</p>
38	Southern Water	<p>Submitted 7 representations relating to different parts of the plan. Their representations include:</p> <ul style="list-style-type: none"> - Offering an amendment to policy 5.4, which would allow essential infrastructure to be delivered in the strategic green gap because they don't believe the current wording of the policy is consistent with national and local policy. - Suggesting that capacity at Neaves Lane Water Treatment Works is higher than stated in the Neighbourhood Plan and "in any event, additional capacity can be provided to accommodate new development". - Introducing a provision in policies 7.10 and 7.11 to ensure that a connection to the nearest point of adequate capacity in the sewerage network is provided as part of development at Bishop Fields stages 1 & 2, Lower Lodge Farm. - Seeking an additional provision in policy 9.10 to encourage and allow the delivery of utility infrastructure. - Disappointment that previous advice relating to evidence on drainage and sewerage have not been addressed and thus they have resubmitted comments made at a previous stage.
39	Sigma Planning	<p>Identify themselves as promoting development on land referred to as Fingerpost Farm and throughout the representation</p>

	Services on behalf of Rydon Homes	<p>provide reasons as to why their site should be considered for development, disputing conclusions reached on the site by the Parish Council. On the plan itself, their representation considers of the following:</p> <ul style="list-style-type: none"> - Ringmer and Broyleside have an important role in contributing to meeting district housing needs, a role that is being understated in the neighbourhood plan. - The plan has arbitrarily constrained itself to meeting a maximum housing target, which is restrictive given that there are other sites that the SHLAA identifies as being suitable, available and achievable and contrary to pro-growth national policy. - The neighbourhood plan relies on a target based on the Core Strategy, which is currently at examination. - That a number of policies in section 7 go against national policy and advice, including those in relation to phasing and housing numbers. - Suggest that land at Lower Lodge Farm would be inappropriate for housing and this could be an extension to the existing industrial premises. - That section 8 of the plan should include provision for Fingerpost Farm to deliver outdoor sports facilities in conjunction with residential development and don't believe that allocation RG3 be reserved for those uses.
40	John and Sue May	Provided the same comments as consultee 13
41	Christine and David Tutt	Stated that they were "grateful for all the hard work that has gone into the preparation of the Neighbourhood Plan for Ringmer and fully endorse all its proposals."
42	J Crawford	Provided the same comments as consultee 13.