

DRAFT SEDLESCOMBE NEIGHBOURHOOD PLAN EXAMINATION 19 JUNE 2017h
SUMMARY REPRESENTATION BY ANTONY SKINNER (9 June 2017)
11 GREGORY WALK SEDLESCOMBE BATTLE TN33 0QZ

I refer the Examiner to my representation under Regulation 16 of The Neighbourhood Plan (General) Regulations (amended 2015) submitted to Rother District Council on the 17 January 2017 together with appendices (A), (B) & (C).

In summary of that representation I remind the Examiner of these points that I believe to be true with respect to only those matters being considered at this Hearing. The Sedlescombe Neighbourhood Plan is referred to as " Plan " below :-

1. The current Draft Neighbourhood Plan and its production should be considered separately from the previous draft Plan that was subject to Examination in January 2015 and withdrawn by Sedlescombe PC in November 2015. Not one of the policies in the current Plan is the same as the previous, and therefore, in my opinion the current draft Plan cannot be considered a revised version of the previous draft Plan. The proposed developments on The Street (Policies 4,7 & 8) are all new, Street Farm (Policy 11) is out of date as Planning Permission has now been approved, Gregory Walk (Policy 2) now proposes a substantially increased number of dwellings. Policies 3,5 & 6 (Pestalozzi, Sawmills & Parish Church) downgrade development sites that were central to the previous draft Plan to aspirational sites providing housing numbers over and above the numbers required by Rother DC. Policies 9 & 10 (Balcombe Green & Pump House) are new aspirational sites, again providing more dwellings than the minimum required. Policy 1 includes new proposals for changes to the Parish Development Boundary.
2. There has, in my opinion, been no legally acceptable consultation inviting "Representations" (as specified under Regulation 14) on the current draft Plan prior to Rother DC's Regulation 16 exercise. To my mind it is simply unacceptable and, legally challengeable, that Sedlescombe PC's "so-called Regulation 14 consultation" **was only on parts of the draft Plan**. The instructions on the form gave no opportunity to suggest additions to the draft Plan or provide anything other than "Approval" or "Comment" on topics chosen by Sedlescombe Parish Council. There was a **clear instruction that "comments" should be written in the tiny blue spaces on the form** that was delivered as a paper copy to each household. Concerns regarding this were sent to Sedlescombe Parish Council in a letter dated 29 August 2016 together with appendices (1) to (5) (all copied to David Marlow RDC).
3. I believe that Sedlescombe Parish Council has used statistics from the "so-called Regulation 14 consultation" to promote, and include within, the draft Plan now before us.
4. To my knowledge there is no Sedlescombe PC meeting minute recording the Parish Council's full discussion of the rationale and details of the current draft Plan nor was there any formal public input into the preparation of the current draft Plan.
5. Reasons given by Sedlescombe PC for the retention of Street Farm as Green Space (Policy 11) are equally applicable to The Street proposals land (Policies 4,7 & 8). However these latter proposals would have a far more detrimental effect on the village regarding traffic generation, multiple accesses, setting in the landscape and the certainty of a "domino effect" for further uncontrollable development. None of these matters have been addressed properly in the current draft Plan. There is no mention of the publicly owned Green Space or land to be given to the village school in the draft Plan with respect to the, now approved, developer's proposal for Street Farm.

In my opinion, Basic Conditions have not been met either with regard to consultation on the draft Plan or with respect to clarity of the advantages of the developer's proposals for Street Farm over other policies now put forward.