

**SEDLSCOMBE NEIGHBOURHOOD PLAN REG.16 CONSULTATION
REPRESENTATION BY ANTONY SKINNER, 11 GREGORY WALK, SEDLES COMBE
17 JANUARY 2017**

I have concerns regarding the Plan production process undertaken by the Parish Council. These concerns have been formed from the experience of a long career as a consultant involved with the statutory procedures for infrastructure projects undertaken for government departments and local authorities. I also have comments to make on Policies within the now published Plan.

1. PRODUCTION OF THE PLAN

(a). The number of pages and statistics issued by the Parish Council is immense and confusing. The content of this current Neighbourhood Plan submission was first published in July 2016. Any reference to consultations etc before that date is irrelevant and misleading as every Policy, or the background to policy, in the current plan differs hugely from the original withdrawn plan.

(b). Most importantly, I consider that the following "Basic Condition" for the Sedlescombe Neighbourhood Plan has not been met and therefore the Plan should be rejected without further consideration:-

Town and Country Planning Act 1990—SCHEDULE 4B

2) A draft order meets the basic conditions if—

(g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.

The prescribed matter for the consultation under Regulation 14 of the Neighbourhood Planning Regulations 2012 has not been met in my opinion.

Sedlescombe Parish Council issued a consultation form to be completed by 12 September 2016 (copy enclosed marked(A). A copy of the Reg 14 form for the previously withdrawn plan is enclosed as (B) for comparison. The Parish Council provided instructions on the 2016 form accepting only an indication of general support for the plan or "COMMENT" on a list of selected policies or topics.

For instance, there was no opportunity to make a representation on Policy 1, Spatial Plan of Parish or the proposal that all of Powdermills is to be within the development boundary. Whole swathes of the plan were not open to Representation because of the prescriptive nature of the form. There was no opportunity to make suggestions regarding additions to the draft plan.

Regulation 14 clearly refers to making REPRESENTATIONS regarding THE PLAN. This unarguably means it was the duty of the Parish Council to invite representations on the entire plan not invite comment on selected extracts in a very limited space. For this reason I did not respond to the consultation but made my concerns known in writing to the Parish Council together with two neighbours on the 29 August 2016 (copy enclosed marked(C))

The currently submitted plan has been influenced by the Parish Council's flawed consultation. Acceptance of the plan would, in my opinion, set a dangerous, and potentially legally challengeable, precedent regarding what forms a permissible consultation.

Rother DC consider that the above concerns are substantive as per the agenda item of its cabinet meeting on the 16 January 2017:-

45. The Consultation Statement refers to some objections from local people about the consultation process. No comment is passed on those. Objectors will have the opportunity to have their substantive concerns about the SNP considered through the examination process.

2. POLICIES WITHIN THE PLAN

POLICY 1: SEDLESCOMBE DEVELOPMENT BOUNDARY

It is proposed that the Development Boundary is adjusted to include developments under Policies 2,4,7 & 8 and around gardens in Balcombe Green and a property "Powdermills" adjacent to Sunningdale, Policy 2. Each of these extensions to the Development Boundary is in the AONB.

In the case of Policies 4,7,8 and Balcombe Green these extensions will inevitably trigger further future extensions and consequent development as a domino effect - precisely the opposite of the Parish Council's stated intention and as so vigorously put forward by it regarding development at Street Farm.

Powdermills cannot be a possible candidate for future development as I believe that the access to Sunningdale over land owned by 5 Gregory Walk is purely for the benefit of that property and surely no planner would allow the current access alongside the children's recreation ground to be used to reach an increase in development.

POLICY 2 LAND AT SUNNINGDALE

I have always acknowledged that development on this site was likely. However, the following constraints, not properly addressed in the Site Assessment Report, will severely limit the number of properties that can be reasonably accommodated:-

It is understood that a large precast aqueduct crosses under the site together with another water main and that substantial trees and hedges will need to be avoided. Adjacent properties in Gregory Walk will need to be protected from overlooking, with the stipulation that bungalows should be built.

The access to the site is across land owned by no 5 Gregory Walk. Amazingly, it is understood that the owners, not in the best of health, have not been approached regarding the use of the access.

The access is not the full width of the stub end in Gregory Walk and is believed to be no more than 3.6m wide.

The highway authority, East Sussex CC previously stated that for six houses a footway would need to be provided into the site. This would require construction from The Street junction across land currently maintained as gardens and driveways for six existing properties in Gregory Walk/The Street to the new development. No mention is made of this in the Plan and the SEA ignores this fact completely (a "Basic Condition").

Within the Consultation Statement there is reference to a meeting with the residents of Gregory Walk. This meeting was not a consultation as evidenced by this quotation from an email sent to me by the Chair of Sedlescombe PC on 28 March 2014, prior to the meeting. " *I am not offering to consult with you I am offering to meet with you and to explain the process.*" Residents of Gregory Walk, many elderly, lost faith in the process after this meeting.

POLICY 4 LAND AT CHURCH HILL FARM, NORTH OF VILLAGE HALL; POLICY 7 LAND AT GATE COTTAGE; POLICY 8 LAND AT CHURCH HILL FARM

Each of these is a green field site in the AONB, with three separate road accesses onto the B2244. The location of the sites will encourage unlimited further development in this area. This does not appear to comply with the stated aims of the Parish Council as contained in its submission regarding Policy 11 Local Green Spaces Land at Street Farm.

POLICY 11 LOCAL GREEN SPACES Land at Street Farm

The Parish Council's policy on this site is very strange. The site is currently a field with no permitted public access which the land owner could further fence and hedge to secure the site and limit views from Brede Lane.

The owner of the site has a proposal for a limited housing development tucked into the existing East View Terrace whilst a large chunk of land is GIVEN to the Parish Council with a commuted sum of money for maintenance. The village school would also be GIVEN a slice of much needed land.

The development of the site and gifts of land to the parish and school would prevent any further development in this area and allow legal public access to the majority of the site.

For some unfathomable reason the Parish Council encourages and promotes opposition to this sensible proposal. My letter of the 29 August 2016 (Copy enclosed as (C)) details just one example of this behaviour. An examination of Bulletins on the Parish website and emails from the Parish would provide many other examples.

SUMMARY

It is my view that the correct procedures have not been adhered to with regard to Regulation 14 procedures. **A "Basic Condition" has not been met.**

Policies regarding possible housing sites have been produced that are in opposition to the given reasons for the rejection of development and the gift of open space at Street Farm. I am of the view that there has not been proper consideration of the developers proposal for Street Farm. **A "Basic Condition has not been met.**

The Sunningdale site has not been properly assessed regarding access and other planning matters that would seriously reduce the ten properties currently proposed to below the six properties that would form an acceptable development to count towards the village quota. The Strategic Environmental Assessment provides no assessment of the effect of the required construction of a footway from The Street along Gregory Walk, partially within the Village Conservation Area and in the AONB. **"Basic Conditions" have not been met.**