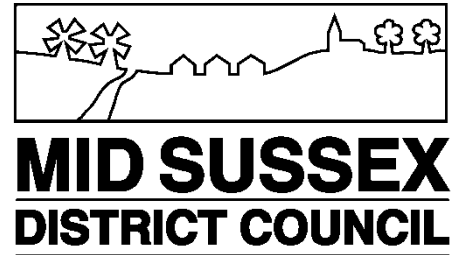


Mid Sussex District Council



District Plan Focused Amendments Consultation

19th November 2015 – 15th January 2016

Consultation Responses – Summary Reports

Pre-Submission District Plan: Consultation Responses

Consultation on the Focused Amendments to the Pre-Submission District Plan was held between 19th November 2015 and 15th January 2016. In total, 125 representations were received, generating 532 separate comments from individuals and organisations.

Summaries of the responses received during the consultation are published within this document, broken down into separate comments. In most cases, the full text of each representation has been included, but in some instances it has been necessary to summarise each response.

Each comment has been categorised and logged using the following codes or policies:

Code	Comment	Comments
A	General Support	5
B	General Objection	0
C	Consultation – timing/length/advertising/etc	1
D	Duty to Co-Operate / compliance with other plans	11
E	Evidence Base	14
F	Factual Corrections / Typos	1
G	Comments on policies/text not subject to proposed modifications consultation	3
H	Re-submission of previous representation (e.g. no new comments / confirm previous comments)	0
I	Neighbourhood Plans – compliance / impact on	1
J	New policy area should be included	7
K	New site proposed	25
L	Compliance with Legislation / Policy	1
M	Maps / Diagrams including general Policies Map comments	2
1	Chapter 2 - Insert Figure 5: Key Diagram	0
2	Chapter 3 - Meeting Housing Needs (paras 3.10 - 3.18)	6
3	Chapter 3 - Neighbourhood Plan table	3
4	Chapter 3 - Ensuring Housing Delivery (paras 3.24 - 3.31)	16
5	Chapter 3 - Gatwick Airport (paras 3.34 - 3.37)	3
6	Chapter 3 – Duty to Co-Operate (paras 3.38 – 3.39).	1
7	Monitoring schedule	1
8	List of evidence base documents	0
9	Saved Local Plan Policies	1
10	Glossary	0
SAa	Support - overall	0
SAb	Object - overall	0
SAc	Methodology	7
SAd	Sustainability Framework – Objectives and Indicators	0
SAe	Monitoring	0
SAf	Compliance with regulations / SEA	0
SAg	Inconsistent with previous version of SA	0
HRAa	Support – overall	1
HRAb	Object - overall	0
HRAc	Methodology	1
HRAd	Compliance with regulations/guidance	0
HRAe	Visitor survey evidence	0
HRAf	Atmospheric pollution	0
HRAg	Recreational disturbance	0
TOTAL		111

Policy	Title	Comments
DP1	Sustainable Development in Mid Sussex	10
DP2	Sustainable Economic Development	9
DP3	Town Centre Development	2
DP4*	Village and Neighbourhood Centre Development	0*
DP5	Housing	
DP5a	- General Support	12
DP5b	- General Object	29
DP5c	- OAN (695dpa) is incorrect	31
DP5d	- Provision (800dpa) is incorrect	28
DP5e	- Affordable Housing	7
DP5f	- Backlog / South East Plan	9
DP5g	- Commitments (e.g. figure incorrect)	3
DP5h	- Completions (e.g. figure incorrect)	0
DP5i	- Site allocations DPD	16
DP5j	- Economic growth	8
DP5k	- New number suggested (OAN or provision)	9
DP5l	- Neighbourhood Plan provision	21
DP5m	- Supply (inc. 5 year supply / SHLAA / capacity / trajectory / delivery)	27
DP5n	- Windfall allowance	4
DP6	Settlement Hierarchy	13
DP7	General Principles for Strategic Development at Burgess Hill	7
DP8*	Strategic Allocation to the east of Burgess Hill at Kings Way	0*
DP9	Strategic Allocation to the north and north-west of Burgess Hill	9
DP9a	Strategic Allocation to the east of Pease Pottage	
DP9aA	- General Support	10
DP9aB	- General Object	13
DP9aC	- Proximity to Crawley / Crawley's unmet needs	3
DP9aD	- Site capacity / density	1
DP9aE	- AONB location	10
DP9aF	- Flood Risk / Sewerage capacity	1
DP9aG	- Gypsy and Travellers	0
DP9aH	- Transport	4
DP9aI	- Infrastructure	4
DP10	Protection and Enhancement of Countryside	17
DP11*	Preventing Coalescence	2*
DP12*	Sustainable Rural Development and the Rural Economy	0*
DP13	New Homes in the Countryside	4
DP14*	High Weald Area of Outstanding Natural Beauty	0*
DP15*	Ashdown Forest Special Protection Area and Special Area of Conservation	2*
DP16	Setting of the South Downs National Park	2
DP17*	Sustainable Tourism	0*
DP18	Securing Infrastructure	3
DP19	Transport	7
DP20	Rights of Way and other Recreational Routes	2
DP21	Communication Infrastructure	0
DP22	Leisure and Cultural Facilities and Activities	8
DP23	Community Facilities and Local Services	0
DP24	Character and Design	3
DP24a	Density	28
DP25	Dwelling Space Standards	5
DP26	Accessibility	5
DP27	Noise, Air and Light Pollution	4
DP28	Housing Mix	7
DP29	Affordable Housing	7
DP30*	Rural Exception Sites	0*

DP31	Gypsies, Travellers and Travelling Showpeople	6
DP32*	Listed Buildings and Other Buildings of Merit	0*
DP33*	Conservation Areas	0*
DP34*	Historic Parks and Gardens	0*
DP35	Archaeological Sites	0
DP36*	Trees, Woodland and Hedgerows	0*
DP37*	Biodiversity	2*
DP38*	Green Infrastructure	0*
DP39	Sustainable Design and Construction	4
DP40*	Renewable Energy Schemes	1*
DP41*	Flood Risk and Drainage	0*
DP42	Water Infrastructure and the Water Environment	2
TOTAL		421

**Not subject to Focused Amendments Consultation*

Note: Codes/policies not appearing in the summary tables on the following pages received no comments during the consultation period.

A number of responses were received on 'Standard Forms' i.e. forms with identical content. These are coded separately as:

Code	Form	Comments
PRC	East Grinstead Post Referendum Campaign (PRC) Form	42

Note: technical reports/appendices may not always be included within the summary reports due to their length and are not always practical to upload to the website. All responses, in full, are available to view at the District Council offices – Oaklands, Oaklands Road, Haywards Heath, RH16 1SS.

Pre-Submission District Plan 2016 - Responses

A - General Support

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
58	1	Mrs R Robertson	Balcombe Parish Council	

Summary

Balcombe Parish Council broadly supports the revised Plan; whilst it is unfortunate that MSDC have to take additional housing to feed a housing need from outside the district, BPC support the Pease Pottage development site as an appropriate location to accommodate these additional units.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
70	1	Mrs D Morgan	Lindfield Rural Parish Council	

Summary

The Council welcomed the consultation on the focused amendments. The Council noted and supported the proposed amendments.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
75	1	Mrs C Marsh	Turners Hill Parish Council	

Summary

We are pleased to see that some of the issues which may have had a negative impact on the progress of the District Plan have been dealt with and that the Plan should now meet the development needs of the area whilst protecting the environment.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
82	1	Planning Policy	Adur and Worthing Councils	

Summary

Thank you for the opportunity to comment on the Focused Amendments to the Pre-Submission Draft District Plan. We support the recent changes that have been made and welcome the production of the Plan to provide up-to-date policy coverage for Mid Sussex.

The revisions made to the Mid Sussex District Plan through the focussed amendments demonstrate a more positive approach to growth and help to respond to recent evidence, particularly the latest household projections data released by the Government.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15043	1	Mrs A Purdye	Gatwick Airport Ltd	

Summary

We can confirm that we have no objections from an aerodrome safeguarding perspective, to the proposed amendments, especially with regard to the aerodrome safeguarding entry under Policy DP24 'Character & Design'.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	1	Mr M Evans	Gladman	

Summary

We would also take this opportunity to express concern about the consultation process undertaken by the Council with regard the Focussed Amendments. It is generally considered best practice that consultations should run for a minimum period of 6 weeks, however if a consultation period is running over periods such as Christmas it is often considered that these periods should be extended. A current consultation into the Canterbury Local Plan is one such current example of a consultation period being extended from 6 weeks to 8 weeks for this very reason. The council should, in our view, have taken a more cautious approach in order to ensure that parties did not claim to have been prejudiced by the process.

Pre-Submission District Plan 2016 - Responses**D - Duty to Co-Operate**

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
82	2	Planning Policy	Adur and Worthing Councils	

Summary

Adur District Council, Worthing Borough Council and Mid Sussex District Council have been working together through a number of mechanisms to meet the requirements of the Duty to Co-operate and address cross-boundary matters. This long standing commitment has been summarised within a Memorandum of Understanding - I have attached the latest draft of the MoU (January 2016) for ease of reference.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
84	1	Ms K Banks	Arun District Council	

Summary

Arun District Council is content that Mid Sussex District Council has continued to engage constructively, actively and on an ongoing basis on strategic matters in the preparation of the District Plan in accordance with S33A of the Planning and Compulsory Purchase Act 2004.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
87	3	Mr R Fraser	Brighton and Hove City Council	

Summary**Duty to Cooperate**

It is noted that amendments have been made to paragraph 3.38 of the Pre- Submission Draft of the District Plan on Duty to Cooperate. Some of these reflect the suggested amendments requested by the city council in July 2015. However, this paragraph could better reflect the Duty to Cooperate work that is being undertaken and reflect the strong functional links that exist between neighbouring authorities particularly with Brighton & Hove.

The city council considers it is essential for further amendments to be made to demonstrate a strong, long term commitment to working positively with adjacent authorities in a pro-active way to address long term strategic planning issues across the wider area. This will allow long-term opportunities for helping to meet the significant unmet housing needs in the area to be fully explored and to identify mechanisms for delivery including local plan reviews.

The suggested amendments to paragraphs 3.18 and 3.38 are appended to this letter. (See representation for suggested changes).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
119	1	Mrs J Dawe	Horsham District Council	

Summary

Throughout the production of the Mid Sussex District Plan, HDC have maintained a close working relationship with MDC, including producing joint evidence. HDC confirm additionally that the two authorities have planned for cross-boundary implications on an ongoing basis through our regular Duty to Cooperate meetings during the preparation of our Plans.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
181	2	Mr J L Phillips	Tandridge District Council	

Summary

Whilst Tandridge District Council understands that Mid Sussex's primary Housing Market Area is with Crawley and Horsham, and that the new strategic allocation is to provide for Crawley's unmet need, our Strategic Housing Market Assessment shows that Tandridge and Mid Sussex have close links. Therefore, Tandridge District Council would welcome opportunities where Mid Sussex may be able to assist in cross boundary housing issues in the future.

Since the publication of the Mid Sussex pre-submission Local Plan, officers have discussed the new Science Park at Burgess Hill in Mid Sussex and the potential for intensification at both Lambs Business Park and Hobbs Industrial Estate set out in the Tandridge District Council Regulation 18 Local Plan. Alongside both these employment areas, is the potential for a strategic employment area at Horley in Reigate. The Council are keen to continue discussions to ensure that all these employment areas can meet the demand of the market and provide the necessary jobs.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	3	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd

Summary

we are concerned that there is a lack of evidence of further discussions with neighbouring authorities on this level of unmet housing need and other strategic cross boundary matters.

Other than contacting these neighbouring authorities to establish their level of housing need there appears to be no evidence demonstrating how MSDC have engaged constructively, actively and on an on-going basis with their neighbouring authorities. As such, it is considered that the Council have fallen short of the legal duty to cooperate.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	4	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.

Summary

Updated Duty to Co-operate Framework (September 2015)

In reviewing this Framework, it is evident that it focuses on how MSDC will meet the requirements of the Duty to Co-operate. Indeed, the Framework (page 9) highlights that “any outcomes from the duty to cooperate work will, where appropriate, be incorporated or used to inform the District Plan.”

In addition, at Appendix 1, the Framework includes a schedule of Duty to Co-operate Engagement, which sets out what MSDC will do.

The Schedule simply sets out that Member and Officer meetings ‘will’ take place with neighbouring authorities on strategic issues but provides very little evidence of outcomes and it does not demonstrate any practical policies to deliver the well documented un-met needs of adjacent authorities. Significantly, by itself, this failure was sufficient to undermine the previous Mid Sussex Local Plan.

The Duty to Cooperate is not an administrative exercise, it must be a practical exercise that delivers homes and jobs for real people and real businesses who are in need to address the unmet needs of adjacent authorities. This point is being reinforced at a number of local plan examinations (such as the Inspector’s findings following the examination of the Birmingham Development Plan).

It is clear that the Duty, as set out in Paragraph 181 of the NPPF has not been met because no effective provision for the clear unmet needs has been made and no mechanism proposed and committed to which provides any realistic prospect that the needs will be seriously addressed.

The Duty to Co-operate Framework, however, provides no evidence whatsoever that MSDC recognises the shortfalls in employment land in Crawley, Horsham, or in any other district adjacent to Mid Sussex and there is no evidence of how MSDC is working with neighbouring authorities to meet these shortfalls.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	12	Mr R Brass	GL Hearn	Anstone Development Limited

Summary

Overall, the DP-FA-PSD is unsound because it fails the duty to cooperate. The strategy for the Plan is not supported by any evidence which considers the duty to cooperate with adjoining LPAs, cross boundary issues and the impact of London. These strategic issues, especially relating to housing, have not been considered by the Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	4	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD

Summary

However, we are concerned that there is a lack of evidence of further discussions with neighbouring authorities on this level of unmet housing need and other strategic cross boundary matters.

Other than contacting these neighbouring authorities to establish their level of housing need there appears to be no evidence demonstrating how MSDC have engaged constructively, actively and on an on-going basis with their neighbouring authorities. As such, it is considered that the Council have fallen short of the legal duty to cooperate.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	4	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G

Summary

However, we are concerned that there is a lack of evidence of further discussions with neighbouring authorities on this level of unmet housing need and other strategic cross boundary matters.

Other than contacting these neighbouring authorities to establish their level of housing need there appears to be no evidence demonstrating how MSDC have engaged constructively, actively and on an on-going basis with their neighbouring authorities. As such, it is considered that the Council have fallen short of the legal duty to cooperate.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	5	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F

Summary

However, we are concerned that there is a lack of evidence of further discussions with neighbouring authorities on this level of unmet housing need and other strategic cross boundary matters.

Other than contacting these neighbouring authorities to establish their level of housing need there appears to be no evidence demonstrating how MSDC have engaged constructively, actively and on an on-going basis with their neighbouring authorities. As such, it is considered that the Council have fallen short of the legal duty to cooperate.

Pre-Submission District Plan 2016 - Responses**E - Evidence Base**

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
61	1	Mrs A Jones	Cuckfield Parish Council	

Summary

1. Cuckfield area Strategic Housing Land Availability Assessment (SHLAA) In addition to Cuckfield Parish Council's pre-submission comments on 24 July 2015, issues remain with the two non-strategic greenfield sites, significant in Cuckfield, having now been identified as 'developable' in the latest version of the District Plan SHLAA. The Cuckfield Neighbourhood Plan Parish Housing Land Availability Assessment (PHLAA) identifies sites N2/3 and E1/2 (SHLAA sites 89 and 479) as 'not-developable', as did previous versions of the SHLAA. It was felt that the alterations to the two sites in the latest SHLAA, had been made seemingly with little reference to the detailed landscape and other sustainability assessments completed and examined for the Neighbourhood Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
117	1	Mr D Bowie	Highways England	

Summary

Our most recent communication with Mid Sussex District Council consisted of our response to the Mid Sussex District Plan Stage 3 Transport Study. We have been advised that this study will be revised to include development scenario at a plan provision of 800dpa which is to reflect the focused amendments. Therefore, for Highways England to be content that the district plan (including the focused amendments) is sound, this study will need to demonstrate that either sufficient capacity exists within the SRN to cater for the additional traffic resulting from development or mitigation of the traffic impacts of the new scenario is achievable and deliverable within the development context.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
192	2	Mr C Owen	West Sussex County Council	

Summary

Further transport modelling is required to enable firm conclusions to be drawn as to the deliverability of the Pre-Submission District Plan (June 2015) with the Focused Amendments modifications included, particularly the increased overall housing provision and the new strategic allocation at Pease Pottage.

It is understood that Mid Sussex DC is preparing to commission consultants to undertake the necessary study work. This should enable the County Council to consider the study's findings and provide its comments and conclusions in advance of the public examination of the District Plan which is expected to commence in April 2016.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
245	3	Ms G Kennedy	Lindfield Preservation Society	

Summary

It will not do to maintain that the SHLAA, which classifies sites as suitable for development or not, is somehow not part of the District Plan proper.

We find the SHLAA's methodology (and therefore the methodology of the draft District Plan) seriously flawed, and therefore unsound.

The draft plan takes no account of the impact of recent and current large-scale development .

It will not do to argue that MSDC takes into account the impact of proposed development when it determines individual planning applications. What is needed is a cogent analysis of the cumulative effect of the development already taking place. Individual planning applications by definition do not provide this.

The draft plan is incoherent in dealing with the emerging Neighbourhood Plan.

Where some analysis has been carried out, the draft's classification of sites often does not follow from its own data.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	1	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings

Summary

Whilst W.T. Lamb and HJA are pleased to note that a number of methodological weaknesses highlighted in the earlier work has been addressed, there still remains a number of fundamental concerns regarding the latest HEDNA Update (November 2015). These are as follows:

- ☐ Lack of analysis over the HMA – The analysis prepared is only at District level. This runs counter to national planning policy provided within the NPPF and the PPG.
- ☐ The balance between jobs and homes – as a result of a lack of analysis at the HMA level, the evidence to inform the balance of jobs and homes is incomplete and insufficient. Even at the District level, the evidence suggests that there will be an imbalance between jobs and workers and at no stage is the implications of this for the wider HMA assessed;

The emerging Plan fails to fully consider the needs of older people, particularly those housed within residential institutions (C2 use class). The 2012 Sub National Population Projections for Mid Sussex project an increase in the population from those residing in communal establishments of 797 residents over the plan period. Data from the 2011 Census provides information on the current population within communal establishments in the District. This suggests that approximately 40% are older persons (65 years and above) who are housed within care settings. Given the forecast substantial growth in older people over the plan period, it is reasonable to assume that conservatively 40% of future growth in the communal establishment will be within care homes. This equates to approximately 320 persons over the plan period, or approximately 20 bed spaces per annum. This is particularly important as para. 4.15 of the HEDNA Update confirms that no allowance has been made for the institutional population, which means that the needs of this section of the community have currently not been met in full within the Plan. This runs counter to the NPPF (paras. 50 and 159 refer) and the PPG (refs: 2a-021-20150326 and 3-037-20150320 refer).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	9	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho

Summary

The supporting text states that the Policy is informed by the evidence base including the 'Mid Sussex District Council analysis of densities achieved', November 2015, however, no such report is available to review.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	18	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd

Summary

We note that the Council has stated that one of the documents that form the evidence base for this policy is the MSDC analysis of densities achieved (November 2015), this however, is not available for view on the Council's District Plan evidence base website.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	30	Mr E Fielding		

Summary

Comments on The Duty to Cooperate Framework September 2015 – Desired Outcomes paragraph (it is not easy to reference when MSDC do not correctly set the document to facilitate ease of direction i.e. give paragraphs or points numbers) This paragraph states: “The MoUs will be signed by the Chief Officer” this is in conflict with other documents saying they are already in place – so which is to do or done? This is further confused through Appendix 1 which says what MSDC will do is “agree memorandum of understanding” with a large number of neighbours. There is a lot of outstanding elements left to be completed how can a plan be put forwards with so many gaps left to fill?

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	5	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.

Summary

Strategic Selection Paper (November 2015)

The Paper identifies that, in order to meet the revised housing target, it will be necessary to allocate a strategic site capable of delivering at least part of its capacity within the first five years to support a robust five year housing land supply. In this respect, the Council considers that to be supported as an additional allocation, a site would need to be at least at preapplication stage, capable of delivery within the first five years of the plan. The Paper also highlights that the need to meet Crawley's unmet needs should be the priority. These criteria have driven a narrow search for a particular type and location of site.

In undertaking such an update as part of the latest SHLAA it is important that the PPG explains that an important part of a desktop review, is to test again the appropriateness of other previously defined constraints, rather than simply accept them.

It remains the case that the approach of MSDC does not reflect this guidance.

The latest SHLAA also continues to adopt an inconsistent approach given that the updated SA (November 2015) (para. 7.102) and the Strategic Site Paper (November 2015) (Appendix 1a) acknowledges that the New Market Town proposal meets at least two of the SHLAA assessment criteria (i.e. achievable, available and suitable) by assessing it as a potential strategic site. In contrast the SHLAA concludes that the New Market Town fails all three of the assessment criteria.

One reason that the HEDNA Update fails to provide any further clarity on the supply of employment land is that MSDC did not have an up to date assessment of the employment land supply in November when the Focused Amendments were published. Indeed, MSDC approved expenditure on consultants to prepare a Strategic Employment Land Availability Assessment on 19 November 2015, the same day that the Council approved the Focused Amendments for consultation and after the HEDNA Update was published. In other words, the Focused Amendments were published and then the Council sought to commission evidence to confirm that the Amendments were sound.

It remains the case that the approach of the SHLAA is flawed and there is no evidence that it is based on a robust assessment or that it has taken account of the available evidence in reaching its self-serving conclusion (despite assurances at the SHLAA Workshop held in January 2015) that such information will be fully considered. As set out in our earlier representations (Section 7), MSDC's evidence 'Capacity Assessment of Mid Sussex District', June 2014) identifies that Mid Sussex is a highly constrained district. However, the area identified for Mayfields New Market Town is identified by the evidence as one of the few areas that does not have any significant constraints. The lack of constraints has also been recognised by the Horsham Inspector.

MSDC's HEDNA Update challenges the EGA baseline projection of requirements. It refers to the Planning Advisory Service's (PAS) Technical Advice Note on Objectively Assessed Housing Needs and Housing Targets. The HEDNA Update refers to the PAS Note as providing "further doubts on the accuracy of economic forecasting..." (para. 7.9) as a basis for dismissing the findings. The PAS note, however, is not government guidance but, more importantly, it cannot and does not contain any assessment of the EGA.

One reason that the HEDNA Update fails to provide any further clarity on the supply of employment land is that MSDC did not have an up to date assessment of the employment land supply in November when the Focused Amendments were published. Indeed, MSDC approved expenditure on consultants to prepare a Strategic Employment Land Availability Assessment on 19 November 2015, the same day that the Council approved the Focused Amendments for consultation and after the HEDNA Update was published. In other words, the Focused Amendments were published and then the Council sought to commission evidence to confirm that the Amendments were sound.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	2	Mr M Evans	Gladman	

Summary

Furthermore it is clear that the proposed consultation has been rushed through, presumably in order to get the plan to examination as quickly as possible. Unfortunately this has led to a key new policy being published with reference to an evidence based document which is not available. Gladman have contacted the Council to ask to see the evidence base which underpins this policy and have been told it is not available. We will discuss the issues surrounding that policy further later in this letter (as best we can), but as a point of process we would expect to see the evidence base for policies published at the same time as the policies to allow for fair consideration of the robustness and soundness of them. This is especially important given that the next stage to discuss them will be at the examination.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	14	Mr W Cobby	Turley	Countryside Properties

Summary

Settlement Sustainability Review. (Full assessment see file).

We request that the shared services methodology be amended to incorporate the IHT maximum walking and cycling distances in place of the assumption on the use of private car in order to promote the use of sustainable transport in the district.

Based on the above and the further commentary on accessibility and environmental constraints below, we suggest that Ansty's classification within the settlement hierarchy be reconsidered by the Council as its shared service provision as a Limited Local Service Centre and location within the district is better suited to classification as a Category 3 settlement.

On the basis of transport, services and employment accessibility from the Ansty settlement we request that the definition of Category 3 settlements is reviewed to reflect the potential for accessibility via sustainable transport options such as walking and cycling (where within the maximum distances defined by IHT guidance).

Given the absence of any overriding environmental constraints within Ansty it is requested that its position within the settlement hierarchy is altered to Category 3 to reflect its potential to provide a significant contribution to the housing needs of Mid-Sussex District in a sustainable location and that following the focused amendments, development in this area would be in line with Policy DP1 (Sustainable Development in Mid Sussex) and other policies in the Plan.

We consider that the methodology used within the Settlement Sustainability Review is flawed and should be reconsidered to ensure that development across the District is encouraged in the most sustainable locations.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	19	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD

Summary

We note that the Council has stated that one of the documents that form the evidence base for this policy is the MSDC analysis of densities achieved (November 2015), this however, is not available for view on the Council's District Plan evidence base website.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	19	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G

Summary
We note that the Council has stated that one of the documents that form the evidence base for this policy is the MSDC analysis of densities achieved (November 2015), this however, is not available for view on the Council's District Plan evidence base website.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	19	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F

Summary
We note that the Council has stated that one of the documents that form the evidence base for this policy is the MSDC analysis of densities achieved (November 2015), this however, is not available for view on the Council's District Plan evidence base website.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
63	4	Ms J Holden	East Grinstead Town Council	

Summary

The announcement on the 2nd runway is to be delayed to 2016 and this should be updated in the plan

Pre-Submission District Plan 2016 - Responses**G - Comments on Policies not subject to modifications**

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	7	Mr M Brown	CPRE - Mid Sussex	

Summary

On that premise we call for changes to be made to the last paragraph of DP14 that track the improvements now being proposed to DP16.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15168	4	Mr B White	Cuckfield Society	

Summary

In this regard, it appears to us that MSDC appears to be trying to facilitate its most recent proposals by applying a differential treatment between the High Weald AONB and the South Downs National Park. However, both are afforded the same level of protection under planning policy and statute. On that premise we call for changes to be made to the last paragraph of DP14 (High Weald Area of Outstanding Natural Beauty) that track the improvements now being proposed to DP16 (Setting of the South Downs National Park).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	10	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group

Summary

Policy DP11 remains the same as previously and consequently we feel it necessary to repeat our representations from July 2015. The policy still remains flawed because it refers to policy DP10 which is in effect an embargo on new housing development in the countryside, which is required to meet the HLS issue. Therefore as a minimum this policy should remove reference to policy DP10.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
68	1	Mr S Hoyles	Hurstpierpoint & Sayers Common Parish Council	

Summary

The Council notes the District Plan Focused Amendments and affirms that areas covered by made Neighbourhood Plans are not required to take additional housing in order to meet the revised District-wide targets.

Pre-Submission District Plan 2016 - Responses**J - New Policy Proposed**

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
192	1	Mr C Owen	West Sussex County Council	

Summary

It was understood that Mid Sussex DC intended to respond to these outstanding matters by putting forward a modification to the District Plan supporting text to include the following wording, or similar:

“West Sussex County Council is responsible for preparing statutory land use plans for waste and minerals. As well as the adopted West Sussex Waste Local Plan (2014) and Minerals Local Plan (2003), proposals for development should have regard to defined County Minerals Safeguarding Area and Minerals Consultations Area guidance and policy produced by West Sussex County Council. Preparation of site plans will require liaison with West Sussex County Council at an early stage to ensure that any potential minerals and waste interests are fully considered in planning development.”

Change requested

A modification based on the above has not been included in the Focused Amendments. The County Council would therefore take this opportunity to renew its request for such a modification to be made to the District Plan in order to ensure soundness and achieve consistency with the adopted West Sussex Waste Local Plan and West Sussex Minerals Local Plan 2003.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16766	6	Mr N Greenhalgh	Village developments plc	

Summary

Last but not least, as far as I can see, you have made no provision for self-builders. This is now a requirement of the Housing Bill. As it is now with House of Lords it therefore carries significant weight.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16766	3	Mr N Greenhalgh	Village developments plc	

Summary

I Would further suggest that there is a safeguarded, or reserve housing land to provide housing for expansion of Gatwick, as it still remains in contention for the second runway.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	7	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group

Summary

A permissive policy should be adopted or a range of smaller allocations put forward that can contribute to housing completions within the next five years. At the current time no other alternative proposal is suggested to deal with this severe issue and accordingly the draft plan and any other iterations that will clearly be unsound.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20303	5		Boyer Planning	Vortal Developments

Summary

Whilst the increase in housing numbers has affected allocations and concentrated on market and affordable housing, there continues to be a complete lack of disregard to other forms of housing such as housing for the elderly. The data provided in the housing needs assessment concludes that there is a significant increase in the elderly population across the District. We attach the representations we have recently submitted to the Albourne Neighbourhood Plan demonstrating the issue that is facing that Plan and the lack of commitment to meeting locally identified needs. Should this be replicated across the District, then this important group of people will not be catered for.

We would wish to see a specific policy setting out the requirement for housing for the elderly, broken down into specific levels of care and need. Following this, and given that neighbourhood plans are not allocating such sites for development in their plans, we would expect this to happen at the District Plan level.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	2	Mr W Cobley	Turley	Countryside Properties

Summary

In order to ensure compliance with para. 47 of the NPPF it is imperative that the Plan includes a policy which specifically sets out the circumstances when the District will be required to produce a Site Allocations DPD to address insufficient housing delivery.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20339	3	Ms R Burns	Gatwick Airport Ltd	

Summary

GAL considers that the Plan remains silent on policies and supporting text directing the important sustainability issue of off airport car parking development. GAL request that in the interests of sustainability 'all airport related car parking is permitted on airport only' and that the Plan incorporated this into the planning policy and supporting text of the proposed Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	12	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD

Summary

We believe the FA-PSDP document needs to review the merits of the SHLAA sites, especially those where LUC have suggested there is no landscape impact, and said sites about category 2 settlements, with a view to making site specific allocations in the District Plan. Sites such as land west of Turners Hill Road Crawley Down (SHLAA site ref 271 and 688) and land east of Northlands Brook and south of Scamps Hill, Lindfield (SHLAA site ref 483) could provide in excess of 500 dwellings between them (45 at Crawley Down on site 271, a further 255 (+) on site 688 and 200 plus a new Primary school on site 483 at Lindfield. Similarly land at 15 Crawley Down Road, Felbridge (SHLAA site 197) could deliver circa 60 dwellings as the accessing issues identified in the SHLAA are now being addressed.

Whilst we note that the SA having assessed a strategic allocation of 500 dwellings on land east of Northlands Brook and south of Scamps Hill, Lindfield (SHLAA site ref 483), dismissed it on landscape impact grounds, the level of development being assessed greatly exceeds that which we believe this site has the landscape capacity to accommodate. A development of circa 200 dwellings plus land for a new primary school could be contained within the lower lying western parts of the site – associated with the valley bottom (which are contained in visual terms), and utilize the existing landscape features to create a high quality development set with generous areas of green space that could retain and positively manage the existing landscape features and provide for ecological enhancement.

Given the potential need for contingencies, and the fact the land at Lindfield provides for additional strategic services in the form of land for a new primary school, we believe it should be reassessed as a potential strategic allocation and the SA updated accordingly. Likewise we believe that land to the west of Crawley Down – SHLAA ref 271 and 688 should be reassessed, as not only is this site capable to accommodating part of Crawley's unmet needs, but it is, unlike the land at Pease Pottage, outside the AONB, and could utilize existing landscape features to facilitate a land-scape led urban extension with associated facilities to supplement those found in Crawley Down and thus serve the wider village/ address local issues, unlike the land at Pease Pottage which is isolated from the surrounding area by the local highway/ motorway network.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14909	1	Mr P Rainier	DMH Stallard	

Summary

Land at Brighton Road, Pease Pottage
The land is approximately 1.11 hectares (2.75 acres) in area with frontages to Horsham Road and Brighton Road, Pease Pottage for employment use.

In addition to additional housing supply, additional commercial floorspace is required and rather than the single allocation at Burgess Hill additional sites should be allocated elsewhere in the District.

We consider that the site is suitably located for employment uses including B1 office, B2 industrial & B8 warehousing based on several factors. The land is well screened and contained on all sides by a landscape zone adjacent to the A23, Horsham Road and the B2114 Brighton Road. Adjacent to the land established development has taken place with the Pease Pottage Service Station to the north and The Pavilions business park to the south. The site is bounded by the A23 to the west and other roads to the north and east. To the north-east lies the strategic allocation of 600 houses and a Hospice, whilst to the south east lies the Bridgers Vehicle recycling centre. It is sound planning policy and complies with the aims of the NPPF regarding sustainable development and economic growth to provide additional commercial floorspace adjacent to Crawley and the proposed strategic housing allocation.

The land is capable of delivering commercial / industrial development with a floor area of approximately 4,645m² (50,000 sq.ft), based on a prudent percentage of site cover. We would be proposing a scheme of small to medium size industrial / business units with the appropriate level of car parking.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15521	1	Mr T Rumble	Wolf Bond Planning	Taylor Wimpey Strategic Land

Summary

our clients have interests in land to the east of Gravelye Lane, Lindfield (as illustrated on the supporting Location Plan). This offers a sustainably located site that could be delivered within a 5 year period.

We have previously provided detailed representations setting out the credentials of our client's site as a housing allocation (Location Plan attached). Its development credentials have been acknowledged in the Council's own SHLAA and the site suffers from no technical constraints to delivery. Further the site is under option to a national house builder and could be delivered and built-out within 5 years, thus making a material contribution to meeting defined needs for housing in the short term. As mentioned, detailed representations were lodged regarding the site in July 2015 and are not repeated further here. However we do wish to comment upon the Lindfield Neighbourhood Plan process that has moved on in the period since July 2015.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	6	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)

Summary

Based on this and previous representations submitted in response to the District Plan consultation, we consider there is a need for additional sites to be identified and allocated and this should include Hill Place Farm (SHLAA ref 562).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	1	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd

Summary

DMH Stallard act on behalf of Jones Homes (Southern) Ltd in relation to land at 88 Folders Lane, Burgess Hill (the “site” - Site Plan at Appendix A). A planning application for 73 houses has been submitted on behalf of Jones Homes for this site, this is still in the process of being determined by MSDC. It is submitted that the site should be included within the District Plan as a housing allocation. The purpose of this submission therefore, is to promote this site as an additional / alternative Strategic Development Site.

This report sets out our site specific submissions relating to the site and demonstrates the suitability of the site for residential development. This is informed by the planning application which was formed by a number of technical inputs in relation to highways, noise, landscape and visual impact, ecology and masterplanning. We have also made specific comments on the Focused Amendments and these have been submitted using the online portal, a copy of these submissions is at Appendix B. (See representation for further details).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16449	4	Mr E Hanson	Barton Willmore	Glenbeigh Developments Ltd (Hanlye Road

Summary

Land to the south of Hanlye Road, Cuckfield Glenbeigh has been actively promoting the site and note that it is included within the 2013 MSDC Housing Supply Document (HSD) (CU/16). The site is therefore now not only achievable and available, but is also considered suitable for development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	7	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.

Summary

When considering the broad location for a New Market Town (Site 678), our previously expressed concerns remain - no consideration has been given to the substantial evidence contained in the representations previously made by MMT or to the conclusions of the Horsham Inspector when considering the suitability and deliverability of a New Market Town.

Indeed, the site continues to be dismissed as being unsuitable due to an asserted significant environment and infrastructure constraints. The Council's own evidence (Strategic Site Selection Paper, November 2015), however, recognises that the site has 'medium' prospects for deliverability and there is no suggestion that the site is undeliverable.

In considering the New Market Town Option, the Horsham Inspector for the recent examination of the HDPF did not identify any adverse effects associated with its deliverability and that there were no overriding environmental constraints associated with bringing it forward.

This conclusion is consistent with that reached by MSDC when considering the broad area for the New Market Town ('Capacity of Mid Sussex District to accommodate development', June 2014), which identified very few environmental constraints, particularly when compared to other areas within the District.

The delivery of a New Market Town remains the only sustainable solution to meet future needs. Indeed, the Inspector's Report (dated 8 October 2015) to the recent Horsham District Planning Framework examination (para. 88) stated that:

"...I think it would be premature to rule out in principle any potential for a new settlement to meet future needs."

Against this background, it is relevant to review the justification for the proposed New Market Town in relation to suitability, availability and achievability (the three criteria used in the SHLAA in considering potential sites).

The hydrological setting of the proposed development, including surface water and flood risk, has been studied in the development of the overall masterplan. The Environment Agency has confirmed their agreement to the general flood risk management principle which has been adopted.

In terms of flooding, the site of the MMT proposal is generally in an area of low flood risk, with areas of flooding generally confined close to river corridors. The masterplan for the MMT proposal has been developed to locate all built development clear of the 1 in 1000 year plus climate change flood envelope. The site area is also clear of the risk of groundwater flooding due to the predominantly clay catchment area. No built development is proposed in any of the areas that has previously been identified by the local opposition groups (LAMBS) to suffer from flood events.

It has clearly been demonstrated that there are no environmental constraints preventing the delivery of a new settlement and no evidence has been presented by MSDC or any other party to the contrary.

Discussions continue with respective landowners about acquiring further areas of land to deliver the proposed new market town. These discussions have generally been positive and led to the acquisition of further land.

In terms of the specific Mayfields proposal it is also worth noting that the Horsham Inspector did not identify any adverse effects associated with its deliverability.

There are significant transport advantages of meeting future needs through a new settlement, including the potential to retain trips and encourage high self-containment by providing a mix of uses. A robust Transport Strategy has been developed with sustainable movement at the forefront and this is reflected by the masterplanning proposals being progressed by MMT for the New Market Town.

A substantial amount of work on transport analysis and development of a Sustainable Transport Strategy for the Mayfields proposal has been undertaken. In relation to the specific points raised by the Horsham Inspector:

- ☑ The Sayers Common area already has a circa 10% rail modal share for work trips, similar to western parts of the urban area of Burgess Hill;
- ☑ We see no reason why this proportion cannot be maintained and growth. The size of Mayfields will allow good quality bus services to be provided to some or all of the 3 nearby rail stations (Wivelsfield, Sayers Common and Muddleswood), which are all located less than 6 miles from Mayfields;
- ☑ The Sayers Common area has a significantly higher rail modal share than Southwater, where significant development is proposed;
- ☑ MMT is well placed in relation to the strategic network, including being close the A23 strategic north-south route, which was one of, if not the most, important criteria set out by the three local authorities when defining an area of search for a new settlement and commissioning the GL Hearn Study;
- ☑ Trips from the area will be dispersed and therefore shared amongst the main routes;
- ☑ Park and Ride is under investigation as a possible addition to the Mayfields proposal. However, it is not an essential element and its need and benefit will be determined in due course through working with the relevant stakeholders. The Sustainable Transport Strategy for Mayfields itself remains valid with or without park and ride.

There is no single constraint, or combination of constraints, that could be considered a ‘showstopper’ to the delivery of a New Market town in the plan period. This position reflects that recently reached by the Horsham Inspector. It is apparent that there is no convincing, evidenced planning reason to assume that a new market town is not deliverable as being suggested by MSDC.

The delivery a New Market Town, as part of a wider strategic approach, within the least constrained part of the district, remains the only sustainable solution to meeting the housing and employment land requirements and that potentially should be reflected in the local plan. However, should the Inspector consider the Plan to be sound, given the significance of the needs of the District and wider area, it will be imperative for MSDC to formally commit to a very early review of the Plan and that any review is comprehensive and not just focused on certain matters.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16766	1	Mr N Greenhalgh	Village developments plc	

Summary

The plans are Foxhole Farm (in your SHLAA as 180 units) , that include a new primary school . This is a vast improvement over the existing school, that is dilapidated , with a dangerous access onto the main road.

Floran Farm , is a brownfield site , incorporating starter homes and 35 plots for self build .

Pakyns Farm is in a sustainable location , walking distance to the town of Hurstpierpoint . The natural boundary of the A23 motorway bridge , is a clearly defined boundary . It will also include starter homes and a majority of smaller homes , but for rent and affordable ownership .

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20082	8	Mr E Hanson	Barton Willmore	Reside Developments Ltd (Portsmouth Wo

Summary

Land to the east of High Beech Lane, Lindfield

As set out in our previous representations, Reside's land interest comprises 2.24 hectares of agricultural land (plus a new road access from High Beech Lane) adjoining the northern boundary of Lindfield.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	1	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group

Summary

We recommend that land to the east of Gibbshaven Farm be considered for allocation for dwellings. An application has recently been submitted for proposed development of 30 dwellings for the council's consideration (Application Ref: DM/15/5048). The site has been subject to pre-application and public consultation, during which only a small number of objections were received during this time which suggested that there was little concerns with the emerging proposals.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	17	Mr R Brass	GL Hearn	Anstone Development Limited

Summary

Given the acceptance of the DP-FA-PSD to allow for strategic development (over 250 dwellings) in the AONB it is recommended that smaller sites, which have a much more limited impact on the AONB, such as Land Adjoining North of Bolney, are also considered to help achieve the District housing target.

It is recommended that the District Plan provides greater flexibility, in accordance with the requirements of Policy DP7 and Policy DP9 (on Burgess Hill) and DP5 (on Pease Pottage), for development proposals, including those on smaller sites, to respond to and address potential environmental, landscape and ecological constraints.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	5	Mr R Brass	GL Hearn	Anstone Development Limited

Summary

Finally, the new strategic allocation of Pease Pottage demonstrates that the Council is willing to bring forward sites within the AONB. This approach should be further considered, in suitable locations, and for small sites would have less of an impact on the AONB, such as at Land Adjoining North of Bolney.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	1	Ms H Allen	Barton Willmore	Crest Nicholson South

Summary

Land South of Old Rocky Lane is currently located within the "Countryside" from an adopted policy perspective. However, following completion of the approved development at Rocky Lane Phases 1 and 2 (collectively 197 units), the site will be surrounded on all sides by built development/the railway line.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20303	6		Boyer Planning	Vortal Developments

Summary

It is strongly considered that land to the west of London Road, Albourne should be allocated for an appropriate level of residential development comprising mixed tenure to meet identified local needs.

The site comprises disused agricultural/horticultural land which is out of productive use at an edge of village location. There is the opportunity to develop the site with an appropriate amount and density of residential dwellings which will be sensitively designed and landscaped to provide a soft edge to this part of the Albourne built-up area. The development will be built out at lower densities with substantial landscaping and spacing between the dwellings.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	1	Mr W Cobley	Turley	Countryside Properties

Summary

Policy AS6: Land off Bolney Road, Ansty within the Neighbourhood Plan says that the site is considered suitable for development as approximately 18 dwellings. Our client welcomes this allocation, but considers that the larger site is also suitable for residential development.

Our client has now commissioned detailed site assessment and master planning work in order to better understand the opportunities and constraints at the site. This information will be used to inform further discussions with the Parish Council and local community ahead of the submission of a planning application later this year.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20327	8	Mr A Bateson	AB Planning & Development Ltd	Mr David Crowther

Summary

Policy DP10 & the Proposals/Policies Map – The boundaries of the ‘Countryside Area of Development Restraint’ should be redrawn around the main settlements of Haywards Heath and East Grinstead in order to enable the objectively assessed housing needs of the two towns to be fully met. In particular at Haywards Heath: the 2.6ha area of land south of Sunte House, west of Gander Green, east of Wickham Farmhouse and north of Sunte Close should be included within the town’s identified settlement boundary (see accompanying plan).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20329	3		RH & RW Clutton	Western Arc Consortium

Summary

We also wish to echo the representation we made in July 2015 with regard to the suitability of Burgess Hill, Western Arc as a sustainable location for a further strategic allocation. The allocation of the Western Arc as a preferred solution to meet wither any shortfall in delivery of the proposed strategic sites, or any increase in numbers required by the Inspector, would significantly improve the soundness of the Plan. It would also help protect the District from speculative development.

The area extends to just under 214 acres. The owners of the land in the western are have appointed RH&RW Cluttons as agents, and we are close to signing terms with Thakeham Homes. Work will start in 2016 to deliver a master plan for consultation.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20390	6	Mr M Richardson	Persimmon Homes (Thames Valley)	

Summary

we believe a need exists to identify additional options for growth to provide flexibility within the plan. For example Persimmon Homes (Thames Valley) control a site lying to the south east of Burgess Hill. The site could accommodate residential development and help in meeting the housing requirement over the plan period. We believe that this site should be considered deliverable and available as one of the leading UK house builders is positively promoting the site. In allowing development to be brought forward on this site it will allow the Strategic Policies of the Local Plan to be met.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20506	1	Mr J Bailey	WYG	Traylen Enterprises Ltd

Summary

the freehold owners of the Aurora Ranch Caravan Park, London Road, Bolney. We have been instructed to write to you to ask for the allocation of the above site for housing development in the emerging Mid Sussex District Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20520	3	Mr and Mrs J and N Hampshire		

Summary

Land at Meadow Wood Brook St, Cuckfield (Ansty and Staplefield Ward) -

Crucially for technical assessment a Landscape and Visual Impact Assessment was produced and included that highlights the advantage this site in that it is neither visible from the Brook St entrance to the east nor land to the west. It is heavily screened and sits on a plateau whilst being part of a gradual slope

This site isn't a significant or harmful expansion of the area. The proposal is for a maximum of 10. The can be made available to provide a mix of housing (market and affordable) to reflect the housing need.

Furthermore we are happy to consider offering the site for self build as we are firmly of the belief that there is little supply for an increasingly large demand. Perhaps the Draft Plan could elaborate and highlight potential self build sites

[Landscape character and visual impact assessment attached]

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20524	1	Mr O Harwood	RH & RW Clutton	East Grinstead Tenants Limited - Halsford E

Summary

We advise that a strategic opportunity exists for redevelopment of the Halsford Estate in East Grinstead (shown on the plan attached), which we suggest should be included in the revised plan, delivering a net gain of up to 200 dwellings over the plan period.

The Halsford Estate extends to just over 9 acres between the London Road and the Imberhorne Land playing fields in East Grinstead. The existing estate was laid out just after the first World War with dwellings including terraced, semi detached and flats together with garages around a central green and on Halsford Lane. The problem remains that many of the buildings are in a poor structural state and occupy the available land at a density of only 19 dwellings per ha.

We proposed that the Halsford Estate should be designated for redevelopment. Initial projections suggest that the existing 72 dwellings could be replaced over time with a high density development between 250 and 300 dwellings.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20527	4	Ms L Goodyear	Terence O Rourke	Gleeson

Summary

an allocation for housing of the site at Clayton Mills and Mackie Avenue would be justified and sound in terms of the local plan. This site is the subject of a draft allocation in the Hassocks Neighbourhood Plan Regulation 14 consultation. However, we consider that, under the current circumstances, it would be justified for the local plan to allocate the site alongside the neighbourhood plan allocation.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	1	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD

Summary

DMH Stallard act on behalf of Haywards Heath Golf Club Limited in relation to land at Haywards Heath golf course (the “site” - Site Plan at Appendix A). The purpose of this submission is promote this site as an additional / alternative Strategic Development Site. We consider that the plan should include sites of less than 500 units. This site would be appropriate for allocation in the latter half of the plan period. However, if not the site at Haywards Heath golf course should be allocated via the forthcoming Site Allocations document.

The site is proposed as a mixed use scheme, accommodating the needs of the area in respect of housing and education. Within previous submissions it was indicated that the site could deliver up to approximately 580 dwellings, this development could provide a neighbourhood centre, primary school, play and open space provision, and landscape corridors incorporating enhanced ecological initiatives where appropriate. The former northern playing area would be retained as open land.

The site is currently utilised as a golf club and course, and as such can not be considered to be open countryside, the vegetation and landform of the site has been much altered to form a golf course.

The total site area is 31.5 hectares and the proposed net developable area is 14.6 hectares. Replanted Ancient Woodland and Ancient Woodland areas border parts of the site to the southwest and west of the site, a Site of Nature Conservation Importance (SNCI) is also located to the west of this site. There are however no landscape designations within the site itself.

Given the reasons outlined above it is considered that land at Haywards Heath golf course is a suitable, available and achievable site for the development of 438 dwellings in a logical urban extension site. This development would make a significant contribution to the level of housing identified as necessary in the District Plan and should therefore be considered for allocation by the Council.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	1	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G

Summary

DMH Stallard act on behalf of Haywards Heath Golf Club Limited in relation to land at Haywards Heath golf course (the “site” - Site Plan at Appendix A). The purpose of this submission is promote this site as an additional / alternative Strategic Development Site. We consider that the plan should include sites of less than 500 units. This site would be appropriate for allocation in the latter half of the plan period. However, if not the site at Haywards Heath golf course should be allocated via the forthcoming Site Allocations document.

The site is proposed as a mixed use scheme, accommodating the needs of the area in respect of housing and education. Within previous submissions it was indicated that the site could deliver up to approximately 580 dwellings, this development could provide a neighbourhood centre, primary school, play and open space provision, and landscape corridors incorporating enhanced ecological initiatives where appropriate. The former northern playing area would be retained as open land.

The site is currently utilised as a golf club and course, and as such can not be considered to be open countryside, the vegetation and landform of the site has been much altered to form a golf course.

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Given the reasons outlined above it is considered that land at Haywards Heath golf course is a suitable, available and achievable site for the development of 438 dwellings in a logical urban extension site. This development would make a significant contribution to the level of housing identified as necessary in the District Plan and should therefore be considered for allocation by the Council.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	1	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F

Summary

Welbeck Strategic have secured a position in relation to land at Imberhorne Farm, Imberhorne Lane, East Grinstead, and this is now being submitted as an additional / alternative Strategic Development Site.

The Site is proposed as a mixed use scheme, accommodating the needs of the area in respect of housing and education. The Site is able to accommodate the growth requirements of Imberhorne School to allow the “Lower School” (located at Windmill Lane, East Grinstead) to merge with the “Upper School” (Imberhorne Lane Site) as well as the provision of a new primary school and early years facility. This will be supported by the delivery of approximately 550 new homes, a Care Village, community centre and a Country Park. This will also allow for the release of the Lower School site for housing, as allocated in the emerging East Grinstead Neighbourhood Plan (EGNP).

The Site, which comprises approximately 51 hectares (ha) of land at Imberhorne Farm, is located to the west of East Grinstead and is accessible via Imberhorne Lane. A site location plan is at Appendix A. It forms a part of the previous allocation of land for approximately 2,500 new homes to the west and south west of East Grinstead.

This Neighbourhood Plan allocates a site at Imberhorne School for housing development under policy SS3, this allocation would provide for 200 housing on the site and is dependant on whether alternative school provision can be secure elsewhere. This allocation is therefore wholly dependant on Wellbeck Strategic Lands proposal at Imberhorne Lane, the proposal would include the expansion of the school in order to accommodate the 800 pupils to be relocated.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	5	Mr J Stevens	Home Builders Federation Ltd	

Summary

The Council's argument that affordability can only be tackled at the national level cannot be considered to be a sound argument. If an increase in housing supply is not judged to be necessary in Mid Sussex then it is difficult to imagine where else in the country such an adjustment would be warranted. Logically it follows from this that the Council considers that the NPPG guidance is flawed and therefore it is not bound to have regard to this guidance. We are not sure that this would be a view shared by the Government.

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M - Maps/Diagrams

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	10	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD

Summary

In addition to the above consideration needs to be had to the way in which the Neighbourhood Planning strategy can be taken forward in the face of the retention of tightly drawn built up area boundaries around all the towns and villages in the district. The proposed Proposals Map does not in our opinion facilitate any Neighbourhood Plans to come forward promoting Greenfield urban ex-tensions as these would not be in conformity with the DP. Whilst we are sure this is not the DC's intention it is an omission that needs resolving.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	2	Ms H Allen	Barton Willmore	Crest Nicholson South

Summary

It is considered that the Built Up Area Boundary currently shown on the draft Policies Map 13 should be amended to include the site (Land South of Old Rocky Lane)

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
63	1	Ms J Holden	East Grinstead Town Council	

Summary

Para 3.17 - we strongly support the statement that 800 dwellings per year is the absolute maximum that the Mid Sussex district can sustainably increase by. Even so we would seek support from West Sussex County Council that the educational programme can support the resultant increase in school age children. The Health Service has adequate provision for healthcare and the utility and emergency services can support this increase.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
99	1	Ms E Brigden	Crawley Borough Council	

Summary

Crawley Borough Council (CBC) supports the increases in the District Plan's housing requirement, from 650 dwellings per annum to 800 dwellings per annum in Policy DP5. In particular, CBC welcomes the recognition in the District Plan, through the Focused Amendments in paragraph 3.18, that this increased figure allows for Mid Sussex to contribute towards meeting neighbouring authorities' housing needs, and the emphasis on the additional dwellings meeting the unmet needs from within the Northern West Sussex housing market area, principally highlighting Crawley's unmet needs. CBC recognises the challenges this has involved in relation to ensuring a five-year land supply of deliverable sites.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20506	4	Mr J Bailey	WYG	Traylen Enterprises Ltd

Summary

The council states that the "tipping point", above which the negative environmental impacts of development would outweigh the positive social and economic effects would be 800 dpa. This figure has been arrived at through the preparation of a District Plan Sustainability Appraisal (DPSA). However, the DPSA analysis will have been carried out in a subjective manner. It is possible to add or subtract weight from criteria, depending upon whether or not you wish the SA to enable more or less development in the plan period. In the past, the South East Plan (SEP) has proposed 855 dpa in Mid Sussex. No doubt a SA was prepared to say that the District could accommodate this number of dwellings without any adverse environmental impact. The council's maximum development figure of 800 dpa is too low and is not justified by perceived environmental impacts.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	2	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD

Summary

The Council correctly identifies that the PPG states that the most recent district level household projections published by the Department for Communities and Local Government should provide the 'starting point' for the estimate of the Districts overall housing need. However, the Council is incorrect in its statement that the District has a housing need of 656 homes per year.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	2	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G

Summary

The Council correctly identifies that the PPG states that the most recent district level household projections published by the Department for Communities and Local Government should provide the 'starting point' for the estimate of the Districts overall housing need. However, the Council is incorrect in its statement that the District has a housing need of 656 homes per year.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	3	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F

Summary

The Council correctly identifies that the PPG states that the most recent district level household projections published by the Department for Communities and Local Government should provide the 'starting point' for the estimate of the Districts overall housing need. However, the Council is incorrect in its statement that the District has a housing need of 656 homes per year.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
63	2	Ms J Holden	East Grinstead Town Council	

Summary

para 3.22 - The East Grinstead neighbourhood plan was submitted to MSDC on 15th December 2015 and can now be updated. We appreciate this is a moving position but we would request this table be up to date at the close of the consultation.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
87	2	Mr R Fraser	Brighton and Hove City Council	

Summary

Updated evidence in the November 2015 District Plan Sustainability Appraisal Pre-Submission Report reinforces this evidence. It includes a summary of Links with Neighbouring Authorities as set out at Table 29 (page 82). This demonstrates that, of all authorities adjoining Mid Sussex, Brighton & Hove has the strongest links on the basis of in and out commuting and migration patterns, particularly with the south of Mid Sussex. These functional relationships underpin the need to continue to commit to working together on a sub-regional basis regarding critical cross-boundary issues such as housing and employment. In our July 2015 comments we welcomed the priority afforded to meeting unmet housing needs of Brighton & Hove in the south of the District should further housing capacity / supply be identified over and above that needed to meet the District's OAN (see Housing Provision Paper paragraphs 4.125 – 4.130). We would like to see this re-iterated in the Focused Amendments at paragraphs 3.18 and 3.38 of the District Plan.

There are concerns, however, that the Focused Amendments at paragraph 3.18 indicate that the surplus housing, amounting to 1785 dwellings (to 2031), '...would principally be directed to Crawley'. It is considered that the Plan would better reflect the evidence and Duty to Cooperate priorities if it reflected the close ties to Brighton & Hove. It is accepted that the new strategic site allocation at Pease Pottage has close geographical links to Crawley District and is more likely to help meet some of Crawley's unmet housing need. However, in overall terms, the basis for directing any further surplus capacity to neighbouring authorities with an unmet housing need should be based on functional links and accessibility. It is therefore requested that paragraph 3.18 is amended to specifically identify and include those neighbouring authorities with unmet housing needs and strong functional links to Mid Sussex including Brighton & Hove.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	2	Mr A Ross	Nexus	Gleeson Developments Ltd

Summary

These representations supplement those submitted previously to the Proposed Submission District Plan.

We note the references in paragraph 3.28 to the proposed strategic allocation at Pease Pottage for 600 dwellings (Policy DP9A), where the paragraph notes that pre-application discussions have commenced and where there is an expectation that a planning application will be submitted in late 2015. We understand that this application has been submitted.

We fundamentally object to the proposed Pease Pottage allocation for the reasons set out in detail in our representations to Policy DP9A.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
2335	1	Mr C Hough	Sigma Planning Services	Rydon Homes

Summary

Paragraph 3.29.

This paragraph needs to be significantly amended to allow Neighbourhood Plans to increase housing numbers and thereby reduce the number of sites, possibly in the same settlement, that need to be identified by the Site Allocations document. In this context the wording from the submission plan that remains in Paragraph 3.29 to the effect:-

"There will be no necessity for the current generation of neighbourhood plans to increase their housing numbers" is misleading and requires clarification. If a Neighbourhood Plan is adopted without making an appropriate contribution to Districtwide housing requirements then there may be a need for the Site Allocations document to increase the housing numbers at that settlement. The word "necessity" in this context would limit the District Council's ability to provide for more housing at a settlement than had been provided in the Neighbourhood Plan and would thereby limit the remit of the Site Allocations document in those settlements that have not sought to accommodate an appropriate share of Districtwide housing need. Also, the words "current generation" are not clear. Does this mean "adopted"? If so, at what date? The meaning needs to be clarified so that the neighbourhood plans to which the reference is addressed can be identified.

The range of size and location of sites proposed in the Plan is unbalanced. The reliance on a very large site at Burgess Hill itself puts the delivery of housing at risk due to the need for phasing, provision of infrastructure and local market demand. To balance this and to ensure delivery, the other housing sites should be small/medium sized and located across the District to optimise choice of location and to comprehensively meet market demand and local need for affordable housing.

To bring forward a single site for 600 dwellings in an unsustainable location and where significant infrastructure will be required from the outset, is the wrong response to the situation. It will only serve to frustrate the early delivery of housing, the opportunity for choice of location and the meeting of local housing needs that are dependent on cross-subsidy housing to provide affordable social housing.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	8	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)

Summary

Additionally, where the Local Plan remains silent on how development should be distributed across the Neighbourhood Plan areas, they will fail to support the identified settlement hierarchy, which seeks direct development towards the most sustainable locations.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16063	2	Mr G Mower	Burgess Hill Action Group	

Summary

DP5, 6, 7, 8, & 9 have chosen Burgess Hill as the location for the majority of new homes proposed for the whole of the Mid Sussex District. When complete the population of Burgess Hill will have increased by around 50% since 2013. The Burgess Hill: A town Wide Strategy; Visioning the Future; Feasibility Study determined that 4000 homes would be needed to raise the £40 m required to finance the new town centre rather than housing needs of the district. This appears to be unsound and ignores the need for homes in other locations where prices could become over-inflated due to scarcity of supply.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	5	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd

Summary

We agree with the Council’s approach of allocating strategic sites for housing development, this is a more sustainable and sound method to housing delivery than allowing sporadic , piecemeal development throughout the District. However, in order to maintain flexibility in housing delivery, small sites of 50 – 200 should also be identified within the District Plan.

the District Plan relies heavily on the strategic allocation of land north and north west of Burgess Hill, paragraph 3.27 of the Focused Amendments state that District Plan assumes the strategic developments around Burgess Hill will yield 3,980 homes over the lifetime of the Plan. We consider that this is overly optimistic, strategic sites can have a long lead in time, and it is considered unlikely that all 3,980 dwellings are able to come forward within this plan period.

It is noted that a further strategic site is proposed at east of Pease Pottage, again, given the size of the proposal it is likely that this site will also have a long lead in time. It is considered therefore that it is likely there will be an initial shortfall in the housing against the Districts housing needs.

We note that the Council has chosen an approach which focuses the majority of housing and employment development at Burgess Hill, it is our view that it is a logical and sound housing strategy to direct development to one of the main towns within the District.

we are concerned that the Council have still chosen to only allocate 2 strategic sites. We are also concerned that all other development is to come through Neighbourhood Plans, however, it is unlikely that such allocations in Neighbourhood Plan will accommodate mid or high range sites of 50 or more units.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16412	2	Dr I Gibson		

Summary

The increased housing numbers now proposed in the District Plan should be delivered through strategic developments that create new communities. The Pease Pottage proposal for 600 new homes is welcome, but either needs to be significantly larger, or at least one other site identified. In this latter respect, the currently dormant proposals for some 2,000 new homes at Crabbit Park should be reviewed, particularly given its proximity to Crawley and the identified need for Mid Sussex to support the unmet housing needs of that authority.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	7	Mr E Fielding		

Summary

Paragraph 3.28 – the anticipated planning application has yet to be produced. As above another example of lack of action by MSDC, leading to a lack of confidence in its ability to ever deliver.

Paragraph 3.30 the SHLAA process is not looking to remove barriers for example any site not within a Built up area boundary is excluded – this restricts the maximum potential of suitable land in the District, this fails DP1 and means MSDC can’t satisfy DP5, or DP19 which is not a part of a SHLAA decision. MSDC is not in a position to have restrictive methodologies when it has not secured sufficient sites for its housing needs.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16449	3	Mr E Hanson	Barton Willmore	Glenbeigh Developments Ltd (Hanlye Road

Summary

We therefore strongly disagree with the rationale that no housing sites need to be identified in Cuckfield over the Plan period. Indeed, we consider that as a Larger Village, Cuckfield and its immediate surroundings should be a key location for the provision of new housing to help meet the housing needs of the District.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	6	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.

Summary

It is evident that MSDC's justification for allocating a strategic site located within the AONB, which is recognised to cause harm on the landscape, is that the benefits of delivering more housing and addressing the unmet needs of Crawley outweigh any adverse impact. A comparable approach should have been taken to other identified needs, in accordance with paragraph 14 of the NPPF.

However, the criteria being set by MSDC in the Strategic Selection Paper, and reflected in the Council's evidence base, means that the approach unfairly discriminates against other options (including the New Market Town) and are therefore not being fully considered. For example, proximity to Crawley is identified a precondition in determining what strategic sites to advance. Such an approach means that sites will not be considered to meet the unmet needs of other authorities.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	1	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd

Summary

In our view, in addition to this growth, we consider that the opportunities for development at East Grinstead have not been fully appraised to ensure the three major settlements across the District are meeting their unmet need whilst also assisting the District in its wider delivery.

As inferred at paragraph 4.18 of the HEDNA Update, the District Council should be looking to allocate more sites and more settlements to provide greater flexibility in the plan, with East Grinstead having the capacity to help achieve this.

Specifically, and in the context of our comments on the Sustainability Appraisal and opportunities for growth at East Grinstead, we do not believe there is adequate justification as to why additional growth in the District cannot be allocated. Given the relationship of Mid Sussex to Crawley it would be appropriate for the district to consider a more positive response to Crawley, which could be further tested through an immediate start on the Site Allocations DPD.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20082	7	Mr E Hanson	Barton Willmore	Reside Developments Ltd (Portsmouth Wo

Summary

We therefore strongly disagree with the rationale that no housing sites need to be identified in Lindfield over the Plan period. Indeed, we consider that as a Larger Village with a population of 6,995 (2011 census), falling only second in the hierarchy after the main towns of Burgess Hill, East Grinstead and Haywards Heath, the village and its immediate surroundings should be a key location for the provision of new housing to help meet the housing needs of the District.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20151	2	Mr M Carpenter	Enplan	LAMBS

Summary

Importantly, and notwithstanding the significant proposed increase in housing provision, there is no suggestion in the District Plan that a new settlement is required at the MMT location (or elsewhere in the district) to accommodate the new housing figures.

MMT made extensive submissions and representations to the DPF to promote their new settlement proposals. LAMBS also made representations to the DPF and attended the relevant examination sessions at which MMT and housing provision were considered. The Inspector's conclusions in relation to the proposal are contained at paras 84-88 and with regard to MMT the Inspector concluded as follows:

- (i) no need to include an area of search in the plan for the proposed market town/new settlement;
- (ii) the planning mechanisms advanced by MMT to seek to deliver their scheme through the District Planning Framework were unlawful;
- (iii) future development needs arising from any decision to expand Gatwick Airport should be determined by Horsham DC in co-operation with other relevant authorities (including Mid Sussex DC) as to how those needs should be met;
- (iv) major concerns raised about the sustainability of the MMT location and in particular its distance from railway services and the strategic road network; and potential usage and viability of the 'park and ride' proposals;
- (v) the location of the site beyond reasonable walking and cycling distance from rail services serving Gatwick Airport and the main employment centres along the route 'remains a severe disadvantage (my underlining);
- (vi) notwithstanding the inclusion of a significant amount of new employment, it would be unavoidable that a very significant proportion of MMT residents would travel to work by car;
- (vii) the proposal is contrary to para 52 of the NPPF as it has no support (indeed strong opposition) from local communities, parish councils, local planning authorities and local MP's;
- (viii) compulsory purchase order powers could only be used if an agreed scheme were approved through the development plan process; and
- (ix) concerns raised over deliverability in the light of the large majority of landowners who do not support the MMT scheme as highlighted by the map prepared by LAMBS (at Document 3) which was signed by 200+ landowners covering some 1,740 ha (4,300 acres).

The MMT proposals contain very limited information about delivery of the project including the transport and flood risk/drainage elements. They were (and remain) high level submissions with an emphasis on housing needs of the wider sub-region.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20303	2		Boyer Planning	Vortal Developments

Summary

The Plan now seeks to accommodate 800 new homes per annum over the 17 year period of the Plan, which is an increase of 150 homes per annum over the previous version of the Plan. This results in an overall increase of circa 2,500 new homes required in that period, however, there is total failure to consider how this should be distributed and whether there are other viable and suitable options that could accommodate some or all of this requirement.

This critical and strategic matter cannot be delagted to another document and the Council should have recognised this and allocated more housing at the front end of the Plan. However, this should not be large strategic sites which always suffer delays in delivery, but more local sites of between 30 and 150 dwellings that could be located in sustainable locations and could come forward now to meet the housing need.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	3	Mr A Ross	Nexus	Gleeson Developments Ltd

Summary

We object to the proposed deletion of the reference in this paragraph to the housing requirement for the District being a minimum. This change is based on the wholly unjustified premise (challenged elsewhere in our original and supplementary representations) that:

- i. the OAN identified for the District Plan is sound (which it demonstrably is not); and
- ii. the Council cannot sustainably accommodate more than 800dpa as a maximum (which is also incorrect and based on a fundamental mis-application of national planning policy).

Even if the OAN / housing requirement identified in the District Plan was sound, it would in any event be wholly unsound to express it as a maximum – placing a cap on development. Such an approach is wholly inconsistent with the policies of the NPPF which seek to boost significantly the supply of housing and which include a presumption in favour of sustainable development.

We welcome the reference in this paragraph to the ability for Town and Parish Councils to revise their existing Neighbourhood Plans (NP's) to provide for higher levels of housing. However, as expressed in our original representations, we object to the statement that there is no necessity for existing NP's to be reviewed. This assumes, and is based on the premise that, increased levels of housing provision will be provided for in a subsequent Site Allocations Document.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	6	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD

Summary

We agree with the Council's approach of allocating strategic sites for housing development, this is a more sustainable and sound method to housing delivery than allowing sporadic , piecemeal development throughout the District.

the District Plan relies heavily on the strategic allocation of land north and north west of Burgess Hill, paragraph 3.27 of the Focused Amendments state that District Plan assumes the strategic developments around Burgess Hill will yield 3,980 homes over the lifetime of the Plan. We consider that this is overly optimistic, strategic sites can have a long lead in time, and it is considered unlikely that all 3,980 dwellings are able to come forward within this plan period.

It is noted that a further strategic site is proposed at east of Pease Pottage, again, given the size of the proposal it is likely that this site will also have a long lead in time. It is considered therefore that it is likely there will be an initial shortfall in the housing against the Districts housing needs.

We note that the Council has determined that for the purposes of the District Plan, strategic sites are limited to those of 500 units or more, we consider that this figure is too high, and that this should be amended to include sites of 300 or more units as strategic level. These types of mid and high range development sites are unlikely to come forward through the Neighbourhood Plan process, it is therefore considered that the most appropriate mechanism to bring forward these desperately needed housing sites is through the District Plan.

We note that the Council has chosen an approach which focuses the majority of housing and employment development at Burgess Hill, it is our view that it is a logical and sound housing strategy to direct development to one of the main towns within the District. We do not agree however with the Council's view that development at Burgess Hill has greater potential to deliver sustainable communities than East Grinstead or Haywards Heath. It is our view that development can provide sustainable communities and benefits to both of these other main towns, and that the Council should direct development to these towns through the allocation of strategic sites in and around these settlements.

We are also concerned that all other development is to come through Neighbourhood Plans as it is unlikely that such allocations in Neighbourhood Plan will accommodate mid or high range sites of 200 or more units.

It is our view that the approach of the Council does not allow for coordinated and strategic level development to come forward, it is our opinion that the Council should promote further sites of 200 or more units as strategic development through allocations within the District Plan, this is considered to be a more sustainable development strategy than promoting piecemeal development through Neighbourhood Plans.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	6	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G

Summary

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We are also concerned that all other development is to come through Neighbourhood Plans as it is unlikely that such allocations in Neighbourhood Plan will accommodate mid or high range sites of 200 or more units.

It is our view that the approach of the Council does not allow for coordinated and strategic level development to come forward, it is our opinion that the Council should promote further sites of 200 or more units as strategic development through allocations within the District Plan, this is considered to be a more sustainable development strategy than promoting piecemeal development through Neighbourhood Plans.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	7	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F

Summary

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the District Plan relies heavily on the strategic allocation of land north and north west of Burgess Hill, paragraph 3.27 of the Focused Amendments state that District Plan assumes the strategic developments around Burgess Hill will yield 3,980 homes over the lifetime of the Plan. We consider that this is overly optimistic, strategic sites can have a long lead in time, and it is considered unlikely that all 3,980 dwellings are able to come forward within this plan period.

It is noted that a further strategic site is proposed at east of Pease Pottage, again, given the size of the proposal it is likely that this site will also have a long lead in time. It is considered therefore that it is likely there will be an initial shortfall in the housing against the Districts housing needs.

It is our view that additional and alternative sites should be put forward for allocation. We note that the Council has quoted a figure of 500 units or more as a strategic allocation, however, it is our view that this figure is too high and that sites of 200 or more should be considered strategic sites.

However, we consider that a more sound strategy would be to also direct a certain level of development to the two remaining towns in the District which are considered to be the most sustainable. It is our view that this would be a much more sustainable option than the proposed allocation of 600 houses at Pease Pottage which is located within an AONB and countryside location.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
107	2	Ms J Field	Natural England	

Summary

3.36 (p9) states that “The Government is to announce its preferred solution to meeting runway capacity in the South East by the end of 2015” and therefore needs further updating.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	9	Mr E Fielding		

Summary

Paragraph 3.36 is incorrect the Government announcement re the airport has been delayed. Why has this plan not been read to ensure small errors are corrected. A poor and unprofessional job rushed through with minimal effort – with this wrong what else is out of date and inaccurate or at worse now misleading.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20339	1	Ms R Burns	Gatwick Airport Ltd	

Summary

-GAL is in agreement that a partial Review of the Plan will be required following the Government’s decision on the location of a new runway in the UK. GAL considers that the proposal for the Plan to be based upon a single runway scenario is pragmatic and appropriate at this time when the Government has yet to make a final announcement on the future runway capacity in the South East.

-In December 2015 Government directed that further investigations be made into the specific environmental parameters of expanding the runway capacity in the UK. The outcome of this extended study and the Governments considerations of such impacts are due in May 2016. In light of this GAL suggests that the text in Para 3.36 of the Plan be amended accordingly as the Government has not ruled out the option for a second runway being built at Gatwick Airport.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15175	1	Mr T Slaney	South Downs National Park Authority	

Summary

The SDNPA recognises the development pressures being experienced in Mid Sussex and the National Park Authority welcomes the efforts made by Mid Sussex to accommodate not only their own need for housing but also some of the need of those of adjoining Districts and Boroughs. The National Park has no view on the ability or otherwise of the District to contribute further to meeting the needs of other neighbouring authorities and considers that it is a matter for the Examination of the Local Plan to test the evidence.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	29	Mr E Fielding		

Summary

The targets shown in the monitoring schedule are poor, they do not leave a clear definition of what success will look like. Subjective judgements lead to poor management decisions and poor choices when spending monies.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
63	8	Ms J Holden	East Grinstead Town Council	

Summary

We welcome the inclusion of The Portlands as a saved policy on conservation grounds, the East Grinstead Neighbourhood Plan reflects this policy as the heritage of this land is important to the town.

Pre-Submission District Plan 2016 - Responses

DP1

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	6	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd

Support

We agree that the Council should remove reference to Policy DP6 (Settlement Hierarchy) in this policy. It is considered that the previous reference to the settlement hierarchy is considered to be overly restrictive to development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	10	Mr E Fielding		

Object

Chapter 4 – DP1 there is reference to walk, cycle or use public transport but not to the other forms of sustainable transport as defined in the NPPF. This plan needs to be revised to ensure it reflects recent legislation and the NPPF, if it is not revised I have no confidence in its ability to withstand any challenges.

There is no reference or consideration for technology minimising the need to travel or access services as detailed in the NPPF. With no regard to technology the MSDC plan is going to be out of date and of little worth before it is in place.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	8	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group

Neutral

We support the general principle of this policy which echoes paragraph 14 of the NPPF. While this policy may allow some development to come forward on unallocated sites which will assist the council in meeting the identified critical backlog and five year land supply requirements we consider that as suggested elsewhere in this document a permissive policy or site allocations policy would deliver sufficient development to address this acute problem. This policy when read in conjunction with the others assess below would not achieve this.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	3	Ms H Allen	Barton Willmore	Crest Nicholson South

Object

Additional text has been inserted into this policy regarding the Council's positive approach to the consideration of planning applications, reflecting the presumption in favour of sustainable development. The additional text states that 'in doing so, it will respond to opportunities to meet economic, environmental and social needs, each strand treated equally'.

We object to the insertion of the above wording as it does not reflect the balancing exercise required by the NPPF for decision taking. The proposed wording suggests that each of the three dimensions of sustainable development will not be weighted against each other in the decision making process. Therefore it would appear that regardless of the significance of the benefits of any given scheme, whether they are social, economic or environmental, these benefits would not be weighed in favour of the proposed development. This approach is in conflict with para 14 of the NPPF which requires decision makers to undertake a balancing exercise to determine whether any adverse impacts arising from the development proposals would "significantly and demonstrably" outweigh the benefits. The NPPF clearly provides for allowances to be made in circumstances where the benefits of a scheme 'outweigh' the harm.

This policy, as currently worded fails to meet the tests of soundness as set out in para 182 of the NPPF since it is not 'consistent with national policy' and therefore is not 'justified' nor 'effective'.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	15	Mr W Cobby	Turley	Countryside Properties

Support

Review has not been updated as part of the focused amendments exercise to the Pre-Submission Draft, though Countryside Properties support the reduced emphasis placed upon the Settlement Hierarchy as a result of the amendments under Policy DP1 – Sustainable Development in Mid Sussex.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	8	Mr A Ross	Nexus	Gleeson Developments Ltd

Object

We are wholly unclear as to the basis, or purpose, of the proposed change to Policy DP1.

The policy, as originally worded, cross-referred to NPPF paragraphs 14 and 15 and was unambiguous.

The inclusion of the proposed additional wording, the purpose of which is wholly unclear, means that on the one hand the policy refers to and relies upon the text in the NPPF but on the other, now includes text that is outwith the Framework. This creates wholly avoidable and unnecessary confusion, and unnecessarily extends an already lengthy policy. This is contrary to paragraph 154 of the Framework which requires that Local Plan policies are clear, and undermines the effectiveness of the policy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20327	4	Mr A Bateson	AB Planning & Development Ltd	Mr David Crowther

Object

Policy DP1 – After “...(paragraphs 14 and 15)” insert “particularly at the main settlements of Burgess Hill, Haywards Heath, East Grinstead and at Pease Pottage, where development should help to fully meet their objectively assessed housing needs”.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	7	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD

Support

We agree that the Council should remove reference to Policy DP6 (Settlement Hierarchy) in this policy. It is considered that the previous reference to the settlement hierarchy is considered to be overly restrictive to development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	7	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G

Support

We agree that the Council should remove reference to Policy DP6 (Settlement Hierarchy) in this policy. It is considered that the previous reference to the settlement hierarchy is considered to be overly restrictive to development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	8	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F

Support

We agree that the Council should remove reference to Policy DP6 (Settlement Hierarchy) in this policy. It is considered that the previous reference to the settlement hierarchy is considered to be overly restrictive to development.

Pre-Submission District Plan 2016 - Responses

DP2

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15308	6	Mr N Kerslake		

Object

A policy decision was taken between consultation on the November 2014 plan and March 2015 plan to delete any reference to jobs meeting the required economic growth. DP2 was changed from "to achieve the required level of economic growth" to "the total additional jobs required".

DP2 does talk in terms of Coast to Capital making significant investment in Burgess Hill to deliver new jobs, homes and employment space. The plan allocates 30ha to provide for the new industrial park called "the Hub" and a high quality science and technology park. There is thus an implied economic policy of making Burgess Hill a growing centre for industrial activity. That policy is not stated explicitly and there is nothing in policy DP2 relating to industrial development in East Grinstead or Haywards Heath.

The clear implication of paras 7, 9, 17, 19, 20 and 154 of the NPPF is that some sort of quantitative target, aim or identified increase in economic activity resulting from the policies and plans in the Local Plan should be identified within the plan. No such target, aim, or economic output resulting from the plan is discernable in the Pre Submission District Plan. The only reference to an economic forecast is in para 3.7 of the Pre Submission plans of March and June 2015 where it states that 'the plan aims to support an annual economic growth rate over its lifetime of 3%".

There is nothing to show that an economic vision or strategy exists for Mid Sussex. There is no strategy or vision for the component parts of business (offices, industry/factories, distribution/warehousing) and no strategy or vision for which the three main towns in Mid Sussex will be the main growth areas for each of the component parts of the 3 basic business types of activity.

The argument in the HEDNA suggesting housing supply is only one way of increasing the workforce and that other policy responses such as reducing the level of out-commuting or provision of new employment development can also have an influence is very debatable in terms of having a policy on these matters.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	7	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd

it is our view that that this estimation of the level of new jobs created as a result of the increased housing figure is incorrect.

The figure of 330 new jobs per year is therefore significantly lower than the figure required to provide for adequate economic growth in the District. The Council's November 2015 HEDNA report states that 695 dpa will provide only 210 new jobs per annum, this is significantly less than the figure of 330 set out in the focused amendments. The District Plan seeks to falsely restrict employment growth on the basis of an already flawed housing strategy. As such, the District Plan fails to meet both its employment and housing needs.

It is our view that the figures quoted within policy DP2 have been overestimated by the Council, and furthermore the figures, although overestimated, would not provide for adequate economic growth in the District.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	11	Mr E Fielding		

Object

Chapter 4 – DP2 the proposed Science and Technology Park is not accessible by train and has been located to be on the road network – what is MSDC doing to improve accessibility for all to this site? How for example will surrounding villages be linked to this site, by cycle route or is it only good for those who live in walking distance of the proposed site?

There is an increase in new jobs per year from 278 to 330 which is more than an 18% increase yet the land used for these jobs has not been increased. How does this fit?

There is no allowance for the identified “unmet employment land needs from neighbouring local authorities in the Gatwick Diamond and wider Coast to Capital LEP area is projected to be significant and there are evident economic and sustainability consequences if an insufficient supply of employment land and floorspace is not secured.” This can only lead to the economic and sustainability consequences forecast since MSDC have done nothing to mitigate or to take action to prevent this consequence, accordingly this plan is not just unsound but also damaging to the district.

Although the wording has changed to “provision for...” there is no new or additional sites identified so this is meaningless.

Does “small-scale economic development in the countryside” support home offices and other measures that reduce or remove the need to commute for employment?

When will MSDC consider allocating sites through a Site Allocation Development Plan Document since the shortfall is already evident? If this is not done DP2 cannot be considered to be either sound or robust.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	9	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.

Object

Looking at the growth forecasts for Mid Sussex itself, the PSDDP (Policy DP2 'Sustainable Economic Development') only made provision for 278 jobs per annum. This was well below how the baseline job growth requirements of 521 jobs per annum as set out in the Northern West Sussex Employment Growth Assessment (the EGA), which represents the Council's own evidence base. The Focused Amendments increase the projected employment growth to 330 jobs per annum – an increase of 19% - but still fail to accept the baseline growth from the evidence base.

There are at least three difficulties here:

- i. The NPPF expects plans to be positively prepared and to take opportunities for growth;
- ii. The underestimate of employment requirements feeds through into an underestimate of the housing necessary to provide for those requirements; and
- iii. No new land it proposed to meet even the increased employment forecasts that are accepted.

In common with the PSDDP, the Focused Amendments do not set out, or refer to, evidence showing that sufficient employment land is being allocated to meet the (now 19% higher) forecast job projection of 330 jobs per annum, not to mention the forecast baseline requirement of some 521 jobs per annum as in the EGA. The challenges in MMT's representations submitted in July 2015 still therefore stand.

The Focused Amendments do not propose any additional allocations of employment land beyond those allocated in the PSDDP, namely the allocation of 30 hectares of land as a high quality business park at Burgess Hill. Significantly, the HEDNA Update (para. 7.17) clearly states that this will not be possible without further employment land.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	11	Mr R Brass	GL Hearn	Anstone Development Limited

Object

In relation to Policy DP2: Sustainable Economic Development the economic evidence set out at Appendix A reinforces the need to provide at least 800 homes per annum within the District to meet its own housing need. (see full rep).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20523	1	Mr C Whelan	Glenbeigh Developments LTD	Dacorar (Southern) LTD

Neutral

DP2-the provision of the Solar Farm will feed the occupiers of The Hub Business Park opposite and thereby support the local community, it will;
 -protect, enhance, restore and utilise a natural and environmental asset
 -it will reflect the need to adapt to the impact of climate change

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	8	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD

Object

it is our view that that this estimation of the level of new jobs created as a result of the increased housing figure is incorrect.

The figure of 330 new jobs per year is therefore significantly lower than the figure required to provide for adequate economic growth in the District. The Council's November 2015 HEDNA report states that 695 dpa will provide only 210 new jobs per annum, this is significantly less than the figure of 330 set out in the focused amendments.

It is our view that the figures quoted within policy DP2 have been overestimated by the Council, and furthermore the figures, although overestimated, would not provide for adequate economic growth in the District.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	8	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G

Object

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It is our view that the figures quoted within policy DP2 have been overestimated by the Council, and furthermore the figures, although overestimated, would not provide for adequate economic growth in the District.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	9	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F

Object

It is our view that that this estimation of the level of new jobs created as a result of the increased housing figure is incorrect.

The figure of 330 new jobs per year is therefore significantly lower than the figure required to provide for adequate economic growth in the District. The Council's November 2015 HEDNA report states that 695 dpa will provide only 210 new jobs per annum, this is significantly less than the figure of 330 set out in the focused amendments.

It is our view that the figures quoted within policy DP2 have been overestimated by the Council, and furthermore the figures, although overestimated, would not provide for adequate economic growth in the District.

The Barton Willmore report states that the November 2015 HEDNA update considers Experian's 'Full Time Equivalent' (FTE) job forecast of 278 jobs per annum rather than 'workforce jobs' of 478 jobs per annum, the latter of which is a more robust measure. Furthermore, the more recent 2015 Experian forecasts (March and June) show significantly higher job growth than set out in the HEDNA report, it is therefore considered that a further adjustment to the OAN is therefore required to ensure an unconstrained approach to OAN to support economic growth.

The report states at paragraph 8.4 that "The Council's most recent economic assessment was undertaken in the Northern West Sussex Economic Growth Assessment (April 2014). The Economic Growth Assessment projects high job growth over the plan period (521 jobs), and the November 2015 HEDNA report confirms how this would require in excess of 1,000 dpa. Notwithstanding this the Council suggests an OAN of 695 dpa".

Pre-Submission District Plan 2016 - Responses

DP3

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16063	1	Mr G Mower	Burgess Hill Action Group	

Object

DP3. The change in shopping habits from the use of traditional retail space to the internet is accelerating exponentially and it is questionable whether there will be the need for additional retail floor space by the time the strategic housing development at Burgess Hill is complete.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	1	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc

Object

Policy DP3 – Town Centre Development Wates wishes to ensure that Policy DP3 is consistent with Policy DP9 in respect of securing adequate retail/ local centre provision without the necessity of sequential or impact tests.

Pre-Submission District Plan 2016 - Responses

DP5a

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
59	1	Mrs D Thomas	Bolney Parish Council	

Bolney Parish Council is in support of the increased housing numbers as shown in the plans.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
60	1	Mr S Cridland	Burgess Hill Town Council	

An increase in the housing provision figure from 650 - 800 new homes per year. The Town Council was content with this proposal as it did not result in more green space being taken for housing in and around Burgess Hill and therefore it was still in line with the Burgess Hill Neighbourhood Plan and the Burgess Hill Town Wide Strategy. The Town Council continued to support the development of 3,500 dwellings in the Northern Arc and the associated infrastructure, including that allocated for the town centre development, as detailed in the Burgess Hill Town Wide Strategy and Policies;

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
75	2	Mrs C Marsh	Turners Hill Parish Council	

The increase to the five year housing supply numbers is a positive step and should help to protect Mid Sussex from unwanted overdevelopment.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
87	1	Mr R Fraser	Brighton and Hove City Council	

The city council supports the revised OAN figure of 695dpa which, it is noted, now takes account of vacancies and market signals.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
119	2	Mrs J Dawe	Horsham District Council	

HDC welcome MSDC increasing their housing target to ensure that they meet their own calculated need as well as a contribution to the unmet need of other authorities.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
181	1	Mr J L Phillips	Tandridge District Council	

We are pleased to see that Mid Sussex have considered an amendment to their housing target to reflect market signals, but more importantly to assist in meeting unmet need from elsewhere.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	1	Mr J Stevens	Home Builders Federation Ltd	

We note that the Council has increased the housing requirement from 650 dpa to 800 dpa. This is made up of the OAN for Mid Sussex of 695 dpa and 105 dpa to contribute towards assisting Crawley and its unmet need of 5,000 dwellings.

The amendment is a positive one. It represents a material and positive change in contrast to the 650 dpa figure in the previous consultation. This change to the OAN in the local plan that goes a considerable way to addressing the HBF's concerns.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	6	Mr R Brass	GL Hearn	Anstone Development Limited

It is positive that the overall housing target for MSDC has increased from 650 dwellings per annum ("dpa") to 800 dpa. This means the overall housing target for the Plan period from 2014 to 2031 as set out in Policy DP5: Housing is 13,600 dwellings.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20151	1	Mr M Carpenter	Enplan	LAMBS

This overall increase in housing provision meets the objectively assessed needs of the district and includes a contribution (105 dpa) towards meeting the needs of neighbouring authorities' housing needs, principally Crawley, which is noted as being within the same housing market area (HMA) as Mid Sussex.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	1	Mr J Steele	Savills	Thakeham Homes

It is now recognised within Chapter 3 that Mid Sussex has the ability to both fully deliver its identified Objectively Assessed Need (OAN) and provide dwellings to support the unmet needs of neighbouring authorities. The increase in plan provision to 800 dwellings per annum (dpa) better reflects the emerging evidence base and unmet needs of Crawley Borough Council and the housing needs of Northern Mid Sussex.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20326	2	Mr C Beaver	Planning Sphere Ltd	Hassocks Golf Club

Support

We broadly welcome this change identifying a larger housing figure and the recognition that the District has the capacity to contribute to the unmet housing need of neighbouring authorities.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20329	1		RH & RW Clutton	Western Arc Consortium

The updated assessment of housing need and the commensurate increase in the total housing requirement represents a significant improvement on the previous version of the plan. We are particularly pleased to see the identification of a further strategic site to assist with part of Crawley's unmet housing need, which is clearly a positive step forward.

Pre-Submission District Plan 2016 - Responses

DP5b

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
61	3	Mrs A Jones	Cuckfield Parish Council	

The Parish Council has concerns about the 'last minute' increase in housing numbers to 800 per annum, a number which has risen again and again from a previous 525 per annum just a few years ago (a 50% increase!). We see this as a political requirement rather than responding to actual calculated housing need for the District and surrounds. The Towns and Parishes were told that the District Council had assembled and could demonstrate 'robust evidence' to justify the previous housing targets, yet this seems to be chicaned now in an attempt to satisfy outside factors. The District has never met the housing numbers currently proposed for a sustained length such as the Plan period and, even with commencement of the substantial Burgess Hill Northern Arc which may satisfy it for a couple of years, it is highly unlikely to be able to maintain this number long term. Which would still leave the District without a 5-year housing land supply and therefore at the ever-continuing mercy of speculative developers. This in turn leaves the area vulnerable with unplanned and considerable adverse effects on the environment, landscape and infrastructure.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
245	4	Ms G Kennedy	Lindfield Preservation Society	

The District Plan needs to identify a substantial number of sites for new housing. A general housing need cannot, however, be used to justify building in unsuitable locations. And no community should be sacrificed for the sake of making up a housing number.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	2	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD

Whilst the FA-PSDP and the SA both suggest that providing for anything over and above 800dpa is 'the 'tipping point' in sustainability terms between acceptability and unacceptability when weighing up whether positive impacts on social and economic objectives outweigh any negative impacts on environmental objectives.'¹ and that as such only 105dpa can be accommodate over and above the baseline figure of 695dpa to meet the unmet needs of adjacent authorities, the fact is MSDC's capacity to accommodate 800dpa(+) is a different matter to its assessment of what is its OAHN. The SA should be identifying the need and then assessing whether the authority have the capacity to accommodate it given the findings of the SHLAA etc. not determining the OAHN based upon their alleged capacity to accommodate it. The basis for the figure promoted in the FA-PSDP to address the unmet needs of adjacent authorities (105dpa) thus needs to be justified if the plan is to be seen to be positively prepared, effective and consistent with national policy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	5	Mr M Brown	CPRE - Mid Sussex	

A Plan that would commit the Council to see at least 800 new dwellings built every year would be an undeliverable Plan set up to fail. It is inevitable that, sooner rather than later, the Council would again find itself in default on meeting its target, with the consequential return to the current disastrous position where the local council has no significant control, and local people have no real say, over where and what type of development is to occur within Mid Sussex.

We submit that it is a responsibility of Council members, or failing them, of the Planning Inspectorate to ensure that such an inevitability is not pre-ordained.

Mid Sussex District lacks the environmental capacity to accommodate its own housing needs, yet alone to set an additional housing target aimed at assisting the overspill housing needs of Crawley BC or other adjacent authorities.

There is no objective justification for the proposition that Mid Sussex has sufficient suitable development land to accommodate part of the overspill housing needs of Crawley Borough Council (or any other neighbouring LPA) as well as Mid Sussex's own needs. That proposition is put forward now for the first time and flies in the face of its considered conclusions only 6 months ago that it only just had site capacity to meet Mid Sussex's own OAHN (as calculated at that time).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	4	Mr M Brown	CPRE - Mid Sussex	

With absolutely no new supporting justification at all, it provides an update to that appraisal which simply and conveniently substitutes 800 dpa in place of 650 dpa as being that sustainability tipping point. The credibility of the new Sustainability Appraisal vis a vis its latest proposals is not assisted by the frequency, rapidity and degree in which it changes them without supporting justification and having previously argued forcefully that its earlier conclusions were sound.

We note that the latest Sustainability Appraisal update admits that "Any housing provision over approximately 800dpa would require the development of every non-strategic size site within the SHLAA to be developed, or the development of more strategic size sites (of which there are limited suitable sites to choose from in the SHLAA)". Given the reality that not all SHLAA sites will be developed and the requirement for a 20% buffer of developable housing, this statement appears to evidence that an 800 dpa target is incompatible with NPPF para 47 even before the backlog is taken into account.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	3	Mr M Brown	CPRE - Mid Sussex	

MSDC has been panicked into this last minute proposal substantially to increase its housing target, but it has produced no robust evidence to justify this change and has failed to undertake a proper analysis of the implications of its proposals. The evidence actually is that the proposed changes are unsustainable, undeliverable and ineffective. The proposals are inconsistent with the National Planning Policy Framework (NPPF) and fail all the tests required of a sound Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15168	1	Mr B White	Cuckfield Society	
Object				
We do not understand how the District can sustainably absorb so many houses. 60% of the District's area is within either the High Weald AONB or South Downs National Park; it borders two areas on Ashdown Forest; nearly 16% of the land area is covered in ancient woodland; there are 50 Sites of Nature Conservation Importance within the District and 13 Sites of Special Scientific Interest.				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15308	8	Mr N Kerslake		
Object				
The markings in the sustainability appraisal are very subjective and constitute a series of pluses, minuses, zeros, and question marks. It is difficult not to conclude that when MSDC changed its housing provision from 650 to 800 that the sustainability report was not simply re-marked to support the higher housing provision figure. Certainly, MSDC have provided no rational explanation for the change in the markings between two sustainability reports published only just over 4 months apart.				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15521	2	Mr T Rumble	Woolf Bond Planning	Taylor Wimpey Strategic Land
Object				
We acknowledge the uplift in the overall housing requirement to 800 dwellings per annum over the plan period and the Council's commitment to producing a Site Allocations document. These are improvements to the emerging Plan. However we continue to object to the Plan as drafted.				
The addition of the word 'minimum' to the first sentence of Policy DP5 would enable a more flexible strategy, as would the wording 'A minimum' in front of the 1,730 figure. Such amendments would enable housing sites to come forward in due course to meet defined needs, if proved to be sustainable. This would accord with NPPF paragraph 47 that seeks to 'boost' the supply of housing.				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	4	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings
Object				
Within our representations submitted to the Pre Submission Plan we identified a number of issues regarding the Council's housing supply land supply assumptions. These included:				
<ul style="list-style-type: none"> ☑ The failure to plan positively; ☑ The strict application of constraints when assessing potential development sites, the majority of which would not preclude development; ☑ Methodological weaknesses with the SHLAA; ☑ The failure to acknowledge the full development potential of some towns and villages; ☑ Unrealistic assumptions relating to the full delivery of existing commitments; ☑ The approach taken to windfall development, which limits the potential source of housing supply to solely from within settlement boundaries; and ☑ The progress on Neighbourhood Plans. 				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	1	Mr R Shepherd	Barton Willmore	Hallam Land Management

Object

The Focused Amendments to the Draft District Plan identifies a requirement of 800 dwellings per annum in Policy DP5: Housing as its planned housing delivery figure. However, the plan suffers from a lack of a robust evidence base justifying such a requirement, using incorrect statistics and unjustified claims to justify this quantum of development, the basis of which are rooted in the Housing and Economic Development Needs Assessment (HEDNA) update document of November 2015.

The HEDNA document is what MSDC claim their SHMA to be. However the NPPF defines a SHMA to be a document that identifies the scale and mix of housing and that caters for housing demand and the scale of housing supply necessary to meet this demand (Paragraph 159). The Northern West Mid Sussex SHMA does not identify the amount of housing demand within Mid Sussex and so in place of this SHMA the Council has been reliant on the HEDNA document. All comments will be related to the HEDNA document, but it is to be noted that it is not considered to be an adequate replacement for the equally inadequate SHMA.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	8	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd

Object

it is our view that additional and alternative sites should be put forward for allocation. We note that the Council has quoted a figure of 500 units or more as a strategic allocation, however, it is our view that this figure is too high and that sites of 200 or more should be considered strategic sites.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16412	1	Dr I Gibson		

Object

The various drafts of the Mid Sussex District Plan have seen a significant increase in the estimated number of new housing units per year, from 530 in 2013 to 800 in the latest draft plan. The strategic planning for the delivery of these increased numbers is insufficient and will inevitably result in increased pressure on the villages and hamlets in the district which will be to the detriment of the local communities concerned and contrary to the overall vision for the District which the Plan seeks to deliver.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	31	Mr E Fielding		

Hardriding Farm is shown to have approx. 500 dwellings on Strategic Site Options – SHLAA ref:#666 in the table detailing the Distribution of Development – Broad Locations for Strategic Development – Strategic site options yet in all other references it is to be for approximately 600 dwellings so which is it 500 or 600? This inconsistency is poor and shows little connection between documents and those drafting them and no proof reading the resultant pile. What other inconsistent numbers are there lurking to make the plan even less sound or robust.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	4	Mr E Fielding		

Within the previous Housing and Economic Development Needs Assessment (HEDNA) February 2015 page 14 paragraph 4.17 “..the Sustainability Appraisal demonstrates that a level of housing provision over 700dpa should be ruled out on sustainability grounds” yet as if by magic the District can now accommodate 800 homes dpa how can this considered sustainable if there is no change to the methodology? How has the tipping point, where the negative environmental effects are considered to great increased by 100 with no explanation – this is a 14.3% increase which can only be classified as significant.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	32	Mr E Fielding		

From the summary of Site proposals – how have sites been ranked for example the site Land North of Cuckfield Bypass (Cuckfield) G, SHLAA ref #240 appears to be less harmful than Hardriding Farm M, SHLAA ref #666.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	8	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.

The New Market Town Option continues to be assessed on the basis of new housing being delivered by a New Market Town only. MSDC continue to fail to assess an option that involves a mix of some smaller sites, urban extensions and a New Market Town. No justification has been provided as to why such an option continues to not be appropriately considered by MSDC. Despite MMT making a number of representations on this matter.

It is also evident that the scoring of a New Market Town, and the specific MMT proposal, in the updated SA does not adequately take into account the real and unique opportunities that a New Market Town could deliver in terms of sustainability.

The SA concludes that options proposing over 800 dpa should be ruled out as the impact on environmental objectives are not outweighed by potential positive impacts on social objectives. Rather than asserting this conclusion, the NPPF requires the council to demonstrate that it is so. In addition, the assessment fails to start from the position that there are significant unmet needs, so that it applies the wrong test or balance. The delivery of 800 dpa would fail to fully meet the OAN of the District let alone any of the significant unmet need of neighbouring authorities.

In concluding that the delivery 800 dpa is the tipping point when the benefits are outweighed by the adverse impacts in terms of traffic and the environment, no robust justification has been provided to support such a position. The SA makes reference to the ‘Sustainability Assessment of Cross Boundary Options’ (February 2015) in suggesting that 780 dpa would be a ‘reasonable assumption’ for distinguishing between minor and significant effects. This figure of 780 dpa, however, is simply based on a 50% increase in housing above that proposed in the 2013 Submission District Plan (10,600 dwellings) – it is not based on the outcome of a robust environmental assessment. It is apparent that there is no robust justification in reaching this position. The Cross Boundary Study (para. 5.3) highlights that “at the strategic scale it is difficult to be precise about where the threshold lies between a minor effect and significant effect.”

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	2	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.

The HEDNA Update (November 2015) is not considered to represent full OAN and fails to meet the requirements of the NPPF and the PPG in a number of important respects. In particular:

- I. The use of housing requirement projections based on the district rather than the wider HMA is wholly inconsistent with the PPG and Paragraph 159 of the NPPF;
- II. The HEDNA Update gives no serious consideration of the scale of unmet housing need in neighbouring authorities, including the overlapping HMA of Brighton & Hove, or unmet needs from the south coast authorities generally, or from London, directly contrary to Paragraph 182 of the NPPF and the clear guidance of the PPG;
- III. The HEDNA Update incorporates the 2012-based household projections, but no proper consideration is given to the need to address household suppression issues inherent within the 2012-based series, contrary to the requirements of the PPG;
- IV. Given the scale of unaffordability and historic under-delivery in the district, a market signals adjustment of 20% would be justified in accordance with the PPG;
- V. The OAN is constrained in the context of the job growth presented in the HEDNA update. This approach does not comply with ID2a of the PPG which states how unconstrained forecasts and/or past trends should inform an uplift for accommodating economic growth as part of OAN. In particular, the Council's own evidence base (the Northern West Sussex Economic Growth Assessment (April 2014) projects job growth over the Plan period totaling 521 jobs per annum, and the HEDNA Update report confirms how job growth of 556 per annum would require in excess of 1,000 dpa.

Critically, the failure to plan for sufficient growth follows a long period of housing underdelivery – since 2006 housing delivery in Mid Sussex has been 43% below even the requirements of the previous South East Plan for the District¹. Linked to this, affordability issues are severe within Mid Sussex, with the ratio of earnings to house prices (10.20) well above the average for Sussex (8.80) and England (6.45). A step change in delivery is long overdue, based on a plan which recognizes the expectations of the NPPF. The council's proposals would exacerbate housing shortages, worsen affordability and inhibit the fulfilment of the area's economic potential.

It remains MMT's strong belief that the housing needs of the District continue to be underestimated by MSDC. As a result of underestimating future needs, the Focused Amendments have been advanced based on inadequate evidence and, critically, the appraisal of strategic options is flawed. With the scale of unmet need there is no justification for not applying the approach set out in paragraph 14 of the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	4	Ms H Allen	Barton Willmore	Crest Nicholson South

As set out in detail in our previous representations (July 2015) it is not considered that MSDC has identified its full OAN in accordance with the NPPF. This matter has not been addressed as part of the Focused Amendments and it is considered that MSDC's OAN will be significantly in excess of the current proposed target of 695dpa.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	7	Mr W Cobley	Turley	Countryside Properties

The SA accompanying the Pre-submission Plan references the Sustainability Assessment of Cross-Boundary Options (February 2015) which supposedly sets a tipping point of 800dpa beyond which negative environmental impacts are likely. However, we have been unable to find reference to this 'tipping point' in the Options report, and would question the validity of this threshold. In such circumstances, and until the figure is properly qualified, the view is held that the additional housing from neighbouring authorities could be met in Mid-Sussex, and the 800dpa threshold limit should not be applied.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	9	Mr W Cobley	Turley	Countryside Properties

The housing requirement figures lack flexibility and should be expressed as a minimum to allow the Plan to respond to changing circumstances over the life of the plan.

Whilst the Plan explains the mechanisms for delivering this residual requirement, it does not specify the location or distribution. The absence of this information is likely to lead to uncertainty over the delivery of housing through Neighbourhood Plans. To avoid this scenario it is suggested that Policy DP5 is amended to disaggregate the residual requirement across specific settlements. This will provide greater certainty in terms of the minimum quantum of housing expected in each area. It would also provide clear housing targets for future Neighbourhood Plans and ensure their conformity with the higher-order Local Plan.

We consider that policy DP5: Housing is unsound on the following basis: flaws within the evidence base that underpin it, a lack of flexibility in the housing requirement, and uncertainty surrounding the location of the housing 'elsewhere' in the district and the possible inability of the Neighbourhood Plans to meet the residual requirement set out in DP5.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	10	Mr A Ross	Nexus	Gleeson Developments Ltd

As referenced elsewhere in our representations, the housing requirement should continue to be expressed as a minimum. The current approach, which places a cap on development, is wholly inconsistent with the policies of the Framework which seek to boost significantly the supply of housing and apply a general presumption in favour of sustainable development.

We are wholly unclear why the Council is proposing to delete the reference to its HEDNA as an evidence base document providing guidance to Parish and Town Councils in determining housing need for Neighbourhood Plans. As set out elsewhere in our representations, we consider that the District Plan, if it is going to defer housing to NP's at all (and we think that it should defer far less), should provide much clearer guidance on the levels of housing to be provided, having regard to the identified settlement hierarchy and the need to deliver a sustainable pattern of development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20326	1	Mr C Beaver	Planning Sphere Ltd	Hassocks Golf Club

Object

We welcome the identification of a slightly larger palette of sites for Mid Sussex to meet address the districts housing needs including the recognition of unmet need in neighbouring authorities. Likewise we can see that the introduction of a strategic site to the east of Pease Pottage would help increase the flexibility of the Plan particularly with respect to demonstrating a five year housing land supply. However, the Plan remains strongly focussed on a number of large sites where delivery timescales are far from certain. Furthermore, the Plan should be far more directive in allocating housing targets to lower tier settlements to ensure the early delivery of sites in these locations through neighbourhood plans. Given this, we do not consider that the Plan is sufficiently flexible to ensure a 5 year housing land supply and are original comments on the pre-submission draft with respect to Policy DP5 still stand.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20373	1	Miss K Waldron	Urbanissta	

Redrow has concerns with the methodology underpinning the housing requirement set within policy DP5 and considers that the proposed provision is insufficient and not fully justified or positively prepared.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20390	1	Mr M Richardson	Persimmon Homes (Thames Valley)	

We support the identification of an increased housing delivery within the District, however, we believe that this does not go far enough and therefore remains unsound.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20521	5	Ms H Richardson	Batchellor Monkhouse	Mr R Penman

We would also question whether there is still too great an emphasis on environmental sustainability compared to social and economic sustainability within the District. Other authorities nearby have taken a greater level of housing from neighbouring authorities, for example Horsham has set out 150 units a year to contribute towards Crawley's unmet need, however it is appreciated that each authority has their own constraints.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20524	2	Mr O Harwood	RH & RW Clutton	East Grinstead Tenants Limited - Halsford E

With regards to the need to significantly boost housing supply, we note that the latest amendments propose to increase the housing requirement from 650 dpa to 800 dpa. This is a positive and proactive step, and significantly improves the housing proposition of the District Plan.

It does not however, represent a significant boost in housing supply for the District, and indeed continues to represent a decline when measured against the former South East Plan target of 855 dwellings per annum. It is disappointing that the Council has not taken the opportunity to plan more positively to genuinely boost housing supply in the District.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20530	2	Mr N Greenhalgh	Village Developments Strategic Land LTD	Tim North and Associates

The revised housing land requirement of 800 dpa forming part of Policy DP5 should have triggered the start of a range of alternative scenarios to meet increased housing needs, without relying on a further strategic housing site in an unsustainable location forming part of the High Weald AONB.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	15	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F

Policy DP5: Housing sets out the Council's strategic objectives for housing delivery within the Plan Period. It also sets out how this will be delivered through existing completions, commitments, strategic allocations and neighbourhood plans. We have reviewed the evidence underpinning Policy DP5 and find it to be wholly unsound. It fails to meet any of the 4 tests requires in paragraph 182 of the NPPF.

Pre-Submission District Plan 2016 - Responses

DP5c

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	1	Mr M Brown	CPRE - Mid Sussex	

the NPPF accepts in para 14 that an LPA's OAHN need not be met in full where "any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole". In the context of NPPF par 47, meeting or exceeding Mid Sussex's OAHN would not be sound or consistent with the NPPF policies if forcing it to do so would result in the NPPF's countryside and designated area protection policies being overridden and in unachievable, unsustainable development requirements being imposed. MSDC has not heeded this aspect of the NPPF's requirements.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15175	2	Mr T Slaney	South Downs National Park Authority	

The SDNPA notes that Mid Sussex has previously confirmed that the figure for the objectively assessed housing need for Mid Sussex includes the communities within the National Park. It is assumed that this has continued through the update to the OAN and that their very low level of needs will be met alongside those of the planning authority area of Mid Sussex. Conversely it is assumed that any new homes built within this part of the National Park will in a very small way contribute towards meeting the objectively assessed needs of Mid Sussex District.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15308	1	Mr N Kerslake		

Each of the 3 Census returns were carried out in very different economic circumstances to one another and those changes in the economy over a ten year period could also lead to increase in vacancy rates in each of the intervening 10 year periods. To use the latest Census 2011, and to the decimal point, as an indicator of what might be reasonable to use for the next 17 years in in my view mathematically and statistically unreliable. In my view, round up this vacancy rate to 3% to account for uncertainty in any changes to the vacancy rate over the plan period. This is what Horsham did.

On the basis of my arguments above the number of homes accounting for vacancy should be 20 homes per annum not 15.

It should be noted that chosing to increase its OAN for affordability/market signals for a single age cohort (20-34) MSDC is going against the HEDNA of June 2015 where it said adjusting for market signals was not justified as even a large increase would only have a small impact on affordability. Now MSDC are claiming a small increase will improve that cohort's chances of affording a home in Mid Sussex.

The HEDNA evidence in para 5.13 and Table 13 do not show a mixed picture either in terms of the reduction in the percentage of owned/shared ownership between every single age band cohort pre and post recession, or in the percentage of those renting. It shows every cohort bar 65-74 seeing a significant decline in home ownership when comparing pre and post recession. It is inappropriate to make an adjustment for one age cohort, it should be applied across the board.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15521	3	Mr T Rumble	Woolf Bond Planning	Taylor Wimpey Strategic Land

Object

Overall average house price, the changes in affordability over the period 1997 to 2012 and rental price changes were the three main factors the Eastleigh Inspector referred to in determining a need for a 10% uplift to account for market signals in that case.

Tables 1 and 2 confirm that house price affordability in Mid Sussex has declined significantly over the period 1997 to 2013. More critically it has declined more sharply than the averages within the County over the same period. In respect of median house prices it is the third worst performing authority out of the seven in West Sussex, whilst in terms of the lower quartile it is the worst performing authority.

Table 3 then indicates that average monthly rents in the private sector have also increased significantly above the County average over the longest term period available and Mid Sussex is the second worst performing authority in this respect. Finally, Table 4 confirms that median sale prices are the second highest in the County.

The above evidence considers Mid Sussex against all the crucial indicators referred to by the Eastleigh Inspector and confirms that in all respects Mid Sussex is a poorly performing authority. In all the tables, the Council is demonstrated to exceed the County average. For these reasons, there is no justification for the Council's change in approach in respect of market signals and a minimum 10% uplift should be applied to the OAN (as required at Eastleigh). This results in an overall base requirement of 738 dwellings per annum.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	3	Mr J Stevens	Home Builders Federation Ltd	

The HBF is also strongly supportive of the Council's use of the DCLG 2012-Household Projections as the demographic starting point. The HBF is very concerned that many other authorities in the wider south east are favouring alternative scenarios based on lower net migration. This does not seem credible in our view owing the nature of the housing problems in London and the Mayor of London's own migration assumptions.

The HBF notes and supports the adjustment to convert the household projection into dwellings. This uses a figure of 2.3% based on the 2011 Census (see Table 10 of the HEDNA update report, November 2015).

The HBF had recommended a larger adjustment of 20% or 135 additional dwellings per year compared to the figure of 24 dpa used by the Council. This was to be added to the baseline demographic figure which we note that the Council has calculated as being 671 dpa (adjusted for vacancies by adding 2.3%). We argued that a 20% uplift on the demographic projection was justified in order to account for a combination of poor affordability, the housing backlog (under-delivery against the previous plan) and higher net migration from London and Brighton as a consequence of the large undersupplies in these locations.

In terms of the affordability ratio the council acknowledges that this is higher than elsewhere including West Sussex and England as a whole, but then says that this ratio is not exceptional for comparable areas. The debate about 'comparable areas' is one the HBF often has with local authorities. They will argue that because the deterioration in affordability in their district isn't as bad as somewhere else, no upward adjustment is necessary: 'it's as bad here as elsewhere so we're not obliged to do anything'. The argument is similar to the one above – that the growing unaffordability of housing is a national issue, not something that Mid Sussex can address by acting on its own.

We think that the Council is trying to evade its responsibilities. The NPPG does say that "a worsening trend in any of these area will require upward adjustment" to the household projections (NPPG, ID 2a-020).

The Government expects all local authorities to play their part in 'boosting significantly' housing supply to improve 'housing affordability' (NPPF, paragraph 17). A trend based projection would merely carry forward the existing trend. For Mid Sussex the trend is one of growing unaffordability.

An increase is justified and it needs to be much bigger than the 24 dpa proposed. The 24 dpa advocated by the Council in its HEDNA November 2015 report represents just a 3.7% increase. This is negligible and it is hard to understand how such a small increase would help improve affordability or with the relief of household suppression among the young (see paragraph 5.23 of the HEDNA).

We consider that the increase should be 20% on the baseline demographic need of 671 dpa. This would add 134 dpa to the annual need, resulting in an OAN of 805 dpa for Mid Sussex.

At least Mid Sussex is using the 2012 household projections. This is welcome. The HEDNA of November 2015 in Table 7 compares the more recent household projections. The 2008-based projection is broadly similar to the 2012 projection. This is why we welcome the decision of Mid Sussex to use the 2012 household projections as its starting point.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	2	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)

As per previous representations, the starting point estimate for Objectively Assessed Need (OAN) should be at least 673 dpa after making an appropriate allowance for vacancy rates and second homes. Although we acknowledge that this broadly aligns with the Council's newly proposed starting point of 671 dpa. However, the current proposed OAN draft target of 695 dpa is still considered to be too low because of the Council's approach to market signals.

The updated 'Housing and Economic Development Needs Assessment, February 2015' (HEDNA) reinstates a market signals uplift, but this is at just 3%. However, this is still contrary to the original HEDNA report (February 2015) which considered it necessary to provide a 10% uplift.

An uplift of at least 10% (67 dpa) is still considered necessary specifically to address the issues of affordability, an approach substantiated through the original HEDNA Report. The Council's uplift of just 3% (24dpa) will not address these issues and appears to have been influenced by Horsham District Council's approach rather than by the Council's own evidence base.

On this basis a starting OAN figure should be 740dpa.

Job Growth

As set out in our original representations, the then and current OAN figure has been artificially constrained by the Council. If the full job growth is to be realised (521jobs),as set out in the Council's 'Economic Growth Assessment', this would result in an OAN figure of at 1,014 dpa. This is acknowledged by the Council's latest HEDNA (November 2015), at Table 20 and para 7.8.

On this basis, an OAN figure of 1,014 dpa should be considered as the full OAN, notwithstanding the need to address other wider strategic matters as detailed further below.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	8	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings

New National Population Projections show an increase on those aligned to the 2012 Sub National Population Projections on which the HEDNA is founded. As a minimum, this is suggesting a front-loading of population growth, and it holds the potential that projections are already being shown to be a substantial underestimate. On this basis a policy response to increase early delivery of housing should be prioritised, coupled with a very robust monitoring mechanism to ensure if this trend is established there is a clear route to increasing housing supply.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	2	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings

As indicated within the HEDNA Update, observed population growth is considerably above that projected. Data nationally and locally both suggests higher levels of population growth than projected. New National Population Projections show an increase on those aligned to the 2012 Sub National Population Projections, on which the HEDNA Update is founded. At the very least, this evidence suggests that there is a need to front load population growth, and at worst, the projections show a substantial underestimation.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	2	Mr R Shepherd	Barton Willmore	Hallam Land Management

Object

It is worth noting that the CLG household formation rates that underpin the CLG projections are also conservative, as the 2012 figures assume a suppression of the 25-34 and 35-44 age groups. The 2008 figures on the other hand have a higher household formation rate for these groups as they are based upon pre-recessionary trends. Rather than seeking to apply the bare minimum requirements at each stage, no doubt so as to suppress the housing requirement, it is these higher household formation rates that should be used in the calculation of the OAN for Mid Sussex.

The HEDNA figure also suffers due to it being based on an incorrect 3% market uplift as well as out of date job forecasts. This market uplift is considered to be too low in the face of worsening market signals and therefore a minimum 10% uplift (as in the February 2015 HEDNA) should be applied so as to encourage more positive planning.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	2	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd

Object

The Council correctly identifies that the PPG states that the most recent district level household projections published by the Department for Communities and Local Government should provide the 'starting point' for the estimate of the Districts overall housing need. However, the Council is incorrect in its statement that the District has a housing need of 656 homes per year. The figure of 656 is actually the household growth figure and not the District's housing need figure.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	4	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd

As raised in our response in July, the OAN is based on CLG projections from 2012. As such the OAN is set from 2012 and it will be necessary to calculate and address any shortfall in the first five years of the plan period.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	4	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group

CLG Live Tables show 59,000 homes in 2014 and 71,000 in 2031. This identified a change in households of 12,000 between 2014 and 2031, which equates to 706 per annum. Therefore the starting figures currently selected by the council do not reflect this baseline and are therefore unsound. There may also be other factors (housing market, economic considerations etc.) that we have not assessed which mean that this may need to be increased. The council have not stated as to why they have chosen to ignore this baseline figure and provide no justification in this regard.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	7	Mr R Brass	GL Hearn	Anstone Development Limited

The 2016 Housing Needs Assessment (GLH Development Economics and Justin Gardner Consulting) set out at Appendix A broadly supports the District housing target of 800 dpa. However this technical report includes a calculation of objectively assessed need (“OAN”) for MSDC and demonstrates that there is need for 674 to 858 dpa. Overall, it concludes that a reasonable demographic-based assessment of housing need would be for 807 dpa. Therefore it is recommended that there is robust justification to further increase the District housing target.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	5	Ms H Allen	Barton Willmore	Crest Nicholson South

MSDC has failed to address the following factors:

- A sensitivity analysis of the 2012-based household projections
- The 'Housing and Economic Development Needs Assessment - Update' (November 2015) applies an uplift of circa 3% (24dpa) for market signals. However the previous February HEDNA considered at least 10% to be appropriate. An uplift of 10% is considered necessary in accordance with recent appeal decisions
- The current backlog should be addressed in the first 5 years of the plan period
- Full economic job growth and affordable housing need should be applied.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	3	Mr M Evans	Gladman	

Firstly, within the introduction in paragraph 1.8 it is stated that the maximum number of units the district can provide is 800 per annum. We set out in our July 2015 representation why we believe this assumption is flawed, we maintain concern therefore that this ceiling figure has permeated decision making with respect to OAN, particularly in the assessment of the issues influencing the surrounding housing market area (HMA).

In terms of market signals the council has now included a modest uplift of some 24 dwellings per annum. This is wholly inadequate in addressing the chronic problems with housing affordability in Mid Sussex. The current proposed uplift set out within the HEDNA is merely paying lip service to the criteria set within the PPG. It will in no way respond to the very real issue of unaffordability in the district, by 2013 the lower quartile earnings to lower quartile house price had reached 10.20, in 1997 this ratio was just 4.4 1 the situation will inevitably have seen further worsening in the past two years given the level of house price growth in Mid Sussex. The Council appear to be attempting to justify their figure by claiming that all surrounding authorities have similar issues and that therefore their uplift of just 24 units is adequate. We wholly reject this position. At the recent Canterbury examination the Council have applied an uplift of 20%, the market signals in Canterbury, whilst significant are not as severe as those experienced in Mid Sussex.

Gladman are therefore of the view that local planning authorities must take a long term view when considering affordability and consider the relative and absolute change over a long term 15-20 year period, which coincides with the normal time span of a Local Plan. Authorities should assess, as a constituent part of their OAN, how they can improve affordability over the life time of a plan to a point where affordability is more in line with average earnings and affordable mortgage lending rates. They should assess a level of housing over the 15-20 year plan period which would enable this step change and consider its deliverability in the plan. Only through planning for significant housing growth can local authorities realistically tackle market signals in the way advocated by the PPG and tackle the affordability and housing crisis.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	3	Mr W Cobley	Turley	Countryside Properties

The Council has followed a non-housing market area approach, which we consider will not have been able to fully account for the functional links between the authorities that constitute the housing market, and is therefore deficient in this respect, and contrary to the approach advised in the NPPF and NPG.

However, as the household projections applied in the HEDA modelling have not taken into account the underestimate in the population projections, there is a concern that this will in effect have artificially deflated the housing requirement figure in the Pre-submission Plan (as amended through the Focussed Amendments).

The approach taken in the HEDNA (March 2015), applies an uplift of 10% on top of the baseline OAN (paragraph 7.6), which we consider to be contrary to the advice within the PPG. If this approach is appropriate, then the 10% uplift should be applied to the baseline figure in the Update HEDNA (July 2015).

It is welcomed that the Focussed Amendments consultation document proposes an uplift of 2.3% (15dpa) to the OAN in response to vacancies. A further uplift to account for market signals (24dpa) in response to comments by the Planning Inspector examining the Crawley Local Plan, and to improve affordability for younger age groups. However, concerns remain that the uplift applied has not been fully justified in the evidence underpinning the Plan (and could be higher than what is proposed). Furthermore, it is also unclear whether the percentage uplifts cited above have been applied to the baseline figures set out in the Updated HEDNA (July 2015).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	7	Mr A Ross	Nexus	Gleeson Developments Ltd

We note from the revisions to paragraph 3.12 of the District Plan that as part of the revised OAN figure of 695dpa, the Council proposes an uplift of only 24dpa from the baseline demographic projections (an uplift from 671dpa to 695dpa) as a response to market signals / the need to improve affordability.

Paragraph ID2a-020 of the PPG confirms that a worsening trend in any of the identified indicators (including affordability) will require upward adjustment and, importantly, that any such upward adjustment should be 'reasonable' - the larger the improvement in affordability that is required, the larger the additional supply response should be. This matter is considered in more detail our original representations but as a point of principle, the Council has identified an issue of worsening affordability and therefore confirmed that an uplift is required. We wholly agree with this conclusion. However the Council's response is to increase the requirement above the baseline demographic projections by just 3.5% - by 24dpa. It is evident that this extremely limited supply response will do nothing to materially address the issue identified by the Council itself i.e. worsening affordability. As such the Council's uplift cannot be considered reasonable in these circumstances and is, therefore, contrary to the relevant provisions of the PPG.

However for reasons set out in detail in our original representations (Policy DP5 in particular), we object to the Council's approach which seeks:

- i. in effect, to depress its own OAN in order to then allow the Council to suggest that it is providing for some unmet needs from elsewhere in the HMA, whilst limiting the overall housing requirement in Mid Sussex to 800dpa; and
- ii. to focus solely on some of the unmet needs from Crawley (which are of course important and should be addressed) but fails wholly to make any provision for unmet housing needs from Brighton and Hove – unmet needs which are significant and which would in theory warrant additional housing provision in the southern part of the District i.e. closest to where the unmet needs from Brighton and Hove are being generated.

Whilst we support the proposed increase in housing provision when compared to the Proposed Submission District Plan we object to the revised housing requirement which remains unsound as it is still significantly and unjustifiably below any reasonable calculation of OAN.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20327	5	Mr A Bateson	AB Planning & Development Ltd	Mr David Crowther

Policy DP5 – In order to fully meet the District’s housing needs and comply with NPPF guidance, the policy should: positively plan for the total of 1,730 new dwellings still needing to be accommodated on unidentified sites. In particular at Haywards Heath, the Plan should enable the full objectively assessed need for 2,200 new houses to be provided, rather than the 1,400 currently proposed in the draft Haywards Heath Neighbourhood Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20329	2		RH & RW Clutton	Western Arc Consortium

We remain of the view however, that the proposed housing numbers continue to be insufficient in quantum and scale to deliver the required housing to address the needs of the District, as well as the wider unmet need of neighbouring authorities. Further, the provision for market signals, though slightly improved, continues to be far too low and threatens to exacerbate affordability issues facing the District.

The household projection-based estimate of housing have been partially adjusted to reflect factors affecting local demography and household formation rates which are not captured in past trends.

However formation rates have been suppressed historically by under-supply and worsening affordability of housing. We advise that Mid Sussex should therefore reflect the consequences of past under delivery of housing in the proposed revision of HEDNA, as current household projections do not reflect unmet housing need.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20373	2	Miss K Waldron	Urbanissta	

Whilst the Housing and economic development needs Assessment (February 2015, updated November 2015) methodology used by Mid Sussex is based on these up to date projections, there is no assessment of economic scenarios and job creation. The Council have not fully assessed the housing requirement within the District including household suppression and affordability. As such the housing supply figure is considered insufficient and not fully justified.

The second phase of population projections have been released by CLG in December 2015. The projections show that the age groups below 44 will decrease over the plan period, suggesting that these households are being suppressed. Again, an assessment of economic scenarios would be needed to show the impact of these decreasing age groups is required and that the housing figure would need to be uplifted to provide the much needed houses for these age groups.

Whilst the District has adjusted the OAN by 24 dwellings to take into account market signals, the HBF have argued that a larger adjustment of 20% or 135 dwellings should be applied in order to account for a combination of poor affordability, the housing backlog (under-delivery against the previous plan) and higher net migration from London.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20390	3	Mr M Richardson	Persimmon Homes (Thames Valley)	

We support the Council's use of the DCLG 2012-Household Projections as the demographic starting point and indeed the comments made by the HBF within their representations in this regard. However, we are concerned that the revised OAN for Mid Sussex is not as high and therefore as robust as it should be. An adjustment has been made for market signals, however, we believe that a larger uplift on the demographic projection is justified in order to account for a combination of poor affordability (the Northern West Sussex HMA- Affordable Housing Needs Update October 2014 confirms that "the current and longer-term trend identified is one of rising unaffordability for entry-level housing (lower quartile prices to household incomes) in all three Northern West Sussex local authorities and the current purchase affordability pressures with ratios at circa ... 10:1 in Mid Sussex."); the housing backlog and housing supply pressures from London, South Downs, Adur and Brighton & Hove etc as a consequence of the large undersupplies in these locations (see later comments).

The Government expects all local authorities to play their part in 'boosting significantly' housing supply to improve 'housing affordability' (NPPF, paragraph 17). A trend based projection would merely carry forward the existing trend. For Mid Sussex the trend is one of growing unaffordability as identified by the council themselves above.

An increase for market signals is therefore entirely justifiable and it is difficult to see, taking into account all of the comments above whether the 24 dpa proposed is sufficient.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20506	3	Mr J Bailey	WYG	Traylen Enterprises Ltd

The Home Builders Federation (HBF) recommends that 10% should be added for market signals from London and Brighton and another 10% should be added for the backlog from London and Brighton. Therefore, the councils OAN figure should be (675 + 135) 810 dpa. This is an increase of 115 dwellings compared to the council's figure of 695 dpa.

The council states that the maximum development figure of 800 dpa, less the OAN figure of 695 dpa, means that the council can accommodate 105 dpa to meet the needs of Crawley. However, no mention is made of the unmet needs of other adjoining Districts or the likely migration to the District from London and Brighton. We consider that the total housing provision should be 915 dpa, which is made up of 810 dpa for OAN and 105 dpa to meet the needs of Crawley. Potentially, it should be even higher to meet the unmet needs of London, Brighton and other Districts.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20521	1	Ms H Richardson	Batchellor Monkhouse	Mr R Penman

We would support the increase of units to 695 in response to market signals requiring an increase in the OAN. The HEDNA sets out that an increase is justified given the lack of affordability for younger age groups and this increase is considered a more realistic requirement than the previous figure. This does however still only represent a 3.7% increase, which is still low compared to other authorities.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20524	4	Mr O Harwood	RH & RW Clutton	East Grinstead Tenants Limited - Halsford E

The household projection-based estimate of housing have been partially adjusted to reflect factors affecting local demography and household formation rates which are not captured in past trends.

However formation rates have been suppressed historically by under-supply and worsening affordability of housing. We advise that Mid Sussex should therefore reflect the consequences of past under delivery of housing in the proposed revision of HEDNA, as current household projections do not reflect unmet housing need.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20527	1	Ms L Goodyear	Terence O Rourke	Gleeson

First, it is worth noting that part of the reason the Council has resisted a more appropriate (and justifiable) uplift to the OAN, specifically to address market signals and affordability issues, is because such an uplift would result in a fiveyear housing land supply shortfall (HEDNA update paragraph 4.23). Of course this approach is inconsistent with the NPPF and the answer would be to plan positively through the introduction of more allocations.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	3	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD

The figure of 656 is actually the household growth figure and not the District's housing need figure.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	9	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD

We are pleased to note that the Council have increased the housing provision figure from 11,050 to 13,600 over the plan period, however, it is our view that this increase does not fully address the full objectively assessed needs of the District or the wider housing market area.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20530	4	Mr N Greenhalgh	Village Developments Strategic Land LTD	Tim North and Associates

The District housing requirement set out in Policy DP5 for 13600 homes between 2014 and 2031 has not been devised to any meaningful extent which has taken account of market signals, having regard to the highest median prices for most property types and affordability issues affecting all age cohorts. A figure of 24 dwellings per annum is only a partial response to the issue of housing affordability directed at those under 34 years old, in a district which has experienced house price appreciation continuously in the past 10 years, and an affordability ratio higher than that experienced in West Sussex and England as a whole. The original HEDNA considered an uplift of 10% on top of the assessed housing need figure, which it was said "would represent a reasonable response to market signals ..." The response in the Focused Amendments to market signals is by any standard pauly and it is argued that a 10% increase as a minimum should be applied to the base demographic need incorporating an adjustment from households to dwellings (671 homes).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	9	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G

We are pleased to note that the Council have increased the housing provision figure from 11,050 to 13,600 over the plan period, however, it is our view that this increase does not fully address the full objectively assessed needs of the District or the wider housing market area.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	3	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G

The figure of 656 is actually the household growth figure and not the District's housing need figure.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	4	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F

Wellbeck Strategic Land have commissioned Barton Willmore to produce a Report on the Full Objective Assessment of Housing Need for Mid Sussex District & Housing Market Area. This report is submitted in evidence of the site specific representations made by DMH Stallard on behalf of Wellbeck Strategic Land. This report correctly identifies that the figure of 656 is actually the household growth figure and not the District's housing need figure.

The Barton Willmore report has undertaken an assessment of this 'starting point', the report advises that to reach a figure for housing need from the household growth figure, an adjustment for vacant and second homes rates needs to be applied. The November 2015 HEDNA report states that an adjustment of 2.3% has been added which results in a dwelling requirement of 671 dpa. The analysis undertaken by Barton Willmore in this report concludes that a slightly higher vacancy rate (2.6%) should be applied, and that this would result in a starting point estimate of 673 dpa.

The analysis contained within the Barton Willmore report also advises that the 'starting point' estimate of need is considered to be a conservative projection due to the concerns raised in the report regarding the 2012-based Office of National Statistics (ONS) Sub National Population Projections (SNPP) projections. The report advises that the "ONS 2012-based SNPP show lower population growth than the previous 2011-based SNPP for all local authorities within the HMA." (Housing Market Area).

Furthermore, the starting point estimate is considered to be a minimum due to the household formation rates underpinning it (2012-based). The Barton Willmore study identifies that these rates actually suppress the 25-44 age groups in MSDC. Alleviating this suppression would increase the starting point estimate above 673 dpa; however the Council have failed to present household formation rate sensitivity scenarios as recommended by ID2a of the PPG, although their adjustment for market signals (24 additional dpa) is drawn from more positive 2008-based household projections.

The Barton Willmore report suggests that growth of 695 dpa is not in itself considered to represent an adequate uplift to OAN for Mid Sussex District. The report confirms that "This uplift amounts to only 3% uplift above the PPG starting point estimate, despite the original HEDNA report (February 2015) suggesting a 10% uplift would be required to alleviate worsening market signals. A 10% uplift would require an increase to approximately 740-765 dwellings per annum."

The Barton Willmore report concludes that the market pressure in Mid Sussex is considered to be more than modest, and as such an uplift of at least 10% should therefore be considered.

The economic-led modelling presented by Barton Willmore within this report shows a requirement of 1,015 dpa to support 521 jobs per annum, and this is similar to the Council's own testing within the November 2015 HEDNA.

We are pleased to note that the Council have increased the housing provision figure from 11,050 to 13,600 over the plan period, however, it is our view that this increase does not fully address the full objectively assessed needs of the District or the wider housing market area.

The Barton Willmore report demonstrates that the November 2015 HEDNA report does not represent the full OAN and furthermore, fails to consider the wider housing market area which includes Horsham and Crawley. As such, paragraph 8.2 of this report advises that this approach wholly conflicts with the NPPF and the PPG, therefore, it is considered that the OAN is not NPPF or PPG compliant.

Pre-Submission District Plan 2016 - Responses

DP5d

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
2335	2	Mr C Hough	Sigma Planning Services	Rydon Homes

Object

The increase in overall housing provision to 800.p.a is welcome but is still not sufficient. For the reasons explained in the Rydon representations on the Submission Plan the figure should be at least 880 p.a. The purported "trigger point" is not justified and the SHLAA has demonstrated that higher levels of new housing can be accommodated across the District without causing undue harm to the Social and Environmental quality of the area.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	1	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD

Whilst all of these changes are welcome, and the overall housing requirement of 800dpa promoted in the FA -PSDP reflects that promoted in our reps of July 2015, we would question whether the figure of 105dpa to meet the unmet needs of adjacent authorities is appropriate. In our previous reps we suggested that MSDC should be looking to provide for at least 167dpa over and above the OAHN to meet some of Crawley's unmet housing needs i.e. 50% of 335dpa; and at least 55dpa over and above the OAHN to meet Brighton and Hove's unmet needs i.e. an extra 220dpa to meet the unmet needs of Crawley and Brighton and Hove rather than the 105dpa promoted in the FA-PSDP. The figure of 105dpa has not in our opinion been justified in the FA-PSDP, nor the associated SA of November 2015.

Similarly we note that despite our former comments about the need to accommodate some of London's unmet need the HEDNA does not look to address this in any way and no adjustment has been made to the OAHN in this regard. This is in our opinion foolhardy and prejudicial to the credibility of overall housing strategy. One cannot ignore London and its effects in terms of housing requirements across the south east. The inspectors report into the Further Alterations to the London Plan is clear as to the need for the GLA to engage with the authorities in the South East and the fact the housing strategy advocated in the LP is likely to be material to the preparation of plans outside London. The HEDNA and SA should look to address this to ensure the MSDP is seen to be posi-tively prepared, justified and effective.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	2	Mr M Brown	CPRE - Mid Sussex	

The NPPF requires a two stage process of determining an appropriate housing target for a District – firstly, determining its OAHN, and then determining whether there are capacity or other constraints identified in NPPF para 14 which necessitate setting a lower housing target than its OAHN. This two step approach has been endorsed by the Courts , which have recognised that national park and AONB protection in line with NPPF paras 115-116 may indeed constitute just such a constraint.

Hastings, Reigate & Banstead, East Hampshire, Dacorum and East Cambridgeshire are all examples of local planning authorities where the application of this two stage approach has resulted in their recent local plans being adopted and/or passing examination with annual housing targets set at levels below their OAHN.

In deciding further to increase that proposed OAHN from the 627 dpa figure it arrived at nine months ago, MSDC notes the implications of the examinations of Crawley's and Horsham's new local plans, but fails to explain why it has abandoned the position previously adopted that no adjustment to the OAHN was required on account of "other factors" when the Inspector of Crawley's new plan has accepted that no such adjustment is required in their case. It is simply not the case that, as claimed by MSDC, Mid Sussex has similar demographics to Horsham.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15308	3	Mr N Kerslake		

In terms of unmet needs - the choice lies between 105dpa (as per MSDC) and 150 per annum which Horsham believe is necessary with the agreement of their inspector. There is no logical reason to suggest MSDC should be providing 30% less than Horsham to meet unmet needs. If meeting 150dpa as per Horsham, the provision figure increases to 892dpa (150 on top of my suggested 742dpa OAN).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15521	4	Mr T Rumble	Woolf Bond Planning	Taylor Wimpey Strategic Land

Object

The Council consider that they can provide 105 dwellings per annum (dpa) to assist in meeting the needs of Crawley Borough. For the reasons set out above, a revised assessment to account for market signals (at a level of 10%) would reduce this contribution to 62 dpa only. As the Council will be aware, up to date Local Plans have recently been adopted by the other two authorities in the HMA, Crawley Borough and Horsham District. It was agreed at the Crawley Examination that Crawley could only meet about 334 dpa of its defined OAN figure of 675 dpa, leaving a shortfall of 340 dpa. The Horsham Inspector's Report confirms that 150 dpa of the Horsham housing requirement was included to account for some of Crawley's unmet needs. This leaves a residual need of 190dpa in the HMA that will only be accounted for if met in Mid Sussex.

It is considered that the residual 190dpa must be added to the District's housing requirement in full to account for outstanding unmet needs elsewhere in the HMA.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	2	Mr J Stevens	Home Builders Federation Ltd	

The HBF supports the provision of 105 dpa for Crawley. It matches Horsham Council's commitment. It is shame that there was not a similar commitment from Reigate & Banstead Council. The HBF had argued that all three councils should take responsibility for accommodating Crawley's large unmet need.

Unfortunately the HEDNA study of November 2015 study does not consider the effect of what is happening in London. We have been unable to locate any evidence of how Mid Sussex has explored the implications of the London Plan with the London boroughs.

The question of out migration is of special concern to the HBF. While the Mayor of London has calculated his housing need on an assumption that many more households will leave London most local planning authorities outside of London are assuming that fewer households will come, or, as in the case of Mid Sussex (which is at least more positive), that the trend will remain stable. Nevertheless, the upshot of this is that no-one is taking responsibility for these migrants. They're either being passed around, or ignored altogether.

Our solution to the uncertainties associated with London would be to add a 20% increase to the baseline demographic need.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	4	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)

the updated HEDNA continues to fail to address the needs of neighbouring Authority, Brighton and Hove. This is despite the 'Sustainability Assessment of Cross-Boundary Options for Mid Sussex District Plan' February 2015, establishing that alongside Crawley, Brighton and Hove has the strongest links with Mid Sussex.

Mid Sussex District Council is well aware of the assumptions of the New London Plan, with regards to outward migration, having responded to consultation to further alterations to the London Plan in a letter dated 10 July 2014, as submitted on its behalf by Mole Valley District Council. However, despite this the updated HEDNA continues not to address and turns a blind eye to the 'London Problem'. Furthermore, it is noted that the District Council's 'Duty to Cooperate Framework, September 2015', does not seek to consult or liaise with the Greater London Authority (GLA).

Given the scale of the unmet need, it is entirely appropriate that MSDC considers and seeks to accommodate at least some of this unmet need due to its proximity to and links to London, specifically in the case of East Grinstead.

In summary the District Council should therefore make a similar allowance as it has done for Crawley (105 dpa) for both Brighton and Hove as well as London, thereby making a total of 210 dpa in order for the Local Plan to appropriately address unmet need.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	3	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings

as a minimum requirement, the majority of housing provision should be provided within the first half of the plan and a very clear and robust monitoring mechanism should be included to ensure that if the trend continues, there is a clear review process that will be undertaken to ensure that housing provision is increased;

Given the above, the proposed housing provision outlined in the emerging Plan cannot be considered as being positively prepared, justified, effective or consistent with national planning policy. Consequently it is unsound.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	4	Mr R Shepherd	Barton Willmore	Hallam Land Management

Object

It is recognised that the Schedule of Modifications, as part of the Focused Amendments to the Pre-Submission Draft District Plan, now makes provision for 800 dwellings per annum. However, the OAN figure produced by the HEDNA update of November 2015 remains at 695 dwellings per annum. This is no doubt due to the addition of unmet need from Crawley of 105dpa, but this is unclear within the HEDNA.

The decision by MSDC to take on no more than 105 dwellings is for the most part unjustified. Whilst the decision to provide for some of Crawley's unmet need is logical due to its tight administrative boundaries, the decision to then ignore all other nearby districts is neither justified or rational.

The consequence is that the unmet need arising from Brighton and Hove, as well as from Adur, Lewes, Tandridge, Wealden and Worthing has all been ignored. Furthermore, MSDC has not considered accommodating any unmet need arising from the GLA.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	4	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd

Object

Whilst we support the Council's initiative to help Crawley in meeting some of its housing need, it is our view however that the Council should also be addressing the needs of its other neighbouring authorities. The Council has not acknowledged that it is known to sit within two separate housing market areas, the Northern West Sussex HMA, and the Coastal West Sussex HMA.

The unmet housing needs of neighbouring authorities is a significant issue, and it is considered therefore that the Council needs to consider meeting more of this unmet need and if it considers that it is unable to do so it will need to demonstrate why.

It is considered that MSDC need to demonstrate how the revised strategic housing land supply will address the wider needs of Brighton & Hove City Council and its other neighbouring Coastal authorities. The District Plan fails to meet the legal duty to cooperate.

Given this strong migratory relationship it is our opinion the MSDC should be accommodating some of the unmet housing needs of Brighton & Hove within their District Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	5	Mr E Fielding		

Point 3.17: How have the extra 105 dwellings been added – how was this number reached? Will it be enough? Is it too many? This looks to be a nice round number with little if any substance, the previous examined number was 855dpa as detailed in the South East Plan. How has the 800 been calculated? Is the correct number somewhere between 800 and 900dpa?

Point 3.18: The 105 dwellings are directed to Crawley so what about our other neighbours needs? Accordingly I do not accept this proposal and challenge the proposed number of houses being put forwards this will not meet known needs for the life of the plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	3	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.

Notably, during the Mid Sussex District Plan publication period objections were received from Brighton & Hove City Council, Adur and Worthing Councils and Lewes District Council on the grounds that they had unmet needs for housing and that Mid Sussex had not met its Duty to Co-operate with them.

More recently, Brighton and Hove City Council made representations to the HDPF (correspondence dated 10 October 2014) highlighting the scale of their unmet need (which has subsequently increased) and recognised that the delivery of more housing through a new market town may need to be considered.

Against this background, there is an onus on MSDC, under the requirements of the Duty to Cooperate, to seek to identify how it can assist in meeting the scale of unmet need. The housing needs will not simply disappear, they are real needs with direct economic and social implications for the region.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16478	4	Mr J Clayton		
Object				

The land identified at Pease Pottage is contained within the MSDC boundary but the 600 houses proposed are firmly linked with housing promised to satisfy Crawley's unmet housing need. If Mid-Sussex is to provide Crawley with 105 dwellings per annum, (1,785 dwellings over the plan period), where within the District will the balance be built? How will this land allocation and cross-boundary housing commitment sit with local Mid-Sussex District residents with housing need?

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16766	2	Mr N Greenhalgh	Village developments plc	

My additional comments are that since you have drafted the amendments Reigate and Banstead have announced well developed plans for a huge business park, (173 acres) in Horley that borders Mid Sussex. It is inevitable that there will be an additional requirement for housing and suggest that this needs to be addressed.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20082	4	Mr E Hanson	Barton Willmore	Reside Developments Ltd (Portsmouth Wo

In addition, the plan makes no mention of its neighbours to the south, including Lewes and Brighton and Hove, both of which have legitimate constraints to further development being provided and large unmet OAN shortfalls.

We therefore do not believe that the Council is meeting its Duty to Cooperate and the Plan is therefore considered to not meet the tests of the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	2	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group

However, the District Plan Sustainability Appraisal suggests that 800 dwellings per annum represents the 'tipping point' where housing provision above this would lead to environmental effects that would not be outweighed by positive benefits. This is therefore the maximum figure that will be planned for in the plan period. Paragraph 004 (Ref ID: 2a-004-20140306) of the National Planning Practice Guidance makes it clear that 'plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development'. In effect MSDC are already doing this by planning for a maximum figure in the district due to a lack of supply of housing land.

In conclusion we consider that the council should be planning to provide for at least 15,227 dwellings over the identified plan period or 896 dwellings per annum and this figure should be included in the plan in order to maintain a flexible supply of sites and address the serious deficiency and backlog due to previous under delivery of housing in Mid-Sussex. Without a serious review of the housing backlog in Mid-Sussex and before reasonable policies are put forward as to how to address this the plan is clearly unsound.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	6	Ms H Allen	Barton Willmore	Crest Nicholson South

It is noted that the proposed housing requirement has been increased to 800dpa to accommodate unmet need from Crawley and this approach is supported. However, the Housing Provision Paper (June 2015) outlines that unmet need arising from Brighton and Hove is significant and MSDC has failed to address this ,despite acknowledging that the two authorities have strong links.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	6	Mr M Evans	Gladman	

The Council do make an adjustment for the HMA,which we will discuss in more detail later, but this is not considered as a constituent part of the OAN.It is considered in relation to the housing requirement and the only consideration of it is to an artificial cap being put onto the housing requirement of the plan.

It reaches the 800 figure by using the OAN it has derived,and which is subject to our objection, of 695 and adding an additional105 units to meet the needs of the HMA. Again we would point out that no overall assessment ofthe HMA or FEMA has been provided to arrive at this figure.The only evidence used is the Mid Sussex Housing Provision Paper June 2015, this does not adequately consider the HMA wide issues.

The Council must as a matter of urgency determine its OAN in a fully Framework and PPG compliant manner, including a full identification of HMA and FEMA needs.Only at this time can it take a view on what's its housing requirement must be.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	6	Mr W Cobley	Turley	Countryside Properties

but it is our concern that the plan does not go far enough in addressing the shortfall in the neighbouring areas.

It is unclear from the evidence whether the Council has appropriately engaged with its neighbours regarding their strategic priorities for delivering new homes and jobs in the area, as required by paragraph 156 and 178 of the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	1	Mr A Ross	Nexus	Gleeson Developments Ltd

In paragraph 3.17 of the District Plan Focused Amendments the Council now asserts that the provision of 800dpa is the ‘maximum plan provision figure that could be delivered sustainably in Mid Sussex’. This is demonstrably not the case and is a conclusion based on a fundamentally flawed application of relevant national policy.

However this balance wholly misapplies national policy guidance in the NPPF and as a result, fails to give appropriate weight to the importance of boosting significantly the supply of housing and meeting OAN (calculated reasonably) in full.

However, as can be clearly seen from paragraph 14 of the NPPF, the appropriate ‘tipping point’ is not where adverse impacts outweigh the benefits, but where adverse impacts significantly and demonstrably outweigh the benefits. It is therefore evident that the Council’s case, and the District Plan approach to housing, is based on a ‘tipping point’ which does not accord with the provisions of the NPPF or recognise the importance of meeting OAN (calculated reasonably) in full. Logic dictates, on the Council’s own case, that application of an NPPF compliant ‘tipping point’ would result in a housing requirement that is materially higher than 800dpa when taking into account the OAN for Mid Sussex and an appropriate contribution to meeting unmet needs from elsewhere in the HMA.

However, as confirmed at paragraph 3.39 of the District Plan, having identified these strong links the District Plan then only makes provision for a proportion of the unmet from Crawley. No explanation is given to explain why the needs of Brighton & Hove have been wholly ignored.

Given the clear functional links between the southern part of Mid Sussex District and Brighton & Hove, and the significant unmet need for housing there, it is a fundamental failing of the District Plan not to provide for any of these unmet needs. Indeed this decision seems to be based on the wholly flawed premise, as set out elsewhere in our representations, that the District cannot sustainably accommodate more than the 800dpa now proposed. The District demonstrably can and should provide for a proportion of these needs, making provision not only for its own reasonably calculated OAN in full (which would be approximately 850dpa) but also providing suitably for unmet needs from Crawley and Brighton & Hove.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20329	4		RH & RW Clutton	Western Arc Consortium

With regards to the need to significantly boost housing supply, we note that the latest amendments propose to increase the housing requirement from 650 dpa to 800 dpa. This is a positive and proactive step, and significantly improves the housing proposition of the District Plan.

It does not however, represent a significant boost in housing supply for the District, and indeed continues to represent a decline when measured against the former South East Plan target of 855 dwellings per annum. It is disappointing that the Council has not taken the opportunity to plan more positively to genuinely boost housing supply in the District.

The proposed housing requirement for 800 dwellings per annum is therefore not justified with regard to national planning policy and guidance. In particular we consider that too little account has been made for market signals, as well as the substantial unmet need within neighbouring authorities, and that further flexibility is required in order for the plan to respond rapidly to change within the District.

The accumulated under-supply of housing in the District and in adjacent authorities areas has contributed to what most commentators now describe as the "housing crisis". We regard a provision of at least 10% as absolutely essential, and indeed a much higher requirement is likely needed, given the acute affordability problems and mounting unmet housing need both within Mid Sussex and in other neighbouring authorities.

The RICS published its own housing forecast for 2016 at the end of December . This shows a predicted price increase of 7% in the south east as against 6% on average in England: in our opinion adding weight to the need for the Plan to address market signals.

We note that the latest amendments go some way to addressing a small part of the overall unmet need. In particular, it is clear that the identification of a strategic site to assist with Crawley's unmet need represents a positive step forward when compared against the previous draft of the Plan.

Overall however, we do not consider that the modest increase in the overall housing requirement is sufficient in quantum and scale to address the huge unmet need of neighbouring authorities and the wider region, most notably that arising from London.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20390	2	Mr M Richardson	Persimmon Homes (Thames Valley)	

The amendment is a positive one. We support the provision of 105 dpa for Crawley and alongside the commitment from Horsham, goes a significant way to meeting the unmet annual need of Crawley over the short term. However, even with the two councils increased housing targets there remains an unmet need within Crawley.

Whilst we note the comments made regarding the councils contribution to neighbouring authorities within the confines of the councils housing market area, it is important to note that the 2009 SHMA District Summary identifies "there are significant out-commuting flows for work from Mid Sussex to Crawley, London and Brighton & Hove, with commuters accessing higher level employment opportunities in these locations".

The District's housing target does not take account of the unmet needs of neighbouring authorities and it has not produced robust evidence that it lacks the sustainable capacity to meet those needs. In comparison to its neighbours, Mid Sussex District is relatively unconstrained.

Unfortunately the evidence supporting the emerging strategy does not consider the effect of what is happening in London or indeed other constrained authorities to the north, including Tandridge.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20521	4	Ms H Richardson	Batchellor Monkhouse	Mr R Penman

The plan concludes that the 'tipping point' where the level of units would have a negative impact on the environment is 800 units per year allowing for an addition 105 units per year to help meet requirements in the duty to cooperate with neighbouring authorities. This is also considered a sensible move forward as the proximity to Gatwick makes Crawley a logical authority to support in order to ensure that development is located close to large local employers to increase sustainability. There does not however appear to be any contribution towards meeting Brighton and Hove's unmet need.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20524	3	Mr O Harwood	RH & RW Clutton	East Grinstead Tenants Limited - Halsford E

The proposed housing requirement for 800 dwellings per annum is therefore not justified with regard to national planning policy and guidance. In particular we consider that too little account has been made for market signals, as well as the substantial unmet need within neighbouring authorities, and that further flexibility is required in order for the plan to respond rapidly to change within the District.

The proposed 24 dwellings per annum to account for market signals is simply too low, and compares unfavourably with the previous provision of 10% for market signals which was recommended in the Council's February 2015 HEDNA.

The accumulated under-supply of housing in the District and in adjacent authorities areas has contributed to what most commentators now describe as the "housing crisis". We regard a provision of at least 10% as absolutely essential, and indeed a much higher requirement is likely needed, given the acute affordability problems and mounting unmet housing need both within Mid Sussex and in other neighbouring authorities.

Overall however, we do not consider that the modest increase in the overall housing requirement is sufficient in quantum and scale to address the huge unmet need of neighbouring authorities and the wider region, most notably that arising from London.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	5	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD

Whilst we support the Council's initiative to help Crawley in meeting some of its housing need, it is our view however that the Council should also be addressing the needs of its other neighbouring authorities.

the Council has not acknowledged that it is known to sit within two separate housing market areas, the Northern West Sussex HMA, and the Coastal West Sussex HMA.

The Council needs to consider meeting more of this unmet need and if it considers that it is unable to do so it will need to demonstrate why.

It is considered that MSDC need to demonstrate how the revised strategic housing land supply will address the wider needs of Brighton & Hove City Council and its other neighbouring Coastal authorities.

Given this strong migratory relationship it is our opinion the MSDC should be accommodating some of the unmet housing needs of Brighton & Hove within their District Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20530	5	Mr N Greenhalgh	Village Developments Strategic Land LTD	Tim North and Associates

The London Plan has an unmet need of at least 7000 households per year, resulting in the Mayor of London writing to LPAs in a wide area of the South East requesting allowance to meet both London's unmet need and higher rates of outward migration. No account has been taken of the London factor in calculating Mid Sussex OAN in its Focused Amendments.

There is considered to be no robust assessment of the extent to which the requirements in meeting the needs of the North West Sussex Housing Market Area can be met. It appears that the only reasoned alternative has been based on either a strategic development east of Pease Pottage, or land east of Northlands Brook and South of Scamps Hill, Lindfield. A re-assessment of other strategic sites should have been undertaken, as well as other alternative strategies in meeting the future housing requirements of your District.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	5	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G

Whilst we support the Council's initiative to help Crawley in meeting some of its housing need, it is our view however that the Council should also be addressing the needs of its other neighbouring authorities.

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The Council needs to consider meeting more of this unmet need and if it considers that it is unable to do so it will need to demonstrate why.

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Given this strong migratory relationship it is our opinion the MSDC should be accommodating some of the unmet housing needs of Brighton & Hove within their District Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	6	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F

Whilst we support the Council's initiative to help Crawley in meeting some of its housing need, it is our view however that the Council should also be addressing the needs of its other neighbouring authorities. The Council has not acknowledged that it is known to sit within two separate housing market areas, the Northern West Sussex HMA, and the Coastal West Sussex HMA.

The unmet housing needs of neighbouring authorities is a significant issue, and it is considered therefore that the Council needs to consider meeting more of this unmet need and if it considers that it is unable to do so it will need to demonstrate why.

It is considered that MSDC need to demonstrate how the revised strategic housing land supply will address the wider needs of Brighton & Hove City Council and its other neighbouring Coastal authorities. Given this strong migratory relationship it is our opinion the MSDC should be accommodating some of the unmet housing needs of Brighton & Hove within their District Plan. There is an unmet need within the South Coast authorities of approximately 1,500 dpa, and that this gives MSDC an idea of the scale of unmet need which is required.

The Mayor of London identified a significant unmet need in London, for which Mid Sussex will also need to contribute.

Pre-Submission District Plan 2016 - Responses

DP5e

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15308	4	Mr N Kerslake		

There was a huge reduction in the MSDC housing register over the period April 2014-August 2014. The NPPG calculation does not provide for a dramatic change in the numbers compared to the months previous to the changed criteria for inclusion on the housing register.

The vast majority of those removed from the tightening of the eligibility criteria still need affordable/social housing. It is reasonable to suppose that some of those removed will, over the 17 year plan period, re apply having met the new qualifying criteria.

One would have expected Chilmark and MSDC to have carried out an assessment/sensitivity check of the effect of such large numbers culled from the waiting list seeking to re apply to join over the 17 year plan period.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	19	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd

Object

Paragraph 47 of the NPPF requires Local Plans to meet the full objectively assessed needs for market and affordable housing in the housing market area. The affordable dwellings proposed per annum total of 209 would meet less than half of the affordable housing needs of the District, it is therefore considered that this is inconsistent with the objectives of the NPPF, and as such the total housing figure proposed in the District Plan needs to be increased in order to fully meet the affordable housing needs of Mid Sussex.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	4	Mr M Evans	Gladman	

In terms of the other aspects of the HEDNA report we would note, as expressed in our July response, that the OAN is still failing to address the full affordable housing needs. There has been no change in approach with regard to this issue since the previous document. We maintain that this is a flaw with the councils HEDNA process.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	4	Mr W Cobby	Turley	Countryside Properties

We consider that the plan as drafted will result in an under delivery of affordable housing. The policy also lacks flexibility to address the shortfall of affordable housing that will inevitably result from those sites that are not able to deliver the full 30% target.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	20	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD

The affordable dwellings proposed per annum total of 209 would meet less than half of the affordable housing needs of the District, it is therefore considered that this is inconsistent with the objectives of the NPPF, and as such the total housing figure proposed in the District Plan needs to be increased in order to fully meet the affordable housing needs of Mid Sussex.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	20	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G

The affordable dwellings proposed per annum total of 209 would meet less than half of the affordable housing needs of the District, it is therefore considered that this is inconsistent with the objectives of the NPPF, and as such the total housing figure proposed in the District Plan needs to be increased in order to fully meet the affordable housing needs of Mid Sussex.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	20	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F

The Barton Willmore report states however that “the Affordable Housing Needs Model Update (2014) the full affordable housing need based on the ‘high’ scenario is identified as 474 dwellings per annum. Thereby 209 affordable dwellings per annum will only be partially meeting the affordable need of Mid Sussex.”

The affordable dwellings proposed per annum total of 209 would meet less than half of the affordable housing needs of the District, it is therefore considered that this is inconsistent with the objectives of the NPPF, and as such the total housing figure proposed in the District Plan needs to be increased in order to fully meet the affordable housing needs of Mid Sussex.

Pre-Submission District Plan 2016 - Responses

DP5f

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	11	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD

Despite our former reps on the PSDP and associated documents, we note that the FA-PSDP and associated documents still make no mention of how the District Council have sought to address the issue of the shortfall in housing supply against the SEP for the period 2006 - 2014. It appears that whilst the SEP requirement of 855 dpa would have generated the need to deliver 6840 dwellings during the 8 year period 2006/7-2013/14, only 3,658 dwellings were completed – a shortfall of 3,182 dwellings.

Not only have MSDC failed to meet the housing requirements of the SEP since 2006, but have failed to meet the requirements of previous regional plans (there was a shortfall of -855 dwell-ings between 2001 and 2006 against the Structure Plan/former RPG9 requirement). This is why, in part, there is such an acute housing need in the district now. The fact the District Council have chosen to ignore this and start their plan period in 2014, when they expect to be able to deliver in excess of 750dpa year on year for the next 5 years according to the housing trajectory at appendix 4 of the 2015 SHLAA suggests to us a plan that has not been positively prepared. The housing requirement has instead been set at a level that the DC feel comfortable they can accommodate and no more.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	6	Mr J Stevens	Home Builders Federation Ltd	

In terms of the backlog, the Council dismisses the argument that an adjustment should be made for under-delivery against the SEP target (855 dpa while the average achieved was 470 dpa) on the basis that this figure was probably an unreasonable figure compared to what the projections were suggesting at the time (considered by the HEDNA at the time). Firstly, it needs to be remembered that the housing targets under the NPPF were not arrived at in the manner that the OAN is considered under the NPPF-based planning regime. The regional strategies started with various projections for the regional and sub-regional areas, and then divvied-up the total between the authorities of those sub-regional areas. Questions of capacity, including the capacity of the house building industry to deliver, was a legitimate consideration under the old regime, and often resulted in housing targets that were lower than the indication provided by the household projections.

Secondly, it also needs to be remembered that the SEP, like the other regional strategies, planned housing supply on the basis of sub-regional strategies where areas of relative constraint were accorded lower figures than areas judged to have greater capacity. Therefore, districts like Surrey Heath and those in the South Downs National Park, for example, would have low targets reflecting the environmental and landscape constraints in those areas, while the urban areas and places like Mid Sussex – where the constraints were fewer or of a lesser significance – were ascribed bigger targets.

Thirdly, the relatively high target for Mid Sussex would also have reflected the districts contribution to assisting the constrained town of Crawley.

Because of the Council's failure to produce a new local plan and the corresponding effect this would have had on delivery – i.e. moribund levels of completions compared to what had been intended by the SEP– we consider that it is legitimate for the Council to make an adjustment for the backlog. This adjustment would compensate for the fact that the under-delivery would get reflected in the projections and those households who should have been accommodated by Mid Sussex over the last eight years have either: a) been prevented from forming new households (reflected in the headshops rates and the affordability indicator and other measures; or b) they were forced to move elsewhere to find accommodation (assuming they are lucky enough to afford a home). They therefore becoming part of someone else's statistical base.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	5	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)

The housing figures for the monitoring period 2014-2015 have been released and show that the housing backlog has increased from 3,182 to 3,407. The November 2015 updated to the HEDNA continues to fail to address this backlog.

In line with our previous representations the backlog, if made up across the plan period 2014-2031, (the 'Liverpool' approach) would raise the plan requirement by 200 dpa. However, the delivery of the back log over the first 5 years in line with the 'Sedgefield' approach would assist in the Council in rectify persistent under delivery at the earliest opportunity in line para 47 of the NPPF.

It is appropriate that the South East Plan (SEP) housing requirement remains the proper figure against which housing delivery is measured as the last adopted and tested housing requirement. It is noted that the HENDA (November 2015) purports that following analysis that an assessment of the actual level of housing need at the time of the SEP would have been between 300-500dpa (average 470). However, such limited analysis does not take into account the wider South East Plan strategy which assessed and determined housing requirements on a regional not just a District basis.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	5	Mr R Shepherd	Barton Willmore	Hallam Land Management

Object

It is also necessary to address any backlog arising from the lack of supply earlier in the plan period, where delivery may not have kept up with the requirement, particularly given the increase in the housing requirement and OAN.

On this basis, in accordance with the Sedgefield approach to addressing backlog, such housing requirements must be re-balanced and addressed within the first five years of the plan period.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16449	1	Mr E Hanson	Barton Willmore	Glenbeigh Developments Ltd (Hanlye Road)

Whilst Glenbeigh welcomes an increase in the housing target, it is not considered that the revised target is sufficient to meet the OAN of the District. Firstly, and as set out in our previous representations, the housing target does not seek to address the previous backlog of housing. MSDC has historically under-provided housing for a number of years against Local Plan (2003) and Regional Spatial Strategy (2009) requirements. However, the draft District Plan fails to acknowledge or include for this ongoing under-provision. The revised start date of the Plan does not mean that past underprovision can be ignored and we therefore reiterate that the backlog must be included in the housing figures and made up through the revised Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20082	5	Mr E Hanson	Barton Willmore	Reside Developments Ltd (Portsmouth Wo

Whilst Reside welcomes an increase in the housing target, it is not considered that the revised target is sufficient to meet the OAN of the District. Firstly, and as set out in our previous representations, the housing target does not seek to address the previous backlog of housing. MSDC has historically significantly under-provided housing for a number of years against Local Plan (2003) and Regional Spatial Strategy (2009) requirements. This is supported and borne out by appeals over many years demonstrating that the council does not have a 5-year supply of housing land. However, the draft District Plan fails to acknowledge or include for this ongoing under-provision. The revised start date of the Plan does not mean that past under-provision can be ignored and we therefore reiterate that the backlog must be included in the housing figures and made up through the revised Plan (using the Sedgfield Approach).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	3	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group

Furthermore, no consideration or mention has taken into account the shortfall that has occurred prior to the year 2014/2015. This is a serious error that will mean that housing need is under represented in the emerging housing figures in the district. A recent Inspector's findings in relation to Horsham District Council's emerging local plan identified that the housing requirements selected there were insufficient as they did not address unmet needs in the SHMA. This is what MSDC in effect are proposing to do by failing to meet the shortfall which will also result in finding that the plan is unsound.

In relation to the shortfall while we note the council's position that the RSS housing targets are not relevant there has been a historic under delivery against the previous plans requirements and the OAN identified. This under delivery will have led to a significant amount of unmet need being generated within the district which will have adversely affected affordability and led to suppressed demand. Addressing the shortfall now is essential and not doing so is a fundamental flaw in the emerging plan.

Based on tested and agreed data in respect to housing requirements the council has a shortfall of 1,945 houses that it needs to address urgently. The February 2015 HEDNA stated that in respect to the shortfall 'it is not appropriate to add any under-supply or backlog to the established OAN of 627dpa where past housing development under delivered RSS targets'. While we note the reluctance to use RSS figures we do not understand the rationale behind not dealing with the issue at all. The above identified shortfall is calculated against past agreed housing requirements; simply ignoring this under delivery will suppress demand and is a critical issue that needs to be dealt with urgently.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	8	Mr W Cobley	Turley	Countryside Properties

It is also unclear how the Council has addressed the shortfall in housing that has occurred in the District against the requirements set out in the South East Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20373	4	Miss K Waldron	Urbanissta	

Based on the requirements of the PPG as set out in paragraph 3.6, it is unclear whether the Council has fully assessed the past shortfall of delivery against the requirements of the South East Plan period to its abolition.

Reviewing completions figures for 2013/14 and 14/15 the average shortfall is equivalent to 27%. Going back further over the past five years the average shortfall is equivalent to 37%. This shows a consistent trend of nonperformance and under delivery of housing supply, resulting in increased housing need and pressure within the District.

The HEDNA update states that a more realistic figure for the period would be 300-500 however there is no clear evidence to justify this remark and as such this suggests that the assessment Council's does not fully reflect consequences of past under delivery as required by the PPG.

Following the revocation of the South East Plan in March 2013, there is a small period of time for which no plan period covers. It is considered that the plan period should be amended to 2013 to enable the time period of March 2013-December 2013 to be included within a plan period, or the shortfall otherwise addressed within the land supply position.

The plan period would therefore be amended from 17 years to 18 years.

Pre-Submission District Plan 2016 - Responses

DP5g

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	4	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD

Unfortunately none of the documentation produced in support of the FA-PSDP provides a detailed critique of the existing commitments – it is not in the Nov 2015 SHLAA, HEDNA or the draft plan itself. Having investigated further however we note that the Commitment Schedule (as at 1st April 2015) found on MSDC’s web site² provides information on large sites (6+ units) over the Plan Period. This indicates commitments of 5124 from larger sites and 281 from small sites giving an overall total of 5,405. Whilst we have not undertaken a detailed review of the commitments set out in the April 2015 commitments table, we note that this comprises sites allocated in the MSLP 2004 (such as land at Rookery Farm) and the SSHA DPD 2008 (such as the Gas holder station at Ley-lands Road Burgess Hill), as well as sites allocated through the Cuckfield and Sharpthorne Neighbourhood plans, a number of sites that have resolution to grant but are pending S106 agreements; and a number of sites that have not commenced and have permissions that are about to expire. Not only do we find it odd that sites that have been allocated for so long and account for over 400 units are still considered deliverable, but that no provision for non-delivery appears to have been placed against the large sites; especially when a discount of 30% has been applied to the small sites to allow for expected non-delivery based on past experience³. In our opinion a 10% discount for the non-delivery of some of the large sites would not be unreasonable; and would amount to some 500 units.

If, as we believe, delivery will take longer to achieve at Burgess Hill and delivery rates will, especially in the early years be less than has been suggested, and if, as we also believe, there needs to be a contingency built into the commitments to address the issue of non-delivery, the true level of commitments is in our opinion likely to be least 1000 less than suggested. As a result MSDC need to identify additional strategic sites if they are to meet their housing requirement / provide for any flexibility as required by the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	13	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd

Object

given the level of housing proposed through the existing Neighbourhood Plans, and the fact that a number of these allocations have already been permitted, it is considered that should the Neighbourhood Plans allocate sites for development which already benefit from planning permission be included as part of the evidence base, there is a real possibility of double-counting to occur, and for the District’s housing figures to be inaccurate.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	6	Mr E Fielding		

Paragraph 3.25 the 6,194 new homes already ‘committed’ includes SHLAA sites yet it has already been proven that a large number of these do not have planning permission and MSDC acknowledge that “there will need to be flexibility should some sites not come forwards or are delivered at a slower rate than anticipated” in paragraph 3.16. These two facts do not add up to a reliable number of ‘committed’ new homes.

Pre-Submission District Plan 2016 - Responses

DP5i

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
75	3	Mrs C Marsh	Turners Hill Parish Council	

The future production of a Site Allocations document will ensure that the homes required will be delivered and allows for a flexible approach.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
99	2	Ms E Brigden	Crawley Borough Council	

Object

CBC strongly supports the commitment in the District Plan to producing a Site Allocations Document to identify the provision of housing sites to meet the needs at this level over the full Plan period. CBC would welcome being involved in the development of this, as part of the Northern West Sussex Authorities, alongside the review of the Horsham District Planning Framework, and as part of the Gatwick Diamond, particularly to support evidence gathering and resolving infrastructure and environmental constraints to meet development needs within the HMA through sustainable development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	6	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD

In the context of the above, and in light of there being no updated housing trajectory in the FA-PSDP, we note that the housing trajectory at appendix 4 of the SHLAA (Nov 2015) suggests residual sites allocated through Neighbourhood Plans will start delivering in 2020/21 at a rate of over 200dpa for the rest of the plan period. To be effective the FA - PSDP needs to demonstrate that this is achievable, and if not have a contingency in place. Reliance on a Site Allocations DPD is not an effective mechanism to address this situation. This will merely delay delivery, add to the costs of plan preparation and lead to uncertainty for both developers and residents alike.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	6	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings

As indicated above, the Plan currently proposes that this component of supply is met through allocations in both Neighbourhood Plans as well as the Site Allocations DPD. Whilst we do not object to the use of Neighbourhood Plans for meeting this component of supply, we have reservations about the need for a Site Allocations DPD.

Moreover, W.T. Lamb Holdings are also concerned that the use of a Site Allocations DPD to meet any unmet housing provision could have political ramifications at a local level. In areas where Neighbourhood Plans have and are being taken forward, there is a strong expectation that each town and village has delivered the development requirements for their settlement for the medium term. For those decision taking powers to be removed from the grass roots levels and placed back with the Local Authority in such a short space of time (2019), it is bound to cause tension. In many cases we do not believe that the residents living within neighbourhood planning areas are aware that further allocations could be made at settlements through the Site Allocations DPD, in addition to those allocated through the Neighbourhood Plan process.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	14	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd

Object

Policy DP5 states that work on the Site Allocations document will commence in 2019 with a possible adoption in 2021. The exact housing figure that the Site Allocations document will provide for is to be determined through the Council's annual monitoring report. In our view the uncertainty regarding this figure is worrying. Furthermore, we believe that the determination of housing figures through the annual monitoring report will be wholly reliant on the Council ensuring that adequate monitoring is taking place.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	12	Mr E Fielding		

There is no planned action on the monitoring report until 2019 (5 years post the start of this plan) with no anticipated adoption until 2021. This leads to an even greater gap between need and supply. 2014-2015 show the scale of shortfall yet no actions are being taken this makes the gap bigger and the issues unsolvable the plan is not sound if it can't meet its known needs.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16449	2	Mr E Hanson	Barton Willmore	Glenbeigh Developments Ltd (Hanlye Road

Furthermore, with regard to the proposed strategy for delivering the remaining 1,730 dwellings which are apparently to be allocated through "future neighbourhood plans, the Site Allocations document and identified SHLAA sites", Glenbeigh does not consider that this approach is robust enough to ensure sufficient sites are identified to address the remaining requirement. Indeed, a number of emerging neighbourhood plans are clearly failing to identify sufficient sites to meet the needs of their neighbourhood plan area and it is currently unclear exactly how the Council intends for this to be rectified through a review of 'made' neighbourhood plans or the emerging Site Allocations document.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16478	2	Mr J Clayton		

Object

The promise to prepare, commencing in 2019, a "Site Allocations" document is unlikely to satisfy the inspector or developers. The statement "If monitoring shows that the Council cannot demonstrate a five-year housing supply before this date then preparation of the document will commence sooner" is unlikely to prove acceptable. It will be pointed out that currently there is no identified 5-year land supply, so preparation should begin now. Additionally, all concerned are very much aware that MSDC has taken several years to prepare the proposed District Plan, this begs the question: "how long will it take to prepare the new document"?

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	2	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd

we wish to highlight that East Grinstead has considerable capacity to assist whilst also revitalising the community through improvements to social and environmental infrastructure that could be delivered alongside a further strategic allocation. The preparation of the Site Allocations DPD, for instance, should reflect the settlement hierarchy, with the main settlements required to deliver in accordance with the services and infrastructure they have which can support growth.

Many local communities consider that they do not need to accommodate growth because of the lack of strategic direction. As a consequence, the Site Allocations DPD should be commenced immediately, to address the delivery of the additional homes needed across the District. Provision in neighbourhood plans could then be considered in the overall context and as an additional boost in supply, helping to meet the needs of the HMA. Further, if the Council is relying on SHLAA sites then it should allocate them.

commencing work on a DPD in the timescales proposed, that is predicted to take a minimum of two years to prepare, is not going to quickly resolve the five year supply situation, thus placing a greater reliance on windfall development when deliverable alternatives are available to address this shortfall.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20082	2	Mr E Hanson	Barton Willmore	Reside Developments Ltd (Portsmouth Wo

It is Reside's consideration that the council has done very little to expedite a Sites Allocations document, which it could have brought forward in tandem with this plan. Further exasperating the problem, the council is ONLY proposing starting work on their Sites Allocations document in 2019. As it stands this plan is clearly going to fail immediately upon adoption if it continues along its current trajectory.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	6	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group

We consider that deferring the preparation of a Site Allocations DPD is not an appropriate way of addressing the significant issues of backlog and supply where there are such chronic issues of under delivery and affordability. These issues were raised previously in our January and July representations. The council are simply ignoring this issue and a plan cannot be adopted without the five year land supply situation, including methods for dealing with the substantial shortfall from past years, being dealt with urgently. Delaying the preparation of a site allocations document until 2021 is far from an urgent response.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	15	Mr R Brass	GL Hearn	Anstone Development Limited

work will commence on a Site Allocations document in 2019, with anticipated adoption in 2021, to identify remaining sites for the plan period. This approach is positive however in practice the locations for new allocated sites will need to be determined. This means that pressure on Neighbourhood Plans is unlikely to disappear and therefore MSDC is encouraged to seek to ensure that Neighbourhood Plans are prepared in a positive manner and demonstrate that they are meeting local needs in a robust manner.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	4	Mr A Ross	Nexus	Gleeson Developments Ltd

The Council's Local Development Scheme indicates that the Site Allocations Document will not be adopted until the middle of 2018. Accordingly, the Council's approach is not only to identify an OAN for housing which is demonstrably too low, but to then actively promote a situation whereby much-needed housing is delayed for several years when it could, and should, be addressed now through a robust District Plan process.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20326	4	Mr C Beaver	Planning Sphere Ltd	Hassocks Golf Club

the timescale for the preparation and adoption of the site allocations DPD would result in a significant delay in site being brought forward, even without any slippage in the Plan's preparation programme.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20506	6	Mr J Bailey	WYG	Traylen Enterprises Ltd

The council states that it will produce a Site Allocations DPD. The purpose of this, presumably, is to make up the expected shortfall in provision that will be left by Neighbourhood Plans, which do not fulfil their requirement to meet the housing needs of their area and adjoining areas. By proposing this plan the council seems to be anticipating future under provision by NP's. Surely, it would be more effective to require the NP's to meet their housing obligations, so that a Site Allocations DPD is not required. Giving them the option, invites them to "pass the buck" and under allocate land for housing, in the expectation that the council will allocate any shortfall, hopefully to another parish, in the Site Allocations DPD. This strategy will not meet housing needs in the short term and it will stifle growth as well as shutting many people out of the housing market.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20527	2	Ms L Goodyear	Terence O Rourke	Gleeson

This strategy carries with it a serious risk and is unsound, in that the need is not met and insufficient flexibility is embedded to address situations whereby the allocations fail to deliver on time and as projected. It is incumbent on the local planning authority to allocate sites to meet needs (NPPF paragraph 157). Whilst a two tier approach, with a secondary document to address allocations for the later part of the plan period, may be acceptable in some circumstances, it would not be acceptable if the document is relied upon to secure a rolling five-year housing land supply in years 1 – 11 of the plan period. It leaves a policy vacuum. In this case, it is clear that there is already concern regarding the adequacy of the five-year supply (hence seeking to cap requirements below any reasonable calculated OAN) and a high-risk strategy reliant on just two strategic development areas.

Pre-Submission District Plan 2016 - Responses

DP5j

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15308	7	Mr N Kerslake		

It would be useful to be able to model a given economic growth aim of annual percentage growth and calculate the job requirement from that economic growth figure and then work out the housing provision numbers to meet those jobs. Such an exercise would provide an alternative check on the reasonableness of the housing provision numbers proposed by MSDC.

I do not accept the argument in the HEDNA Update (Nov 2015) in para 7.9 that there will be a never ending vicious circle and self defeating prophecy if one increases housing supply to meet an economic forecast. The same vicious circle case could be argued for reconsidering housing supply in relation to meeting affordable housing needs.

The HEDNA Update of November 2015 increases the job requirement to 330 jobs per annum based on 800dpa but is keeping the number of jobs actually provided based on allocation of employment land to 294 jobs per annum.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	3	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)

The updated 'Housing and Economic Development Needs Assessment, February 2015' (HEDNA) reinstates a market signals uplift, but this is at just 3%. However, this is still contrary to the original HEDNA report (February 2015) which considered it necessary to provide a 10% uplift.

An uplift of at least 10% (67 dpa) is still considered necessary specifically to address the issues of affordability, an approach substantiated through the original HEDNA Report. The Council's uplift of just 3% (24dpa) will not address these issues and appears to have been influenced by Horsham District Council's approach rather than by the Council's own evidence base.

On this basis a starting OAN figure should be 740dpa.

Job Growth

As set out in our original representations, the then and current OAN figure has been artificially constrained by the Council. If the full job growth is to be realised (521jobs), as set out in the Council's 'Economic Growth Assessment', this would result in an OAN figure of at 1,014 dpa. This is acknowledged by the Council's latest HEDNA (November 2015), at Table 20 and para 7.8.

On this basis, an OAN figure of 1,014 dpa should be considered as the full OAN, notwithstanding the need to address other wider strategic matters as detailed further below.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	3	Mr R Shepherd	Barton Willmore	Hallam Land Management

The Experian Full Time Equivalent (FTE) job forecast equates to 278 jobs per annum. However, the March and June forecasts show a much higher amount of job growth than in the HEDNA report.

It is also worth noting that notwithstanding the concerns relating to the HEDNA (as outlined above), the Draft Local Plan has still failed to provide for the full objectively assessed need. The initial OAN figure identified in the HEDNA of February 2015 was 627 dwellings per annum but the November 2015 update raises this figure to 695. Although the Focused Amendments propose an uplift to 800 dwellings per annum within the District Plan, this provision still fails to properly provide for the expected level of demand brought by projected job growth within the district.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16478	3	Mr J Clayton		

Object

I note that 13,600 is now the proposed housing delivery target for the 2014 – 2031 period – a 28% increase on the 10,600 identified in the first draft plan. I further note that there is now no 3% per annum economic-growth target ambition. The plan period covered is also 2 years shorter! These facts will, rightly, be a concern to the local community.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	5	Mr M Evans	Gladman	

The issues previously discussed with regard to economic growth, and the comments included in our previous July representation do not seem to have been addressed in the HEDNA update. We would therefore maintain our position as outlined in our July representation.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	5	Mr W Cobley	Turley	Countryside Properties

The EGA provides a means of addressing joint working across a range of planning policy and economic development issues in line with the NPPF duty to cooperate.

The Council has failed to take account of the projections within this study to inform their OAN and instead has relied on the locally based Burgess Hill Employment Sites Study (BHES) (March 2015). We consider this information to be less robust as it does not consider the influence of the wider economic area.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20373	3	Miss K Waldron	Urbanissta	

The OAN figure of 695 dpa equates to a jobs figure of 210 jobs per annum, this figure represents jobs within Mid Sussex taken by Mid Sussex residents. This is in contrast to the view elsewhere in the HEDNA report that states that migration is the main component of population change over the plan period. Taking into account jobs taken by commuters, it is likely that the jobs figure would be higher and as such the housing requirement would need to be increased to take account of this anticipated migration.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20520	2	Mr and Mrs J and N Hampshire		

Whilst the Focused Amendments to the District Plan state that the Site Allocations Document will enable the Plan's housing requirement to be delivered in full, without requiring NP's to supply the whole residual amount of housing, it is not anticipated to be adopted until 20121, leaving at least 6 years for the Parish Councils, such as Cuckfield, to fail to deliver any housing beyond windfall development.

Pre-Submission District Plan 2016 - Responses

DP5k

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15308	5	Mr N Kerslake		

Assuming MSDC meet 80% affordable housing need (as few District Plans meet the entire need) - assuming 30% returnees to the affordable housing waiting list MSDC would need to increase the housing provision to 925dpa. If one takes a more cautious view of between 20-30%, MSDC would need to increase the housing provision to 900dpa.

If a modest increase of 47.1% for newly forming households unable to rent without assistance is built into the Chilmark model, together with the proportions of returnees to the housing waiting list referred to, then at 20% returnees the housing provision in Mid Sussex would need to rise to 939dpa.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15308	2	Mr N Kerslake		

MSDCs baseline OAN of 656dpa should be increased to 742dpa (based on increased vacancy rate and adjustment for market signals).

With the addition of an increase for unmet needs MSDC should consider/be required to provide a minimum of 850 homes per annum in its District Plan but with preferable a figure closer to 900 homes per annum.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	4	Mr J Stevens	Home Builders Federation Ltd	

The HBF argued previously that the housing requirement for Mid Sussex should be 910 dpa.

We consider that an overall housing requirement of 805 dpa for Mid Sussex, plus 105 dpa to account for the needs of Crawley – or 910 dpa in total – would also inject some flexibility into the plan just in case the Council is wrong in its assumptions about housing need and employment growth and it needs to provide more homes. This would accord with paragraphs 14 and the 17 of the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	1	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.

The assessment undertaken by Barton Willmore identifies an objectively assessed need for Mid Sussex District of 1,014 dpa. This is notably higher than that identified in the Council's updated evidence base (695 dpa) and that being planned for by the Focused Amendments (800 dpa). Consequently, whilst MSDC now suggest that they are able to assist in meeting some of the unmet needs of neighbouring authorities (105 dpa), the fact is that the housing needs within the District have been significantly underestimated (by 214 dpa or 4,280 dwellings), so that the Focused Amendments fail to meet the district's OAN and make no contribution to the unmet needs of neighbours.

[Technical Report attached]

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	1	Mr R Brass	GL Hearn	Anstone Development Limited

In terms of housing need, the increased District housing target is supported however the figure should be set at least 810 dwelling per annum (“dpa”) to provide 13,770 dwellings over the plan period from 2014 to 2031. As explained above taking account of unmet needs this figure would increase to 910 dpa which equate to an overall figure of 15,470 dwellings over the period 2014 to 2031.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	9	Mr A Ross	Nexus	Gleeson Developments Ltd

As set out in detail in our original objections, expanded upon elsewhere in our representations to the Focussed Amendments, the OAN for Mid Sussex District should be approximately 850dpa. In addition to this should be added suitable provision for unmet housing needs from the two locations in the HMA which the Council accepts have the strongest functional links with Mid Sussex - Crawley and Brighton & Hove.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20506	2	Mr J Bailey	WYG	Traylen Enterprises Ltd

We consider that the proposed level of housing provision is unsound, because it is unjustified. The LPA’s assessment of Objectively Assessed Need (OAN) in the District for the plan period is too small and needs to be increased from 800 dwellings per annum to at least 915 dwellings per annum (dpa).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20530	6	Mr N Greenhalgh	Village Developments Strategic Land LTD	Tim North and Associates

It follows that when considering the need to take into account a 10% increase in homes due to market signals, the London factor along with the 105 dwellings per annum contribution to assist in meeting the unmet needs of Crawley BC, a figure of approximately 850 dwellings per annum is more realistic, even though this is still largely dependent on only three strategic development sites.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	2	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F

Welbeck Strategic have commissioned Barton Willmore to undertake a full assessment of the Council’s OAHN and this Report is included within these submissions. This suggests that the Council’s true OAHN is 1,014dph, substantially higher than the District Plan housing target (this does not reflect the significant unmet needs of adjoining authorities).

Pre-Submission District Plan 2016 - Responses

DP5I

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	5	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD

No evidence has been presented to demonstrate that the scale of development expected through the Neighbourhood Plans will come to fruition. Whilst the amendments to para 3.22 seek to update the position vis a vis the preparation of Neighbourhood Plans the FA-PSDP does not indicate the level of growth proposed in said Neighbourhood Plans.

In the context of the above we note that the 4 made plans (which are now included within the overall commitments in policy DP5) provide for some 400 dwellings, albeit 120 are already accounted for in MSDC's April 2015 commitments table. Whilst there are a further 2 plans referred to as being at referendum, only 1 – the Burgess Hill Plan that looks to make any firm allocations, which would provide for circa 200 dwellings within the town over the plan period. Likewise of those said to be at examination the Turners Hill Neighbourhood Plan provides for just 44 dwellings to be allocated on land at Old Vicarage Field and the Old Estate Yard; and the Twineham Neighbourhood Plan for around 20 new homes on unidentified sites across the plan period. No formal allocation is suggested in the Lindfield and Lindfield Rural Neighbourhood Plan. Of the submitted plans Albourne Neighbourhood Plan looks to provide for just 16 dwellings across the plan period, Ashhurst Wood Neighbourhood Plan looks to allocate sites to accommodate circa 62 dwellings, and Bolney Neighbourhood Plan looks to allocate 3 sites for a total of 41 to 45 dwellings. In addition to the above we note that the East Grinstead Neighbourhood plan looks to allocate a number of sites via policy EG6B, which would, between them provide for circa 450 dwellings; and that the Haywards Heath Neighbourhood Plan looks to provide for 560 dwellings across both greenfield (455 dwellings) and brown-field sites (105 dwellings)

the above the Neighbourhood Plans would provide for circa 1667 dwellings; some 63 short of the target proposed by policy DP5 as amended in the FA-PSDP. As however both the Haywards Heath and Hassocks plans are in their infancy and have yet to be tested through public consultation/ examination, there is still a level of uncertainty as to whether all the sites they have identified will come forward. On this basis and in order to provide for some flexibility and thus an effective plan the FA-PSDP should provide for additional strategic allocations.

It is also clear that other than Hassocks and the category 1 settlements, the other settlements are not allocating sites of more than circa 50 dwellings⁴ and that as only 1 category 2 settlement (the Copthorne part of Worth) has still to progress a Neighbourhood Plan to formal submission, and only 3 category 3 settlements (Balcombe, Horsted Keynes, and Handcross/ Pease Pottage/Slaugham), are still to progress a Neighbourhood Plan to formal submission, the likelihood of the total Neighbourhood Plan allocation being suggested in policy DP5 being met is in our opinion slim.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	7	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)

Specifically there remains no requirement for Neighbourhood Plans to take account of the identified OAN for each of the settlements, as set out in the updated HEDNA (November 2015).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	7	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings

As a minimum, the OAN for the District as used in the neighbourhood planning process, must include an allowance for vacancy and market signals. Accordingly, there is a need to base the apportionment on a minimum figure of 695dpa and realistically, in line with HJA's concerns over the insufficient adjustment for market signals, a higher figure.

At present, on the basis of the higher OAN (695dpa), a large number of the Neighbourhood Planning Groups have or will fail to meet their proportional requirement. At this point in time and as reflected in the Focused Amendments, there is an acknowledged need for a Site Allocations DPD. In this respect we note that para. 153 of the NPPF states that "any additional development plan document should only be used where clearly justified." The Site Allocations DPD is presently only justified by virtue of the failure of the Local Planning Authority to ensure that a more appropriate level of housing was provided within adopted and emerging Neighbourhood Plans.

To provide certainty to residents, stakeholders and developers, and to remedy the above, the Local Authority should seek for all emerging Neighbourhood Plans to meet a proportion of the OAN which includes vacancy and an allowance for market signals. Where there are adopted Neighbourhood Plans in place, the Local Authority should seek an early review. Such an approach would provide a far better chance of ensuring that a further Site Allocation DPD is not required, which provides a better fit with national planning policy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	12	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd

Object

We are concerned about the breakdown of the housing figures within policy DP5, in particular, we note that the residual amount of dwellings in the housing figure calculation is 1,730. Policy DP5 states that the "Council will prepare a Site Allocations document to enable the Plan's housing requirement to be delivered in full, without requiring neighbourhood plans to supply the whole residual amount of housing." It is our view that it is highly unlikely that neighbourhood plans will be able to provide this level of housing.

Twenty Neighbourhood Plan Areas have been designated, of that four Neighbourhood Plans have been 'made', all of these plans state that the parishes are limited in their capacity to provide new housing sites. It should be noted that these four Neighbourhood Plans have allocated a total of 372 dwellings, although, one of these plans allocated 252 dwellings on housing sites which have already been permitted, and are already included as part of the Council's commitments. Therefore the total of housing allocations put forward by Neighbourhood Plans so far is 120, which is approximately 40 dwellings per Neighbourhood Plan. Given this low figure of housing through the existing Neighbourhood Plans, and the fact that not all Parishes will be able to adopt a Plan, it is considered unlikely that Neighbourhood Plans would provide for the residual housing figure.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	8	Mr E Fielding		

Paragraph 3.29 – the neighbourhood plans are not delivering at any pace, most have yet to get to examination and all are short of the OAN for the relevant parishes and so MSDC cannot rely on them to deliver any shortfall since this process is leaving its own shortfall against known needs.

There is no evidence that the neighbourhood plans will generate the required housing numbers. To date none have even got close to acknowledged objectively assessed needs and very few through referendum.

Will the neighbourhood plans have to provide more houses to match the increased housing requirement since none of the identified strategic developments have been increased to match this shortfall? There is now a 2,000 shortfall yet to be met anywhere. If the need is not met the plan is not sound.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20082	6	Mr E Hanson	Barton Willmore	Reside Developments Ltd (Portsmouth Wo

Furthermore, with regard to the proposed strategy for delivering the remaining 1,730 dwellings which are apparently to be allocated through “future neighbourhood plans, the Site Allocations document and identified SHLAA sites”, Reside does not consider that this approach is robust enough to ensure sufficient sites are identified to address the remaining requirement and will therefore leave the plan open to early failure and will mean the Plan cannot meet the relative tests set out in the NPPF. Indeed, a number of emerging neighbourhood plans are clearly failing to identify sufficient sites to meet the needs of their neighbourhood plan area and it is currently unclear exactly how the Council intends for this to be rectified through a review of ‘made’ neighbourhood plans or the emerging Site Allocations document.

Taking the Lindfield and Lindfield Rural Neighbourhood Plan (LLRNP) as an example, the draft Plan proposes that new housing will be met through windfall sites within the settlement boundary alone and no provision is made for new housing allocations, despite the fact that Lindfield is defined within the District Plan as a Larger Village (Category 2 Settlement). The council’s HEDNA sets out that the starting point OAN for Lindfield and Lindfield Rural parishes is 682 homes (478 and 204 homes respectively). Whilst the Focused Amendments to the District Plan state that the Site Allocations document will enable the Plan’s housing requirement to be delivered in full, without requiring neighbourhood plans to supply the whole residual amount of housing, it is not anticipated that this will be adopted until 2021, leaving at least six years for Parish Councils, such as Lindfield and Lindfield Rural, to fail to deliver any housing beyond small windfall development sites.

On this basis, we believe, as currently drafted, the council will not be able to demonstrate a 5-year supply of housing land at the point of adoption of this plan, which only demonstrates that the plan as drafted will fail and therefore does not meet the tests of the NPPF. There is clearly data available that sets out how and where the distribution of housing should be made. We therefore believe the housing policy should be updated to reflect this distribution for each village and town in order to give certainty and direction for Neighbourhood Plans and the Site Allocations document.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	16	Mr R Brass	GL Hearn	Anstone Development Limited

It is recommended that the District Plan is amended to state that Neighbourhood Plans are prepared to conform to the adopted District housing target. Any emerging plans which do not adequately contribute towards the District housing target of 810 dpa (910 dpa including meeting unmet needs), should be reviewed immediately.

It is recommended that the potential housing contribution of the villages (including Neighbourhood Plan areas) is promoted to be maximised by the District Plan to help achieve the overall housing target.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	8	Mr R Brass	GL Hearn	Anstone Development Limited

It is recommended that the District Plan is amended to state that Neighbourhood Plans are prepared to conform to the adopted District housing target. Any emerging plans which do not adequately contribute towards the District housing target of 810 dpa (910 dpa including meeting unmet needs), should be reviewed immediately.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	3	Mr R Brass	GL Hearn	Anstone Development Limited

In terms of housing delivery and distribution of development, it is recommended that the District Plan provides clearer guidance in relation to Neighbourhood Plans to ensure that plans are prepared in accordance with the latest consultation document.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	11	Mr W Cobley	Turley	Countryside Properties

As Neighbourhood Plans form a key delivery mechanism for housing in MSDC the MSDP should be explicit in requiring neighbourhood plans to be updated so they conform to the higher level planning document.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	5	Mr A Ross	Nexus	Gleeson Developments Ltd

It should be noted in this regard that, almost without exception, the Neighbourhood Plans that are emerging / have been 'made' identify levels of housing that are significantly below those identified as necessary / appropriate in the Council's HEDNA Update (November 2015). As such there can, and should, be no confidence that Neighbourhood Plans will provide for appropriate levels of housing. This stresses further the importance of the District Plan providing robust strategic guidance in terms of the location and scale of development appropriate in the main settlements in the District.

As expressed in our original representations, we object to the District Plan strategy of deferring approximately 27% of the total housing requirement (1,730 dwellings of the residual requirement of total of 6,325 homes having regard to existing completions and commitments) to future Neighbourhood Plans and a Site Allocations Document. This strategy is vague and ineffective, failing to provide towns and parishes with appropriate and suitable guidance on the level of housing that they should be accommodating having regard to the need for housing and the relative sustainability of settlements within the District. We note that this reliance on Neighbourhood Plans, and the lack of guidance provided by the District Plan, is already resulting in emerging Neighbourhood Plans, almost without exception, providing for significantly lower levels of housing than those identified as suitable / necessary in the Council's HEDNA Update November 2015.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20327	2	Mr A Bateson	AB Planning & Development Ltd	Mr David Crowther

The LPA acknowledge (Para.3.16) that their proposed Site Allocations Document, which they hope will address any shortfall, will not be available until 2019-2021. In the meantime, the Council forlornly hope that Town and Parish Councils might make plans for increased numbers of houses (Para.3.29). However, that is not reflected at Haywards Heath, where the Town Council are proposing to follow the District Council's lead and only accommodate 63.6% of their objectively assessed needs. Such failure will not ensure adequate or sustainable housing delivery, especially at Haywards Heath, and the draft Plan therefore fails to satisfy the requirements of the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20390	4	Mr M Richardson	Persimmon Homes (Thames Valley)	

Persimmon does support the Councils backing for Neighbourhood Plans and the identification of their importance to the emerging Local Plan and the delivery of units that they can make.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20506	5	Mr J Bailey	WYG	Traylen Enterprises Ltd

The council says that the unallocated new homes that are needed in the plan period should be delivered through a combination of neighbourhood plans and a Site Allocations DPD, which the District will produce in due course. The plan suggests that there will be no necessity for current Neighbourhood Plans to increase their numbers. However, if they wish to that would be helpful and the District Council will encourage any over provision. In our experience, of submitting representations to the Bolney Neighbourhood Plan, it is extremely unlikely that Town and Parish Councils will voluntarily allocate more than the absolute minimum amount of additional land for housing. In this context, the District Council should require Neighbourhood Plans to meet the Full OAN of their areas and also provide additional land for housing to meet the needs of adjoining Districts, Brighton and London in order to help to boost housing supply significantly, as required by the NPPF, and help to make housing more affordable for the many thousands of people who cannot get on the housing ladder in Mid Sussex and beyond.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20520	1	Mr and Mrs J and N Hampshire		

It is clear that NP's are failing to identify sufficient sites to meet the needs of their NP and it is currently unclear how the Council intends for this to be rectified through a review of "made" neighbourhood plans or the emerging Site Allocations Document.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20521	3	Ms H Richardson	Batchellor Monkhouse	Mr R Penman

The Site Allocations document has been proposed to identify sites for the remaining plan period, however this will not be adopted until 2021 at the earliest. In the meantime there is a reliance on a few large development sites, as well as the neighbourhood plans to bring forward sites. Many of the neighbourhood plans have not yet been adopted, and in addition this is channelling housing heavily toward the areas where neighbourhood plans are in place rather than necessarily on areas where there is the highest housing need.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20527	3	Ms L Goodyear	Terence O Rourke	Gleeson

We do acknowledge that many communities are progressing with neighbourhood plans. Some of those are responding positively to the need to allocate sites. Others are not. The local plan fails to provide sufficient guidance to ensure a consistent and positive approach. There is no reason as to why the Site Allocations DPD should not be progressed in parallel with Neighbourhood Planning, as a complementary process, with local plans meeting the strategic needs of the HMA and district and neighbourhood plans providing an additional boost in supply tailored towards local circumstances and opportunities/benefits.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	11	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD

We are concerned about the breakdown of the housing figures within policy DP5, in particular, we note that the residual amount of dwellings in the housing figure calculation is 1,730.

It is our view that it is highly unlikely that neighbourhood plans will be able to provide this level of housing.

These four Neighbourhood Plans have allocated a total of 372 dwellings, although, one of these plans allocated 252 dwellings on housing sites which have already been permitted, and are already included as part of the Council's commitments. Therefore the total of housing allocations put forward by Neighbourhood Plans so far is 120, which is approximately 40 dwellings per Neighbourhood Plan. Given this low figure of housing through the existing Neighbourhood Plans, and the fact that not all Parishes will progress a Neighbourhood Plan, it is considered unlikely that Neighbourhood Plans would provide for the residual housing figure.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20530	7	Mr N Greenhalgh	Village Developments Strategic Land LTD	Tim North and Associates

The welcome rise in the number of dwellings per annum in Policy DP5 of the Focused Amendments from 650 dpa to 800 dpa reveals that the basis in preparing emerging neighbourhood plans has been on unrealistically low future housing requirements. This situation will render the same neighbourhood plans out of date at an early stage, alongside a continued inability to satisfy your Council's 5 year housing land supply requirement. There is an absence of any strategic overview or assessment of the extent to which individual neighbourhood plans should contribute to the future housing requirement between 2014 to 2031, a factor which should be addressed either in the text or reasoned justification to Policy DP5.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	11	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G

We are concerned about the breakdown of the housing figures within policy DP5, in particular, we note that the residual amount of dwellings in the housing figure calculation is 1,730.

It is our view that it is highly unlikely that neighbourhood plans will be able to provide this level of housing.

These four Neighbourhood Plans have allocated a total of 372 dwellings, although, one of these plans allocated 252 dwellings on housing sites which have already been permitted, and are already included as part of the Council's commitments. Therefore the total of housing allocations put forward by Neighbourhood Plans so far is 120, which is approximately 40 dwellings per Neighbourhood Plan. Given this low figure of housing through the existing Neighbourhood Plans, and the fact that not all Parishes will progress a Neighbourhood Plan, it is considered unlikely that Neighbourhood Plans would provide for the residual housing figure.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	13	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F

We are concerned about the breakdown of the housing figures within policy DP5, in particular, we note that the residual amount of dwellings in the housing figure calculation is 1,730. It is our view that it is highly unlikely that neighbourhood plans will be able to provide this level of housing.

It should be noted that these four Neighbourhood Plans have allocated a total of 372 dwellings, although, one of these plans allocated 252 dwellings on housing sites which have already been permitted, and are already included as part of the Council's commitments. Therefore the total of housing allocations put forward by Neighbourhood Plans so far is 120, which is approximately 40 dwellings per Neighbourhood Plan. Given this low figure of housing through the existing Neighbourhood Plans, and the fact that not all Parishes will be able to adopt a Plan, it is considered unlikely that Neighbourhood Plans would provide for the residual housing figure.

Pre-Submission District Plan 2016 - Responses

DP5m

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
245	2	Ms G Kennedy	Lindfield Preservation Society	

Object

this would produce a target of at least 800 houses every year from now until 2013. This is of course well beyond what the district has ever delivered in any year, let alone in an unbroken succession of years.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	3	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD

The District Council could, given the find-ings of the SHLAA, look to accommodate more of their objectively assessed need on sites that have been identified as suitable if they so choose. The fact is MSDC have decided against this without any clear rational as to why they have adopted the approach they have, which leads us to conclude that the plan has not been positively prepared and has not been justified.

we feel we have to question the delivery rates being suggested for the main strategic allocation at Burgess Hill. To assume, as set out in the housing trajectory con-tained in appendix 4 of the SHLAA that this site will deliver 172dpa from 2017/18, when an applica-tion has still to be submitted, and that from 2020/21 it will be delivering 336dpa is in our opinion unrealistic. There is no evidence in the supporting documents to justify the trajectory put forward in the SHLAA and thus nothing to justify the housing trajectory. Without evidence to support the trajec-tory put forward in the SHLAA (which we assume will at some stage be included within the District Plan itself), the FA -PSDP cannot be said to be positively prepared, justified and effective.

Contrary to the assertions in policy DP5 of the FA-PSDP we do not believe the level of exist-ing commitments are all deliverable – this needs to be tested and the results shared with consultees or a contingency of 10% provided for non-delivery.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	7	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD

In order to demon-strate a plan that is positively prepared, effective and consistent with national policy, policy DP5 should provide for additional strategic allocations to those proposed at Pease Pottage and Bur-gess Hill to accommodate at least 500 -1000 dwellings (based on an OAHN of 800dpa) rather than promote a Site Allocations Document to come forward in circa 2021. The higher figure providing an element of flexibility / a contingency for any unforeseen delay in the delivery of the existing commit-ments/ the strategic allocation at Burgess Hill.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15168	2	Mr B White	Cuckfield Society	

MSDC has only been able to deliver an annual average of 493 net completions over the last decade; or 532 pa in the last 5 years to March 2015 – a period during which it mostly operated under the NPPF presumption in favour of allowing planning consent to be granted for any new development proposed anywhere that is sustainable. If MSDC falls short in meeting whatever new housing target is approved in its new Plan - and its past record suggests that it may well do so - it risks finding itself back into the current dire situation where it would again lose control over the District's strategic planning, and ever more greenfield sites selected by developers will become free game for building. MSDC itself is already predicting that it will need to start looking for yet more new development sites in 2019.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15308	10	Mr N Kerslake		

In order to meet a higher housing provision of between 850-900 homes per annum MSDC would need to find sites for an extra 850 homes to 1700 homes in total over the plan period. Some of the extra homes could come from the SHLAA and from selecting strategic sites J (Land east of Northlands Brook and south of Scamps Hill Lindfield - 500 dwellings), site K (Haywards Heath Golf Course - 500 dwellings), site L (Eastlands Lewes Road Scamps Hill, Lindfield - 630 dwellings) and site N (land south of Pease Pottage - 660 dwellings). The summary appraisal in the Sustainability Report (Nov 2015) seems to raise no specific sustainability objections.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15308	9	Mr N Kerslake		

MSDC has increased its proposed housing supply to 800 homes per annum but the HEDNA Update (Nov 2015) makes no mention at all of any constraints on the supply of additional sites/land to met an extra 150 homes per annum.

If MSDC was required to reconsider its housing provision to increase the figure to between 850dpa and 900dpa it could revisit the current SHLAA to include sites below the current sustainability judgement threshold. This would be no different to accepting the concept of least worse options as is commonplace in the commercial world and simply represents pragmatism and common sense. It is for MSDC to carry out such an exercise but I would be surprised if such an adjustment to the SHLAA did not increase housing supply from 723dpa to at least 750 homes per annum.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15521	6	Mr T Rumble	Woolf Bond Planning	Taylor Wimpey Strategic Land

The above confirms that even when applying the housing requirement currently proposed and accepting all of the Council's supply assumptions a substantive HLS deficit exists¹. It is therefore critical that that MSDC allocate suitable sites that can begin to deliver housing within the 5 year period and consequently meet the soundness requirement to demonstrate a 5 year HLS. As discussed later in these representations, our client's site is available and deliverable within the 5 year period.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	5	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings

We note that in terms of housing, the Focused Amendments seeks the provision of an additional 2,550 dwellings over the Pre Submission Plan, but only increases the housing supply by 600 dwellings. This leaves an additional 1,950 dwellings to be allocated within the emerging Development Plan(s). This additional quantum of development places a significant importance on the issues presented within our previous consultation response relating to housing supply. Whilst we do not repeat the concerns raised through that consultation process at this point in time, it is likely that once the more realistic supply assumptions advocated in those representations are taken into consideration, the housing provision indicated for “elsewhere in the District, as allocated through future neighbourhood plans, the Site Allocations document ad identified SHLAA sites (years 1-5))” in Policy DP5 (Housing), is likely to significantly increase. At the very least, a 10% reduction should be applied to all existing commitments, to reflect the fact that certain housing commitments will not be developed, will only be partly developed, or may achieve planning permission for an alternative use. If such a discount is provided, it would reduce the level of commitments by 619 dwellings and increase the residual requirement to 2,349 dwellings.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	1	Mr E Fielding		

I have no faith in MSDC to actually add the numbers correctly or to even come close to the 12,400 homes required and so have to challenge the whole plan since housing needs are not going to be met by this proposed approach.

Point 3.16: There is considerable concern regarding deliverability in the first five years of the plan since a large number of the sites have yet to secure planning permission and so cannot be considered to be valid for delivery in the first five years when one refers to the SHLAA rules. This is clear evidence MSDC can't deliver the plan as it is set out and so I object to this iteration of the plan.

There is a shortfall in required housing – how is MSDC to make this up? Year 1 only 630 built so already 170 houses short. Without a plan to deliver the shortfall and catch up the plan is unsound and undeliverable.

There is no evidence that the shortfall of 1,730 dwellings will ever be built. The housing commitments have double counted the SHLAA sites which also fall in any relevant Neighbourhood Plans making this plan unsound and not deliverable.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16478	1	Mr J Clayton		

Object

The plan does still not identify a 5-year land supply. Developers and the inspector will no doubt point this out!

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16766	5	Mr N Greenhalgh	Village developments plc	

Object

To rely solely on one very large strategic site, is surely the planning of wishful thinking, when it will obviously not supply the delivery needed to meet 800 homes per year, let alone any further increase.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	2	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc

Whilst the strategic allocation of the BHNA is supported by Wates, the realistic capacity potential is for “up to” 3,500 dwellings.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20082	1	Mr E Hanson	Barton Willmore	Reside Developments Ltd (Portsmouth Wo

A new strategic site is also proposed to the east of Pease Pottage which has capacity for 600 new homes. It is proposed that this will form part of the first 5-year delivery, although there is no sign of a planning application at this stage. In order for this site to be deliverable the site will need to gain an outline planning permission and then reserved matters and the discharge of pre-commencement conditions. All of this puts the site at least three years away from commencing, and four years from first completions. It is therefore challenging to understand how the site could make a meaningful contribution to the council’s 5-year housing supply.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	5	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group

Secondly, it is a common occurrence that some development sites that benefit from planning permission or allocation are not implemented. Therefore in many instances council's apply a non-implementation allowance to their housing supply or requirements to allow for this issue and ensure their future supply is robust and flexible. Normally a 10% allowance is provided in this regard in relation to five year supply but in relation to overall requirements we would suggest a 5% allowance is applied to the figures identified above.

In respect to five year housing land supply we have the following issues that need to be addressed in a revised version of the local plan:

- ☑ MSDC has for many years experienced a chronic under delivery in housing as we have identified and a plethora of appeal decisions have clearly identified that this is in effect a record of persistent under delivery which means a 20% buffer must be applied to MSDC's five year requirement. This makes addressing this requirement challenging and requires a complete change in planning policy approach to this issue;
- ☑ A shortfall in delivery has already occurred since 2014 when compared against the 800 dwellings per annum housing target and at present there is no method for dealing with this identified shortfall. This needs to be deal with via the Sedgefield method for reasons established in various appeal decisions; and
- ☑ It light of this a large step change in housing delivery is needed in the district and urgent action is required in the form of policies that aim to significant boost the supply of housing in the first five years of the plan, aside from setting a large strategic allocation at Pease Pottage.

Without addressing this issue as part of the plan making process now it is highly likely that the plan will not be found sound if a robust five year supply cannot be identified. Recent decisions in South Somerset (Refs: APP/R3325/A/13/2209680 and APP/R3325/A/13/2203867) and South Gloucestershire (Ref: APP/P0119/A/14/2220291) have shown that if this issue is not adequately dealt with as part of the plan then the authority will be left in a position where it is found to have no 5yrHLS very shortly after its plan is adopted, rendering most of the process meaningless as paragraph 49 of the NPPF will class the newly adopted plan out of date.

To avoid such an outcome which will seriously undermine confidence in the plan making system we urge the council to adopt a permissive policy to housing development in the first five years of the plan. This should include either a general district wide policy that allows sites to come forward that lie in sustainable locations adjoining existing built up areas or alternatively specific allocations of smaller discrete sites that can come forward quickly without the need for extensive infrastructure or phasing arrangements that would delay housing delivery.

In relation to the level of housing any new policy approach would have to deal with within the first five years it is clear to us that the identified shortfall should be dealt with via the Sedgefield method. This means that the policy proposals we have outlined would need to be formulated in a way that addresses the five year requirement, plus shortfall, plus 20% to address the persistent under delivery in the district.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	13	Mr R Brass	GL Hearn	Anstone Development Limited

It is recommended that an up-to-date housing trajectory and housing land supply assessment are set out by MSDC to demonstrate that the District Plan is sound. Without this information the District Plan is unsound and cannot be fully assessed or taken to Examination.

Firstly, the supply figure attributed to Total Housing Commitments should be reduced to take account of under delivery of housing over recent years. It is fair and reasonable to apply at least a 10% discount to the delivery rates set out in Policy DP5: Housing.

Secondly, the Strategic Development Site at Burgess Hill is unlikely to be delivered at the rate set out in the DP-FA-PSD and therefore the site is unlikely to be completed during the plan period (by 2031). The DP-FA-PSD proposes annual completion rates between 310 dpa to 325 dpa whereas recent research on urban extensions demonstrates that in 2013 average annual completions was 120 dpa. The potential failure to deliver Strategic Development at Burgess Hill over the plan period (by 2031) would therefore impact the ability of the plan to effectively achieve policies Policy DP7, DP8 and DP9.

Thirdly, the DP-FA-PSD has also identified a new allocation at Pease Pottage to deliver 600 dwellings. Notably, this site is located within the AONB and is subject to a range of constraints (see Para 5.11 for further analysis). A planning application has been submitted for the site, however similarly to Burgess Hill, expected annual delivery rates would not exceed 120 dpa, once the planning application has fully progressed through the system.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	2	Mr R Brass	GL Hearn	Anstone Development Limited

In terms of housing supply, it is recommended that Policy DP5 provides a set of sources of housing land supply that are achievable and deliverable over the plan period. The GLH assessment of five year housing land supply, demonstrates that MSDC has less than 3 years housing land supply. Significantly, the DP-FA-PSD does not provide an updated housing trajectory to demonstrate the housing land supply position. Therefore, the shortfall remains. Based upon historic delivery rates and existing build rates, the quantum of dwellings associated with existing commitments and strategy development at Burgess Hill, are unlikely to come forward as expected.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20303	4		Boyer Planning	Vortal Developments

there is no amended housing trajectory that shows that the Council can demonstrate a five year supply of housing land. Given the Council's acceptance that it has less than five year's supply of housing land and given that even in 2014/15 the Council was unable to meet this lower housing target (which is a reduction from the South East Plan target), it is highly speculative from the Council to be able to state that it will be able to demonstrate a five year of housing land supply. The Council also acknowledges that the buffer that should be applied is 20% and using the Sedgfield method (which is endorsed by government guidance), this clearly would lead to a significant lack of housing land supply. The Council cannot simply ignore the serious failure of planning of housing over the past few years and the impact that this has had on house prices in the area and should seek to ensure that sufficient land is allocated now to provide for the required homes. A full and updated trajectory must be provided within the Plan. We note that as usual the Council has sought to frontload a significant amount of housing at the beginning of the Plan (in order to seek to demonstrate delivery). However, from years of experience this so called front-loading just does not happen (particularly when dealing with strategic sites that have significant infrastructure requirements). The Plan should include some smaller (and less controversial) sites at the early stages in order to ensure housing delivery.

It is no use whatsoever to rely on neighbourhood plans that deliver no or limited housing or a Site Allocations document in 2021. In order for the Plan to be compliant with national policy and for it to significantly boost the supply of housing, the Plan has to make additional allocations in sustainable locations now.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20303	1		Boyer Planning	Vortal Developments

The housing land supply situation has been made worse with the Council's acceptance that the housing requirement figure should be 800 new homes per annum rather than the 650 identified previously. However, how has the Council sought to address this additional requirement of 2,550 new homes over the plan period? By the allocation of one site providing 600 new homes in an unsustainable location with significant objection arising to this to this allocation. By what about the other circa 2,000 homes needed? Where will these provided? The Plan is silent on this (other than providing significant and inappropriate policies on density increases).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	7	Mr M Evans	Gladman	

Gladman understand the role to which SUEs can play in meeting strategic plan targets for housing we would remind the Council that it must take a cautious approach to the timelines and delivery rates associated with such development. Sites of this nature often have long lead in times due to the delivery of major infrastructure and the need to land assemble sites, whilst therefore they may play an important role in meeting overall plan targets it is vital that the Council ensure that a sufficient supply and range of sites exists within the plan to help meet needs in the shorter term.

The Council envisage the delivery of 1,730 units to come through Neighbourhood Plans, Site Allocations Document and on SHLAA sites identified in years 1 - 5. Whilst Gladman are pleased to see a mechanism for ensuring the delivery of the housing numbers required we are unsure as to why the delivery of the site allocations document is delayed until 2021, and have concerns about the potential negative impact this will have on the delivery of the Councils rolling housing land supply, particularly given its reliance on large SUEs.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	10	Mr W Cobley	Turley	Countryside Properties

the inclusion of windfall sites within the planned supply means that the Council has no contingency to account for the potential under delivery of identified housing sites.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20326	3	Mr C Beaver	Planning Sphere Ltd	Hassocks Golf Club

Object

Paragraphs 3.24-3.31 of the draft District Plan:

We note that paragraphs 3.24 -3.31 of the draft District Plan have also been revised to update housing delivery information including the simple update increase in committed sites from 5,500 to 6,194 in para 3.25. This suggests that over half of the anticipated supply in the Plan period has not yet been identified, notwithstanding the ability of committed supply to be translated into actual homes. We consider that the approach taken needs to be more directive particularly with respect to lower tier settlements such as Hassocks which would provide these communities the necessary guidance and direction in which sound neighbourhood plans can be prepared. Given this again, our original comments on Policy DP5 still stand.

The Plan needs to be more directive in terms of the housing contribution made by lower tier settlements in order to give the necessary direction and guidance to communities in preparing sound neighbourhood plans.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20327	1	Mr A Bateson	AB Planning & Development Ltd	Mr David Crowther

Notwithstanding the identified need, MSDC has failed to make adequate provision in the District for that need (only 90% of new sites required are currently identified) and is particularly lacking at Haywards Heath, which will undermine its vitality, viability and sustainability. This failure has been compounded by an accompanying failure in the draft Haywards Heath Neighbourhood Plan, which follows the lead set by the draft Local Plan for Mid Sussex, and only seeks to accommodate 1,400 of the 2,200 new dwellings required (<64%).

By concentrating the majority of new development needs at just a few large sites, notably around Burgess Hill and at Pease Pottage, the draft Plan lacks flexibility and will fail to deliver even the 13,000 new homes it currently plans for should those few sites not come forward or are delayed in their delivery of new housing completions.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20521	2	Ms H Richardson	Batchellor Monkhouse	Mr R Penman

Paragraph 3.16 states that some flexibility must be required should some sites not come forward and this is supported. However there are still some concerns regarding the housing provision as it relies largely on a few strategic development sites coming forward to meet the housing need particularly at the beginning of the plan period. The plan is heavily focussed on the Burgess Hill extension which only provides for the south of the borough. The proposed development at Pease Pottage would assist with the meeting housing needs around the Gatwick area however it will put additional pressures on transport infrastructure surrounding Crawley which is already heavily congested. There should therefore be an additional emphasis on more small and medium sites coming forward in the earlier stages of the plan to reduce the reliance on the proposed strategic sites, to act as a buffer if they don't fully deliver in the proposed time frame and to provide more housing provision elsewhere in the district, particularly to the north east.

Given these concerns and they council's history of under delivery with housing, we would therefore urge that there is a call for an early plan review. Horsham District Council are required to do this should the Gatwick Extension go ahead. We would ask that this is the case regardless of the Gatwick Extension to ensure the council reassesses their plan if they continue to demonstrate a housing deficit in the first 5 years of the plan period.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	12	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD

should the Neighbourhood Plans allocate sites for development which already benefit from planning permission, there is a real possibility of double-counting to occur, and for the District's housing figures to be inaccurate.

The exact housing figure that the Site Allocations document will provide for is to be determined through the Council's annual monitoring report. In our view the uncertainty regarding this figure is worrying, furthermore, we believe that the determination of housing figures through the annual monitoring report will be wholly reliant on the Council ensuring that adequate monitoring is taking place. The previous monitoring from the Council has been sporadic, therefore it is considered that the Council will need to have appropriate mechanisms in place which will reassure all interested parties that this will not be the case moving forward.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20530	8	Mr N Greenhalgh	Village Developments Strategic Land LTD	Tim North and Associates

Reliance placed on a small number of large sites, as is the case in Policy DP5, in the ownership of one or a consortium of large house builders, inevitably means that undue reliance is placed on the same sites to satisfy future housing provision, which for a number of economic or financial circumstances, can be delayed, particularly where the duration of the Plan is of 15 or more years. It means the time frame in which these large sites become developed operates over a longer duration, in contrast to a larger number of smaller sites which are likely to become unlocked at an earlier date. If reliance is to be made on a small number of large sites, provision should be made to parcel them up in such a way as to meet a range of different house builders.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	12	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G

should the Neighbourhood Plans allocate sites for development which already benefit from planning permission, there is a real possibility of double-counting to occur, and for the District's housing figures to be inaccurate.

The exact housing figure that the Site Allocations document will provide for is to be determined through the Council's annual monitoring report. In our view the uncertainty regarding this figure is worrying, furthermore, we believe that the determination of housing figures through the annual monitoring report will be wholly reliant on the Council ensuring that adequate monitoring is taking place. The previous monitoring from the Council has been sporadic, therefore it is considered that the Council will need to have appropriate mechanisms in place which will reassure all interested parties that this will not be the case moving forward.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	14	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F

Should the Neighbourhood Plans allocate sites for development which already benefit from planning permission be included as part of the evidence base, there is a real possibility of double-counting to occur, and for the District's housing figures to be inaccurate.

The exact housing figure that the Site Allocations document will provide for is to be determined through the Council's annual monitoring report. In our view the uncertainty regarding this figure is worrying, furthermore, we believe that the determination of housing figures through the annual monitoring report will be wholly reliant on the Council ensuring that adequate monitoring is taking place. The previous monitoring from the Council has been sporadic, therefore it is considered that the Council will need to have appropriate mechanisms in place which will reassure the interested parties that this will not be the case moving forward.

Pre-Submission District Plan 2016 - Responses

DP5n

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	13	Mr E Fielding		

"Small windfall sites from year 6 of the plan period onwards" yet monitoring is to happen from 2019 which is year 5, this is impossible! Reliance on chance i.e. windfall is very weak planning and makes the plan unsound since it can't prove how it will deliver.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	14	Mr R Brass	GL Hearn	Anstone Development Limited

Finally, the DP-FA-PSD also proposed to include Windfalls as an identified source of housing land supply that would come forward from year 6 of the plan period. This is not considered to be a robust source of housing delivery, and could as a result place more pressure of Neighbourhood Plans or the proposed site allocations document.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	8	Mr M Evans	Gladman	

The Councils plan also includes a windfall allowance of 495 units for the plan period, the tracked changes main modifications suggest that this is evidenced in a Mid Sussex District Council Windfall Study, at the time of writing this evidence based document was also not available for comment, the policy therefore cannot be considered to be justified or properly evidenced, given the information available during this consultation. The Council will need to ensure that the evidence base referenced is actually published, should the plan be submitted for examination, in order that the policy can be robustly assessed.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	11	Mr A Ross	Nexus	Gleeson Developments Ltd

We object to the reliance in Policy DP5 on a contribution of 495 homes from windfalls.

Paragraph 48 of the NPPF confirms that windfalls can be included in a 5 year land supply calculation. However this is only where there is 'compelling' evidence that such sites consistently become available in the local area '..and will continue to provide a reliable source of supply'. Paragraph ID3-24 of the PPG is clear that the same tests apply to any reliance on windfalls in the longer term.

Accordingly it is evident that to include a windfall allowance in its housing figures, the Council must provide compelling evidence of delivery that looks forward as well as backwards.

The supporting text to Policy DP5 is clear that the allowance for 45dpa from windfalls from Year 6 of the Plan (495 homes in total) is based on a 'Windfall Study' that provides evidence for such an allowance '..based on past delivery'. This is neither compelling evidence nor forward looking and as such, does not accord with the requirements of the NPPF or the PPG.

Pre-Submission District Plan 2016 - Responses

DP6

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	9	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD

Object

How can the SA assess the sustainability of policy DP5 if the scale and direction of growth in the neighbourhood plans is unknown? How does the DC ensure this approach does not prejudice their objectives in terms of housing delivery, sustainable economic growth, sustainable travel, environmental protection etc.?

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	8	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD

Object

We object to the deletion in the supporting text to policy DP6 of the words:-

‘Whilst local assessments of affordable housing need will be relevant, the Housing and Economic Development Needs Assessment also provides a breakdown of the objectively assessed housing need for Mid Sussex by parish to assist in establishing housing needs for Neighbourhood Plans’

It is in our opinion important that policy DP6 does cross refer to the HEDNA and the break-down of the OAHN for each parish. Likewise it is also important that the description of the category 1 – 5 settlements remains in policy DP6. These deletions could be said to be a cynical attempt to hide the fact that many of the category 2 settlements have, through their Neighbourhood Plans failed to make any allocations.

Policy DP6 needs to be more, not less prescriptive in the scale of growth to be accommodated across the district through the Neighbourhood Plans i.e. it should refer the parishes to table 24 of the Nov 2015 HEDNA and the scale of growth it recommends given the OAHN, or similar taking into account the level of growth being directed to Burgess Hill. This approach would in our opinion reflect the Distribution of Development strategy advocated in the PSDP and supported by the SA

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	15	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd

Object

It is considered that the general approach to the settlement hierarchy is sound, in that it seeks to set out an appropriate hierarchy of settlements and direct development towards those settlements in the highest tiers.

however, the Council has chosen to remove the list of settlements and their categories within this policy, we do not agree that this list should be removed from the policy as it provides useful context to the settlement pattern of the District, it also assists in directing development to the more sustainable settlements in the District.

Policy DP6 states that the Council’s preference is that “the location and nature of additional development be identified through Neighbourhood Plans.” We disagree with the wording of this policy, the additional development would appear to in fact be the remainder of the District’s housing requirement after the level of housing on the strategic sites have been taken into consideration. As stated previously, it is our view that this level of development cannot be accommodated through Neighbourhood Plans alone, rather than the Council relying solely on Neighbourhood Plans as a mechanism to bring forward development, it is our view that the District Plan should be amended to include an additional sites such as the Land south of Folders Lane.

DP6 - Settlement Hierarchy

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	14	Mr E Fielding		

Object

There is inconsistency in the settlement hierarchy since it reduces a category of a village if it does not have a built up area boundary which is a restrictive condition that MSDC cannot afford to have when it can't secure sufficient housing to meet its needs. Sustainability is not dictated by the presence or not of a built up area boundary as shown by the email below:

Correspondence from a LPA Senior Planning Officer dated the 7th April 2015 (Appendix 1)

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	9	Mr R Brass	GL Hearn	Anstone Development Limited

Object

POLICY DP6 –

It is recommended that the potential housing contribution of the villages (including Neighbourhood Plan areas) is promoted to be maximised by the District Plan to help achieve the overall housing target.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	4	Mr R Brass	GL Hearn	Anstone Development Limited

Object

Analysis of the villages, in respect of Policy DP6: Settlement Hierarchy demonstrates that Bolney is a midranking settlement and should help to contribute towards achieving the updated District housing target.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	12	Mr W Cobley	Turley	Countryside Properties

Object

Our client supports the principle of the Settlement Hierarchy policy, which seeks to ensure that development is provided in the most sustainable locations. In the case of Mid Sussex this constitutes the Category 1 Towns of Burgess Hill, East Grinstead and Haywards Heath. Whilst this approach can also be applied to the lower tier settlements, greater regard needs to be had to the function of those settlements, and their proximity and reliance on larger settlements for local services and facilities.

An assessment is also required of the physical capacity of those settlements to accommodate additional development, in terms of preserving their existing character and the impact of high-level environmental constraints.

The distribution of development within the district aims to not only focus development within or adjacent to the three towns but ‘encourage both larger villages and smaller villages to take growth to support the provision of additional services and meet local needs.’

Our assessment of the above matters supports the reallocation of Ansty village from a category 4 to a category 3 settlement. This assessment is further explained in our comments on the Council’s Settlement Sustainability Review below.

Given its proximity to services within nearby settlements and the absence of any overriding environmental constraints, we consider that Ansty’s position within the settlement hierarchy should be altered to Category 3 to reflect its potential to provide a significant contribution to the housing needs of the district in a sustainable location, particularly given that another Category 3 settlement (Pease Pottage) is being utilised by the neighbouring authority, Crawley Borough Council in order to meet the unmet housing need of Crawley town.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20327	6	Mr A Bateson	AB Planning & Development Ltd	Mr David Crowther

Object

Policy DP6 – The draft supporting text, which currently states: “...focus the majority of housing and employment development at Burgess Hill...than at East Grinstead and Haywards Heath” should be amended to read: “...focus the majority of housing and employment development at Burgess Hill, Haywards Heath and East Grinstead”.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	14	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD

Object

however, the Council has chosen to remove the list of settlements and their categories within this policy, we do not agree that this list should be removed from the policy as it provides useful context to the settlement pattern of the District, it also assists in directing development to the more sustainable settlements in the District.

Policy DP6 states that the Council’s preference is that “the location and nature of additional development be identified through Neighbourhood Plans.” We disagree with the wording of this policy, the additional development would appear to in fact be the remainder of the District’s housing requirement after the level of housing on the strategic sites have been taken into consideration. As stated previously, it is our view that this level of development cannot be accommodated through Neighbourhood Plans alone, and rather than the Council relying solely on Neighbourhood Plans as a mechanism to bring forward development, it is our view that the District Plan should be amended to include additional strategic sites.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	13	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD

Support

It is considered that the general approach to the settlement hierarchy is sound, in that it seeks to set out an appropriate hierarchy of settlements and direct development towards those settlements in the highest tiers.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	14	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G

Object

however, the Council has chosen to remove the list of settlements and their categories within this policy, we do not agree that this list should be removed from the policy as it provides useful context to the settlement pattern of the District, it also assists in directing development to the more sustainable settlements in the District.

Policy DP6 states that the Council’s preference is that “the location and nature of additional development be identified through Neighbourhood Plans.” We disagree with the wording of this policy, the additional development would appear to in fact be the remainder of the District’s housing requirement after the level of housing on the strategic sites have been taken into consideration. As stated previously, it is our view that this level of development cannot be accommodated through Neighbourhood Plans alone, and rather than the Council relying solely on Neighbourhood Plans as a mechanism to bring forward development, it is our view that the District Plan should be amended to include additional strategic sites.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	13	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G

Support

It is considered that the general approach to the settlement hierarchy is sound, in that it seeks to set out an appropriate hierarchy of settlements and direct development towards those settlements in the highest tiers.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	16	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F

Object

The Council has chosen to remove the list of settlements and their categories within this policy, we do not agree that this list should be removed from the policy as it provides useful context to the settlement pattern of the District, it also assists in directing development to the more sustainable settlements in the District.

Policy DP6 states that the Council’s preference is that “the location and nature of additional development be identified through Neighbourhood Plans.” We disagree with the wording of this policy, the additional development would appear to in fact be the remainder of the District’s housing requirement after the level of housing on the strategic sites have been taken into consideration. As stated previously, it is our view that this level of development cannot be accommodated through Neighbourhood Plans alone, rather than the Council relying solely on Neighbourhood Plans as a mechanism to bring forward development, it is our view that the District Plan should be amended to include an additional strategic site in the two remaining main towns.

Pre-Submission District Plan 2016 - Responses

DP7

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
59	2	Mrs D Thomas	Bolney Parish Council	

Object

Bolney Parish Council has some concerns about the increased traffic loads arising from Residential and Commercial developments in and around Burgess Hill, which are proposed by the MSDC District Plan. Improvements should also be considered to the A23 northbound slip road which leads to and off the A272 Bolney interchange. The traffic loads will increase substantially as a result of the Burgess Hill developments and the heavily used junction with the A272 will have queues backing up along the A23 and the busy single lane A272. In addition, drivers wishing to access the A272 from the Burgess Hill residential and commercial development areas are expected to increase use of the narrow roads running from Burgess Hill to the A272, for example Stairbridge Lane. Other proposed road improvements associated with the Burgess Hill developments are recognised but these do not address the A272 Bolney interchange problem or the Stairbridge Lane problem.

It is felt that this policy should be amended to include the aforementioned A23/A272 junction and narrow road issues, and that DP18 should make it clear where the locality extends to. ie. would this include improvements at this junction.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15624	1	Miss H Clarke	Sport England	

Neutral

This policy requires the development to provide new and/or improved and well connected sports, recreation and open space in and around Burgess Hill. The provision of sports facilities must be based on identified needs. This should be set out in a robust evidence base.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	3	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho

Object

We object to the additional last sentence in the final bullet point which reads: "the development shall also include appropriate carbon reduction, energy efficiency and water consumption reduction measures to demonstrate high levels of sustainability."

The sentence does not provide sufficient clarity as to what „appropriate“ measures might comprise and hence this element of the policy is not effective. Stronger reference should be made to requirements of National Policy and building regulations to ensure the policy is consistent with national policy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	2	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho

Support

We support the broad principles for Burgess Hill as set out in the Burgess Hill Town Wide Strategy and accept that the development of land within our clients' control (Gleeson Developments Limited and Rydon Homes Limited), together with other land within the Northern Arc (Wates Developments) and the other identified strategic site at Kings Way will assist in delivering the Council's policy objectives for the Town.

We support the reference to potential contributions to transport interchanges as an alternative to provision. This provides sufficient flexibility for delivery of required infrastructure and ensures consistency with the emerging Infrastructure Delivery Strategy being prepared by the Northern Arc developers. It must be noted however that the contributions should be justified by technical evidence and assessed through the planning application.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	15	Mr E Fielding		

Object

There is no detail where the public transport will serve to enable people to get to the Business park, this is required to make the plan have any credibility.

The statement "including provision for broadband" is not good enough this could be so slow it is worthless, it needs to be super high speed & capable of being enhanced with time to ensure MSDC does not fall behind technology.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	3	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc

Object

Wates supports the principle of the Burgess Hill allocation within the District plan, however continues to make a technical objection to the wording of the Policy, which should be altered to provide clarity. (See full representation for details).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20470	1	Mr G Flood		

Object

I wish to raise an objection to proposed policy DP7 in particular to the safety concerns that it will effect on the rural residential Stairbridge Lane. This policy and the proposed expansion of Bolney Grange Business Park will bring safety concerns with the increase in speeding traffic and HGV along the rural residential Stairbridge Lane north of the Business park and from the A2300.

This policy will see a further increase in traffic which needs further consultation, impartial studies & examination to ensure that this lane is not used as it currently is by the business traffic and as a short cut to the A272 in order to avoid the well documented bottleneck issues at the A23/A272. Specific measures need to be put in place to ensure vehicles do not use the lane from the A2300 such as calming/width reduction/speed reduced from 60 to 30 mph etc. The proposed Northern Arc expansion on the land south of the A2300 will add significantly to this volume of speeding and HGV traffic.

Pre-Submission District Plan 2016 - Responses

DP9

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
59	3	Mrs D Thomas	Bolney Parish Council	

Object

It is felt that this policy should be amended to include the aforementioned A23/A272 junction and narrow road issues, and that DP18 should make it clear where the locality extends to. I.e. Would this include improvements at this junction.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15308	11	Mr N Kerslake		

Object

Unless MSDC has got the 3,500 figure completely buttoned down with the developers on the Northern Arc, there could well be a shortfall of between 10%-20% of the 3500 figure and if that happened MSDC would need to relook at the strategic site options in their Sustainability Report of November 2015 and pick out another strategic site to make up the shortfall. I make this point to highlight the risks of the "eggs in one basket problem" and also the fact that MSDC may themselves have to pick out and include in their housing provision yet another strategic site.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15624	2	Miss H Clarke	Sport England	

Support

This policy requires A Centre for Community Sport in the vicinity of the Triangle Leisure Centre and St Paul's Catholic College as part of the allocation. The allocation includes an area of land for formal sport. Sport England is pleased to note this inclusion and is keen to be consulted on the Master Plan and Delivery Statement for the developer setting out site-specific infrastructure requirements. The mix and quantity of sports facilities must be informed by a robust evidence base and the Council must be satisfied that the land allocated is capable of providing what is identified as needed.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	5	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho

Object

(detailed comments on policy wording set out in the representation).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	4	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho

Support

We support the broad principles for Burgess Hill as set out in the Burgess Hill Town Wide Strategy and accept that the development of land within my clients' control (Gleeson Developments Limited and Rydon Homes Limited), together with other land within the Northern Arc (Wates Developments) and the other identified strategic site at Kings Way will assist in delivering the Council's policy objectives for the Town.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16063	4	Mr G Mower	Burgess Hill Action Group	

Object

DP11 states it provides the framework to prevent coalescence and one of the Strategic Objectives of DP24 is also to prevent coalescence yet the strategic gap between Burgess Hill and Haywards Heath and Burgess Hill and Ansty will be seriously compromised by the strategic housing allocation to the North & Northwest of Burgess Hill. The David Lock 2007 Report concluded that development along the northern edge of Burgess Hill would need careful and more detailed considerations and was in favour of development in other directions. It suggested development should be restricted to redevelopment of the football club and the former sewage works that would confine it to the confines of the original strategic gap boundary.

It is a requirement of the NPPF for the District Council to adopt the most appropriate strategy, when considered against the reasonable alternatives, for it to be seen as positively prepared. DP19 states that development will only be permitted where certain objectives are met, one of which says “does not cause a severe cumulative impact in terms of road safety and increased congestion.” The proposals for the strategic housing developments at Burgess Hill together with other developments since 2013 will increase the population of the town by around 50% and this will increase traffic flow by at least a similar amount and cause a severe cumulative impact in terms of road safety and increased traffic congestion unless major road improvements are instituted including a third road bridge across the railway line.

The proposals (DP9) for the strategic development North & Northwest of Burgess Hill makes no reference to the retention of the popular and well used Burgess Hill Golf Course and Driving Range. This leisure facility if retained would be an attractive feature of the development and within walking distance of the majority of the new homes.

The large covered driving range is one of only three in the area, the others being at Horsham and Pease Pottage. The loss of these amenities to the residential development would be simply unacceptable and contrary to the provisions of DP17 Sustainable Tourism, DP 22 Leisure and Cultural Facilities and Activities and DP23 Community Facilities and Local Services. There appear to be no plans for alternative provision in the immediate vicinity, and should the facility be lost to property development this clearly would be inconsistent with the national policy as set out in the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	16	Mr E Fielding		

Object

There is no date for the two new primary schools identified, this with the lack of joined up approach it is unlikely the infrastructure will be delivered as required.

No details for secondary schools – without this the plan is not sound or deliverable.

No details for increased hospital capacity or healthcare provision etc – this needs to be in place when houses are built not as an afterthought.

The West Sussex Transport Plan 2011-2026 does not reflect the increased housing number, higher housing density and hence increased traffic movements the documents need to be aligned to ensure a joined up approach or it will not work.

The sustainable transport measures do not match those defined in the NPPF with no mention of low emission/hybrid vehicles, car share, train or even minimising travel etc and a too strong a focus on road and bus. The traffic is going to get worse and the pollutions out of control if oversight is not controlled. This flawed approach is not sound and will not enable MSDC to deliver its plan.

There is recognition of “on-site flood plains” and known flood areas in the allocated strategic development sites – how is this deemed to be suitable? This is against Government edict, making the plan unsound and not deliverable.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	4	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Object				
Wates supports the principle of Policy DP9, and the allocation of land for development to the north and north-west of Burgess Hill, forming the Burgess Hill Northern Arc (BHNA). However Wates continues to hold some technical objections to some of the elements included within the Policy, and the wording of the Policy, which should be altered to provide clarity. (See representation for full details).				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20523	2	Mr C Whelan	Glenbeigh Developments LTD	Dacorar (Southern) LTD
Neutral				
DP9-As the Solar Farm will serve the Employment allocation within the Northern Arc it shall be complimenting this policy				

Pre-Submission District Plan 2016 - Responses

DP9Aa

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
58	2	Mrs R Robertson	Balcombe Parish Council	

Balcombe Parish Council broadly supports the revised Plan; whilst it is unfortunate that MSDC have to take additional housing to feed a housing need from outside the district, BPC support the Pease Pottage development site as an appropriate location to accommodate these additional units.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
63	3	Ms J Holden	East Grinstead Town Council	

We support this new strategic site but would hope no further strategic sites will need to be introduced during the making of the plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
75	4	Mrs C Marsh	Turners Hill Parish Council	

We note that the additional 600 homes to be provided at Pease Pottage show how well Mid Sussex District Council is working with neighbouring authorities. The site will, as noted in DP9A, require sensitive planning considering its position in the High Weald AONB.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
108	1	Ms H Hyland	Environment Agency	

Neutral

Overall we have no concerns regarding the inclusion of this site in the Local Plan.

We note that Thames Water have highlighted that there may not be current capacity within the sewer network to serve the development at this time. It may be prudent to ensure some additional criteria is included within the policy to highlight that the development will connect to the public foul sewer at the nearest point of capacity.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
119	3	Mrs J Dawe	Horsham District Council	

HDC note that a new site has been proposed adjacent to the boundary with Crawley which was previously assessed through the joint SHLAA. It is noted that the SHLAA identified that this site could contribute to the sub-regional needs. As it is directly adjacent to Crawley, HDC will assume that the detailed planning issues for the site will take place between your two authorities.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
2335	5	Mr C Hough	Sigma Planning Services	Rydon Homes

Object

The Pease Pottage site was ranked negatively in the Pre-Submission Sustainability Appraisal submitted in June 2015 and again, although to a slightly lesser extent, in the November 2015 Sustainability Appraisal, primarily focusing on the poor sustainability of the site and its relation to existing facilities. The only difference between the two SA's relates to the delivery of a primary school at the site which improves sustainability and the delivery of a Hospice which improves the availability of health facilities although this type of facility is for palliative care for cancer patients only and does not provide the primary and secondary health services that are more generally required. Both Sustainability Appraisals state the following- "Option (k), (1), (m the site in question), (n) and (o) are all considered to be available within the SHLAA and could contribute towards meeting housing need at a small scale, however they are not considered to be suitable. This is reflected in other objectives within this appraisal". Thus, the site is negatively assessed in the SA and we question how the Council can now state that the site meets all the District Plan objectives.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15521	7	Mr T Rumble	Woolf Bond Planning	Taylor Wimpey Strategic Land

The site allocated in Policy DP9A located to the east of Pease Pottage forms option M in the SA. This option scores 7 positive scores, 8 negative scores and 3 nil scores. Consequently it scores less favourably when compared to alternative options that are not allocated in the Plan. This further supports our argument that alternative options do exist in the District that can be delivered in a sufficiently sustainable manner to meet defined housing needs.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16478	5	Mr J Clayton		

The plan shows that the Burgess Hill Northern Arc land will contribute a large part of the housing needed over the plan period. Has all the land be secured? Has the required team of developers come forward? Has the necessary Master Plan been prepared, if not, what is the likely lead-time for its preparation? Will phased housing development deliver the annual housing numbers required by the proposed District Plan? These are some of the questions an Inspector may ponder. That is: how sound is the proposed plan?

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	2	Mr J Steele	Savills	Thakeham Homes

As a result the increase in plan provision to 800 dpa requires a new strategic site allocation at land east of Pease Pottage, which is recognised as a site which is capable of early delivery. The allocation is supported by MSDC's evidence base, including the Interim SHLAA published in November 2015, which assessed the site as suitable, available and achievable to deliver dwellings.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	14	Mr A Ross	Nexus	Gleeson Developments Ltd

Object

We object in the strongest terms to the proposed allocation of this additional strategic site at Pease Pottage for 600 homes, an allocation which is clearly and demonstrably unsound. Our concerns in this regard focus on the following key issues:

- i. the allocation involves the wholly unnecessary and inappropriate development of land within the AONB, contrary to the provisions of the NPPF;
- ii. it assumes that Pease Pottage is the only settlement that is well related to Crawley; and
- iii. the Sustainability Appraisal process itself is flawed.

Whilst not specific to the District Plan process we also highlight, for the avoidance of any doubt (and for the Council's benefit), the fundamental issue of prematurity associated with the recently submitted planning application for this emerging allocation.

The Pease Pottage application is, using the Council's own description, a 'strategic allocation' and its determination ahead of the District Plan process would clearly pre-determine issues of the scale and location of housing.

Pre-Submission District Plan 2016 - Responses

DP9Ab

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
99	3	Ms E Brigden	Crawley Borough Council	

Notwithstanding this, CBC raises a number of concerns in relation to the new allocation for the site at Pease Pottage, set out in Policy DP9A, primarily relating to:

- Crawley's unmet need: timing and location of strategic development;
- Infrastructure capacity and constraints;
- Site boundary & extent of allocation;
- Density, housing mix & housing need.

CBC requests to be involved in the strategic planning and development management processes, informally as well as formally as a statutory consultee, and the opportunity to participate in effective and genuine joint working alongside MSDC to resolve the cross-boundary issues and implications arising from this allocation.

CBC welcomes the opportunity to work with MSDC to resolve the concerns listed above which are set out in more detail below. It is envisaged modifications to policy wording are likely to satisfy the concerns, although some additional work may be required if current evidence is insufficient. CBC will favourably consider proposed amendments by MSDC to address the issues raised, and will seek to agree these through a Statement of Common Ground, or similar document. CBC is happy to support MSDC in undertaking additional new evidence, where appropriate.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
180	1	Ms L Brook	Sussex Wildlife Trust	

The Sussex Wildlife Trust is concerned that there has been little recognition of the potential for increased recreational impact on the Ancient Woodland adjacent to the strategic site. Tilgate Forest is largely ancient woodland with areas of wooded heath. It is known to contain populations of dormice, bats and all common reptiles. Bird species recorded in the woodland include woodlark, crossbill, lesser redpoll, turtle dove, cuckoo and nightjar. The addition of 600 new homes in such close proximity to the woodland will undoubtedly increase the number of people visiting the site, which could result in the deterioration of the ancient woodland and associated ecology.

Policy DP9A must include a specific requirement to ensure that the ecology of the woodland is not compromised through increased recreational impact. We suggest that bullet point 6 of this new policy is amended to:

'Identify and respond to environmental and ecological constraints and deliver opportunities to enhance green infrastructure and local biodiversity, including:

- the provision of an appropriate buffer, minimum 15m, to the Ancient Woodland to the east of the site.'
- appropriate mitigation measures, in consultation with the Forestry Commission, to ensure no adverse impacts on Tilgate Forest, such as through informal recreation.'

Without this detail, we believe this allocation would be contrary to paragraph 118 of the National Planning Policy Framework (NPPF) and inconsistent with draft policies DP36 and DP37.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
245	1	Ms G Kennedy	Lindfield Preservation Society	

Object

Proposing 600 houses on a site at Pease Pottage that MSDC excluded six months ago as "very unsuitable" for development would undermine any credibility attaching to previous "objective assessments", opening all of them to challenge.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
519	1	Mr M Small	Historic England	

DPA9 - Housing Strategic Allocation the east of Pease Pottage: we do not object in principle to the allocation of land for a significant amount of new housing and associated development to the east of Pease Pottage as indicated in the plan; there are no designated heritage assets within or in proximity to the site that may be directly impacted. However, we recommend that in advance of any masterplanning or design work a desk-based assessment of the archaeological potential of the area is undertaken and the advice of the West Sussex Archaeological Service is sought on the possibility for buried resources in the locality.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
2335	4	Mr C Hough	Sigma Planning Services	Rydon Homes

Object

Rydon do not consider that the introduction of a site on this scale and in this location is an appropriate response to the inadequacy of the housing provision in the Submission Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	14	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD

There are other more appropriate sites located outside the AONB that are better placed to meet the districts housing needs in a sustainable fashion i.e. land to the west of Crawley Down – SHLAA ref 271 and 688; and Land east of Northlands Brook and south of Scamps Hill (Lindfield) - SHLAA ref 483.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	6	Mr M Brown	CPRE - Mid Sussex	

We are especially concerned that MSDC's proposal in new policy DP9A to commit to building an extra 105 homes p.a. for current Crawley residents is based on a proposed allocation of a site comprising 250 acres of land within the High Weald AONB for up to 600 houses, a hospice and a primary school. This same site was rejected less than 6 months ago in the course of the SHLAA process as being "very unsuitable" for development. It is every bit as disturbing that a full planning application has been submitted for this site whilst public consultation on the principle of its allocation is ongoing, and before its allocation (if pursued as a proposal by MSDC) has been considered as part of the District Plan's examination, or the adoption of the Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15168	3	Mr B White	Cuckfield Society	

Key to MSDC's proposal to contribute to meeting Crawley BC's excess housing needs is its new proposal to allocate a 250 acre "strategic" site for 600 new houses at Pease Pottage. 6 months ago MSDC itself described this same site as "very unsuitable" for development. We agree with that description. Not least for the fact that the site is within the High Weald AONB, ignores the wishes of the local Slaugham Parish as expressed in their draft Neighbourhood Plan and makes a mockery of the restrained rural development policies that MSDC intends to include in its own plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	6	Mr R Shepherd	Barton Willmore	Hallam Land Management

Object

The Council (and Inspector) will need to be certain that the proposals can be implemented in full within the trajectory identified. To date, it would appear that insufficient evidence exists to demonstrate that the technical issues and constraints can indeed be overcome without delaying delivery. In the event that any uncertainty exists, additional allocations will need to be provided so as to address any potential shortfall in the delivery of much needed housing.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	3	Mr E Fielding		

I object to the proposal of this site, it is in a sensitive location, no EIA has been conducted and has been pushed forwards without any public consultation and to compound insult is unlikely to deliver the number of houses required and even if it does they are for the Crawley not MSDC so the District will not get any benefit other than worse traffic problems and higher stress on the road network, secondary education system and is contra to MSDC policy which should not allow development if it conflicts with DP10, DP12, DP13, DP14, DP18 since infrastructure is yet to be considered, DP19, DP36, DP37.

There is no explanation for the proposed 600 houses at Pease Pottage – this site is identified to be medium high (50-150) not high or above and has considerable constraints including that an EIA has yet to be conducted and the High Weald AONB Management Plan resists such a major development. In addition the junction at Pease Pottage A23 is already exceeding 100% capacity yet no mitigation is provided to manage the additional traffic this development would cause.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	6	Mr J Steele	Savills	Thakeham Homes

The site was, however, assessed as having an unknown impact on access to retail and community facilities.

The SA stated that the location of the site is remote from existing retail and community facilities, and although the development could be of a size that encourages or provides limited facilities, this would not be to the same standard and range of facilities that can be expected in town/village centres. Thakeham disagrees with this assessment of the site. As stated within the recently submitted application and acknowledged by Policy DP9A, the scale of approximately 600 dwellings is of a critical mass that allows community facilities to be provided and sustained to support future occupants.

The application offers a range of social and community benefits on site including:

- Affordable and market housing provision to meet pressing needs
- Community building with meeting rooms, cafe and retail
- Provision of care facility
- Primary school provision to serve the site and alleviate wider pressure on school places
- Provision of substantial publicly accessible open spaces
- Value added associated with the provision of new homes within the Gatwick Diamond

Additionally Thakeham has proposed to assist with the construction of a community building for Pease Pottage, using existing Section 106 contributions received from other developments. Therefore the SA should be updated to indicate that the site will have a positive impact on the District Plan objective of providing access to retail and community facilities.

Additionally the SA assessed the site as having a negative impact on the objective to reduce road congestion as it was seen as remote from public transport facilities, and remote from essential services, meaning most journeys are likely to take place using private car. Thakeham disagrees with this assessment of the site. Policy DP9A states that the development will provide improved public transport and pedestrian/cycling connectivity with surrounding settlements, and the recently submitted application proposes an amended bus service which will also serve Pease Pottage. Additionally a number of community, retail, education uses will be provided within the site, which will also create employment opportunities. As a result the improvements proposed as part of the development aim to reduce the amount of journeys that will take place using a private car.

It is important that the SA accurately reflects how the site will ultimately be implemented, and that there is consistency between the SA and policy DP9A. Thakeham therefore recommend that the SA is updated to conclude positively against this objective of the District Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	17	Mr A Ross	Nexus	Gleeson Developments Ltd

The overall conclusion confirms that the rationale for the selection of South of Crawley (Pease Pottage) is that it would provide housing close to Crawley where there are unmet needs, and that it would provide a workforce close to the main employment areas (presumably Crawley in the context of Pease Pottage). The SA conclusion notes that “All options generally impact negatively on environmental objectives as all propose strategic development in countryside locations” but states that this “..is to be expected”. Unfortunately these conclusions seem to be a post-justification of a decision to allocate the Pease Pottage site rather than an objective Sustainability Appraisal.

By way of example, it is quite clear that development at either Crawley Down (Option F) or Copthorne (Option E) would also fulfil the criteria to provide a workforce close to the main employment area and to provide housing close to where the need arises i.e. from Crawley. As such, why these options score less well than South of Crawley (Pease Pottage) is wholly unclear and in any event unjustified.

Of even greater concern is the fact that the SA seems almost to ignore the fact that the South of Crawley (Pease Pottage) option is located in the AONB and, therefore, benefits from national level policy protection from major development. To seek to equate this with all of the other options, even where they are outside the AONB and have no such restrictions, is at best wholly incorrect and at worst deliberately misleading.

Even within the flawed scope of this exercise, it is evident from the matrix on pages 109 and 110 of the SA that the Pease Pottage site in any event scores less well than a number of the other strategic options that have not been selected. As such the logic of the decision is immediately unclear even from this limited exercise.

The decision becomes even more questionable when it can be seen that in assessing the Pease Pottage site (Option M) the Council has, despite the site’s location in the AONB, identified only a single negative score against criterion 9 (protecting and enhancing the countryside). Major development in a nationally protected landscape cannot reasonably be scored as anything other than a double negative against this criterion and this highlights, as referenced elsewhere in our representations, the Council’s apparent disregard for the significance attached in national policy to the protection of the AONB. This flaw is compounded further by the fact that, as a constraint of national significance, developing in the AONB is a criterion that should carry very significant weight in the overall planning balance.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20530	1	Mr N Greenhalgh	Village Developments Strategic Land LTD	Tim North and Associates

There has been no effective robust assessment surrounding the choice of the strategic allocation to the east of Pease Pottage ostensibly to meet the unmet housing needs of Crawley. In examining locations for further strategic housing developments, only two sites were identified, one of which was subsequently rejected, as the site promoter had to reduce the scale of the development to 188 homes, thereby reducing its strategic relevance.

Pre-Submission District Plan 2016 - Responses

DP9Ac

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	11	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd

Object

Furthermore, given the location of the site on the District's boundary with Crawley Borough Council it is considered that a Joint Area Action Plan should be put forward as part of the evidence base to justify the appropriateness of this site.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	16	Mr A Ross	Nexus	Gleeson Developments Ltd

In seeking to meet unmet needs we accept the logic that they should, in general terms, be met in proximity to where these needs are generated. If Pease Pottage was the only settlement in Mid Sussex District that was close to Crawley, then we might understand the Council's logic to an extent (although we would still seriously doubt whether it was appropriate to justify development in the AONB).

However in this instance there are a range of settlements in close proximity to Crawley which include, most notably, Crawley Down and Copthorne. These are both Category 2 settlements, which the Council's Settlement Sustainability Review May 2015 identifies as meeting all of the criteria as Local Service Centres i.e. providing a range of retail uses, school facilities, significant local employment opportunities within 5km, a village hall, a health centre and good provision of recreational facilities. Importantly, neither of these settlements is subject to any national level environmental designations. As such these settlements are both less constrained than Pease Pottage and, on the Council's own evidence, more sustainable.

In these circumstances the proposed allocation of 600 homes on the site at Pease Pottage, within a nationally protected AONB landscape and at a Category 3 settlement which the Council's Settlement Sustainability Review May 2015 identifies as having only "...a shop based at the nearby service station and a public house") is irrational, unjustified and unsound.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	12	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F

Furthermore, given the location of the site on the District's boundary with Crawley Borough Council it is considered that a Joint Area Action Plan should be put forward as part of the evidence base to justify the appropriateness of this site.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
2335	3	Mr C Hough	Sigma Planning Services	Rydon Homes

Object

Reduce the scale of the proposed housing allocation at Pease Pottage to under 100 dwellings and allocate small/medium sized sites across the District that were considered to be suitable, available and developable in the SHLAA, in order to meet the required housing.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
107	4	Ms J Field	Natural England	

New policy DP9A proposes allocating a significant area of greenfield land within the High Weald AONB for development. This appears to be in conflict with the principles in the NPPF which provide greater protection to Areas of Outstanding Natural Beauty, including paragraph 115 “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty” and paragraph 116 “Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest”. Although the policy commits to the inclusion of some enhancement measures to limit impact, the loss of a large area of greenfield land within a protected landscape is a major concern. A large development on this site is considered to have a major adverse impact on the AONB so we are obliged to object to this allocation. As major development it will be for the Council to assess the impacts of developing this site against the tests in paragraph 116 of the NPPF including a robust assessment of alternatives. We note that recent applications for development on this site have been submitted so more detailed comments will be included within our consultation response to these.

1. Based on the information provided with the planning application, it appears that the proposed development comprises approximately 32ha of agricultural land, including 30.5 ha classified as ‘best and most versatile’ (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system), much of which will be irreversibly lost as a result of the proposals.

2. Government policy is set out in paragraph 112 of the NPPF which states that:

‘Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.’

3. It is recognised that a proportion of the agricultural land affected by the development will remain undeveloped e.g. through landscaping and public open space. In order to retain the long term potential of this land and to safeguard soil resources as part of the overall sustainability of the whole development, it is important that the soil is able to retain as many of its many important functions and services (ecosystem services) as possible through careful soil management.

4. Consequently, we advise that if the development proceeds, the developer uses an appropriately experienced soil specialist to advise on, and supervise, soil handling, including identifying when soils are dry enough to be handled and how to make the best use of the different soils on site. Detailed guidance is available in Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (including accompanying Toolbox Talks) and we recommend that this is followed.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
116	1	Mr J Lavender	High Weald AONB Unit	

In view of this, it's my opinion that allocating this site for housing would result in an extension of the urban area of Crawley into the open countryside and into the AONB, which would erode the current and clear demarcation between the urban area of Crawley and the AONB and detract from the rural quality of the site.

The wording of DP9A appears to justify the site's allocation by suggesting it is appropriate to build on a site considered unsightly in some way (what assessment has been used to support the opinion that the landscape 'is particularly poor' at this site?) and that the subsequent major and permanent change to the landscape would be a contribution to the conservation and enhancement of the High Weald's landscape. Given the site's AONB designation, the opposite argument could be made - if indeed this area is of poor landscape quality it should instead be a priority site for landscape conservation, restoration and enhancement, which could be achieved without the building of 600 houses and the subsequent loss of the site's current rural quality.

In my opinion a site allocation suitable for 600 houses constitutes a major development and the NPPF will require MSDC to refuse planning permission except in exceptional circumstances and where MSDC can clearly demonstrate that the allocation of the site for a development of this scale is in the public interest and its benefits would outweigh the adverse impacts resulting from the development. It is important to note that this is more than a simple balancing exercise: 'great weight' needs to be applied in the evaluation of the merits of a proposal in all cases. Although there will be other material considerations in addition to landscape and scenic beauty, it's my understanding that those other matters will need to outweigh the AONB designation and its landscape and scenic beauty for planning permission to be granted.

The 1839-40 tithe map for the site shows very unusual field patterns at the site, which we have not encountered before and are likely to have considerable historical significance (echoes of this field pattern can still be seen in the most recent aerial photograph of the site). There is a growing recognition of the historical significance of fields in the AONB and, at the very least, the views of David McOmish at Historic England should be sought for this particular site.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	7	Mr R Shepherd	Barton Willmore	Hallam Land Management

Object

In addition, the Council need to demonstrate that the tests within paragraphs 115/116 of the NPPF (relating to development within the AONB) have been met, passing the tests of exceptional circumstances and public interest, including the consideration of alternative locations and the need for the development. Hallam Land Management is not aware of the consideration of alternative locations to this allocation or adequate evidence to support this proposed allocation.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	9	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd

Object

We note that a further strategic site has been allocated for the development of 600 dwellings at Pease Pottage, however, we are concerned at the appropriateness of this allocation given the sites location within and AONB.

LUC to produce a report on the Sustainability Assessment of Cross-Boundary Options for the Mid Sussex District Plan, and this report states that "the national level landscape designations of the High Weald Area of Outstanding Natural Beauty and the South Downs National Park cover around two thirds of the district and are a primary constraint to housing development. Whilst limited development could occur in the AONB, it is not likely to be appropriate for large-scale strategic development to be developed here."

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	2	Mr E Fielding		

The recently identified site at Pease Pottage, site reference 666, Hardriding Farm has yet to even have an Environmental Impact Assessment Conducted on it, having only had a Landscape capacity study yet the MSDC are claiming 150 dwellings in the first five years. This site is 100% in the High Weald AONB and so is a sensitive site and wholly within the countryside so has considerable restrictions that MSDC have yet to acknowledge. The whole site has been ruled out due to constraints such as Ancient Woodland and mitigation required so it is very questionable if 600 dwellings could actually be accommodated without harm outweighing the benefit of this site.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	15	Mr A Ross	Nexus	Gleeson Developments Ltd

Accordingly it is evident that there are a variety of sustainable locations, which are not affected by AONB or National Park designations, which could accommodate additional housing. As such it is impossible to see that any circumstances exist to justify the allocation of the Pease Pottage site, let alone the exceptional circumstances (and public interest) required by the NPPF. This fundamental policy conflict alone requires the deletion of this allocation.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	10	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD

We note that a further strategic site has been allocated for the development of 600 dwellings at Pease Pottage. However, other non-AONB sites should be considered before making housing allocations within the AONB.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20530	3	Mr N Greenhalgh	Village Developments Strategic Land LTD	Tim North and Associates

The selected housing allocation to the east of Pease Pottage is to take place in the High Weald AONB, when there are other sites which are both available and deliverable, having a less damaging impact. The justification for the use of this greenfield site scores poorly when it is considered that one of its main advantages is that it lies opposite a motorway service station with a convenience store, being a facility principally designed to attract the motorist using the M23 and A23.

The justification for relying on a site in the AONB having regard to the contents of paragraph 116 of the NPPF is stated to be (i) the need for the development; (ii) the scope for developing outside the designated area; and (iii) the impact on the AONB's characteristics which it is said could be enhanced through a mixed development incorporating 600 houses, as the western part of the site is poor. It is difficult to reconcile a large mixed use strategic development of the size contemplated, whilst protecting views into and out of the site, whilst taking into account the objectives of the High Weald AONB Management Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	10	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G

We note that a further strategic site has been allocated for the development of 600 dwellings at Pease Pottage. However, other non-AONB sites should be considered before making housing allocations within the AONB.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	10	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F

We are concerned at the appropriateness of this allocation given the sites location within and AONB

We believe it should be acknowledged that the Council commissioned independent consultants LUC to produce a report on the Sustainability Assessment of Cross-Boundary Options for the Mid Sussex District Plan, and this report states that “the national level landscape designations of the High Weald Area of Outstanding Natural Beauty and the South Downs National Park cover around two thirds of the district and are a primary constraint to housing development. Whilst limited development could occur in the AONB, it is not likely to be appropriate for large-scale strategic development to be developed here.”

On this basis we do not believe that a site within the AONB, a nationally important site should be allocated for development and consider this approach unsound. Para 115 of the NPPF requires AONB to be given the highest status of protection. Allocation of land at Imberhorne Farm would not have this level of impact, and as a result would allow for the protection of valued landscapes elsewhere.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14901	2	Mr D Wilson	Savills (UK) Limited (Thames Water)	Thames Water Utilities Ltd (Thames Water

We do not object to Policy DP5 and DP9A in principle, but consider amendments are required in relation to the new allocation of a strategic site at east of Pease Pottage for 600 dwellings.

We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

Policy DP9A should be amended to set out the sewerage infrastructure capacity issue and the requirement for a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered prior to the occupation of the development.

Pre-Submission District Plan 2016 - Responses

DP9Ah

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
117	2	Mr D Bowie	Highways England	

It should be noted that we are currently reviewing the Pease Pottage applications DM/15/4711 and DM/15/4706. These applications cover the strategic site included in DP9A. We have raised concerns regarding these applications and are currently discussing these matters with yourselves, West Sussex County Council (WSCC) and the applicant. Unfortunately this site has been brought forward by the applicant ahead of any investigatory work and agreement between Highways England, Mid Sussex District Council and WSCC. At this point neither of us are certain whether or not this site is deliverable bearing in mind the extent of Highway and Transport mitigations that may be necessary. Despite this we are not, at this point, opposed the inclusion of the site within the District Plan provided that the Transport Study can demonstrate that sufficient mitigation can be delivered for this strategic site.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
192	3	Mr C Owen	West Sussex County Council	

The County Council awaits the results of the transport modelling being commissioned by Mid Sussex DC and technical work by the site promoter through the preparation of a Transport Assessment to establish whether increased District Plan housing numbers, including the new strategic allocation, can be delivered without severe impacts on the highway after mitigation.

In order to determine access and mitigation requirements for the strategic site itself, further work is required by the site promoter in consultation with West Sussex County Council and Highways England with a view to demonstrating that safe and suitable access to the site can be achieved and that current queuing problems at junction 11 of the M23 will not be significantly worsened. However, at this stage the County Council has concerns with the principle of development on this scale at this location given the known highway capacity issues at this important interchange between the M23 motorway and the local road network.

The proposed wording of the new policy includes a comment (in the eighth bullet point) about improving connectivity with surrounding settlements, in particular Pease Pottage and Crawley. It is suggested that this be expanded to require provision of appropriate access to the countryside surrounding the site, particularly on foot and on bicycle.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	10	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd

Object

the possible highway impact of development in this location due to its close proximity to the A23 junction which it is understood is already at or is close to capacity.

We are also concerned at the wording of Policy DP9A, which states that "Work is being undertaken with West Sussex County Council and Highways England to ensure that access can be satisfactorily gained to the site without exacerbating current traffic conditions at junction 11 of the M23." It is our view that this work should have been undertaken prior to the allocation of this site within the Focused Amendments document.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	11	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F

We are concerned at the possible highway impact of development in this location due to its close proximity to the A23 junction which it is understood is already at or is close to capacity.

We are also concerned at the wording of Policy DP9A, which states that “Work is being undertaken with West Sussex County Council and Highways England to ensure that access can be satisfactorily gained to the site without exacerbating current traffic conditions at junction 11 of the M23.” It is our view that this work should have been undertaken prior to the allocation of this site within the Focused Amendments document.

Pre-Submission District Plan 2016 - Responses

DP9Ai

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
164	2	Ms S Solbra	Southern Water	

With regard to the additional strategic site at Pease Pottage it is likely that new or improved water supply infrastructure will be required to service the site. Local (site-specific) infrastructure will need to be delivered by the development in line with the water industry's regulatory framework. This should be recognised in Policy DP9A.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	6	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho

However we object to its lack of employment provision; specifically regarding its spatial relationship with Crawley; an administrative area that cannot accommodate its own district employment needs.

It is therefore questioned why the Council have not considered the ability of the additional strategic allocation at Pease Pottage (which is adjacent to Crawley) to accommodate an element of employment provision in reflection of the District Plan's strategy to accommodate unmet employment needs from adjacent authorities; the vast majority of which is resultant from Crawley. Such an approach would be consistent with the allocation of the Pease Pottage site to partly meet the unmet housing needs of Crawley.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	17	Mr E Fielding		

Is there a need for a further primary school when there is one in Handcross (approximately 1 mile away) that is not a 100% capacity? How has school place planning been conducted? When will the school be built?

What about secondary schooling? Children grow up and leave primary school at 11! This is not in line with DP26.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	3	Mr J Steele	Savills	Thakeham Homes

Thakeham proposes Bullet 2 of the Policy to be amended to reflect the recent application submission, and it should therefore read (new text underlined): “A new primary school (including potential co-location of nursery provision. In the application, community uses are proposed at a separate location within the site and therefore should be included within a separate bullet point to the new primary school. The Policy, to be effective, should permit community uses elsewhere within the site. Bullet 9 of the Policy states the allocation should “provide new formal play facilities and informal open space on the site, alongside the provision of new allotments to encourage healthy lifestyles”. The ability of the site to accommodate allotments will only become apparent at the detailed reserved matters stage of each phase of development. Therefore Thakeham proposes the Policy be amended to read (new text underlined): “provide new formal play facilities and informal open space on the site, alongside the provision of new allotments or suitable alternative, to encourage healthy lifestyles”.

Thakeham wishes to make comment on Policy DP29 Affordable Housing, which are detailed later in this letter. However it is proposed that Bullet 10 of Policy DP9A is amended to read (new text underlined):

“Provide a range of housing including a target of 30% affordable housing”.

Thakeham disagrees with the requirement in Bullet 11 of the Policy to include ‘community energy systems’.

The inclusion of these systems is not possible at the lower level density of development agreed for the site by MSDC, and therefore this should be removed from the Policy.

Thakeham wishes to ensure that all of the properties meet the higher levels of sustainability now required by the Building Regulations.

Changes sought:

- Bullet 2: “A new primary school (including potential co-location of nursery provision.
- New Bullet: “The suitable provision of Community Facilities”.
- Bullet 9: “provide new formal play facilities and informal open space on the site, alongside the provision of new allotments or suitable alternative, to encourage healthy lifestyles”.
- Bullet 10: “Provide a range of housing including a target of 30% affordable housing”.
- Deletion of Bullet 11.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	9	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)

Object

Policy DP10 as currently drafted, takes a very broad brush approach and seeks to protect all areas of the countryside from development by virtue of its intrinsic character and beauty without reference to the value of that landscape. Therefore contrary to the NPPF (para 115), it affords it a similar level of protection as the highest quality landscapes. The policy is therefore exceptionally restrictive and would frustrate development, in the countryside in nearly all circumstances, and could therefore unnecessarily restrict sustainable development in close proximity to existing settlements. Given the extent of AONB landscape within the District such an onerous approach to local landscape policy is likely to result in the District Council failing to meet its housing requirement (see representations on Policy DP5).

The additional criteria is as follows:

- The character, beauty and quality of the landscape;
- The intrinsic value of the landscape;
- The susceptibility of the countryside to change brought about by development;
- The potential for the mitigation of potential impacts resulting from development;
- The benefits of the scheme in respect of landscape character.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	1	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)

It is noted that additional text has been inserted which expands on how the Council will positively approach and reflect the 'presumption on favour of sustainable development'. The additional text states that 'in doing so, it will respond to opportunities to meet economic, environmental and social needs, each strand treated equally.'

We object to the above wording on the basis on the last part of the sentence 'each strand treated equally'. The wording implies that any development must meet all the sustainability credentials as outlined in the policy and that, for example, if a proposal has significant social benefits these benefits would not be weighed in its favour no matter how significant those benefits are, if it does not meet, for example, all the environmental and/or social requirements. This approach is contrary to the NPPF which throughout advocates a balancing of considerations, recognising concessions can be made where wider sustainability benefits can be demonstrated. There are clear references to the 'weighing' up of considerations as paras 14, 65, 74, 88, 102, 118, 133 and 140 of the Framework.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	1	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho

We are wholly unclear as to the basis, or purpose, of the proposed change to Policy DP1.

The policy, as originally worded, cross-referred to NPPF paragraphs 14 and 15 and was unambiguous.

The inclusion of the proposed additional wording, the purpose of which is wholly unclear, means that on the one hand the policy refers to and relies upon the text in the NPPF but on the other, now includes text that is outwith the Framework i.e. "in doing so, it will respond to opportunities to meet economic, environmental and social needs, each strand treated equally."

This creates avoidable and unnecessary confusion and unnecessarily extends an already lengthy policy. This is contrary to paragraph 154 of the Framework which requires that Local Plan policies are clear. The changes undermine the effectiveness of the policy.

Proposed Change

The proposed amendments to Policy DP1 should be deleted as they are unnecessary and reduce clarity.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16063	3	Mr G Mower	Burgess Hill Action Group	

Object

DP10 stresses the need to protect and enhance the countryside and states that agricultural land of grade 3a and above will be protected but a large proportion of the Mid Sussex weald is comprised of agricultural land grade 3a and below so in reality DP10 provides little or no real protection. Currently the UK produces only about 60% of its food consumption and with the current growth in population due to immigration it is important that real protection is given to the countryside. A large part of the good quality arable land either side of the A273 and B2036 roads within the strategic housing allocation to the North & Northwest of Burgess Hill is currently (as it has been for many years) used for grazing and the production of cattle feed for the local dairy farm and its loss due to the housing development appears to be contrary to the principles of DP10.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	16	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd

Support

We support the amended wording of this policy, we consider that the wording is more positive and is in accordance with the requirements and guidelines of the NPPF and PPG. We note that this policy suggests that the built-up area boundaries are subject to review by Neighbourhood Plans or through a Site Allocations Development Plan Documents which is to be produced by the District Council. We consider that a review of the built-up area boundaries should be progressed given that the current built-up area boundaries have remained unchanged since prior to the adoption of the existing Local Plan (2004).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	18	Mr E Fielding		

Object

There is no mention of Built- up area boundaries (BUAB) in the NPPF yet MSDC have decided to limit suitable housing opportunities by including this additional barrier. When have the polices maps been reviewed? How have decision to where BUABs should be? How are BUABs changed? What factors determine the position of a BUAB? Who has the last say re a BUAB – parish or District?

The impact of a strategic site not in a Built up Area Boundary is going to be greater than it would be for a small number of houses. What does a built up area boundary give residents – it is not a measure of sustainability.

Sites cannot currently be SHLAA's if they are not in a built-up area boundary (BUAB) so the rules need to change and all SHLAA sites outside of a BUAB now need to be assessed for this policy to stand or it is restrictive and out of line with the NPPF making this plan unsound and not deliverable.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	5	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc

Object

Given the importance of the BHNA for the delivery of the District Plan, a wider assessment has been made to release the land for development. Policy DP10 should be clear in this respect. Additionally the third paragraph should be amended to ensure no ambiguity with respect of allocation land.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	9	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group

Object

This policy is still problematic as drafted this would prevent new housing development in sustainable locations adjacent to existing urban areas which would conflict with policy DP1 and national planning policy. Given the issues we have raised with regards to the identified need and the critical undersupply of housing in the district, this policy would conflict with the requirements of the NPPF.

The inclusion of this policy without a proposal to address the HLS issue in the first five years will unreasonably inhibit the council's ability to 'meet objectively assessed needs, with sufficient flexibility to adapt to rapid change' and hence be in direct conflict with paragraph 14 of the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	10	Mr R Brass	GL Hearn	Anstone Development Limited

The overall strategy set out in Policy DP1: Sustainable Development for Mid Sussex seeks to consider economic, social and environmental factors in an equal manner. Whilst this is in accordance with national policy, it must be noted in practice that in some cases (for example development in the AONB) this is challenging to achieve. This must be acknowledged if the Plan is to achieve the proposed District housing target.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	13	Mr W Cobley	Turley	Countryside Properties

Object

we believe that this text should be strengthened to make clear that applications for housing development on edge of settlement sites may be acceptable, in circumstances where the local authority is unable to demonstrate a five year supply.

Amend text to acknowledge that housing development on some edge of settlements sites may be acceptable where the Council is unable to demonstrate sufficient housing supply and the proposals are in general accordance with the other policies in the plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	13	Mr A Ross	Nexus	Gleeson Developments Ltd

Object

We object to the amendments to Policy DP10 which state that the countryside will be 'protected in recognition of its intrinsic character and beauty'. This is based on a fundamental misapplication of national planning policy.

Paragraph 17 bullet 5 of the NPPF states, inter alia, that planning should take account of the different roles and character of different areas, recognising the intrinsic character and beauty of the countryside. There is no policy protection for the countryside generally - the reference to 'protection' in paragraph 17 of the NPPF relates only to land in the Green Belt.

Policy DP10 must therefore be amended to delete reference to the 'protection' of the countryside generally and to instead accord with the provisions of paragraph 17 of the NPPF. In terms of applying this policy in a development management scenario, the 'recognition' of the intrinsic character of the countryside should have regard to the conclusions of the relevant evidence base documents referenced later in the policy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20327	7	Mr A Bateson	AB Planning & Development Ltd	Mr David Crowther

Object

Policy DP10 & the Proposals/Policies Map – The boundaries of the 'Countryside Area of Development Restraint' should be redrawn around the main settlements of Haywards Heath and East Grinstead in order to enable the objectively assessed housing needs of the two towns to be fully met. In particular at Haywards Heath: the 2.6ha area of land south of Sunte House, west of Gander Green, east of Wickham Farmhouse and north of Sunte Close should be included within the town's identified settlement boundary (see accompanying plan).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20327	3	Mr A Bateson	AB Planning & Development Ltd	Mr David Crowther

Object

By drawing the policy DP10 'countryside' boundary too tightly around the built-up areas of the main settlements, particularly around Haywards Heath, the draft Plan will fail to accommodate its development needs in a truly sustainable manner and will therefore fail to adhere to both its new plan policy DP1 and NPPF guidance contained at paragraphs 14 and 15. Policies DP5 and DP6 need at very least to be able to fully satisfy the objectively assessed development needs of the main towns of Haywards Heath and East Grinstead and should facilitate this through a redrawing of the settlement/DP10 countryside boundaries, which will then guide the Neighbourhood Plans.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20523	3	Mr C Whelan	Glenbeigh Developments LTD	Dacorar (Southern) LTD
Neutral				
DP10-The land chosen to locate the Solar Farm is above Grade 3 agricultural value				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	15	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD
Support				
We support the amended wording of this policy, we consider that the wording is more positive and is in accordance with the requirements and guidelines of the NPPF. We note that this policy suggests that the built-up area boundaries are subject to review by Neighbourhood Plans or through a Site Allocations Development Plan Documents which is to be produced by the District Council. We consider that a review of the built-up area boundaries should be progressed given that the current built-up area boundaries have remained unchanged since prior to the adoption of the existing Local Plan (2004).				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	15	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G
Support				
We support the amended wording of this policy, we consider that the wording is more positive and is in accordance with the requirements and guidelines of the NPPF. We note that this policy suggests that the built-up area boundaries are subject to review by Neighbourhood Plans or through a Site Allocations Development Plan Documents which is to be produced by the District Council. We consider that a review of the built-up area boundaries should be progressed given that the current built-up area boundaries have remained unchanged since prior to the adoption of the existing Local Plan (2004).				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	17	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F
Support				
We support the amended wording of this policy, we consider that the wording is more positive and is in accordance with the requirements and guidelines of the NPPF and PPG. We note that this policy suggests that the built-up area boundaries are subject to review by Neighbourhood Plans or through a Site Allocations Development Plan Documents which is to be produced by the District Council. We consider that a review of the built-up area boundaries should be progressed given that the current built-up area boundaries have remained unchanged since prior to the adoption of the existing Local Plan (2004).				

Pre-Submission District Plan 2016 - Responses

DP11

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
2229	1	Mr D Evans		

Object

I would like to see Local Gaps in Mid Sussex become part of planning policy, to stop coalescence between settlements, with the increased housing targets from 10,600 to 13,600 this puts further pressure on our green fields.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20326	5	Mr C Beaver	Planning Sphere Ltd	Hassocks Golf Club

Object

We are disappointed that the Council has not taken this opportunity to amend this Policy to make it more sustainable and compliant with national policy advice. Given this our previous representations still apply.

Pre-Submission District Plan 2016 - Responses

DP13

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
63	5	Ms J Holden	East Grinstead Town Council	

Object

We are concerned as to the potential development of this amendment. We would seek to see a change to not significantly increasing the footprint of the original dwelling on any replacement property in AONB. As it currently reads the property could be replaced by a dwelling several times the size of the original.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	19	Mr E Fielding		

Object

There is no definition of “isolated”, so how is this assessed? Subjective opinion is not acceptable when MSDC is drafting the plan and should avoid it.

There is statistics to prove that the number of people working in agriculture has significantly fallen yet MSDC have not moved with the changing times and to limit rural workers to those who work on the land is out of step with modern times. It would be appropriate to enable workers to work from home since technology as per DP21 now allows this and this is a sustainable form of employment that also aids the delivery of DP12, DP14, DP19, DP21, DP23. Without changing the parameters for what employment is acceptable in the countryside MSDC is out of line with needs, fact and the NPPF and so this needs to be expanded to include the options technology enable to be sound or deliverable.

A “re-use of a rural building for residential use” is seen to be sustainable and not isolated no matter where they are situated, yet a site located in walking distance to many services is considered isolated and not sustainable – I cannot fathom this logic that makes no sense. If development is to be sustainable surely this is all development, otherwise there is a two or more tier system that would lead to future occupants being in homes cut off from services etc if the same criteria are not applied and MSDC could approve planning applications for unsustainably located new dwellings that result from converted agricultural buildings with no requirements or conditions on them at all.

The reliance on agriculture and forestry probably do not require 24/7 access to the land – plants & trees do not tend to have emergencies in the night and so such a sweeping generalised category is poorly conceived and drafted.

Rural exception sites could ghettoise future occupants and make them solely reliant on the private motor car if they are not located close to sufficient services or have suitable access to them. Those seeking a home in an exception site are likely to have less options for travel than those who are not. Exception sites can be located in what would be considered an unsustainable location with limited services with little thought for future residents needs – how can this be a good thing or sustainable over the longer term?

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	11	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group

Object

This policy remains largely the same since the last version of the Plan and suggests that large scale housing in the countryside is inappropriate apart from that required for agricultural workers. Given the severe HLS deficit this policy is premature as significant amounts of land currently located in the countryside may be required to address this issue. Furthermore this policy should remove reference to Policy DP10 as this is effectively an embargo on housing supply.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20312	1	Mr S Cox	Tim North & Associates Ltd	Sean Cox

The Policy allows for replacement dwellings in the countryside subject to three criteria which are considered appropriate and reasonable, as well as in accordance with national policy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
181	5	Mr J L Phillips	Tandridge District Council	

Neutral

Due to the small amount of buffer zone around the Ashdown Forest falling within Tandridge District, Tandridge have in the past taken the pragmatic approach that this strategic issue is unlikely to have a significant impact on development within Tandridge. However, more recently, an appeal decision determined that the distance of the buffer zone around the Ashdown Forest is no longer applicable and therefore Tandridge could be more affected by the European designation of a Special Conservation Area and Special Protection Area on the Ashdown Forest. We are still of the view that this issue needs early discussion with your Inspector and Natural England, and we are happy to join you for those discussions as it may be of mutual benefit. We also reiterate our current commitment to working with you on Strategic Access Management and Monitoring (SAMM) and the provision of a Suitable Alternative Natural Greenspace (SANG) within Mid Sussex.

Tandridge understand that MSDC have secured a SANG. However, we understand that now with the increase in housing provision, there may be limited capacity that Tandridge District could use. The Council would like to continue working with Mid Sussex to identify if there is an opportunity to share this SANG.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20521	6	Ms H Richardson	Batchellor Monkhouse	Mr R Penman

Neutral

DP1 stated that economic, environment and social needs should be treated equally which is essential as there tends to be a focus on the environmental needs particularly surrounding the Ashdown Forest, which heavily restricts growth both in Mid Sussex and surrounding areas. It is appreciated that this is largely down to the Habitats Regulations however the council need to be more proactive with assisting developers in establishing suitable mitigation rather than preventing development.

Pre-Submission District Plan 2016 - Responses

DP16

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	20	Mr E Fielding		

Object

The inclusion of “dark night skies” for the National Park should be followed through to the AONB since it is within the High Weald AONB Management Plan. If this is not included the plan does not conform to the agreed High Weald AONB Management Plan as per DP14.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	6	Mr A Ross	Nexus	Gleeson Developments Ltd

Object

We do not object to Policy DP16 insofar as it seeks to protect the South Downs National Park (in accordance with the provisions of the NPPF) but we do object to the more extensive yet increasingly vague wording, which makes the policy ineffective.

As set out at paragraph 154 of the NPPF, only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in a plan.

Policy DP16, as amended, expands the policy as originally drafted but importantly, does so at the expense of clarity and effectiveness. The inclusion of the words ‘or cause detriment to’ seem wholly superfluous given that they follow the words ‘detract from’. The additional wording makes the policy far less clear and suggests that a separate and additional test is included?

Furthermore, how should a decision-maker assess whether a proposal adversely affects ‘transitional green spaces’? What are transitional green spaces? Does this refer to all green spaces between a site and the National Park or are they specially defined? If so, how and where are they defined?

Whilst we are sure that the proposed changes to this policy are well-intentioned, it is clear from the above that they are unnecessary and would cause significant uncertainty at the development management stage. As such the changes fundamentally undermine the effectiveness of this policy.

Pre-Submission District Plan 2016 - Responses

DP18

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
59	4	Mrs D Thomas	Bolney Parish Council	

Object

It is felt that this policy should be amended to include the aforementioned A23/A272 junction and narrow road issues, and that DP18 should make it clear where the locality extends to. ie. would this include improvements at this junction.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	21	Mr E Fielding		

Object

Who establishes what the “necessary social, physical and green infrastructure..” are since if these are contributed towards development is to be permitted? Do they have a minimum level of contribution required to secure development? How is it decided how much needs to be contributed to these items? If an item is on the Civil Infrastructure Plan is it considered necessary?

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16478	7	Mr J Clayton		

Object

It is widely recognised that over several past years required infrastructure development has not kept pace with housing delivery. How will the necessary catch-up infrastructure development be funded? The plan gives no indication.

Pre-Submission District Plan 2016 - Responses

DP19

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
63	6	Ms J Holden	East Grinstead Town Council	
Support				
We welcome this amendment as car parking remains an issue and developments should ensure that adequate provision per dwelling is made.				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
181	3	Mr J L Phillips	Tandridge District Council	
Object				
Our previous comments set out that "Tandridge are aware that there are considered to be capacity issues on the A22 / A264 between Felbridge and East Grinstead. The MSDC Local Plan sets this out as an issue on page 7 of the Local Plan. It is noted that the Infrastructure Delivery Plan sets out some improvements to the A22 / A264 junction that will be paid by the Community Infrastructure Levy. We are of the view that it would assist communities if a minor change to the Plan brought more clarity to the trigger point for delivery of this infrastructure improvement". It does not seem that this has been included with the focused amendments to the plan.				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
415	1	Ms K Harrison	Surrey County Council	Surrey County Council
Support				
We responded to the consultation on the Pre submission Mid Sussex District Plan in July of this year to raise objection relating to the need to address the mitigation of potential cross-boundary impacts of the plan on the highway network in Surrey. [NOTE: This representation was subsequently withdrawn] We therefore welcome the amendment to policy DP 19 which makes provision for appropriate mitigation to support new development on the local and Strategic Road Network, including the transport network outside of the district.				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
868	1	Mr P Brooks		
Object				
I still believe that the Plan needs to include in the Infrastructure requirements the need for highway improvements in East Grinstead. This has been identified as an area requiring action yet it is still not included in these focussed amendments despite the increased requirement in MSDC for more housing. This will inevitably put more pressure on the East Grinstead area and therefore needs further amendment				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	17	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD

Object

Wates are also concerned about the potential implications of the proposed changes to policy DP19 wherein it is suggested that:- Residential development in and close to the town centres which are well served by public transport will normally be expected to make lower parking provision;

In the first instance we would ask what is meant by ‘in and close to the town centres’; and ‘well served by public transport’. These terms need to be clearly defined in order to enable the policy to be effective. In addition we would question whether proximity to a town centre is necessary a good way of determining whether a reduced level of parking is appropriate. It is access to sustainable forms of public transport that provide an opportunity for reduced parking, albeit we would suggest that given the problems that arose from the maximum parking standards imposed in PPG3 it would be more appropriate to look at issue on a site by site basis than try and impose a blanket restriction on parking provision in certain areas.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	8	Mr M Brown	CPRE - Mid Sussex	

Object

One of the bullets in DP19 has been amended to refer to the special qualities of the South Downs National Park as a particular consideration in the context of the cumulative impacts of development on road safety and congestion. The new addition should also refer to the special qualities of the High Weald AONB, which is actually within the Plan area and is entitled to similar levels of protection.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	22	Mr E Fielding		

Object

The Mid Sussex Transport study has not been updated to reflect the increase in housing numbers. This will result in a gross impact at Pease Pottage due to the current issues identified at the junction of the A23 with no measures detailed to reduce or remove these problems. The increase in traffic has to be coupled with measures to enable it to flow with ease and for people to travel in a sustainable manner not be sat in traffic jams at over capacity junctions. This is not in conformity DP12, DP20 or DP21 since there is no attempt to show how technology can reduce travel.

The West Sussex Transport Plan 2011-2026 does not span the same duration as this draft District Plan so what happens post 2026? Has this plan been reviewed in light of the NPPF 2012? If not then it needs to be or the plan is not sound.

What is the maximum “cumulative impact in terms of road safety” that is acceptable? How will this be measured? Without details it is a meaningless phrase making the plan and policy unsound.

The South Downs National Park has been noted to be protected but not the High Weald AONB – why? In the NPPF both are to be protected – make the changes or the plan fails the NPPF criteria.

Pre-Submission District Plan 2016 - Responses

DP20

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14909	2	Mr P Rainier	DMH Stallard	

The policy refers to the Council's Economic Growth Assessment (2014) which appears to be the only economic evidence base produced by the Council, this states that 521 new jobs per annum are required to achieve the council's baseline economic growth. The figure of 330 new jobs per year is therefore significantly lower than the figure required to provide for adequate economic growth in the District. The Council's November 2015 HEDNA report states that 695 dpa will provide only 210 new jobs per annum, this is significantly less than the figure of 330 set out in the focused amendments.

It is our view that the figures quoted within policy DP2 have been overestimated by the Council, and furthermore the figures, although overestimated, would not provide for adequate economic growth in the District.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	23	Mr E Fielding		

Object

Sustrans NCN20 runs from Crawley to Brighton via Handcross and Staplefield not just along the A23, neither Staplefield or Handcross are on the A23. This needs to be corrected as shown in the evidence base for this plan within the Capacity of Mid Sussex District to accommodate development June 2014 the report prepared by LUC in Figure 2.11: Environmental Issues: Green Infrastructure and Open Spaces. NCN20 needs to be linked at Hicksted/A2300 to provide a safe cycle route to the proposed Burgess Hill Strategic Development and Science Park.

Pre-Submission District Plan 2016 - Responses

DP22

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15624	6	Miss H Clarke	Sport England	
Support				
Sport England supports the latter part of the above policy as it echoes the criteria set out in Paragraph 74 of the NPPF.				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15624	5	Miss H Clarke	Sport England	
Neutral				
<p>The policy requires on-site provision of new leisure facilities for all new residential development where appropriate. This is not very clear because there is no explanation of what would be appropriate. The requirement for on site provision is good and compliant with National Policy but the Council must be clear when this is expected and how the quantity/quality of on-site requirements is calculated. In order to identify what onsite provision is needed, it's essential that the Council has a robust assessment of the needs and opportunities for sport. Any forthcoming supplementary planning document must incorporate the findings of a recent sports strategy and the current PPS. Sport England provide substantial advice online regarding how the Council should assess the needs and opportunities for sport https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/assessing-needs-and-opportunities-guidance/.</p> <p>The District Plan advises that details about the provision, including standards, or new facilities will be set out in a Supplementary Planning Document. Sport England is very keen to be consulted on such a document. In the meantime, it is unclear how the requirements of on-site provision will be derived.</p>				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15624	4	Miss H Clarke	Sport England	
Support				
Sport England supports a policy that improves the quality, quantity and accessibility of sport and recreation facilities. It is suggested that increasing the community use of sports facilities at education sites could help improve and strengthen local partnerships and increase participation in arts, culture, sport and physical activity. Multi-sport community facilities could also improve the provision of leisure services and leisure assets in order to increase participation in leisure activities.				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15624	3	Miss H Clarke	Sport England	
Neutral				
The evidence base for this policy in terms of built facilities is six years old and is likely to be out of date therefore Sport England would question its robustness. Sport England would encourage the Council to update this evidence base. Sport England is pleased to note the PPS is listed here as part of the evidence base.				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	24	Mr E Fielding		
Object				
<p>How will the increased car journeys to sporting and leisure facilities be moderated to ensure traffic issues are not caused? E.g. travel to play cricket, go in a car, park and then play and then drive home all additional journeys impacting neighbours to the cricket club.</p> <p>Do churches and places of worship come under cultural facilities? What about facilities other than pitches e.g dance studios, swimming baths, tennis courts, running tracks, sculpture trails, theatres, adult fitness trails etc? MSDC should not be cricket alone. How many cricket facilities does MSDC require in a 2 mile radius – there are 2 in Ansty and at least 2 in Cuckfield all within 800m – this seems a waste of money and out of kilter with residents requirements. Both clubs are accessed by private motor vehicles which increases the traffic on local roads.</p>				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20373	5	Miss K Waldron	Urbanissta	
Object				
<p>The application of Policy DP22 would need to be considered on a case-by-case basis in conjunction with the scale of development and the location of development with existing facilities. This needs to be set out more clearly within the proposed Policy amendments.</p>				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	16	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD
Object				
<p>Whilst we consider the general objectives of this policy to be sound, it is our view however that the detail of this policy is not sound, in particular the Council's approach to proposals that involve the loss of facilities.</p> <p>The policy should allow for situations where the facility is no longer financially viable. This would ensure that sites which are no longer economically viable are able to be appropriately redeveloped when necessary. This is considered to be in accordance with the objectives of the National Planning Policy Framework, which seeks to encourage the effective use of land by reusing previously developed land.</p>				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	16	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G
Object				
<p>Whilst we consider the general objectives of this policy to be sound, it is our view however that the detail of this policy is not sound, in particular the Council's approach to proposals that involve the loss of facilities.</p> <p>The policy should allow for situations where the facility is no longer financially viable. This would ensure that sites which are no longer economically viable are able to be appropriately redeveloped when necessary. This is considered to be in accordance with the objectives of the National Planning Policy Framework, which seeks to encourage the effective use of land by reusing previously developed land.</p>				

Pre-Submission District Plan 2016 - Responses

DP24

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
60	2	Mr S Cridland	Burgess Hill Town Council	

Neutral

DP24 – “ incorporates well integrated parking that does not dominate the street environment, particularly where high density housing is proposed;”. If higher densities are proposed then good design and layout will be paramount to avoid the issues experienced in Bolnore Village, Hammonds Ridge and housing to the West of Burgess Hill;

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16412	3	Dr I Gibson		

The Plan leaves open the interpretation of NPPF para 55 with regard to the scale of the development affected, the meaning of isolated and the need for quality and innovation in the design.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20534	18	Ms K Lamb	DMH Stallard	Welbeck Strategic Land LLP (Imberhorne F

Object

Whilst we agree with the Council’s approach to detailing Housing Density, and the provision of a new policy, we believe that the details contained within this policy are overly prescriptive.

We are also concerned that some of the densities quoted are too high for the District. Densities of at least 70 dwellings per hectare is suggested in areas within and close to the centres of the three main towns, and densities of at least 50 dph are required for areas within the remaining built up area boundaries of the three main towns. We are concerned that these levels are too high, and furthermore, would not be in keeping with the existing level of development in these areas.

We consider that this policy should be amended to remove the wording ‘at least’. It is also that in order to protect the countryside a density of 30-35 dph would be most appropriate, however, the policy should allow for density to be considered on a site by site basis. This would allow development to come forward which allows for a mixture of density on the site and is not constrained to meet such high densities throughout the development, and this would ensure that all proposals are appropriate to the District.

Pre-Submission District Plan 2016 - Responses

DP24a

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
60	3	Mr S Cridland	Burgess Hill Town Council	

Object

DP24A – “High density development in and close to the town centres and/or which are well served by public transport will normally be expected to make lower parking provision.” This is not supported by Burgess Hill Town Council because the majority of householders will have vehicles to make those journeys not possible by public transport, as evidenced by Bolnore Village and West of Burgess Hill, and therefore the parking standards in the Burgess Hill Neighbourhood Plan should always be applied.

DP 24A – “Lower densities will only be accepted where it can be adequately demonstrated that these are necessary in order to avoid harm to the established characteristics of the area and/or to residential amenity.” Burgess Hill Town Council considers the current proposal of a blanket 50 dph too prescriptive as a range of densities exist throughout the town. We believe the test for allowing lower densities is a difficult hurdle and could be applied inconsistently. We would suggest the wording of DP24A be amended to read:

“a range of densities from 30-50 dph should be considered and that higher densities will only be appropriate where they are compatible with the established characteristics of the area and will have no adverse effect on residential amenity”.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
63	7	Ms J Holden	East Grinstead Town Council	

Support

We welcome the amendment as the trend to reduce the number of dwellings per hectare is usually linked with negotiation to reduce affordable homes as unviable. We note the link with the design and minimum size and standards. This must be effectively controlled and robust to ensure that quality of build is not lost for the sake of quantity. We remain concerned as to the Governments encouragement for S106 agreements to be negotiated to encourage build, but this should not be at any price and affordable homes are needed especially in the south east.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
75	5	Mrs C Marsh	Turners Hill Parish Council	

Support

We also welcome the housing density policy which will help to protect the open countryside.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
87	4	Mr R Fraser	Brighton and Hove City Council	

Neutral

Housing Density Policy

New policy DP24A on Housing Density is welcome. This promotes a more efficient use of housing sites in accordance with National Planning Policy Framework. It would be useful if it could be clarified within the text of the Plan whether the increased housing densities are reflected in the site allocations in the District Plan and whether they have been taken into account in the revised sustainability appraisal.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
519	2	Mr M Small	Historic England	

DPE24A – Housing Density: HE supports the inclusion of a policy to manage density in new housing development where this is an appropriate planning tool to avoid inappropriate development related to location or scale. It is important to include safeguards, however, that protect and reinforce existing character, form and scale of the built environment, particularly in historic settlements that are often also designated conservation areas. Where there is the possibility of significant amounts of development taking place in such locations, up-to-date conservation area appraisals should be in place as part of the plan evidence base and as a management tool to guide future development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
2335	6	Mr C Hough	Sigma Planning Services	Rydon Homes

Object

Remove the prescriptive minimum density figure and re-word the policy in line with the NPPF to the effect that new developments will be expected to be carried out at the maximum achievable density commensurate with the character, history and identity of the local surrounds.

Policy DP24A - Housing Density. A density requirement which imposes a minimum requirement of 40 dwellings per hectare on large sites with in excess of 5 hectares of developable land is superfluous and is not supported by the NPPF.

40 dwellings per hectare is a high density to achieve in developments that are urban extensions to existing settlements where the adjoining development is mainly 2-21f> storey. Local character would be put at risk if such a prescriptive minimum density policy is applied. Most of the new housing sites across the District will be urban extensions and the adjacent development will be at significantly lower densities. It is acknowledged that the under-use of land can be harmful but a prescriptive density level, particularly one as high as 40 d.p.a will be harmful to local character in most cases.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	15	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD

Object

We are concerned about the implications of the proposed introduction of policy DP24A (housing density). Whilst we acknowledge the need to make efficient use of land we do not believe setting mandatory densities is an effective way of dealing with it. Furthermore it is not clear from policy DP24A what is meant by 'in and close to the centres of Burgess Hill, East Grinstead and Haywards Heath. This needs to be clarified by reference to a suitable plan if this policy is to be taken forward.

In addition to the above, we would question whether policy DP24A as drafted reflects the preamble to policy DP24A as set out in the FA-PSDAP i.e. should the policy be an 'at least' policy or require an average across the site. Large sites with in excess of 5 developable hectares could provide for a range of 20 – 70dph across the site and still result in an average of 40dph. Again this point needs clarifying.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	9	Mr M Brown	CPRE - Mid Sussex	

Object

We are however shocked at the levels of density proposed in this policy DP24A, and query their compatibility with meeting the objectives set out in DP24. We assume that this policy DP24A is motivated principally by a paucity of suitable developable sites to enable MSDC to meet the (in our view unachievable) housing target that it proposes to set itself.

It is of concern that the Council offers no explanation of what a 70 dph level in town centres means in practice in terms of the types of housing it envisages, how that would meet social needs, nor its compatibility with the character of our District's three market towns. Nor does its "analysis of densities achieved" evidence base appear on its website.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	7	Mr J Stevens	Home Builders Federation Ltd	

Object

The policy is unsound because the densities proposed are unjustified. They are unrealistically high. The policy will therefore also prove ineffective because it is too inflexible and will become an obstacle to delivery.

The policy stipulates minimum densities at a number of locations. These densities are far too high. The way in which the policy is phrased removes the ability for these densities to be negotiated.

The densities proposed are considerably in excess of the densities for development that one typically sees in these areas. The figure of 50 to 70dph for the settlements of Burgess Hill, East Grinstead and Haywards Heath and 45 dph for the strategic allocations and 40 dph on large sites are particularly excessive when the current average in these settlements is 30-35 dph. While it is not impossible for new development to be built at a higher than average density, it is specifying compliance with densities that are much higher than the typical local character for the area. This is likely to result in design difficulties and objections being made on design and amenity grounds with concerns about the adverse effects on landscape setting, local character, conservation area character, and the setting of listed historic assets etc.

The Council should provide evidence of the prevailing density of existing development at the locations listed. We refer the Council to the DCLG report Land Use Change Statistics in England: 2013/14 released on 6 August 2015

the average density of residential development in Mid Sussex is 9-25 dwellings per hectare. Densities of over 70 dph are typical only in the central London boroughs and very few other locations. Such high densities are not even typical for the centre of major English cities such as Birmingham, Manchester and Leeds. It is, however, more typical for neighbouring Brighton & Hove.

DCLG Live Table P232: Land use change: density of new dwellings, by local authority, 1996-99 to 2008-2011 records the following density of development in Mid Sussex:

1996-1999 23 dph

2000-2003 33 dph

2004-2007 37 dph

2008-2011 37 dph

The Council is therefore stipulating a considerable increase in the density of development that is typical for the area. We would question whether this is feasible or desirable and whether this is supported by local people. PPG3 attempted to enforce a minimum national density of 35 dph and it is generally acknowledged that this resulted in some very poor residential schemes, where family homes were crammed into tight spaces with resulting problems such as cars parked on public pathways. We are also aware of recent appeal cases in this part of the region where flat schemes in town locations have been dismissed since they represent an overly dense and incongruous form of development.

The policy also leaves no room for discretion since the policy states that applications 'must provide net residential densities of at least...'. The policy goes on to state that applications that do not make efficient use of land will not be permitted. It would be reasonable, therefore, for a prospective applicant to assume that the decision-taker would expect that an efficient use of land would involve complying with the minimum densities stipulated in this policy. The policy is too inflexible.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	9	Mr R Shepherd	Barton Willmore	Hallam Land Management

Object

The density requirements within the emerging Local Plan are wholly unjustified and will not create high quality living places. The design, form, character and density needs to be informed by a proper understanding of the individual character, context and place, not arbitrary density standards applied across the whole district. This approach clearly does not take into account the variations between rural and urban areas and areas of different character.

To summarise, MSDC needs to reconsider their housing density requirements in order to ensure density is informed by the character of the place and surrounding area, thus complying with principles and requirements within the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	8	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho

Object

The policy requires strategic allocations (one of which is the Northern Arc) to achieve a net residential density of at least 45 dwellings per hectare. We have concern regarding the high average density this would require and the rigidity of the policy itself. As such we consider the policy is not justified in relation to the tests of soundness for examination of local plans. The key tests that need to be considered relate to whether the District Plan is in accordance with legal and procedural requirements and whether it is sound (i.e. positively prepared, justified, effective and consistent with national policy) in accordance with paragraph 182 of the NPPF. We have concerns that the policy at present is not deliverable nor, will it enable the delivery of sustainable development.

Neither the Council's justification for Policy DP24a on density nor its evidence base has considered how a minimum of 45 dph across the Northern Arc would be consistent with achieving the SHMA.

Given this uncertainty and the evolving masterplanning work for the Northern Arc it is considered wholly inappropriate to impose a rigid density policy without fully understanding the impacts on the site's ability to achieve the SHMA housing mix.

Furthermore such policy restrictions do not allow for flexibility to adapt to changes in the housing market. It is critical that the District Plan supports delivery of the Northern Arc over the long term given a scheme of such scale will be delivering housing over the life of the plan (until 2031). It must be flexible to respond to changes in the housing market over time.

As such it is evident that existing national policy and the Government's emerging emphasis on reviewing density policy clearly identifies that density policies should reflect local circumstances that a range of densities should be promoted and minimum requirements should be avoided.

The other report identified in the evidence base is the „Urban Design Compendium“ (UDC), English Partnerships/The Housing Corporation, August 2000. It is not clear which specific references within the UDC supports the policy. Indeed there are many key elements of the UDC which would preclude a minimum density policy.

The evidence base for the policy referred to by the Council therefore does not support the need for a specific density policy and appears to indicate the opposite; that blanket standards lead to poor quality development and that density should not be the driver for development rather a measure of it.

Furthermore, the Council has not identified how a density policy is justified in principle, or why the specific target of 45 dph is appropriate as opposed to other density figures. We can only speculate that this would appear to be informed by the net developable area of the Northern Arc and the Council's aspiration to achieve 3,500 units on the site overall.

We consider that a suitable average density for these sites would be 40 dph (as an absolute maximum).

(Rep inclusion more detailed info on BH capacity).

Residential density examples from elsewhere - set out in rep

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	17	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd

Object

Whilst we agree with the Council's approach to detailing Housing Density, and the provision of a new policy, we believe that the details contained within this policy are overly prescriptive.

We are also concerned that some of the densities quoted are too high for the District. Densities of at least 70 dwellings per hectare is suggested in areas within and close to the centres of the three main towns, and densities of at least 50 dph are required for areas within the remaining built up area boundaries of the three main towns. We are concerned that these levels are too high, and furthermore, would not be in keeping with the existing level of development in these areas.

We consider that this policy should be amended to remove the wording 'at least'. It is also that in order to protect the countryside a density of 30-35 dph would be most appropriate, however, the policy should allow for density to be considered on a site by site basis. This would allow development to come forward which allows for a mixture of density on the site and is not constrained to meet such high densities throughout the development, and this would ensure that all proposals are appropriate to the District.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16478	6	Mr J Clayton		

I note the new policy on Housing Density. How will this policy be applied to developments that already have outline planning approval based on a maximum number of dwellings and a provisional Master Plan? If housing densities are allowed to increase, how will the knock-on additional demands on transport, education, health, water needs, drainage and general infrastructure be re-evaluated, delivered and funded?

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16766	4	Mr N Greenhalgh	Village developments plc	

The policy is unsound because the densities proposed are unjustified. They are unrealistically high. The policy will therefore also prove ineffective because it is too inflexible and will become an obstacle to delivery.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	8	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc

Object

The SA, amended in November 2015, only assessed the introduction of the National Described Standards against the objectives of the District Plan, and not against the objectives contained within Paragraph 20 of the PPG.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	6	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Object				

Wates wishes to object to Policy DP24A Housing Density, which is a new Policy proposed in the Focussed Amendments. The Policy is superfluous and unlikely to be justified nor effective. (See full representation for denisty information).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	7	Ms H Allen	Barton Willmore	Crest Nicholson South
Object				

This policy outlines the minimum densities that residential development must provide for in specific locations. The proposed densities are considered to be disproportionately high in relation to the development which is characteristic of these areas.

The wording of this Policy suggests that in order to make efficient use of the land, the minimum densities outlined the Policy must be met. If efficient use of the land is not made, development proposals will be permitted. However, it goes on to state that lower densities will be accepted "where it can be adequately demonstrated that these are necessary in order to avoid harm to the established characteristics of the area and/or to residential amenity".

This flexibility is supported, however, this policy seems to somewhat contradict itself and must be clarified to ensure that inappropriately high densities are not imposed on all sites. The density of developments should be reflective of site characteristics and not purely prescribed by policy.

As a result this policy is neither 'justified' nor 'effective' and therefore fails the tests of soundness.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	4	Mr J Steele	Savills	Thakeham Homes
Object				

As a District Plan allocation the site is subject to new Policy DP24A, which aims for 45 dph.

However this is inconsistent with the supporting text of new Policy DP9A, which recognises that a density of approximately 30 dph should be achieved for the development due to site sensitivities, most notably the Area of Outstanding Natural Beauty (AONB). The plan must ensure consistency for the Pease Pottage allocation at the lower density level, reflecting these site-specific sensitivities.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	9	Mr M Evans	Gladman	
Object				

In generic terms our view on the policy would be that the Council must be careful in its insistence on certain densities for certain sites. Individual site circumstances may well lead to a level of density which can be reasonably achieved and which may not accord with those set out within the policies. As written at present the policy could be used as a reason to refuse otherwise sustainable development. At best the consideration of a schemes density should be a factor in arriving at the planning balance argument, but this should only be done after an assessment of the sites individual characteristics, and the densities it can reasonably and practically achieve.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	12	Mr A Ross	Nexus	Gleeson Developments Ltd

Object

We support the policy aspiration to ensure the efficient use of land, and accept that the NPPF states at paragraph 47 that as part of a suite of measures to boost significantly the supply of housing LPA's should, inter alia, set out their own approach to housing density to reflect local circumstances. We also accept that some locations in urban areas, which are well served by public transport, have the potential to deliver a higher density of development. However we have a number of significant concerns about the soundness of this policy, as set out below.

The proposed approach to residential density must of course be consistent with, and have regard to, the provisions of Policy DP28 of the District Plan, which requires that housing mix within developments has regard to the best available evidence.

with a need in the District which clearly focuses on family housing, it is difficult to see how the density requirements of Policy 24A, which will necessitate the delivery of smaller units, could possibly be met in a way that complies also with Policy DP28 relating to Housing Mix.

We note from the DCLG Land Use Statistics that in 2013/14, the average residential development density achieved in England as a whole was 37dph on previously developed sites. In Mid Sussex it was 25dph. We note from this same source that in the longer period between 1996 – 2011, average residential densities on greenfield and previously developed sites in Mid Sussex District ranged from 23dph to 37dph. In England generally the range was 25dph to 42 dph in this same period. This period of course includes a number of years when PPG3 provided government policy on housing, and this included a very clear urban focus which also sought to significantly increase densities. Yet notwithstanding this, Mid Sussex achieved average densities of 23 – 37dph – significantly below that now sought by Policy DP24A.

Against that background it is inconceivable that Mid Sussex could realistically achieve the density levels now proposed, and we have seen no evidence to indicate otherwise.

With reference to some of the Council's own strategic allocations we consider that this is unsound for the following reasons:

- i. the Council is proposing to allocate an additional strategic site at Pease Pottage for 600 homes. Policy DP9A confirms that the average density of the emerging proposals for this site is 30dph, and we understand that the recently submitted planning application accords with this. This of course fundamentally conflicts with Policy DP24A which requires that density should be a minimum of 45dph; and
- ii. we have seen no evidence to indicate that it is possible, or appropriate, to require a minimum average density of 45dph across the Burgess Hill Northern Arc allocation (3,500 homes). This is a very high average density across a development of such a significant scale and the Council must provide suitable evidence to justify such an assumption. Given all of the above, the Council's last minute inclusion of Policy 24A can only be seen as a thinly disguised attempt to increase the supply of housing from existing sites and allocations in order to reduce the need to allocate additional sites for housing. This is not proper plan-making, or a considered response to local circumstances. Instead it is an engineered and apparently cynical attempt to avoid providing the housing in Mid Sussex District which is much needed.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20326	6	Mr C Beaver	Planning Sphere Ltd	Hassocks Golf Club

Object

We do not consider that this additional policy on density is necessary or justified in its current form, given that such prescriptive density requirements are no longer required by national policy guidance. The Policy as currently drafted is overly prescriptive and whilst the overall aim of making the best use of available land is reasonable, the effect of such a prescriptive policy would be to prevent rather than enable necessary housing development

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20373	6	Miss K Waldron	Urbanista	
<p>Object</p> <p>Objections are made to the implementation of Policy DP24A. The implementation of this Policy would need to be based on evidence of what has been delivered at the range of scales identified within this Policy. This Policy is also negative in its drafting.</p> <p>Whilst reference is made to the Mid Sussex District Council analysis of densities achieved, November 2015, it appears that this information is not within the public domain.</p> <p>Without being able to scrutinize the evidence on which this Policy is based, this Policy is not robust and justified and cannot be applied to proposals.</p>				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20390	5	Mr M Richardson	Persimmon Homes (Thames Valley)	
<p>Object</p> <p>Persimmon support the need to make the most efficient use of land in line with Government guidance, however, we are concerned that policy DP24A is too prescriptive and potentially could lead development coming forward, which doesn't necessarily meet the needs of all sectors of society.</p>				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20524	5	Mr O Harwood	RH & RW Clutton	East Grinstead Tenants Limited - Halsford E
<p>Support</p> <p>We note and strongly support the proposed housing density policy.</p>				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	18	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD
<p>Object</p> <p>We are also concerned that some of the densities quoted are too high for the District. Densities of at least 70 dwellings per hectare is suggested in areas within and close to the centres of the three main towns, and densities of at least 50 dph are required for areas within the remaining built up area boundaries of the three main towns. We are concerned that these levels are too high, and furthermore, would not be in keeping with the existing level of development in these areas.</p> <p>We consider that this policy should be amended to remove the wording 'at least'. This would allow development to come forward which allows for varying density on the site and is not constrained to meet such high densities throughout the development, and this would ensure that all proposals are appropriate to the District.</p> <p>However, we consider that this will reduce overall the number of houses which will be delivered due to the need to take account of the neighbouring character/density. As a result supply will be lower and additional site allocations required.</p>				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20529	17	Ms L Da Silva	DMH Stallard	Haywards Heath Golf Club LTD

Whilst we agree with the Council's approach to detailing Housing Density, and the provision of a new policy, we believe that the details contained within this policy are overly prescriptive.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	18	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G

Object

We are also concerned that some of the densities quoted are too high for the District. Densities of at least 70 dwellings per hectare is suggested in areas within and close to the centres of the three main towns, and densities of at least 50 dph are required for areas within the remaining built up area boundaries of the three main towns. We are concerned that these levels are too high, and furthermore, would not be in keeping with the existing level of development in these areas.

We consider that this policy should be amended to remove the wording 'at least'. This would allow development to come forward which allows for varying density on the site and is not constrained to meet such high densities throughout the development, and this would ensure that all proposals are appropriate to the District.

However, we consider that this will reduce overall the number of houses which will be delivered due to the need to take account of the neighbouring character/density. As a result supply will be lower and additional site allocations required.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20533	17	Mr P Rainier	DMH Stallard	Oakmere Projects Management LTD (HH G

Whilst we agree with the Council's approach to detailing Housing Density, and the provision of a new policy, we believe that the details contained within this policy are overly prescriptive.

Pre-Submission District Plan 2016 - Responses

DP25

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	8	Mr J Stevens	Home Builders Federation Ltd	

Object

The policy is unsound because it is unjustified and contrary to national planning policy.

We refer to our representations made in July 2015. The Council has not addressed the issues we raised back then in terms of the necessity and viability tests set out in the NPPG. Considering the full costs imposed on development by national and local standards is a requirement of national policy (NPPF, paragraph 174).

As we argued previously, the Council's evidence in terms of the cost of complying with the Nationally Described Space Standard is unclear.

Secondly, the NPPG requires local planning authorities to establish the need for adopting in policy the Nationally Described Space Standard. This requires a local authority to assess the size and type of dwellings currently being built in the area. If the homes being built in Mid Sussex are typically in line or exceed the Nationally Described Space Standards then there may not be a case for adopting the new national standard since the constriction of sub-optimally sized dwellings is not an issue.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	10	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)

Object

The NPPG makes clear (Reference ID: 56-020-20150327) that where there is a need for internal space standards than this must be justified taking into account the, need, viability and timing of such requirements. The District Council has not provided evidence that justifies the need for Policy DP25, contrary to the NPPG. In particular it has not assessed the affect the imposition of the standards will have on the demand for starter homes which might put the homes increasingly out of reach of lower income households.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16766	7	Mr N Greenhalgh	Village developments plc	

Object

The policy is unsound because it is unjustified and contrary to national planning policy.

I agree. I am at the coalface of planning applications and wholeheartedly agree with HBF. It is difficult enough coping with the very high infrastructure charges in Mid Sussex that average £15,000 a unit, without yet more burdens that plainly affect viability.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	7	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc

Object

Wates wishes to object to Policy DP25 and the inclusion of the Nationally Described Space Standards in the District Plan. There is no supporting documentation published within the District Plan's Evidence Base that these three areas have been assessed, and therefore there has been no justification regarding the adoption of the Nationally Described Space Standards. Policy DP25 makes reference to the Mid Sussex Whole Plan and CIL Viability Assessment (2015), however this document was based on the previously adopted Mid Sussex minimum space standards. Although these standards may be seen as similar to the National Described Standards, this evidence cannot be seen as an up-to-date assessment which justifies Policy DP25.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	8	Ms H Allen	Barton Willmore	Crest Nicholson South

Object

The PPG states that where a need for internal space standards is identified, LPAs should provide justification for such policies and take into account the need, viability and timing of adopting these standards (56-020-20150327). It is not considered this policy is justified due to the lack of evidence demonstrating the need for this policy and lack of viability assessment.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	9	Mr J Stevens	Home Builders Federation Ltd	

Object

The policy is unsound because it is unjustified and conflicts with national policy.

We refer back to our representations of July 2015. We remain concerned that the Council has not adequately justified its case for adopting the accessibility and wheelchair housing standards. We previously referred the Council to the tests set out in the NPPG in section ID 56-007.

If a local planning authority wishes to adopt the optional technical standards in relation to accessibility and wheelchair use dwellings the NPPG requires the authority to:

- Establish the likely future need for housing for older and disable people;
- The size, location, type of dwellings needed to meet specifically evidenced needs;
- The accessibility and adaptability of the existing housing stock; and
- How needs vary across different housing tenures.

(ID 56-007)

We have been unable to locate such an analysis. Policy DP26 refers to the Whole Plan & CIL Viability Assessment of June 2015. This is an appropriate evidence document to answer the viability dimension of the issue but it does not help answer whether the policy is necessary.

The Council needs to establish whether there is a need for this policy requirement and the accessibility and adaptability of the existing stock.

It follows from above – i.e. answering the necessity question – whether it is necessary and proportionate to require that 100% of all new dwellings are built to Part M4(2) and 5% of the affordable element built to Part M4(3). While there may be a need for more accessible dwellings in Mid Sussex, it does not necessarily follow that the house building industry is solely responsible for addressing a shortage of such dwellings. If some of the existing stock is capable of adaptation then it may not be appropriate to require that all new dwellings meet the accessibility and wheelchair user optional standards. .

In terms of viability, we note that on page 32 of the Whole Plan & CIL Viability Assessment, June 2015, that the council has assumed that the cost of building to Category 2 Accessible and Adaptable Dwellings Standards – which is the same as the cost of building to Part M 4(2) – is subsumed within the earlier policy requirement for all homes to be built to Code 4. Since the Code for Sustainable Homes has been cancelled and the Council cannot insist on compliance with this (see the Written Ministerial Statement, 25 March 2015) then the Council will need to reflect upon the cost of this for its potential impact on viability. Policy DP26 requires that all dwellings meet Part M4 (category 2) albeit with some exemptions. We refer the council to the DCLG report Housing Standards Review: Cost Impacts, September 2014 (EC Harris). This was the report published to support the Government's Housing Standards Review. It provides an assessment of the costs associated with building to the optional standards. Page 38 provides a breakdown of the costs of building to the various Part M standards. The cost of building to Part M4 (2) averages out to £682 per dwellings depending on size. The cost is greater for flats. The Council will need to consider carefully these costs to ensure that it does not impair the viability of development, especially the delivery of affordable homes.

The Council has also not calculated the effect of building to Part M 4(category 3) although we note that policy DP26 requires that 5% of the affordable housing element should

be built to this standard. The cost of building to Part M4(3) is steep. We refer the Council to the DCLG report Housing Standards Review: Cost Impacts, September 2014 (EC Harris). It averages at £16,779 per dwelling depending on type, rising to over £22,000 for terraced, semi and detached properties. This is likely to have a significantly adverse effect on viability (something the Mayor of London has acknowledged). The Council must assess the implications for viability of this policy requirement in combination with other policy expectations. Considering the full costs imposed on development by national and local standards is a requirement of national policy (NPPF, paragraph 174).

The NPPG advises that where step free access is not viable neither of the Optional Requirements in Part M should be applied (ID 56-008).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	11	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)

Object

We welcome that the policy now recognises that meeting the provisions of Category 2 - Accessible and Adaptable Dwellings might be unachievable on some sites due to locational factors such as typography. However, notwithstanding this, the District Council has not produced any evidence to support its policy position, that all new residential developments should meet Building Regulations Requirements M4 (2).

The Council has produced no such evidence to demonstrate that the above matters have been fully considered individually or collectively and that the policy requirement responds to an identified need for all new housing to meet Building Regulation Requirement M4 (2).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16766	8	Mr N Greenhalgh	Village developments plc	

Object

The policy is unsound because it is unjustified and conflicts with national policy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	9	Ms H Allen	Barton Willmore	Crest Nicholson South

Object

The PPG sets out a number of factors that LPAs should consider when determining the need for adopting higher accessibility, adaptability and wheelchair housing standards (56-007-20150327). However, insufficient evidence has been provided to demonstrate that these factors have been considered and the introduction of this policy is justified. In addition it is not clear whether the costs associated with applying higher accessibility standards have been fully explored and the impact this may have on the delivery of new housing, particularly affordable housing.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20373	7	Miss K Waldron	Urbanissta	

Object

The requirement for generally 5% of affordable homes to be wheelchair accessible is considered high. We question where is the evidence to justify the requirement for 5% of dwellings to be built in accordance with the Building Regulations Part M s4 (3).

It is considered that this Policy should be reworded to state: "Wheelchair-user dwellings under Building Regulations – Approved Document M Requirement M4(3) will be required for a reasonable proportion of affordable homes, this can be discussed throughout the planning process and agreed through planning conditions".

Pre-Submission District Plan 2016 - Responses

DP27

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
164	1	Ms S Solbra	Southern Water	

Support

We welcome the amendments that have been proposed relating to water supply and wastewater services. We particularly welcome recognition in the supporting text to Policy DP27 (Noise, Air and Light Pollution) that development proposals next to existing wastewater facilities will need to mitigate any odour impact on that development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14901	1	Mr D Wilson	Savills (UK) Limited (Thames Water)	Thames Water Utilities Ltd (Thames Water)

Support

Thames Water support the proposed amendments to the supporting text as agreed in the Statement of Common Ground between the Council and Thames Water dated 19th August 2015.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	25	Mr E Fielding		

Object

no link to the High Weald AONB Management Plan re Dark skies.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20339	2	Ms R Burns	Gatwick Airport Ltd	

Object

GAL promotes the need for additional text in the proposed Policy DP27. This would help to ensure that new development proposals for residential development are not an unsuitable form of development due to the potential exposure to unacceptable levels of noise. This includes the inappropriate location of residential development around the airport which is an insitu known noise generating development. GAL considers the clarification provided by the additional modifications to the Plan which will both avoid development forms which could be adversely impacted upon due to proximity to the airport or constrain the ability of the airport to grow it and promote further economic gains to the local area and wider sub region.

GAL considers that the Plan and Focused Amendments are lacking in robustness regarding policy on noise as it is lacking details of on noise metrics and threshold for assessing the acceptability of noise sensitive development in relation to noise exposure.

Noise Thresholds and metrics are absent in Policy DP27 and the entire Plan. In the absence of specific guidance on set noise threshold metrics noise generating developments could result in higher noise exposure limits for noise sensitive development (such as housing) and as a result, lead to significant adverse effects on future residents, contrary to the National Planning Policy Framework and Noise Policy Statement for England and good planning practice.

Furthermore because it is undesirable to permit ‘major noise sensitive developments’ in areas of slightly lower noise exposure there should be a presumption against such development in areas exposed to noise levels >60dB Leq daytime and 57dB Leq night unless the development supports wider sustainability objectives (including meeting objectively assessed needs for market and affordable housing).

In particular the current and possible future noise impacts of Gatwick Airport, including those resulting from a potential second runway, should be recognised as a possible constraint on locations within the most northern areas of the District for new housing allocations.

In terms of limiting exposure to noise GAL believe that:

- i) Sites should not be allocated or permitted for residential development which would result in new dwellings being exposed to existing or future predicted noise levels of >66dBA and
- ii) In relation to ‘major new noise sensitive developments’, it is also desirable to avoid such developments in areas exposed to noise levels >60dBA Leq.

It is wholly accepted that the District is not particularly constrained by exposure to unacceptable levels to aircraft noise but noise from surface access source are a concern in specific areas. As such it may be that parts of major development sites proposed to be allocated for housing will fall within the 60 – 66 dBA exposure. In such cases there may be sound sustainability reasons, including related to the need to meet objectively assessed housing needs, to justify development in the 60 – 66 dBA threshold. However, it is considered that the exposure of future residents to noise impacts should be a factor that is taken into account in determining the optimum locations for new housing in the District as part of the consideration of sites during the District Plan Examination.

Pre-Submission District Plan 2016 - Responses

DP28

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	16	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD

Object

Wates are concerned about the implications of the proposed amendments to policy DP28 (housing mix). We do not believe the need to provide permanent pitches for Gypsies and Travellers and serviced self-build homes on strategic sites (as now undefined), has been justified. To request this is on our opinion potentially prejudicial to housing delivery and thus the plan and has been discouraged elsewhere. If the need for Gypsies and Travellers site is so acute it may be more realistic to require a contribution from strategic sites to pay for the acquisition of land elsewhere, so as to reflect Gypsies and Travellers nomadic lifestyle; albeit this would need to be modelled into the viability assessment. Similarly if the demand for self-build homes is so acute the PSDP should look to provide for these in all instances not just strategic sites. The need to provide for self-build homes however needs to be justified and scale of delivery anticipated quantified so that it can be effectively monitored.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	12	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)

Object

In accordance with para 50 of the NPPF, Policy DP26 should be amended to reflect local 'demand' not just need. Local needs are usually quantified through housing needs surveys of existing residents in an area and will therefore fail to pick up on the 'demands' of those wishing to move into an area. This would include the demands of those people wishing to re-locate back to an area where they have previously had to move away for reasons of affordability, for example.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	10	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho

Object

We reiterate our objection to provision of gypsy and traveller pitches on the Burgess Hill Northern Arc (as a strategic site) as set out in our comments to Policy DP9.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	26	Mr E Fielding		

Object

Few if any neighbourhood plans will have evidence of self-build housing needs since this is recent legislation, have checks been made to make them aware?

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	9	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc

Object

As outlined in separate representations, and in the earlier objection to Policy DP9, Wates objects to the requirement for all strategic sites to provide permanent pitches for Gypsy and Travellers. As expressed within these representations, the inclusion of Gypsy and Traveller sites can jeopardise the delivery of important residential schemes which are vital for meeting the housing requirements for the District. Additionally there are likely to be other, more suitable sites across the District and the supply of Gypsy and Traveller sites should not be grouped together in only a few locations across the strategic allocations. This method reduces the flexibility and choice for Gypsies and Travellers in respect of both location and size of site. This part of the Policy should therefore be removed and replaced with a criteria based policy for the provision of Gypsy and Traveller pitches across the District based upon the emerging evidence base.

The Focussed Amendments have now included the requirement for self-services plots. In response, Wates wishes to ensure that the District Plan makes specific reference to Starter Homes as a proportion of affordable housing. It is believed that the inclusion of self-serviced plots in Policy DP28 is a response to the Housing and Planning Bill (Draft – October 2015). In addition the Government published the Autumn Statement, in November 2015, which contained new targets for affordable housing provision. Both these documents seek to increase the rate of house building and home ownership in line with the Government’s stated commitment to build one million new homes by 2020. They put a general duty on all planning authorities to promote the supply of Starter Homes, which are included in the affordable housing commitment. Therefore, following the inclusion of the requirement for self-serviced plots, Wates wishes to see Starter Homes included within the District Plan affordable housing requirement, in line with the Draft Housing and Planning Bill and the Autumn Statement.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	10	Ms H Allen	Barton Willmore	Crest Nicholson South

Object

Para 50 of the NPPF requires LPAs to reflect local demand and need. As currently worded Policy DP26 does not require housing developments to reflect local demand by identifying the size, type, tenure and range of housing that is required in particular locations.

As a result DP26 is not consistent with National Policy and therefore fails the tests of soundness.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20373	8	Miss K Waldron	Urbanissta	

Object

Specific objections are made to the requirement for serviced self-build plots within development sites within this Policy.

Whilst the evidence base refers to a Mid Sussex Self Build Register, there is no evidence currently of any level of interest in self-build properties. Until this evidence has been developed, there is no justification for requiring serviced self-build plots.

The requirement for self-build plots has significant viability and commercial implications on the ability of housebuilders to manage, develop and promote deliverable development sites and which in turn has implications on the Council's ability to provide a five-year supply housing. There would also be implications on the overall design and layout of sites.

The application of Policy DP28 would need to be considered on a case-by-case basis within the context of site viability. This matter should be addressed more clearly within the Policy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
2335	7	Mr C Hough	Sigma Planning Services	Rydon Homes

Object

The Government policy objective to restrict the provision of affordable housing to developments of 10 units and over remains valid and will be introduced either through their challenge to the High Court decision being successful or by the introduction of the measure by lawful process. Local Plan policy should be sufficiently flexible to accommodate this inevitability or should reflect it now. The reason for the threshold of 10 is to encourage the delivery of more housing by smaller, local builders, as set out in the DCLG Planning Contributions (Section 106 Planning Obligations) Government Response to Consultation - November 2014. Similar planning policy principles apply in Mid-Sussex and a 10 unit threshold could therefore be reasonably included in this policy. Otherwise it should be worded so as to accommodate any future introduction of a Government threshold.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15707	1	Ms E White	The McLaren Clark Group	

Object

Current focused amendments in respect to Policy DP29 allow for the changes to thresholds for affordable provision in line with National Planning Policy Guidance (NPPG) changes that no longer exempt small sites from making affordable housing contributions.

However, the policy does not take into account government aspirations in terms of the delivery of affordable housing and widening the opportunity for purchase by those whose needs are not met by the market. These aspirations look to allow for greater flexibility in the delivery of affordable housing which will also, in turn, improve the viability and delivery of affordable housing at a time where rents are being reduced and the value of social rented housing is falling.

Policy DP29 does not allow for the flexibility outlined above and makes no mention of the NPPG and NPPF definition of affordable housing. The policy relies on the adoption of a future affordable housing SPD. There doesn't currently appear to be a timetable for the adoption of this document. Policy DP29 should allow for this flexibility at least until such time as the SPD is adopted. Without this flexibility the policy would not be consistent with national policy and there does not appear to be any justification to support this departure.

Policy DP29 stipulates a mix of 75% social or affordable rented and 25% intermediate housing. The value of affordable rented housing and changes to social rents means that the above split is no longer desirable and often unviable for registered providers. This requirement will therefore limit the number of interested providers for delivery.

The amendment of Policy DP29 to incorporate a range of delivery mechanisms for affordable housing will ensure the policy corresponds with Government aspirations and changes to the definition of affordable housing. It will also ensure development schemes are viable, delivering both affordable and market housing to meet local needs and district housing targets over the plan period. Due to the changing definitions and affordable delivery mechanisms, references should be made to the NPPG and NPPF definitions of affordable tenures as opposed to specifying social/affordable rent and intermediate homes only.

As a local agent, we recognise that registered providers are disinterested in S106 stock that requires a split upwards of 50/50. In addition, specifying an affordable mix does not allow for flexibility and changing circumstances over the plan period. The split of affordable tenure should be calculated in-line with the Strategic Housing Market Assessment (SHMA) recommendations, housing register figures and housing stock and turnover. Seeking a mix based on the above factors will ensure that this policy remains effective throughout the plan period.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	10	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc

Object

Wates continues to make a technical objection to the wording of Policy DP29.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	5	Mr J Steele	Savills	Thakeham Homes

Object

It is recommended that Bullet 1 of the Policy is amended to read (new text underlined): “A provision of a target of 30% affordable housing for all residential developments providing a net increase of 4 dwellings and above”. This is more effective as it has due regard to the NPPF requirements in respect of delivery and competitive development returns. Affordable Housing is required in the context of scheme delivery and hence viability. It is one cost of many, alongside for example new infrastructure provision.

Additionally the paragraph which follows the bullets and which relates to the tenure mix, should be moved to the supporting text. This allows for flexibility in the delivery of affordable housing, where currently the Policy is too prescriptive. This would be more consistent with Paragraph 50 of the NPPF (3rd bullet point), which states that affordable housing policies “should be sufficiently flexible to take account of changing market conditions over time”. By means of the Housing and Planning Bill, and modifications to the NPPF that are currently being consulted on, the Government is seeking to broaden the definition of affordable housing, such that it includes Starter Homes. As a result, Policy DP29 of the emerging Mid Sussex District Plan must remain suitably flexible to allow for changing market conditions, and it is a prerequisite that the Plan remains fully compliant with overarching national policy objectives.

Finally the Focussed Amendments have now included the requirement for self-serviced plots in Policy DP28 Housing Mix. In response, Thakeham wishes to ensure that the District Plan makes specific reference to Starter Homes as a proportion of affordable housing. It is believed that the inclusion of self-serviced plots in Policy DP28 is a response to the Housing and Planning Bill (Draft – October 2015). In addition the Government published the Autumn Statement, in November 2015, which contained new targets for affordable housing provision. Both these documents seek to increase the rate of house building and home ownership in line with the Government’s stated commitment to build one million new homes by 2020. They put a general duty on all planning authorities to promote the supply of Starter Homes, which are included in the affordable housing commitment. Therefore, following the inclusion of the requirement for self-serviced plots, Thakeham wishes to see Starter Homes included within the Policy DP29 Affordable Housing, in line with the Draft Housing and Planning Bill and the Autumn Statement.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20373	9	Miss K Waldron	Urbanissta	

Object

Objections are made to Policy DP29 as it is not flexible and does not reflect National Government intentions to support higher levels of home ownership, not least recent consultation on revisions to the NPPF.

With recent Government announcements to remove the requirements for affordable rented properties on development, the requirements of this Policy risks making development proposals unviable. It is considered that Policy D29 should be amended to reflect the Government intention to support higher levels of home ownership through the creation of the Starter Homes Initiative.

A more flexibly worded Policy will provide greater support to the Registered Providers to deliver the much needed affordable houses and developers to deliver the similarly needed market houses.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20390	7	Mr M Richardson	Persimmon Homes (Thames Valley)	
Object				

We would draw the councils attention towards the Governments emerging requirement for Starter Homes. Policy DP29 needs to have flexibility within it, to allow the initiative to be fitted in at a later date.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20526	1	Mr J Williams	Vail Williams	
Object				

As required through the tests of soundness, Policy DP29 needs to be consistent with National Policy, effective to ensure delivery over the plan period and also flexible enough to deal with changing circumstances.

Given the overwhelming drive by Government to ensure flexibility for housing delivery within the planning system, it is considered that Policy DP29 Affordable Housing, when assessed against the test of soundness, will not be effective in delivering housing over the Plan period. In addition, it is considered that it is in conflict with the flexible requirements of National Policy and is overly prescriptive in terms of tenure and mix.

In response, the requirements of DP29 should be relaxed within the policy to enable the ongoing changes within the wider housing industry to be accommodated and facilitate the continuous delivery of homes.

In addition, the policy, in terms of threshold, should recognise that for some smaller sites the required tenure split may be impractical in management terms. Therefore, the policy should have regard to the composition of affordable housing, relating to site specific circumstances, and the particular needs of the locality. This will allow the policy to continue to deliver housing effectively over the course of the plan period and maintain the necessary flexibility given the persistently shifting housing and financial markets.

It is concluded that the policy on affordable housing, DP29, is currently inflexible in terms of the requirement for tenure and mix and this should be revised to ensure the policy remains effective over the Plan period and consistent with the explicit requirements of the Government.

We therefore request the following changes to be made:

Policy DP29: Affordable Housing

....

Suggested text change to:

A mix of tenure will be required that reflects local demand and has regard to the best available evidence.

Suggested text removal:

(Proposals that do not meet these requirements will be refused unless significant clear evidence is provided to show that the site cannot support the required affordable housing from a viability and deliverability perspective.)

Suggested text:

Proposals that are unable to meet affordable housing requirements will be supported by clear viability evidence to establish deliverability.

Pre-Submission District Plan 2016 - Responses

DP31

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
181	4	Mr J L Phillips	Tandridge District Council	

Neutral

As discussed by respective officers Tandridge is unlikely to meet its traveller and travelling showpeople needs due to the constraints and land availability within our district. The Council recognise that the plan has allocated some land for Gypsy and Traveller provision, as well as deferring some allocations to a separate development plan document. If the option to defer the allocation of traveller sites within the Mid Sussex Plan is a sound one, Tandridge would still like to engage and cooperate with MSDC on the preparation of this document.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15243	1	Mr A Yarwood	Derbyshire Gypsy Liason Group	National Federation of Gypsy Liaison Grou

The changes to Policy DP31 do not address the failure of the Local Plan to comply with national policy as set out in DCLG's Planning Policy for Traveller Sites (PPTS) Paragraph 10 of PPTS requires that Local Plans set out criteria for dealing with applications even where no need has been identified. Thus the first criterion which includes the phrase:

"satisfies a clearly defined local need, as evidenced by the Mid Sussex Gypsy and Traveller Accommodation Assessment or the best available evidence;"

is unacceptable and should be deleted

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	10	Mr J Stevens	Home Builders Federation Ltd	

Object

The requirement in the policy to provide 24 gypsy and traveller sites within the strategic allocation of Burgess Hill is unsound because it will be ineffective.

The HBF is concerned that this policy will make the important Burgess Hill strategic allocation undeliverable. The district must make provision for the needs of gypsies and travellers but integrating pitches with conventional dwellings is likely to be unpopular with both the potential purchasers and renters and the gypsy and traveller community. This is very likely to render the Burgess Hill strategic allocation undeliverable and this will adversely affect the housing supply situation. We strongly urge the Council to reconsider this policy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	11	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho

Object

We reiterate our objection to provision of gypsy and traveller pitches on the Burgess Hill Northern Arc (as a strategic site) as set out in our comments to Policy DP9.

It is considered that provision to meet gypsy and traveller needs would be more appropriately facilitated through a general criteria based policy requiring the Council to assess applications for provision on a site by site basis.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	27	Mr E Fielding		
Object				
When will the Traveller Sites Allocations Development Plan Document be published? It is not good enough to say it is being done! The plan can't be considered sound with outstanding elements.				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	11	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Object				
Wates wishes to object to Policy DP31 which allocates 24 Gypsy and Traveller pitches within the strategic allocation to the North and North-West of Burgess Hill. The allocation of 24 Gypsy and Traveller sites at the BHNA within Policy DP31 has not been tested against the recent Government changes to Gypsy and Traveller Planning Policy published in November 2015. Therefore this allocation is premature and cannot be seen as based on up-to-date evidence. Wates propose that a new criteria based policy is included within the District Plan and used to determine future applications based upon the emerging evidence base.				

Pre-Submission District Plan 2016 - Responses

DP37

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
180	2	Ms L Brook	Sussex Wildlife Trust	

We would like to see one additional indicator included for DP37 of the number/proportion of non-statutory designated sites lost/gained. This was mentioned in our previous submission of 21st July 2015, however there was a typing error so it was not clear that we were referring to non-statutory sites such as Local Wildlife Sites. We apologies for this and ask that it be included now to ensure that the District Plan is positively prepared and effective in its aims.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20523	4	Mr C Whelan	Glenbeigh Developments LTD	Dacorar (Southern) LTD

Neutral

DP37-Biodiveristy, Solar Panels have minimal ground intrusion impact. The site will be restored, enhanced and managed so that there is a net gain in biodiversity at the site.

Pre-Submission District Plan 2016 - Responses

DP39

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
107	3	Ms J Field	Natural England	

Object

DP39: Sustainable Design and Construction Strategic Objectives: 1) To promote development that makes the best use of resources and increases the sustainability of communities within Mid Sussex, and its ability to adapt to climate change. This policy should stress the need to reference the relevant section of the High Weald AONB Management Plan, particularly for areas within the AONB or its setting S3 "To enhance the architectural quality of the High Weald" (p 32 of the High Weald AONB Management Plan).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	10	Mr M Brown	CPRE - Mid Sussex	

Object

CPRE Sussex believes that DP39 could be strengthened to tighten the energy efficiency standards required and provide more detail relating to areas of sustainable design which should be addressed in all new development.

Policy DP39 should also be tightened to state that all development proposals must be accompanied by a Sustainability Statement within the design and access statement which demonstrates how the following aspects of sustainable design and construction have been incorporated:

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	12	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho

Object

The revised policy wording now removes reference to assessing the feasibility and viability of establishing connections to communal heating networks (supplied by biomass boilers, biomass/gas CHP or heat pumps). It is considered this reference should be re-included given that energy needs are not necessarily best met using CHP and/or community energy.

Proposed change

The above reference should be re-included given that energy needs are not necessarily best met using CHP and/or community energy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	12	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc

Object

Wates continues to object to Policy DP39 as the requirements of this Policy are already covered by the statutory Building Regulations. As these Building Regulations are a national requirement of all new development, it is unnecessary to repeat these conditions within a District Plan policy. Wates is unaware of any technical evidence on this matter, notably in respect of viability.

In addition, Wates questions the necessity of Policy DP42, notably the requirement to limit to a standard of 110 litres per person per date for residential development. Again, these matters are covered by the Building Regulations.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20523	5	Mr C Whelan	Glenbeigh Developments LTD	Dacorar (Southern) LTD

Support

Dacorar Southern Ltd support the Draft Plan but would like to see the continued support by MSDC towards Solar Energy particularly here as it feeds the local business community and is interpreted as a further attraction to new companies to the area bringing with it new jobs

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	11	Mr M Brown	CPRE - Mid Sussex	
Support				
CPRE Sussex strongly supports this policy. The evidence base clearly demonstrates the need for water efficiency measures above and beyond building regulations.				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16427	28	Mr E Fielding		
Object				
MSDC should take the lead and plan with water and wastewater companies to ensure strategic proposals are viable and that the resultant network is of benefit to the District. A piece meal approach will not lead to optimum solutions or economies of scale but to endless roads being dug and disruption and misery to all its residents. An example of leading this sort of work is the London Mayor and the benefits have been significant.				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	13	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD

Summary

The fact the SA dismissed the land east of Northlands Brook and south of Scamps Hill, Lindfield in part because of the scale of development it was attributing to the site leads us to question the basis upon which the 'strategic' sites were assessed and whether these too would be less harmful than initially suggested; such that there is more capacity within the district than the LPA suggest.

In the context of the above we note that the Nov 2015 SA suggests at para 7.99 that whilst sites of 250 (+) are considered strategic, sites of this size could feasible be brought forward through Neighbourhood Plans, such that at para 7.100 the SA indicates that only sites of 500 (+) dwellings were considered suitable as potential strategic sites to be considered for inclusion in the PSDP. We believe the rationale behind the determination of what is strategic, and as a result what could be seen as helping to contribute towards the council's housing land supply (especially in the shorter term) is unjustified and that as a result the plan has not been positively prepared.

It is evident from our appraisal of the Neighbourhood Plans that have been submitted or 'made' to date that few look to allocate sites of 50 (+) let alone 250. Indeed only 3 Neighbourhood Plans look to allocate land for 250 dwellings in total. Thus to discount sites of 200 (+) as un-strategic is in our opinion unjustified and prejudicial to the plan. This approach is also at odds with that of neighbouring authorities such as Horsham and Wealden where sites of 150/120 dwellings are con-sidered to be strategic⁶. Given the above we believe that definition of a strategic site within appendix D of the PSDP – as set out on p67 of the FA-PSDP should be amended to provide for sites of 200(+) dwellings.

Having regard to the above, we are surprised at the comments in section 7 of the SA of the FA-PSDP on the potential strategic sites and the merits of site M (the land east of Pease Pottage). In our opinion the SA has not considered the merits of the land east of Pease Pottage in the context of the advice in the NPPF and the way in which it has weighted the suitability of the land east of Pease Pottage against the other 'strategic sites' in terms of the protection and enhancement of the countryside is in our opinion flawed. The sites proposed designation is unjustified and contrary to the aims and objectives of the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15521	5	Mr T Rumble	Woolf Bond Planning	Taylor Wimpey Strategic Land

Summary

The Council's argument is that 800 dpa is the tipping point whereby negative environmental effects of new development beyond this level will not outweigh the positive social effects. We have reviewed the relevant pages 82 to 91 of the SA. The SA states at page 90 that any housing provision over approximately 800dpa would require the development of every non-strategic size site within the SHLAA to be developed and therefore less suitable/unsuitable sites to meet the housing provision would be required. This is said to have knock-on effects upon the environmental objectives. In effect therefore the Council is putting forward a capacity led argument for limiting the housing requirement to 800dpa.

Reference is also made to the possible in-combination impacts of all the sites within the Council's SHLAA coming forward. No evidence is provided to justify this argument and ultimately this is a matter that would be dealt with via the usual EIA Screening and development management processes. For these reasons, the Council's evidence base is unjustified and ineffective in arguing that 800dpa is the tipping point before significant negative environmental effects would occur.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	8	Mr R Shepherd	Barton Willmore	Hallam Land Management

Summary

Ultimately, the SA fails to make any sort of meaningful conclusion as to whether Mid Sussex can take on unmet need from all of the more influential districts surrounding it.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	7	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho

Summary

Further, there is no evidence in the Sustainability Appraisal supporting the District Plan that the Pease Pottage site has been assessed for its potential to accommodate employment uses.

Sustainability Appraisal

We note that the "District Plan – Sustainability Appraisal Pre-Submission Report – November 2015" identifies that the Burgess Hill Northern Arc is assume to accommodate approximately 3,385 dwellings. It is noted that this is inconsistent with the Policy DP9 which identifies a figure of 3,500 units for the site.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	3	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd

Summary

The supporting text of this section of the plan has been amended to indicate that there is a "tipping point" at 800 dwellings a year when the negative environmental impacts outweigh the positive social effects of development. This conclusion is drawn from the SA, and is described in the SA as "when weighing up whether the positive impacts on social and economic objectives outweigh any negative impacts on environmental objectives" (page 91).

It is our view that this conclusion is a failing of the report and would benefit from further review. Firstly, it relies on the OAN being under 700 dpa in order to describe meeting the housing need within the district as a benefit in each case, if

this figure should be higher, as we suggest, this conclusion could not be drawn. In addition, the weighing up of the benefits of various levels of growth relies heavily on deliverability and draws on the conclusions of the SA in regard to the

strategic sites and the conclusions of the SHLAA for the non-strategic sites. This may not best reflect the availability and deliverability of land that may have previously been discounted due to availability.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20082	3	Mr E Hanson	Barton Willmore	Reside Developments Ltd (Portsmouth Wo

Summary

This supposedly represents the 'tipping point' where the negative environmental effects of new development are not outweighed by positive social effects. The district is, however, largely unconstrained by environmental or other designations, much like its neighbour Horsham, but unlike its neighbours to the north and south of the district, there appears to be no substantive evidence to support this purported 'tipping point'.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20303	3		Boyer Planning	Vortal Developments

Summary

The Plan now seeks to accommodate 800 new homes per annum over the 17 year period of the Plan, which is an increase of 150 homes per annum over the previous version of the Plan. This results in an overall increase of circa 2,500 new homes required in that period, however, there is total failure to consider how this should be distributed and whether there are other viable and suitable options that could accommodate some or all of this requirement. The SA does nothing of a sort and just states that this assessment has been done through the development strategy section, whilst not appraising the reasonable alternatives as required by legislation.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
107	1	Ms J Field	Natural England	

Summary

Thank you for consulting Natural England on the updated District Plan HRA which takes account of the amendments to the District Plan. I can confirm that Natural England is satisfied with the content of the HRA and concurs with the conclusions of the HRA that the amendments to the District Plan will not be likely to have significant effects on designated sites.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
61	2	Mrs A Jones	Cuckfield Parish Council	

Summary

2. Strategic Environmental Assessment

Cuckfield Parish Council notes the amendments to the District Plan Strategic Environmental Assessment, with regards to the Suitable Alternative Natural Greenspace (SANG) approach. We would propose that suitable 'offset' areas would be 'strategic' gaps between settlements, which would achieve numerous planning policy and environmental benefits. In particular the area between Haywards Heath and Cuckfield would be a suitable area for this in view of the following:

- it would give the opportunity to open up further leisure space close to urban areas;
- it would extend the Blunts Wood and Paiges Meadow Local Nature Reserve and Borde Hill Millennium Wood open space;
- the area is outside the 7km Ashdown Forest zone of influence but inside the 15km zone.
- it would ensure prevention of further urban coalescence and maintain settlement distinctiveness;
- it would maintain ecological networks and corridor;
- it would reinforce numerous local Neighbourhood Plan policies.