

Mr J. Bore
c/o 260 Collingwood Road
Sutton
Surrey
SM1 2NX

Date 4 November 2016
Your ref Haywards Heath Golf Club Ltd
Our ref 300461/1

Dear Mr Bore,

Mid Sussex District Plan 2014-2031
Housing Matters – Response to Inspectors questions, and earlier initial comments

DMH Stallard LLP act on behalf of Haywards Heath Golf Club Limited (“HHGC”) in relation to the promotion of land at Haywards Heath Golf Course.

Representations were made by DMH Stallard LLP in relation to the pre-submission consultation in January 2016. These representations, at the request of the Inspector, are not appended to this hearing statement but can be made available if necessary.

At your request, we have also enclosed our response letter dated 21st October 2016 in which we provide a reply to your initial letter of 5th September 2016 and comment on the letter from MSDC’s Head of Economic Promotion and Planning of the 29th September, which refers specifically to Haywards Heath Golf Course. There are a number of statements in the Council’s response to your questions which my client considers it important to comment on.

Response to Plan Inspector’s questions

1. Evidence Base

Q. Do the West Sussex SHMA (2009), the Northern West Sussex SHMA (2012), the Housing and Economic Development Needs Assessment (HEDNA) (February 2015), the HEDNA Update (November 2015) and the HEDNA Addendum (June 2016) constitute an adequate evidence basis for the assessment of the District’s Objectively Assessed Housing Need (OAN)?

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DMH Stallard LLP incorporates the practice of Ross & Craig.



A. It is our view that the evidence base is not adequate. We have concerns regarding the methodology that the Council have used in their evidence base, in particular the inconsistencies in methodologies used in subsequent HEDNA's, and the calculations of the OAN.

2. Calculation of the OAN

Q. Are the calculations that have led to the OAN starting point of 714dpa sound?

A. No, it is our view that the Council have erred in their methodology. The Council have correctly identified 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 714 dwellings per year. The figure of 714 is actually the household growth figure and not the District's housing need figure. A vacancy rate has to be applied to this figure to provide the starting point OAN and the required dwellings per annum. This has been acknowledged by the Council in the HEDNA Addendum (EP22).

Q. Have appropriate adjustments been made to the starting point of the OAN to reflect market signals? In particular, is the figure of 24dpa adequate to reflect affordability issues and trends?

A. We consider that an upward adjustment is required on the OAN starting point to reflect market signals in Mid Sussex, however, we believe that the level of uplift is insufficient. The NPPG advises that "In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable. The more significant the affordability constraints...and the stronger other indicators of high demand..., the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be."

The figure of 24dpa is an increase of just 3% on the OAN starting point, this is despite the fact that the HEDNA of November 2015 (EP22) states that affordability ratios are higher in Mid Sussex in comparison to the rest of West Sussex and England as a whole. It is our view that this increase should be increased further to reflect the advice in the HEDNA of February 2015 (EP20), which suggested that an uplift of 10% would be more appropriate to take account of market signals.

Q. Do the calculations adequately reflect projected jobs growth?

A. The HEDNA Addendum (EP22) states that MSDC's OAN of 754 dpa will support 323 jobs per annum, and the the housing provision of 800dpa would lead to a job growth of 370 jobs per annum. The Council's most recent economic studies (EP35 & EP36) show job growth in Mid Sussex is forecast to be in the region of 500 jobs per annum.

Therefore, the proposed OAN figure would not be able to adequately support the forecast job growth of the District.

3. The Duty to Co-operate

Q. Can it be demonstrated that active co-operation has taken place on strategic cross boundary issues, especially in respect of the assessment of wider and unmet housing need?

A. The Localism Act 2011 and Planning and Compulsory Purchase Act 2004 places a legal duty on local planning authorities (LPAs), county councils and public bodies, to *“engage constructively, actively and on an ongoing basis”* to ensure effective planning of cross boundary matters.

LPAs must make every effort to engage and cooperate on strategic cross boundary matters before they submit their Local Plans for examination. They must demonstrate how they have complied with the duty at examination of a Local Plan. It is acknowledged that the duty to cooperate is not a duty to agree.

The previous Local Plan submission, was subject to a pre-examination exploratory meeting in Winter 2013. Following this meeting, the Inspector concluded that MSDC had failed to meet the legal duty to cooperate. It is acknowledged that since this time, MSDC have made some effort to cooperate and engage with neighbouring authorities. However, it is our view that this has been ‘light touch’ and appears to only establish the level of housing need in these neighbouring authorities, with no real intention to cooperate on cross boundary matters, particularly in relation to meeting housing needs across the HMAs. Indeed this is confirmed in paragraph 3.14 of the Submission District Plan (BP1).

It should be noted that the Council has revised its position on meeting the level of need for other neighbouring authorities, the Focused Amendments document stated that the plan would contribute 105 dpa towards meeting neighbouring authorities housing needs, this would principally address the needs of Crawley Borough Council (CBC) which is within the same housing market area and has an unmet need of 5,000 dwellings over its plan period. However, the Pre-submission version now proposes to contribute just 46 dwellings per annum towards meeting neighbouring authority needs.

It is noted that the Council has produced an evidence paper on the Duty to Co-operate Framework (EP5), and a Duty to Cooperate Statement (PB17) however, these do not provide any information on when discussions with neighbouring authorities have taken place and the content of any discussions concerning cross-boundary matters. Therefore, there is a lack of evidence of appropriate discussions with neighbouring authorities on the level of unmet housing need and other strategic cross-boundary

matters. Where this is considered by MSDC in the Duty to Cooperate Statement, the focus is on the constraints of the District and how this limits the capacity to accommodate development and meet the unmet need of neighbouring authorities. As such it is our view that it cannot be demonstrated that active co-operation has taken place, and as such we consider that the Council have again fallen short of the legal duty to cooperate.

4. Unmet need

Q. What factors should determine the amount of provision that should be made in Mid Sussex to accommodate the unmet needs of other authorities, notably Brighton and Hove, and Crawley?

A. Mid Sussex is geographically located between London and Brighton, on the main commuter train line and adjacent to Crawley, a major business area. It is adjacent to a number of LPAs which are heavily constrained and unable to meet their housing needs. Particularly Brighton and Hove, and Crawley.

It is our view that Mid Sussex is a District relatively free from primary constraints, especially in comparison to other neighbouring authorities. It is well known that the adjoining authorities of Crawley Borough Council (CBC) and Brighton & Hove City Council (BHCC) are unable to meet their housing needs due to their tightly drawn administrative boundaries, and in Brighton's case the physical constraints of the South Downs and the sea. Additionally, other neighbouring authorities such as Tandridge District Council, Lewes District Council, Worthing District Council, and Adur District Council are unable to meet their housing needs by virtue of their environmental constraints (such as flood risk, Green Belt, AONB and the South Downs National Park).

It is considered that factors such as the level of unmet need, commuting links and migration links should form the basis of the provision of Mid Sussex to meet the unmet need of other Districts.

The Council's own SA (BP5) assesses the unmet needs of neighbouring authorities, this notes that the unmet housing need of Brighton & Hove over the period from 2011 to 2031 is for a total of 10,800 dwellings. The relationship between Mid Sussex and Brighton is significant and there are strong links in terms of migration and commuting. Evidence contained within the Council's Sustainability Appraisal is that more people from Brighton & Hove have moved to Mid Sussex than from any other neighbouring authority. In addition, there is a strong commuting link between Mid Sussex and Brighton & Hove, with more people commuting into Mid Sussex for work from Brighton than any other neighbouring authority.

There are also very strong links between Mid Sussex and Crawley, in particular with regards to commuting to work. The SA advises that more people in Mid Sussex commute out to Crawley to travel to work than any other neighbouring authority area. It is noted that the Submission Plan proposes meeting some (although in our view not enough) additional housing in order to meet the unmet needs of Crawley, however, given the very strong migration links between Mid Sussex and Brighton & Hove, it is our opinion the MSDC should be accommodating some of the unmet housing needs of Brighton & Hove within their District Plan.

Q. What calculations have taken place on a cross-boundary basis to arrive at that provision?

A. It does not appear that any calculations have taken place in determining the level of provision to meet the needs of neighbouring authorities. An assessment of the links between Mid Sussex and other neighbouring authorities has been undertaken but this has not been used to calculate how any unmet needs of these authorities could be met in addition to the overall OAN for the District, it has instead been largely discounted. The SA concludes that as Crawley is the same Housing Market area as Mid Sussex there is an overriding case for Mid Sussex to meet the unmet need of Crawley, and that this should take precedence over meeting the needs of other neighbouring authorities.

In calculating the amount of housing to provide for the unmet need of Crawley, it appears that MSDC have chosen to use the figure of 800dpa as a ceiling for the level of housing to be provided in the District, they have then subtracted the OAN figure of 754dpa and determined that the remaining 46pda will go towards assisting the unmet needs of Crawley Borough Council. The calculation is therefore based on the residual amount left from the capacity figure of 800dpa. It should be noted that the previous consultation version of the District Plan proposed 105dpa to meet the unmet needs of Crawley Borough Council, and this was based on an OAN of 695dpa.

5. Affordable housing

Q. Will the housing requirement be sufficient to ensure that the District's affordable housing needs are met?

A. No. It is our view that the housing requirement is too low to meet the affordable housing needs of the District in full. The Council states within the HEDNA Addendum (EP22) that the provision of 800 dpa would provide for 320 affordable dwellings per annum (40% of 800).

The Northern West Sussex Housing Market Area Affordable Housing Needs Model Update (EP26) assessed the full affordable housing need based on the 'high' scenario

which is identified as 474 dwellings per annum. As such the proposed 320 affordable dwellings per annum will only be partially meeting the affordable need of Mid Sussex.

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 320 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.

6. The ability of the market to deliver

Q. Can the market deliver the requirement set out in the submitted Plan? What would be the implications of a higher housing requirement for market deliverability?

A. It is our opinion that the market can deliver the requirement set out in the Submitted Plan. The Housing Implementation Plan (HIP) (BP18) demonstrates that the District can deliver in excess of 800dpa, the HIP advised that in the year 2015/16, 863 units were delivered in the District.

The housing market in Mid Sussex is considered to be very strong with house prices consistently higher than the West Sussex average. The Strategic Housing Market Update (EP25) advises that over the last 10 years, Mid Sussex has witnessed the strongest proportional growth in house prices in the Housing Market Area. It is considered that this demand for housing and growth in house prices points to there being a very good housing market in Mid Sussex, and that a higher housing requirement could be easily absorbed and delivered in the current market.

7. Past under-delivery

Q. Should the housing requirement be adjusted to compensate for a degree of under-provision against the South East Plan prior to 2014?

A. Yes, it is our view that the housing requirement should be adjusted to compensate for under provision. The housing target of 855dpa set out in the South East Plan is the last tested figure for housing in the District, and it should be noted that the Council has consistently under-delivered against this figure.

It should be noted that the NPPG advises that the housing need number should be adjusted to reflect appropriate market signals, one of these signals is the rate of development, and specifically a lack of previous delivery. The NPPG advises that should actual supply fall below planned supply, future supply should be increase to reflect the

likelihood of under-delivery of a plan. It is our view that the Council's chosen uplift figure of 24dpa to take account of market signals is not sufficient to take into account previous under-delivery of housing.

8. Site selection and housing distribution

Q. Are the methodologies described in the Strategic Site Selection Paper and the SHLAA sound?

A. It is our view that the site selection and housing distribution strategy of the submission plan is flawed and the process by which sites have been selected have been skewed in favour of the selected sites.

The methodology and site selection process does not take into account the advice of paragraphs 110 & 115 of the NPPF, which states that "In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework." It is our view that the Council has not taken a sequential process to its site selection, the Council should look to allocate sites which are located outside of the AONB first, and if it can be demonstrated without any doubt that there are no sites that can come forward, only then should a site within the AONB be allocated for development. It is our view that the Council have not undertaken a fair assessment of the other sites promoted for strategic allocation, in particular, with regards to the site at Haywards Heath Golf Course (HHGC) they have based the exclusion of the site on incorrect assumptions and out-of-date information.

Whilst we note that you will not be considering "omission sites" in any detail, our clients site has been specifically referenced by MSDC in their reply to your initial questions, and as such we feel it is necessary to provide further clarification on this matter. The SHLAA assessment of the site considers that the site is fairly remote from local services and access to public transport, and this is one of the reasons that the site is considered 'unsuitable'. However, the SA (BP5) scores the site positively in this respect and states that the site is within an average 15 minutes walking time from existing retail and community facilities in Haywards Heath town centre, and could encourage improved facilities. The SA also states that the site is within a reasonable walking distance from public transport facilities, which may reduce the number of journeys by private car. HHGC scores higher in this regard than the allocated site at Pease Pottage.

It is our view that the requirement for strategic sites to be able to deliver within the first 5 years of the plan period is too limiting. Whilst it is recognised that there is a need for

housing to come forward as soon as possible within the plan period, there is also a need for more medium and long-term sites to be allocated to ensure that there is a consistent supply of housing in the District and no short-fall of housing within the plan period.

Q. Is there any value in the concept of 'environmental capacity' and the 'tipping point' in the context of the whole district? Will the District's environmental constraints make the housing requirement undeliverable? What would the environmental implications be of raising the housing requirement? How far have the SHLAA and site selection methodologies taken into account the ability of development impacts to be mitigated through local landscape and infrastructure measures?

A. It is accepted that there is a balance to be made between providing an adequate number of housing sites and the ensuring that there are no adverse and significant environmental impacts in doing so. However, it is not considered that the 'environmental capacity/tipping point' is a concept which can be applied across the whole district. There may be capacity issues if a significant increase in housing numbers were to be provided in a single location, but additional numbers in Haywards Heath (for example) would not in our opinion lead to an impact across the District or in the south or north of the District.

It is our view that the concept of environmental capacity and the tipping point of the whole District is unclear from the evidence base and needs to be clarified by the Council, especially as the District is considered to be largely free from environmental constraints in comparison to the neighbouring authorities.

It is our view that the SHLAA and site selection methodology have not considered how the proposed sites could deliver mitigation, this has been demonstrated through the dismissal by the Council of sites which are considered to be constrained, but importantly have constraints that can be overcome through mitigation.

Q. To what extent is the Sustainability Appraisal preferred option (*Focus development within or adjacent to Burgess Hill, East Grinstead and Haywards Heath, but encourage both larger villages and smaller villages to take growth to support the provision of additional services and meet local needs*) reflected in the distribution of strategic allocations and the overall spatial strategy of the submitted plan?

A. We do not believe that the Sustainability Appraisal preferred option has been taken into consideration in the overall spatial strategy of the submitted plan. The strategy and strategic allocations within the submitted plan is overly reliant on one strategic site (Burgess Hill Northern Arc), and furthermore only allocates one other site on land east of Pease Pottage, which is within an Area of Outstanding Natural Beauty. There are no sites allocated within East Grinstead and Haywards Heath despite the preferred option of the SA to focus development within or adjacent to these towns.

Q. Can the allocation of the Pease Pottage site be reconciled with the SA and SHLAA findings? How is the site expected to relate to Crawley in terms of connectivity?

A. It is our view that the Pease Pottage site does not represent the most appropriate location for strategic development in the District, and that the allocation of this site does not reconcile with the assessment and findings in the SA and SHLAA.

The site is located outside the village of Pease Pottage which is classed as a Category 3 Settlement within the SA.

It is not thought that MSDC have demonstrated robustly that the other sites submitted for strategic site allocation are unsuitable for development.

Q. Does the Plan need an expressly stated spatial strategy for the District with target figures for each area to provide guidance for neighbourhood plans and for any future site allocations plan? What are the implications of not having such a strategy?

A. It is considered that there is merit to providing target figures for neighbourhood plans. A number of the 'made' neighbourhood plans do not actually allocate any housing sites. There is a real danger that the residual housing figure set out in Policy DP5 will not be met.

9. Trajectories

Q. What are the housing delivery trajectories overall and a reasonable estimate from the neighbourhood plans?

A. The housing trajectory estimates that the allocated site of Burgess Hill Northern Arc will come forward and deliver 172 units per annum from 2018/2019, it also estimates that the Pease Pottage site allocation will come forward at the same time and deliver 50 units per year from the same period.

It is our view that this is a unrealistic estimation, the submission plan relies heavily on the strategic allocation of the Burgess Hill Northern Arc, policy DP5 of submission Plan assumes this strategic development will yield 3,500 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 3,500 dwellings are able to come forward within this plan period. It is acknowledged that the Council had anticipated an outline planning application is to be submitted for the site in late 2015, however, this has not yet been submitted. Given the size of the site and complexity of the application, the approval of an outline application will be likely take some considerable time by the Council. The site will require further applications to approve reserved matters and given the size of the

site this is likely to require a phased approach to development and subsequent reserved matters applications.

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 2,262. 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 a DPD and the remaining neighbourhood plans will be able to provide this level of housing.

Presently, twenty Neighbourhood Plan Areas have been designated, of that 10 Neighbourhood Plans have been 'made'. It is worth noting that all of these plans have stated that the parishes are limited in their capacity to provide new housing sites, and that a number of these plan have not actually allocated any housing sites. In total these Neighbourhood Plans have allocated approximately 450 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 approximately 200, which is approximately 20 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.

Furthermore, given 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, there is a real possibility of double-counting to occur, and for the District's housing figures to be inaccurate.

Q. What are the reasons for the proposed timing of the site allocations plan?

A. It is understood that the Council suggest the Site Allocations DPD would be started in 2019, and that this would deal with medium to long-term requirements in the plan period. It appears that the reason for this is that the Council considers the other sites put forward for strategic allocation are constrained due to the timescale of their delivery, and therefore cannot be allocated within the District Plan.

As previously stated, it is our view that the SHLAA assessment is fundamentally flawed, and this has resulted in a number of sites (including HHGC) being unfavourably assessed. Sites such as these are capable of coming forward in the short to medium term and should be allocated in the District Plan, rather than waiting to be allocated in a DPD that could be delayed or never actually come forward.

Furthermore, 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. 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. In any case we see no reason to delay production of the Site Allocations DPD which should be produced immediately.

10. Five year housing land supply

Q. Given the advice in the PPG, what reason does the Council have for favouring the Liverpool methodology?

A. The Council have stated that the Liverpool methodology has been favoured due to the circumstances of the available housing land supply in terms of the delivery of the strategic sites and the absence of available sites which are deliverable in the first five years. This is the reason that the Council discounts the Sedgfield approach which would front load the provision within the first five years of the plan. It is our view that based solely on the above, the Council have not put forward a robust argument in favouring the Liverpool methodology.

As previously stated it is our view that a number of the sites assessed in the SHLAA were discounted for allocation on the basis of not being able to come forward within the first five years of the plan, however, a number of these assessments, (such as the assessment of the availability of the HHGC) were based on flawed assumptions.

It should be noted that the Sedgfield approach is more closely aligned with the requirements of the NPPF and the need to boost significantly the supply of housing, and has been the required approach for neighbouring local plans. There is a need to meet the shortfall in housing land supply as soon as possible, and the Sedgfield approach would enable this to occur more quickly than the Liverpool approach advocated by the Council.

It is our view that a number of the other strategic sites put forward to the Council (including HHGC) could be brought forward quicker than their assessment by the Council suggests, and the allocation of these sites in the Plan would allow the Council to take the Sedgfield approach.

Q. What is a realistic estimate for the contribution from deliverable sites in the next 5 years?

A. It is our view that the delivery from the two proposed strategic sites have been over-estimated, as previously stated, these sites are larger scale strategic sites, and a planning application is yet to be submitted on the Burgess Hill site. It is considered therefore, that these deliverable sites are unlikely to provide as much housing over the first five years of the Plan as MSDC has estimated within the trajectory.

Q. What is the level of under-provision from the start date of 2014?

A. It is difficult to answer this with the current evidence base of the Council as a recent Authority Monitoring Report has not been undertaken. The most recent AMR was undertaken in March 2015, and this states that there was a net completion of 630 houses in 2014/15.

This AMR stated that the housing target for the District at this time was 650dpa based on the figure being taken forward by the Council in the Pre-Submission District Plan at the time. This results in a fairly low level of under-provision of 20 units, however, given that this figure was untested and has since been revised, it is our view that the level of under-provision should be assessed against the current OAN of 800dpa set out in the Submission District Plan. Therefore, the level of under-provision from this year alone was 170 units.

The Council have not produced a subsequent AMR, but have instead produced a list of completions in the year 2015/16, which demonstrates a completion of 863 units, however, it should also be noted that the completions list is based on net numbers of housing and not a gross figure.

The table below demonstrates our understanding of the under-supply over the last two years. This demonstrates that when calculated against the target of 800dpa the Council has an undersupply of 107 units based on the AMR figure and net completion figure.

Housing Requirement	District Plan Target (800 x 2) 1600
AMR & Completion (630 + 863) = 1493	107

Q. With regard to the 'buffer', what is the District's record of housing provision over the economic cycle?

A. It is our view that the Council have consistently under-supplied against its housing target of 855dpa as set out in the SEP, the Council's response to you on the 29th September 2016 confirms that the Council has had a historical average completion rate

of 518 units for the past 12 years, and 661 completion over the past 5 years. This has resulted in a consistent under-provision of housing against target, and as such a 20% buffer should be included.

Q. Having regard to the above, what is the 5 year housing supply using the Sedgefield methodology?

A. We have undertaken a crude calculation based on the District Plan figure of 800dpa, + our calculated undersupply of 107 units from the first two years of the plan, + a 20% buffer over the first five years (Sedgefield approach).

The table below demonstrates this calculation of 5 year housing land supply, which is based on 800dpa and MSDC's own supply figures as contained in the Housing Implementation Plan (BP18).

Requirement	MSDC
District Plan housing requirement 2016 - 2021	4,107
Annualised housing requirement with 20% buffer applied (years 1 -5 only)	4,928
Supply	
Large sites where development has commenced	1,573
Large sites with planning permission where development has yet to commence	1,870
Large allocated sites without planning permission	199
Sites identified in the SHLAA	239
Small sites with planning permission (with 40% discount applied)	317
District Plan allocation at Burgess Hill	515
District Plan allocation at Pease Pottage	150
Total Housing Supply in year 1 - 5	4,863
Five year supply	4.93
Deficit over the 5 year period	-65

This demonstrates that the Council cannot demonstrate a 5 year housing land supply, instead it can only demonstrate a 4.93 year supply. Whilst it is recognised that this is marginal, our previous comments should be noted regarding the Council's over-estimation of the rate of housing delivery on the proposed strategic sites. It is our view that this over-estimation is likely to reduce the housing supply further.

Q. Will the plan's strategic allocations and policies, together with allocations from neighbourhood plans and any future site allocations plan, ensure that sufficient sites are available for a 5 year supply of deliverable land to be maintained into the future? What adjustments might be made to the plan to ensure a reliable supply?

A. It is our view that the above will not provide a sufficient 5 year supply of sites into the future, furthermore, it is our view based on the trajectory figures that the Plan would not actually be able to provide a sufficient supply of sites within the first 5 years of the Plan period. The Plan currently relies too heavily on the two large strategic sites, as previously stated, these sites are likely to take longer to come forward than the trajectory estimates, and as such it is our opinion that further sites should be allocated within the Plan in order to meet a robust 5 year supply of housing sites.

In terms of adjustments which can be made, it is our view that the other strategic sites capable of providing 500 units, which have been assessed within the SA should be re-considered. It should be noted that should the Council have undertaken a further round of consultation prior to the submission of their Plan, the promoters of these sites could have provided further information on how the constraints which ruled out their sites could have been overcome.

In addition, it is our view that a further issue is the fact that the Council have stuck to a minimum of 500 units for a site to be considered as a strategic site, and flexibility may be required in this respect. It should be noted that the neighbouring authority of Horsham DC had to include a site of 150 units as a strategic site in their recently adopted HDPF.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rainier' with a stylized flourish at the end.

Peter Rainier
Principal Director of Planning
For and on behalf of DMH Stallard LLP



Mr J. Bore
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SM1 2NX

Date 21 October 2016
Your ref
Our ref 300461/1

Dear Mr Bore,

I write on behalf of my clients, Haywards Heath Golf Club Limited the owners of the above site, with reference to the submission made to you by Mid Sussex District Council's Head of Economic Promotion and Planning in his letter of the 29th September in response to your letter of 5th September in which you raised initial questions relating to your examination of MSDC's District Plan. There are a number of statements in the Council's response to your questions which my client considers it important to comment on.

At the time of writing this letter we have also received details of the additional questions you have issued to MSDC in your letter of the 12th October and to which you have requested a response by the 8th November. We are presently preparing a response to these questions on behalf of our client which I will send you in early November.

One of the main concerns that you have raised is the choice of strategic sites taken forward in the Council's District Plan and the reasoning why other strategic sites have been rejected by the Council. In Page 11 of their response the Council restate a number of factors within their SLHAA consultation process, and in accordance with their agreed methodology, which determined their rejection of the golf course site on the grounds of its "suitability", "availability", and "deliverability". In Page 10 of their response the Council also state that, "The authority also welcomes evidence from developers on how these constraints may be overcome and the SLHAA is reviewed on an annual basis and is updated to reflect new information on sites that is received from developers. The Council has also proactively checked the position of key sites which have been submitted in the calls for sites, but not promoted through the District Plan process." Despite this statement my client considers that this consultation process has not been as interactive and productive as it could have been given that the golf course

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DMH Stallard LLP incorporates the practice of Ross & Craig.



site is regarded by the Council as one of only two sites which fall within their category of a "strategic site" (capable to accommodate more than 500 units).

In their reply to your initial questions, the Council restate their doubts about the "availability" of the site as the land is currently leased by Haywards Heath Golf Club Limited to the golf club for use as a golf course. However, it is most important in this context that the provisions and status of the current lease are fully understood by the relevant authorities concerned with the future assessment of the site. The current lease was made in October 2001 for a period of 20 years and will terminate in December 2022. Section 9 of the lease covering the Landlord's Break Clause, provides as follows:-

"If at any time the Landlord shall have entered into either an unconditional and legally binding contract or a contract conditional only upon the giving of vacant possession of the demised premises by the Tenant for the sale of not less than 25% in area of the whole of the demised premises for the purposes of development as defined by the Town and Country Planning Act 1990 or any statutory modification or re-enactment thereof and in consequence thereof the Landlord shall desire to determine the term hereby granted the Landlord shall serve not less than 12 months notice in writing upon the Tenants to determine the term hereby granted requiring the Tenant to give up possession of the demised premises on the date specified in such notice"

This means that the whole of the site can be made available for development subject to the twelve month notice period set out above. Given the lead in time for obtaining planning permission and the subsequent discharge of planning conditions and mobilisation of contractors, such a restriction would not lead to a delay in the commencement of development. The site is therefore both "available" and "deliverable".

In their assessment of my client's comprehensive submission to the SLHAA consultation process prepared by Bell Cornwell LLP and submitted in March 2010, the Council's planning officers and their associated assessment panel rejected the site citing a number of other factors which made it unsuitable and not currently "developable". These included poor access to services and public transport and remoteness from local services; development would represent large encroachment into the countryside; the site is bordered by SNCI, ancient woodland and an area of townscape character. The Council's assertions have been politely challenged by my clients through their representatives over the course of the past six years since their SHLAA submission. In particular, they have highlighted the advantageous location of the site in comparison with other sites, particularly in relation to local services, local amenities and its close

proximity to the local railway station. These advantages compare very favourably with the significant and disproportionate volume of residential developments on the south side of the town either planned, under construction or completed, and the associated infrastructure and transport congestion issues these have posed locally. My client's SHLAA submission also included informed surveys of the site by eminent transport, accessibility, landscape and ecological consultants together with their proposed development principles.

All these factors and other specific points demonstrating the site's suitability for residential development were addressed on behalf of my clients in two submissions made by DMH Stallard – both a site specific study and a strategic overview promoting the site as an alternative “strategic site” – in response to the Council's consultation on their schedule of Focused Amendments to the Mid Sussex District Plan Pre-Submission Draft. Copies of these two submissions are enclosed for your information.

We fully appreciate the considerable workload that you and your colleagues are required to undertake in your further examination of the Draft District Plan. However, we hope that in the process you will give this submission the consideration we believe it fully justifies. We will write to you again with our specific comments on the further questions you have raised in your most recent letter of the 12th October to MSDC so far as they impact on the golf course site.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rainier' with a stylized flourish at the end.

Peter Rainier
Principal Director of Planning
For and on behalf of DMH Stallard LLP

Mid Sussex District Plan Focused Amendments

**Representations on behalf of
Haywards Heath Golf Club Ltd**

Mid Sussex District Plan Focused Amendments

Submission on Behalf of
Haywards Heath Golf Club Ltd

January 2016

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Date: 13th January 2016

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Date: 15th January 2016

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B.	Copy of DMH Stallard General Comments on Focused Amendments to the Pre-Submission Draft
C.	Proposed Access Arrangements Plan (Stuart Michael Associates)
D.	Potential Cycleway Improvements (Stuart Michael Associates)
E.	Accessibility Plan – Proposed Indicative Strategy (Stuart Michael Associates)
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1. Introduction

- 1.1 The Mid Sussex District Council ("MSDC") District Plan Focused Amendments ("Focused Amendments") were published in November 2015 for public consultation. The Plan is proposed to cover the period 2011-2031 and includes the strategy for the District over this period, the proposed level of development and the associated development control policies.
- 1.2 The District Plan Pre-Submission Draft was previously published in June 2015 for public consultation, however, at this time, the District Plan did not include the proposed level of development. As such, MSDC have published Focused Amendments, prior to the submission of the Plan to the Secretary of State (SoS) in February 2016 which sets out the housing growth figure and associated allocations of land, including a new allocation of land at Pease Pottage.
- 1.3 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.
- 1.4 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.
- 1.5 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 a number of technical inputs in relation to highways, 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.

2. The Site and Surroundings

- 2.1 The site is located to the north of Haywards Heath, the boundary of the site is situated adjacent to the existing settlement boundary of Haywards Heath which runs along the entrance road to the site. The site is accessible from High Beech Lane, and a site location plan is at Appendix A.
- 2.2 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.
- 2.3 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.
- 2.4 High Beech Lane runs north-south to the east of this site. To the south of the site is the residential cul-de-sac of Roundwood Lane which is characterised by detached dwellings in large plots. To the northern half of the site the boundary wraps around Sandridge Lane which is a residential cul-de-sac of eight detached dwellings. There is an existing public footpath which runs along the western boundary and through the northern half of the site.
- 2.5 The existing public footpath to the west of the site connects to Wickham Lane to the south. Currently, this route is unsurfaced and resembles a dirt track, it is also prone to waterlogging. It is therefore considered that this footpath would benefit from upgrading, the proposed residential development on this site would enable this upgrading to take place. If upgraded this footpath would provide a convenient and safe route to Haywards Heath town centre, the rail station, superstore and employment areas.
- 2.6 The site is located approximately 1.4km from the centre of Lindfield High Street and as such is within easy walking distance from the services and facilities of this large village. There is a well lit footpath which runs along High Beech Lane and the road is limited to 30mph. The centre of the main town of Haywards Heath is 2.7km from the site. The bus service route 81 runs along High Beech Lane and provides access to Haywards Heath town centre and Ardingly village.

Site Assessment

Access and Transport Considerations

- 2.7 The site owners have commissioned Stuart Mitchell Associates to undertake an assessment of transport and accessibility considerations of the site. Drawing 3401.001A (Proposed Access Arrangements) attached at Appendix

C demonstrates that direct access to the site is possible via a new access from High Beech Lane, this would be located directly north of the existing golf course access. It is considered that the most appropriate form of access is for a priority junction with right turn lane facility. A footway would be provided to the south of the proposed junction linking with the existing footway on High Beech Lane, secondary emergency access would be available along the retained existing driveway.

- 2.8 Pedestrian and cycle access from the site will be facilitated via a link to the existing public footpath to the west of the site. The development proposals would provide the opportunity to upgrade the public footpath to a shared use facility for cyclists and pedestrians. Figure SMA2 (Potential Cycleway Improvements) is attached at appendix D and this provides an example of the type of facility that could be provided.
- 2.9 The proposed development site is located within walking distance to the services and facilities at Lindfield High Street, the existing footway along High Beech Lane and the proposed improved public footpath provides scope for increasing the accessibility of the site by other modes of transport than the private car both within the development and for the surrounding area.
- 2.10 Figure SMA3 (Accessibility Plan – Proposed Indicative Strategy) is attached at appendix E demonstrates that the site has direct access onto an existing public footpath and footway, providing access to Haywards Heath town centre, the railway station, local employment, colleges and primary schools.
- 2.11 The proposed upgrading of the existing public footpath to a shared pedestrian/cycle path would offer a viable, safe and convenient route to the centre of Haywards Heath and beyond. High Beech Lane and the surrounding area are of a good standard with street lighting and a speed restriction of 30mph, these footways offer suitable cycling and walking conditions.

Public Transport

- 2.12 Presently, bus service 81 runs along High Beech Lane and provides access to Haywards Heath town centre and Ardingly village twice daily, Monday to Friday. Additional and more frequent town centre and inter-urban bus services are available from Sunte Avenue, Gander Hill Road and West Common Road as illustrated on figure SMA4 (Existing Bus Services) attached at appendix F.
- 2.13 It is proposed that as part of the development the provision of a bespoke bus service is to be explored, this would be subject to consultation with West Sussex County Council and the local bus operators. Figure SMA3 illustrates two potential routes, a peak route and an off-peak route, both providing access to Haywards Heath Rail Station. A bus terminus with waiting facilities can be provided in close proximity to the proposed Neighbourhood Centre, this would ensure all homes within the site are within 400m of the bus

terminus, and would enable convenient access for all residents of the proposed development.

Integration of the development with the surrounding residential areas

- 2.14 The proposal would provide a mixed use development, which would comprise a neighbourhood centre with retail, service and community facilities. The surrounding residential area currently has limited access to these facilities, and as such it is considered that the proposed development has the potential to attract short inward journeys from the surrounding residential areas. Figure SMA5 (Proposed Neighbourhood Centre – Catchment) is attached at appendix G , this illustrates the potential catchment area for inward journeys to the site for onsite facilities. It is reasonable to suggest that inward journeys to the site from the surrounding residential areas might be conducted on foot/cycle. There is scope to provide a controlled crossing on High Beech Lane in proximity to By Sunte, if it is considered necessary.

Accessibility

- 2.15 It is considered that the proposed development site at Haywards Heath golf course is particularly well located for access to the wider area including Haywards Heath town centre and Lindfield village centre. Convenient and viable direct routes are available along existing highways or via public footpaths which can be upgraded.
- 2.16 The bespoke bus service from the site would, in conjunction with the viable options for walking/cycling provide a very possible alternative mode of travel for rail users who might otherwise use the private car. Given these transport and accessibility options it is considered that the proposed development site at Haywards Heath golf course would be a sustainable urban extension development site.

Landscape Considerations

Physical Features

- 2.17 To the west of the site there is a corridor of open land lying between the site and the Wickham Wood / Sugworth Wood. This has a locally distinctive character because it is visually enclosed to the east and west, but long views can be obtained when looking north and south. The northern part of this corridor is used as part of the golf course playing area and has some amenity landscape characteristics.
- 2.18 The golf course site is surrounded on its north and west sides by woodlands, and it is considered that these woodlands form an important physical and visual barrier between the golf course and the surrounding open countryside to the north.

- 2.19 In contrast to the wooded areas surrounding the golf course, the playing areas themselves have the characteristics of an 'amenity' landscape which has been shaped and altered to meet the requirements of a golf course. Extensive areas of mown grass dominate the site and there are few areas of rough or natural grassland.

Trees

- 2.20 There are no Tree Protection Orders on this site. There is some tree cover throughout the course but this takes on the form of small plantations and many individual trees arranged between the fairways, there is also a significant proportion of non-native coniferous trees which further emphasises the amenity character of the site. The age structure of the trees on the site are considered to be uniform with the majority of trees of being young or semi-mature in age, there are few mature or veteran trees, and where these are found they are located around the periphery of the site or along the public footpath routes. Given these locations it is not considered that the removal of the mature or veteran trees would be required.

- 2.21 The owners have commissioned landscape architects Floyd Matcham to undertake a landscape appraisal of the site, a Landscape Context Plan is attached at appendix H.

Landscape Character

Landscape Analysis

- 2.22 The analysis of the landscape character shows that given the sites current use as a golf course the landscape comprises an amenity type landscape that is not considered typical of the undeveloped countryside around other parts of Haywards Heath. Furthermore, because it is visually well-contained, it does not provide an open setting to Haywards Heath, and is not considered to form an open countryside setting.
- 2.23 The site comprises a golf course within a countryside edge location, there is built form on this site comprising club house buildings, outbuildings, a car park and the access road. The site is not protected by any statutory landscape designations.
- 2.24 In terms of the sites landscape character, the golf course is best described by reference to its internal characteristics, as seen in internal views and, subsequently, its external character as seen in external views. These views are shown on the photosheets attached at appendix I.
- 2.25 Internally, the site falls into two distinct character areas, comprising the main playing area to the south of the ridge and the northern playing area to the north of the ridge, and a relatively narrow corridor of land to the west side of the site.

- 2.26 The main playing area can be seen on photos 2, 3, 4, 5 and 6 which shows views from the public footpaths crossing the site, and from the access road to the club house. The northern playing area can be seen on photo 1. Photo 7 shows a view looking across High Beech Lane from the bank above the road, as no view can be obtained at road level. In this winter view, part of the main playing area of the golf course can be glimpsed.
- 2.27 The photosheets demonstrate that the site is visually well contained by substantial woodland blocks, existing well-vegetated residential boundaries, and by tree cover along High Beech Lane.

Landscape Analysis

- 2.28 The use of the site as a golf course results in a site which has the character of amenity landscape rather than open countryside. The analysis of the landscape demonstrates that the least constrained area to accommodate new residential development is the main playing area lying south of the local ridge and east of the public footpath.
- 2.29 The amenity landscape here has no special qualities or designations which would impose constraints on development, there would be no loss of significant landscape features and residential development within this part of the site would not be widely visible in public views other than from the existing public footpaths. The existing tree cover along High Beech Lane would soften the visual appearance of the proposed development public view.
- 2.30 The northern part of the playing area does not have any special landscape designations or qualities, however, this area is generally more undulating ground and is visually separated from the main playing area by the local ridgeline. This part of the site directly adjoins an area of woodland (Wickham Wood) which provides an important setting around the western and northern boundary, this part of the site is also partially visible from High Beech Lane. The owners of the site have taken this into consideration and have decided to preclude this part of the site from development, this would be retained as open space which would be managed by the site owners, and this would ensure that an open setting would be retained on the north side of the public footpath which divides the site.

Ecological Considerations

- 2.31 The owners have commissioned EAD to undertake an Ecological Scoping Appraisal of the proposed site in terms of its suitability for development, and EAD were also commissioned to undertake an Extended Phase 1 Survey on site. A Designated Sites Plan is attached at appendix J, The results of this Ecological Scoping Appraisal and Survey are detailed within this section of the submission.

2.32 As shown on the EAD Designated Sites Drawing, the site does not lie within a designated SNCI. Wickham Woods SNCI occurs immediately adjacent to the north-western site boundary. There are also three other SNCI which occur within 2km of the site, Blunts and Paiges Woods; Scrase Valley, and Bursteye Farm Meadow, and these are all designated as local nature reserves.

2.33 The majority of Wickham Woods SNCI has been designated as Ancient Woodland, the vast majority is an area of replanted Ancient Woodland. An area of Ancient Woodland is located adjacent to the southwest boundary of the site

Extended Phase 1 Habitat Survey

2.34 The proposed development site is considered to be of low ecological value; predominantly of 'Site' value under the IEEM Ecological Impact Assessment Guidelines (2006). The site is dominated by amenity grassland, within which are a number of stands of broadleaved and mixed plantation woodland. This is shown on the EAD Phase 1 Habitat Plan at appendix K.

2.35 The Phase 1 Habitat Survey concludes that the habitats within the site are likely to provide foraging and nesting habitat for common and widespread bird species. Bats are likely to forage along tree lines and may also roost within mature trees, however, these occur predominantly along the site boundaries and are therefore unlikely to be adversely impacted by the proposed development.

2.36 A badger sett occurs within the mixed plantation woodland in the northern half of the proposal site, this part of the site is to be retained as open land, however, appropriate mitigation measures can be put in place to ensure the protection of this habitat.

2.37 The Habitat Survey concludes that the site is considered to be sub-optimal for Great Crested Newts, Hazel Dormouse and reptiles.

2.38 The proposed development site is of low ecological value, no designated sites would be adversely affected through the proposed development, and furthermore development would be likely to deliver ecological gain through:

- The consolidation of existing defunct links between Wickham Wood to the north west and the Ancient Woodland to the south west of the site;
- Creation of new ecological corridors within the development area that link to existing and proposed development boundary habitats, i.e. reinforcing the ecological network;

- Consolidation of existing defunct mixed woodland corridors along the central part of the proposal site through native tree and shrub planting;
- Buffering Ancient Woodland habitats along the north-western, western and south-western boundaries from development through native tree and shrub planting.

3. Planning History

- 3.1 The site has some limited history of promotion through the MSDC District Plan process.

Mid Sussex Strategic Housing Land Availability Assessment (SHLAA) 2015

- 3.2 In 2007, Haywards Heath Golf Club Ltd submitted details of the site in response to the Council's call for sites for the SHLAA. The site reference was ASL/19.
- 3.3 A further SHLAA submission was made in 2010 as a result of a further call for sites, this submission provided far more comprehensive information on the development potential of the site. The site is included within the Mid Sussex SHLAA 2015 (site reference 503). The total site is approximately 31.5 hectares of land classified as sports facilities and grounds, and outdoor amenity and open spaces.
- 3.4 The assessment acknowledges that the site is considered to be available and achievable. However, at the time of writing, the site was considered unsuitable for development, the Council acknowledges that Mid Sussex Landscape Capacity Study considers the area as having medium landscape capacity for development, but that this decreases as the landscape sensitivity increases further north into the site.
- 3.5 The SHLAA assessment considers that the site is fairly remote to local services and considers that access would be reliant on a car due to the lack of footpath from the site and the distances involved. The Council also considers that the site is not well related to the BUA of the town and development would represent a significant encroachment into the countryside. The Council contends that the loss of the golf course needs to be considered. It cites the known constraints to the scale and quantum of development would be the as SNCI and Ancient Woodland that borders the site. It is considered that this submission will demonstrate how the site can address these concern.
- 3.6 Overall, the assessment concluded that the site would require allocation through a Neighbourhood Plan. A buffer to the SNCI and Ancient Woodland would be required. It also identified that it would be desirable to retain large numbers of trees, preserve buffers to the boundary hedges/trees, and preserve/create a landscape buffer between the site and the Sussex Ouse Valley Way.

Mid Sussex Landscape Capacity Study 2007

- 3.7 The site is included within the Haywards Heath North Weald area. The Study considers this area to be of slight landscape sensitivity but of moderate

landscape value, overall it is therefore concluded to have medium/high capacity for development. It should be noted that this is the only area within and around Haywards Heath designated as such, and it is therefore considered that this area is the most suitable for development within Haywards Heath.

Capacity of Mid Sussex District to accommodate development Study 2014

- 3.8 Land Use Consultants were appointed by MSDC to undertake an assessment of the constraints to development in Mid Sussex, this looked at environment, infrastructure, landscape capacity and sustainability.
- 3.9 Figure 6 of the Study brings together the constraints to development and maps then as having primary constraints (afford the highest level of protection in national policy, ie. Areas of Outstanding Natural Beauty) and the number of secondary constraints (less sensitive but still protected by national policy, ie. Setting of Listed Buildings); where there are less than 4 primary constraints and more than 3 services, it is identified with purple hatching and demonstrates the areas on the edges of settlements which might be able to accommodate development.
- 3.10 Figure 6.1 shows that almost two thirds of the District is covered by primary level constraints. Furthermore, only 4% of the District benefit from 2 or fewer, secondary constraints. Therefore, the purple hatched areas, adjacent to settlements are considered to be the only areas with the capacity to accommodate development. Haywards Heath golf course is located within one of these purple hatched areas, the site is therefore considered to be suitably located for development.

Lindfield and Lindfield Rural Neighbourhood Plan

- 3.11 This site has not been allocated for development in the Lindfield and Lindfield Rural Neighbourhood Plan. The Neighbourhood Plan has already been progressed and on the 30th November 2015, Mid Sussex District Council formally accepted the recommendations of the independent examiner for the Lindfield and Lindfield Rural Neighbourhood Plan.
- 3.12 The recommendations of the independent examiner was that the Neighbourhood Plan should allocate a strategic development site of approximately 200 units, however, the Parish Council have chosen to proceed on the Neighbourhood Plan without this allocation. A neighbourhood planning referendum will be held on 28th January 2016 to establish whether the Neighbourhood Plan will be used by Mid Sussex District Council to decide planning applications in the area.
- 3.13 Given that the Parish Council have chosen to proceed the Neighbourhood Plan without this additional allocation, despite the recommendation of the independent examiner, we are of the view that should this referendum

succeed, the Neighbourhood Plan can only be given limited weight as it is considered to be unsound.

Neighbouring Development

- 3.14 There are a number of other developments that have come forward on sites on the northwest and northeast of this site, such as the recently approved Development at Penland Farm in the Borde Hill area, a site which is located on the edges of Haywards Heath.
- 3.15 These developments have come forward on sites identified as having medium capacity for development by MSDC in their Landscape Capacity Study. There are very few remaining locations within and around the edges of Haywards Heath that are also considered as having a medium or medium-high landscape capacity for development. It is considered therefore that this site, as one of the few remaining areas within and around Hawards Heath that has been classified as such an area, would be able to provide a significant level of housing which would help meet the outstanding needs of the District.

4. The Masterplan

- 4.1 The site is currently used as a golf course, the site is owned by Haywards Heath Golf Club Limited, herewith referred to as “the owners”. This is a separate entity to Haywards Heath Golf Club who lease the site. The current lease for the site is due to expire shortly in 2022.
- 4.2 Golf clubs, both nationally and locally, are experiencing increasing financial pressures arising from the changing nature of golf club memberships and the related demographics of golf as a pastime. Haywards Heath golf course is no exception in this respect, however, the club also has the added disadvantage of occupying a course which falls well short of the yardage requirements for a modern golf course set down by the Professional Golfers’ Association. The golf course is therefore currently too small to meet PGA specifications, and there is no scope to expand the course in order to enable it to do so. It is therefore considered that the use of the site as a golf course is no longer a viable option in the long-term.
- 4.3 Details of the provision of a replacement golf course is not part of this submission. The cost of purchasing land and the construction of a new course may be prohibitive, and may not be a viable option.
- 4.4 Crucially, since the Haywards Heath Golf Club was established in the 1920 many other courses have been developed. Two courses are situated very close to Haywards Heath Golf Course; the Lindfield Golf Club at Paxhill, and Cuckfield Golf Club at Whitemans Green. In addition, Mid Sussex Golf Club near Wivelsfield and Hassocks Golf Club between Hassocks and Burgess Hill have been established. Put simply, there is now significant over-supply of golf courses in the central Mid Sussex area, and the loss of the Haywards Heath Golf Course would not result in a lack of provision.
- 4.5 Given the sites location adjacent to the existing settlement boundary and the previously developed status of the site it would be suitable for residential development.

Development Principles

- 4.6 This site is located adjacent to the existing settlement boundary of Haywards Heath, development on this site would therefore be a form of extension to the urban form of Haywards Heath. This type of development has significant benefits over small scale, piecemeal development, and is considered to be in line with the preferred approach to development. Paragraph 52 of the National Planning Policy Framework states: *“The supply of new homes can sometimes be best achieved through planning for larger scale development,*

such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.”

- 4.7 A vision for the site has been prepared and a Development Principles Plan is appended at Appendix L. Stuart Michael Associates (transport), Floyd Matcham (landscape architects), and EAD (ecology).
- 4.8 The total site area is 31 hectares and the proposed net developable area is 14.6 hectares. At an average density of 40 dwellings per hectare this would accommodate approximately 580 dwellings. Taking account of the edge of settlement location and site constraints it is considered more realistic to estimate the total number of dwellings to be up to 438 (30 dph over 14.6 ha).
- 4.9 Within the remainder of the site, part of the land would be used for a neighbourhood centre, primary school, play and open space provision, and landscape corridors incorporating where appropriate enhanced ecological initiatives. It is proposed to retain the former northern playing area and for the owners to manage this as open land.
- 4.10 The preparation of the development principles plan has been guided by the landscape context of the site and all the above considerations have been taken into account. The principles of the development comprise:
- Two main areas of residential development, separated by a central landscape corridor served by a road and cycleway network with access from High Beech Lane;
 - A neighbourhood centre close to the entrance to the site and associated with a landscaped area that would form an attractive feature at the site entrance;
 - A new primary school
 - A new landscape framework to integrate the residential development areas into the local landscape framework.

Neighbourhood Centre

- 4.11 The proposal comprises the provision of a neighbourhood centre, this centre would provide for retail, service and community facilities such as doctors and dentists surgeries and possibly some B1 business units. The neighbourhood centre would also provide a suitable location for a new community hall.

Primary School and Early Years Provision

- 4.12 It is acknowledged that a development of this size is likely to generate the need for a new Primary School. The Vision Plan allows for a new one-form entry primary school to be provided on the site. The exact nature and scale of this facility would be the subject of future discussions with West Sussex County Council as the local education authority.

Landscape Strategy

- 4.13 The landscape strategy shown on the development principles plan has been designed around the landscape constraints and opportunities identified in the landscape analysis with section 2.0 of this submission, and is summarised below.
- 4.14 New residential development would be restricted to the main playing area of the golf course lying to the south of the site. This reflects the LUC assessment of the site which states that “development on the ridge top and northward-sloping area beyond would represent an intrusion into the rural area.”
- 4.15 The residential development would be located in two distinct character areas separated by a central landscape corridor linking the western end of Sandridge Lane to the north east corner of Birchen Wood. Land to the east of the landscape corridor is considered to be most appropriate for higher density housing while land to the west would lend itself to lower density housing, incorporating generous internal structural planting that would reinforce the wooded setting of the western side of the site.
- 4.16 An open tree-lined corridor would be formed along the access road leading from High Beech Lane, and the existing woodland growing along the High Beech Lane boundary would be retained and strengthened through additional planting if required. Further woodland planting is proposed along the boundary south of Sandridge Lane to provide a visual buffer for the existing residents, this planting would be extended westwards as a boundary tree belt, and would strengthen visual and physical separation from the northern playing area.
- 4.17 In order to integrate the scheme to the wider area and the open countryside and wooded areas beyond the site, all new structural planting within the development would utilise native species of trees and shrubs that are indigenous to the locality. Native planting would also support measures to enhance biodiversity by providing corridors and links across the development that can be utilised by any wildlife.

Conclusion

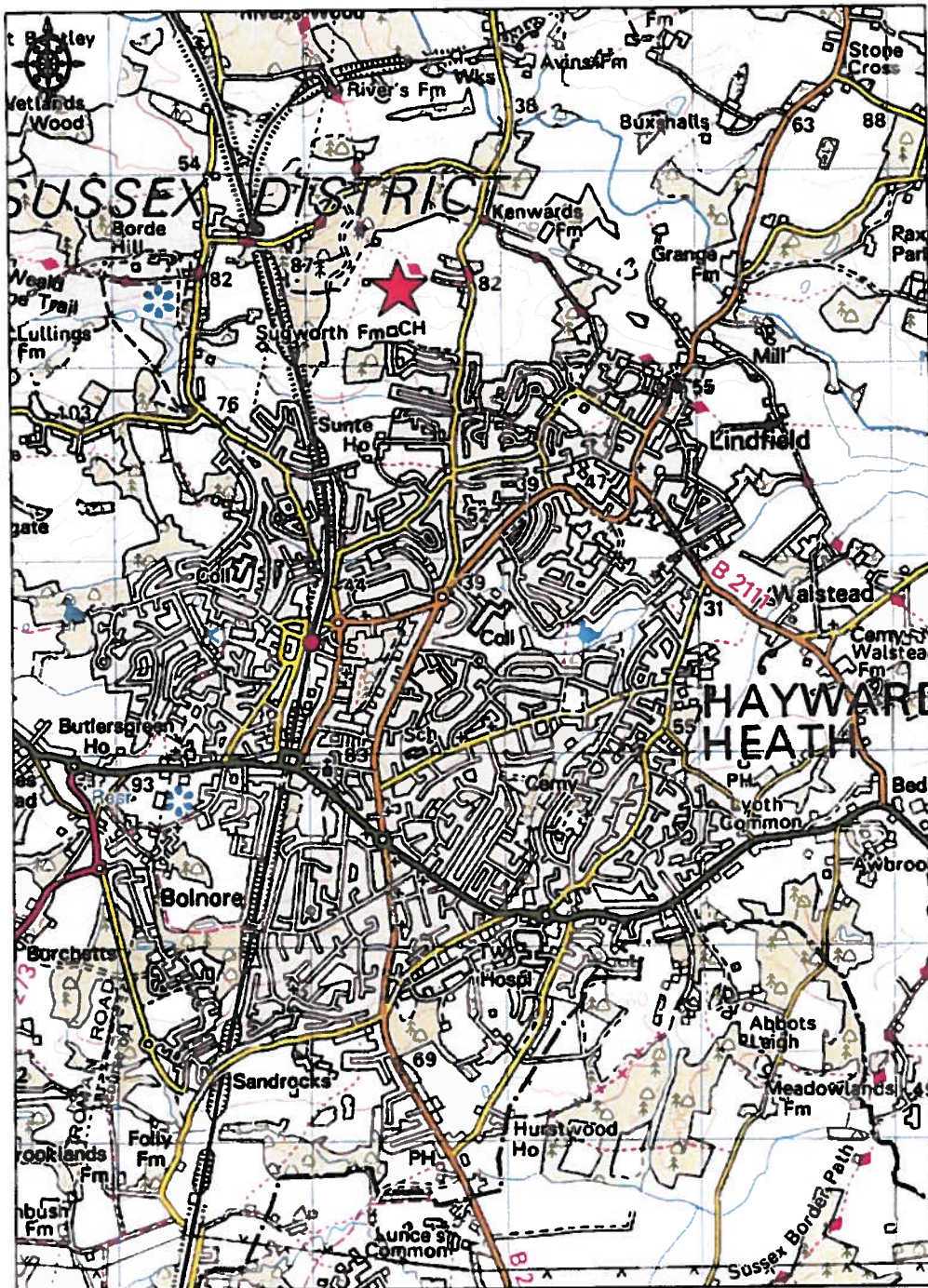
- 4.18 It is our view that there are no overriding constraints to development at Haywards Heath golf course (SHLAA reference 503). The site is considered to be a logical site for an extension to Haywards Heath being located adjacent to the existing settlement boundary of the town.
- 4.19 The Council has previously assessed this site for potential development, although the Council has assessed this site as unsuitable for development, it is our view that this submission has highlighted how the Council’s concerns can be overcome. As such, we consider that land at Haywards Heath golf

course should be chosen as an additional or alternative strategic site allocation, and should be taken forward through the Mid Sussex District Plan process as such.

- 4.20 The site is located within the Haywards Heath North Weald area as identified in the Council's Landscape Capacity Study, this area was assessed as having a medium-high landscape capacity for development. This area is less visually sensitive in general terms and is also recognised as having fewer constraints to development than elsewhere in and around Haywards Heath, it is therefore considered that development in this area would have less of a visual impact than elsewhere in the settlement.
- 4.21 It is noted that there are concerns regarding the sites location and the Council has considered the site to be remote from local services. It has been demonstrated through this submission however, that the site is in close proximity to the services of Lindfield village centres and Haywards Heath town centre. Furthermore, through improvements such as upgrading the existing footpath adjacent to the site and the provision of a bespoke bus service this will no longer be thought of as a barrier to development.
- 4.22 Haywards Heath is one of the three main towns in Mid Sussex District, presently, the District Plan does not propose any sites within Haywards Heath. It is our view that given the role that Haywards Heath plays as a major town with excellent commuter links to the region and to London, there is a need for the Council to consider allocating additional and alternative potential strategic sites within and around Haywards Heath.
- 4.23 Our general representations on the MSDC Focused Amendments suggest that the housing needs figure should be increased further in order to meet the full objectively assessed needs of the District, but also of the Council's neighbouring authorities. It is considered therefore that the Council should consider the allocation of further sites moving forward in the District Plan process.
- 4.24 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.

APPENDIX A

HAYWARDS HEATH GOLF CLUB LTD SITE LOCATION PLAN



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BELL CORNWELL LLP

APPENDIX B

Mid Sussex District Plan Focused Amendments

**Representations on behalf of Haywards Heath
Golf Club Ltd**

Mid Sussex District Plan Focused Amendments

General Comments

Submission on Behalf of
Haywards Heath Golf Club Ltd

January 2016

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Checked by

DRAFT

Prepared by: Lisa Da Silva

Checked by: Peter Rainier

Date: 14th January 2016

FINAL

Prepared by: Lisa Da Silva

Checked by: Peter Rainier

Date: 15th January 2016

Introduction

- 1.1 The Mid Sussex District Council ("MSDC") District Plan Focused Amendments ("Focused Amendments") were published in November 2015 for public consultation. The Plan is proposed to cover the period 2011-2031 and includes the strategy for the District over this period, the proposed level of development and the associated development control policies.
- 1.2 The District Plan Pre-Submission Draft was previously published in June 2015 for public consultation, however, at this time, the District Plan did not include the proposed level of development. As such, MSDC have published Focused Amendments, prior to the submission of the Plan to the Secretary of State (SoS) in February 2016 which sets out the housing growth figure and associated allocations of land, including a new allocation of land at Pease Pottage.
- 1.2 DMH Stallard act on behalf of Haywards Heath Golf Club Ltd in relation to land at Haywards Heath Golf Club. It is submitted that the site should be included within the District Plan as a strategic housing allocation. The purpose of this submission therefore, is to promote this site as an additional / alternative Strategic Development Site.
- 1.3 This report sets out our general comments relating to the Focused Amendments to the Pre-Submission Draft, we have also made further site specific representations on the Focused Amendments and these have been submitted to the Council via email. These submissions should therefore be read in conjunction with our site specific representations.

Paragraphs 3.10 – 3.12: Meeting Housing Needs - unsound

- 1.4 The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) state that in planning for future levels of housing, local planning authorities should boost significantly the supply of housing in their area. To do this, the NPPF states at paragraph 47 that local authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area.
- 1.5 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.
- 1.6 It is our view that the Council's calculations are based on a number of flawed assumptions. It is considered that as a result MSDC are significantly underestimating the level of housing need within the District. This results in a District Plan that fails to provide for the current and future housing needs of the District. It cannot, therefore, be found sound.

Paragraphs 3.13, 3.14, 3.38 & 3.39: Duty to Cooperate - unsound

- 1.7 We are pleased to note that the Council have acknowledged the requirements of the Duty to Cooperate, this is of particular importance given the findings of the Planning Inspector during the previous examination. We note that the Council has contacted neighbouring authorities to establish whether they have any unmet housing needs, and that six of the eight authorities contacted advised that they will not be able to fully meet their needs. 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.
- 1.8 We note that in response to the level of need for other neighbouring authorities, the Council has revised its previous position in the Draft Local Plan, and is now proposing to contribute 105 dpa towards meeting neighbouring authorities housing needs. Paragraph 3.18 of the Focused Amendments document states that this would principally address the needs of Crawley Borough Council (CBC) which is within the same housing market area and has an unmet need of 5,000 dwellings over its plan period. 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.

- 1.9 Whilst the Council has noted that it is within the same housing market area as CBC, 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.
- 1.10 It is well known that the adjoining authorities of Crawley Borough Council (CBC) and Brighton & Hove City Council (BHCC) are unable to meet their housing needs due to their tightly drawn administrative boundaries. Additionally, other neighbouring authorities such as Tandridge District Council, Lewes District Council, Worthing District Council, and Adur District Council are unable to meet their housing needs by virtue of their environmental constraints (such as flood risk, Green Belt, AONB and South Downs National Park). 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.
- 1.11 It is noted that BHCC had made a formal request for joint-working with Mid Sussex District Council to help meet its housing needs during the previous round of consultation. It is interesting to see that the Focused Amendments to the District Plan however makes no reference to the housing needs of Brighton & Hove City Council or demonstrated how the District Plan has had regard to the Duty to Cooperate with this particular local authority. 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.
- 1.12 The Council's own Sustainability Appraisal Pre-Submission Report (November 2015) assesses the unmet needs of neighbouring authorities, this report notes that the unmet housing need of Brighton & Hove over the period from 2011 to 2031 is for a total of 10,800 dwellings. The relationship between Mid Sussex and Brighton is significant and there are strong links in terms of migration. The evidence contained within the Council's Sustainability Appraisal is that 12% of all people migrating to Mid Sussex came from Brighton & Hove, and as such more people from Brighton & Hove have moved to Mid Sussex than from any other neighbouring authority. 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.

Paragraphs 3.24 – 3.30: Ensuring housing Delivery – unsound

- 1.13 These paragraphs set out how MSDC propose to deliver new homes across the District. It states that the delivery of new homes within the District will be delivered through the District Plan, and through allocations in the Neighbourhood Plans.
- 1.14 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.
- 1.15 However, 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 acknowledged that the Council anticipates an outline planning application is to be submitted for the site in late 2015, however, this has not yet been submitted. Given the size of the site and complexity of the application, the approval of an outline application will be likely take some considerable time by the Council. The site will require further applications to approve reserved matters and given the size of the site this is likely to require a phased approach to development and subsequent reserved matters applications.
- 1.16 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.
- 1.17 Given this likely shortfall it is considered necessary for MSDC to allocate further potential strategic sites moving forward in the Local Plan process.
- 1.18 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 therefore urge the Council to consider amending the Focused Amendments to include these such sites for allocation in the District Plan.

Policy DP1: Sustainable Development in Mid Sussex - sound

- 1.19 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.

Policy DP2: Sustainable Economic Development - unsound

- 1.20 We agree that by increasing the level of housing growth there would be a resultant increase in the number of new jobs being generated, policy DP2 states that the level of housing growth proposed in the Focused Amendments would result in an average of 330 new jobs per year being generated. However, 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.
- 1.21 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.
- 1.22 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.
- 1.23 The NPPF requires the planning system to perform a number of roles: economic; social, and environmental. These roles are mutually dependant and should be considered jointly through the planning system. The NPPF places a great deal of importance on these roles, in particular the role of planning in driving and supporting "sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs." (Paragraph 17)
- 1.24 Supporting and achieving economic growth should be a consideration in plan-making, it is therefore considered that the Council needs to increase the level of housing proposed in order to achieve appropriate economic growth. This can be done through the allocation of further strategic sites such as the site at Haywards Heath Golf Club, this would increase the level of housing supply and thus the required level of economic growth.

Policy DP5: Housing - unsound

- 1.25 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. As stated previously it is our view that the District's housing need figure has been underestimated by the Council and furthermore that this figure has been based on flawed assumptions and calculations.
- 1.26 The NPPF requires that Plans are justified, in that they demonstrate the most appropriate strategy based on the proportionate evidence base. It is considered that in this instance, on the basis of flawed evidence as set out above, Mid Sussex have failed to demonstrate the most appropriate strategy for identifying land which has development potential. The Draft DP, therefore fails to be justified and therefore must be considered unsound.
- 1.27 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.
- 1.28 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.
- 1.29 Presently, twenty Neighbourhood Plan Areas have been designated, of that four Neighbourhood Plans have been 'made'. It is worth noting that all of these plans have stated that the parishes are limited in their capacity to provide new housing sites. 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.
- 1.30 Furthermore, given 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, there is a real possibility of double-counting to occur, and for the District's housing figures to be inaccurate.

- 1.31 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. 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.

Policy DP6: Settlement Hierarchy – unsound

- 1.32 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.
- 1.33 The Council acknowledges that the settlement pattern of Mid Sussex contains three main towns (Burgess Hill, East Grinstead and Haywards Heath), and a large number of villages of varying levels of services and accessibility. Whilst this is considered to be a sound approach, it is our view however that the detail of Policy DP6 is not considered to be sound.
- 1.34 A settlement hierarchy has been developed by the Council which identifies five different categories of settlement in the District, 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.
- 1.35 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.
- 1.36 Whilst we are pleased to see that an additional site has been allocated for strategic development, 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 as it is unlikely that

such allocations in Neighbourhood Plan will accommodate mid or high range sites of 200 or more units.

- 1.37 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.
- 1.38 As such, it is our view that the current housing strategy of the Draft District Plan does not comply with one of the core principles of the NPPF, which is to ensure that Plans set out a clear strategy for allocating sufficient land which is suitable for development in their area.
- 1.39 We consider that a more sound strategy would be to allocate a number of other strategic sites for development, primarily in and around the settlement boundaries of the main towns in the District which are considered to be the most sustainable, such as Haywards Heath and East Grinstead in addition to Burgess Hill. It is our view that this would be a more sustainable and sound option than relying solely on the large strategic development at Burgess Hill and the proposed allocation of 600 houses at Pease Pottage which is located within an AONB and countryside location.
- 1.40 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.
- 1.41 The allocation of the proposed development at Haywards Heath Golf Club as a strategic site would be able to provide for housing on the site from towards the middle end of the plan period, and thereby address any potential shortfall in the long-term housing land supply of the District.
- 1.42 On this basis and the other evidence provided in our submissions, it is our contention that MSDC are failing to provide for the future housing needs of the District. There has been a persistent undersupply of housing within the District, on this basis it is considered that MSDC are not capable of responding quickly to change. It is submitted therefore that there should be adequate flexibility within the District Plan to accommodate any shortfall in housing. This would result in a positively prepared District Plan.

Policy DP10: Protection and Enhancement of Countryside - sound

- 1.43 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).

Policy DP22: Leisure and Cultural Facilities and Activities - unsound

- 1.44 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.
- 1.45 This policy states a number of criterion for which developments which propose the loss of leisure and cultural facilities will need to comply with. This policy allows for the loss of facilities if it has been demonstrated that it is surplus to requirements; would be replaced by equivalent or better facilities; the development is for alternative provision for which the needs outweigh the loss.
- 1.46 Whilst we consider this criterion to be appropriate, it is also our view that 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.

Policy DP24A: Housing Density – unsound

- 1.47 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, and is not NPPF compliant. Paragraph 59 of the NPPF states that local planning authorities should avoid unnecessary prescription or detail and should concentrate on overall density of new development in relation to the local area more generally. As such, each case should be determined on its own merits.

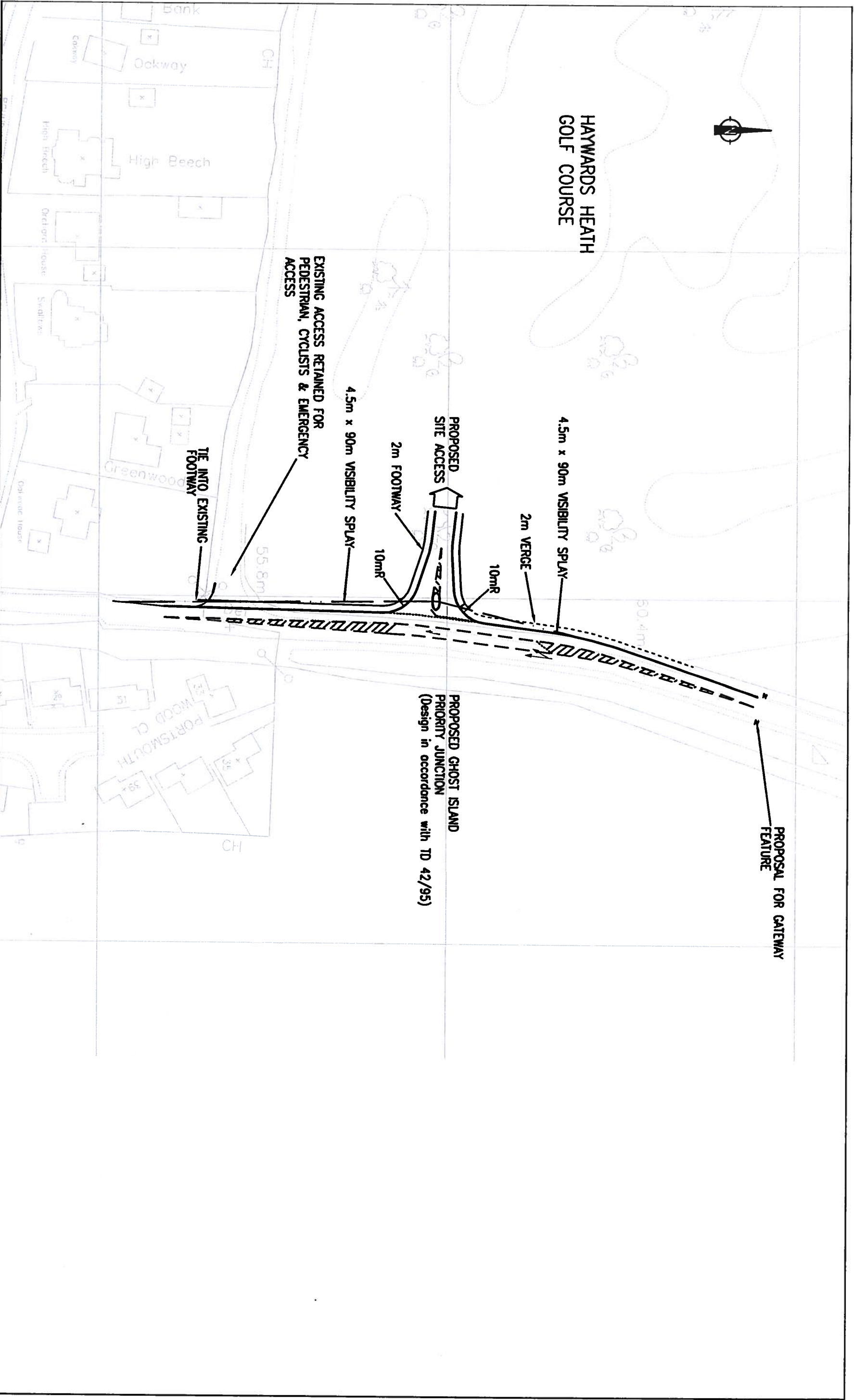
- 1.48 We are also concerned that some of the densities quoted are too high for the District. Densities of at least 70 dwellings per hectare is suggested in areas within and close to the centres of the three main towns, and densities of at least 50 dph are required for areas within the remaining built 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.
- 1.49 Furthermore, it is considered that the Council has chosen this level of proposed density of development as it will inflate the potential of the two proposed strategic sites over and above that which can be accommodated without effecting the countryside.
- 1.50 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.
- 1.51 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.
- 1.52 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.

Policy DP29: Affordable Housing - unsound

- 1.53 Whilst the principle of the Policy and the general detail regarding the requirements for development to provide 30% affordable housing is considered to be sound, we are of the view that the evidence base behind this policy is unsound.
- 1.54 The Council states within the November 2015 HEDNA report that the provision of 695 dpa would provide for 209 affordable dwellings per annum (30% of 695). The November 2015 HEDNA report states that the current affordable needs of the District is for 127 dpa.
- 1.55 The Northern West Sussex Housing Market Area Affordable Housing Needs Model Update (2014) assessed the full affordable housing need based on the 'high' scenario which is identified as 474 dwellings per annum. As such the proposed 209 affordable dwellings per annum will only be partially meeting the affordable need of Mid Sussex.

- 1.56 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.

APPENDIX C



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HAYWARDS HEATH

GOLF CLUB LIMITED

LAND AT HAYWARDS HEATH
GOLF CLUB LIMITED

PROPOSED ACCESS ARRANGEMENTS

Rev	Description	Dm	Chk	Date
REVISIONS				
Preliminary	Approval	Tender	Cons.	
DRAWING STATUS				

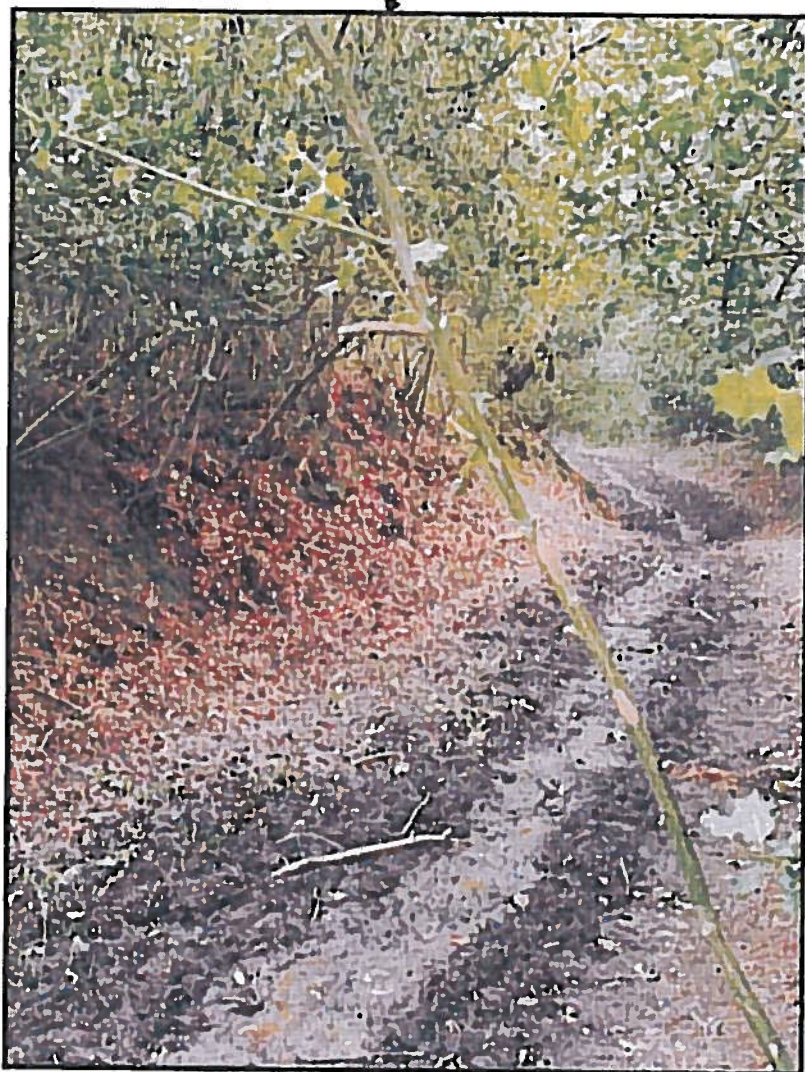
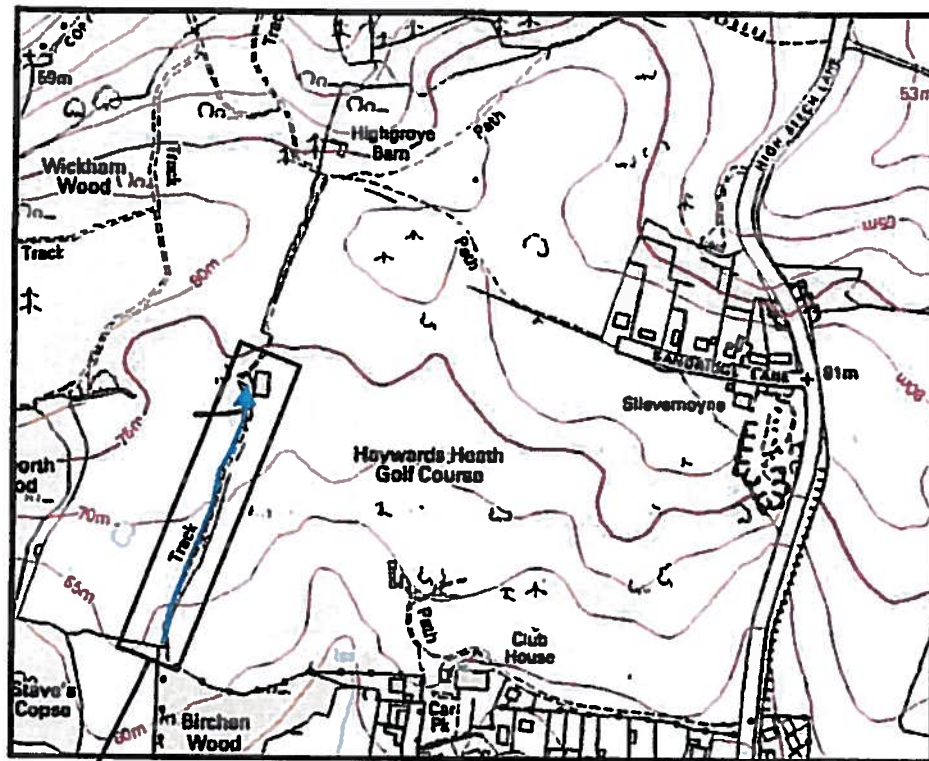
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Appendix D



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Existing public footpath



Potential foot/cycle path surfacing,
fencing optional



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JOB TITLE

Haywards Heath
Golf Club Limited

DRAWING TITLE

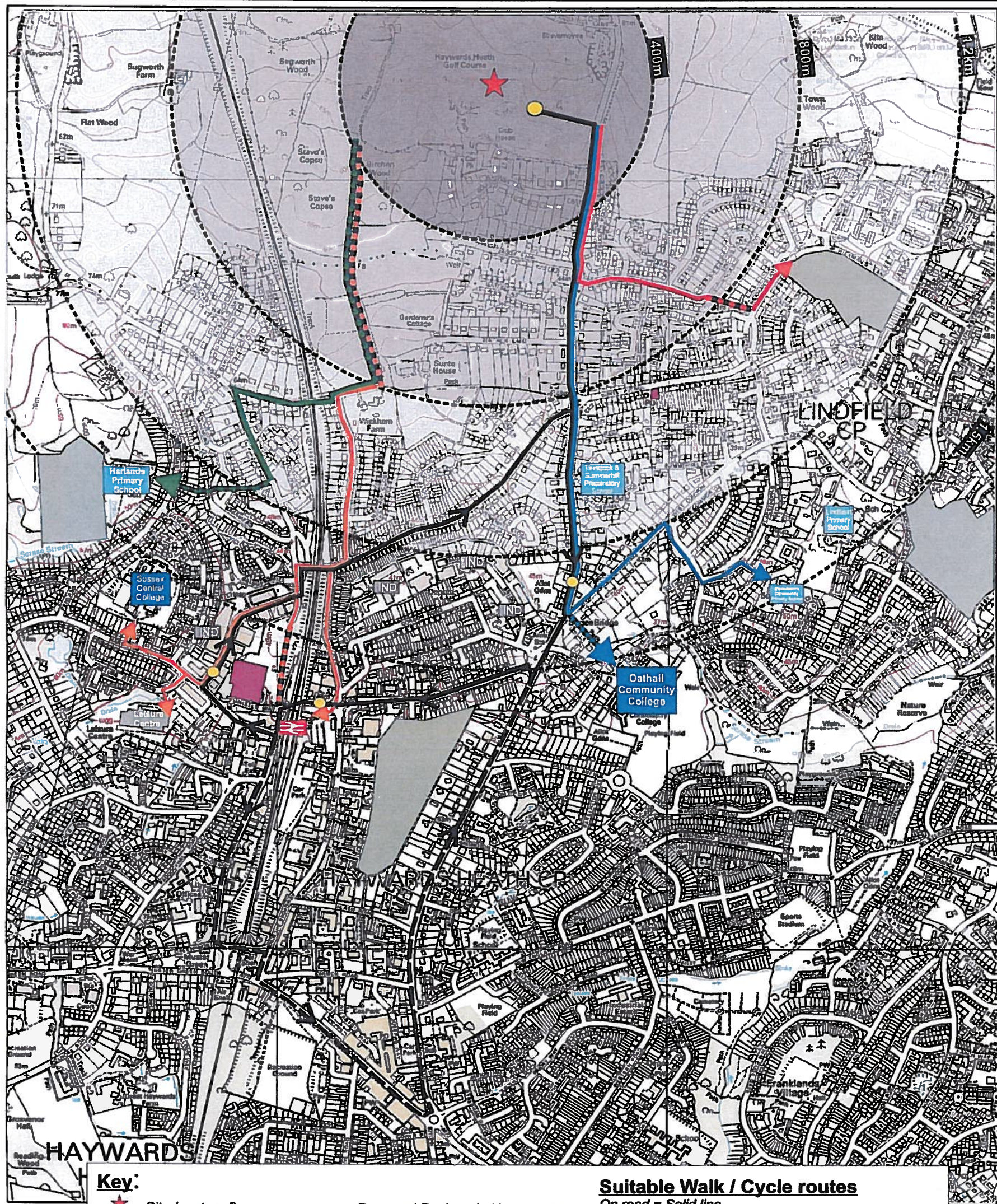
Potential Cycleway
Improvements

FIGURE NO.

SMA2

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APPENDIX E



Key:

- ★ Site (centre of)
- Recreation ground
- Primary School
- College
- Retail
- Rail Station
- Proposed Peak period bus route
- Proposed off peak period bus route
- Bus Stops

Suitable Walk / Cycle routes

- On road = Solid line
- Off road = Dashed Line
- Site - Station / Sussex Central College / Industrial estate / Leisure Centre
- Site - Oathall College / Blackthorns Community Primary
- Site - Harlands Primary School
- Site - Hickman's Lane Recreation Ground



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JOB TITLE

Haywards Heath Golf Club Limited

DRAWING TITLE

Accessibility Plan - Proposed Indicative Strategy

FIGURE NO

SMA3

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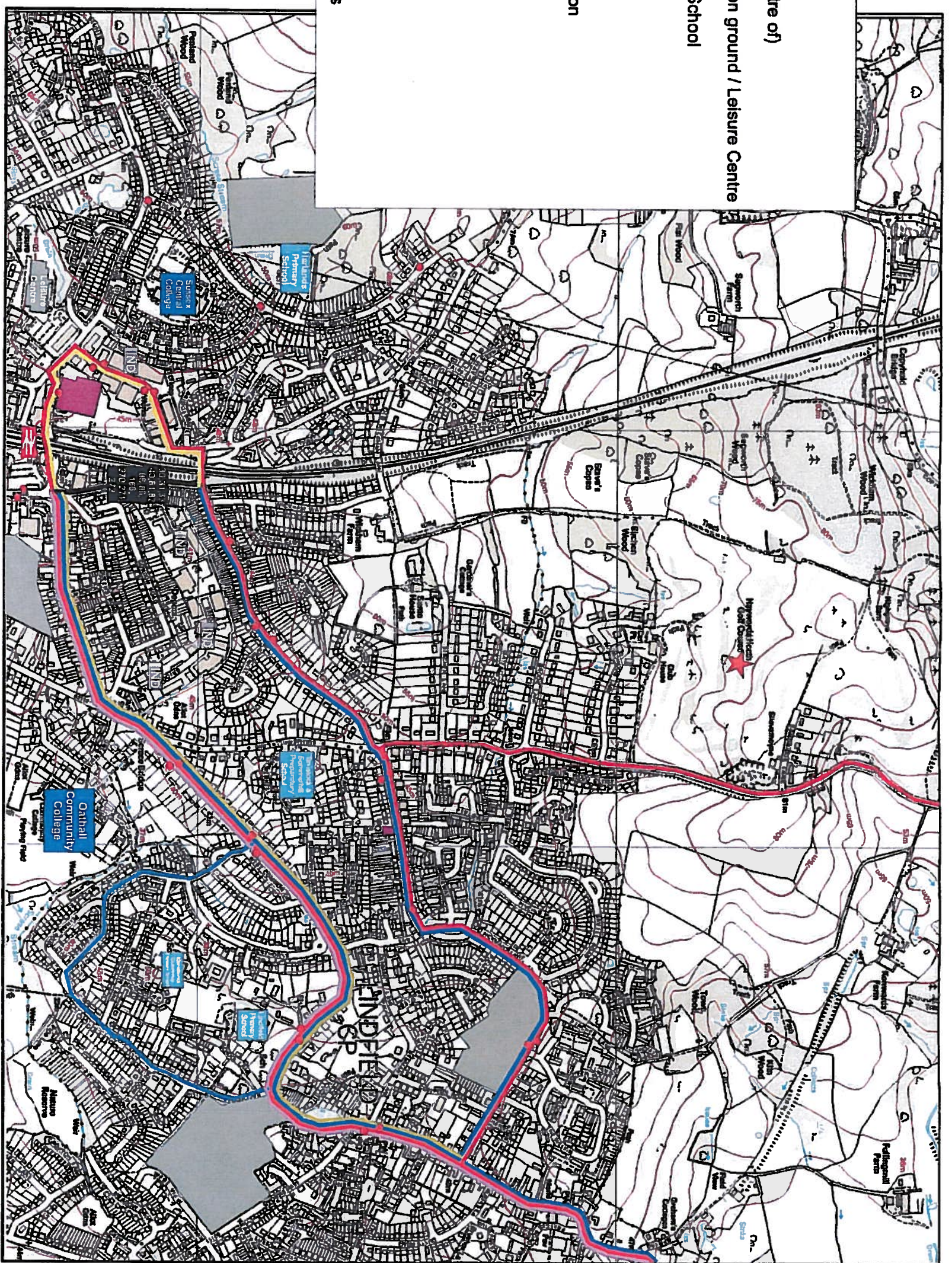
APPENDIX F

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Key:

- ★ Site (centre of)
- Recreation ground / Leisure Centre
- Primary School
- College
- Retail
- 🚉 Rail Station
- 30
- 81
- 89
- 270
- 166
- Bus Stops



JOI TITLE

DRAWING TITLE

FIGURE NO.

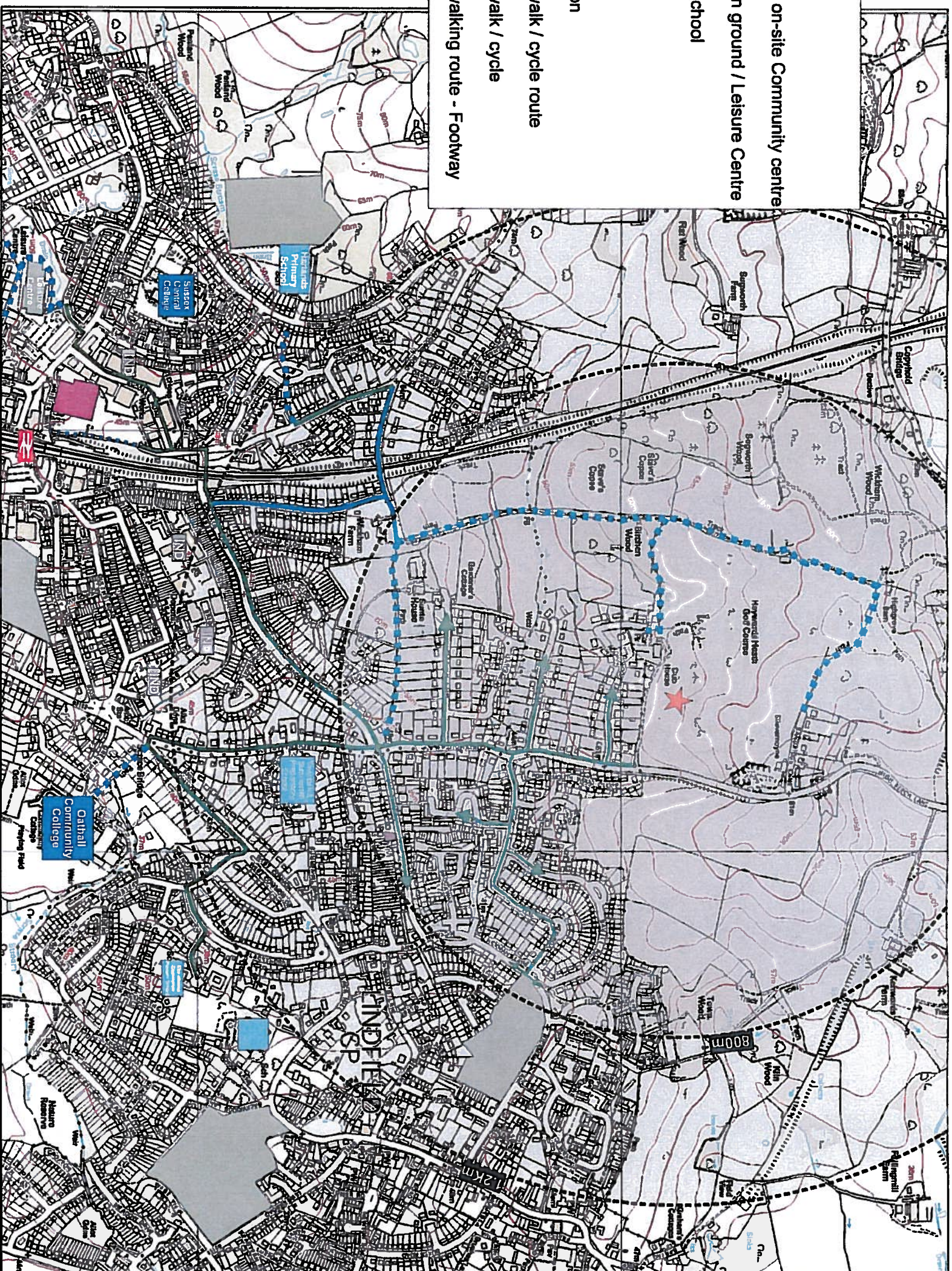
APPENDIX G

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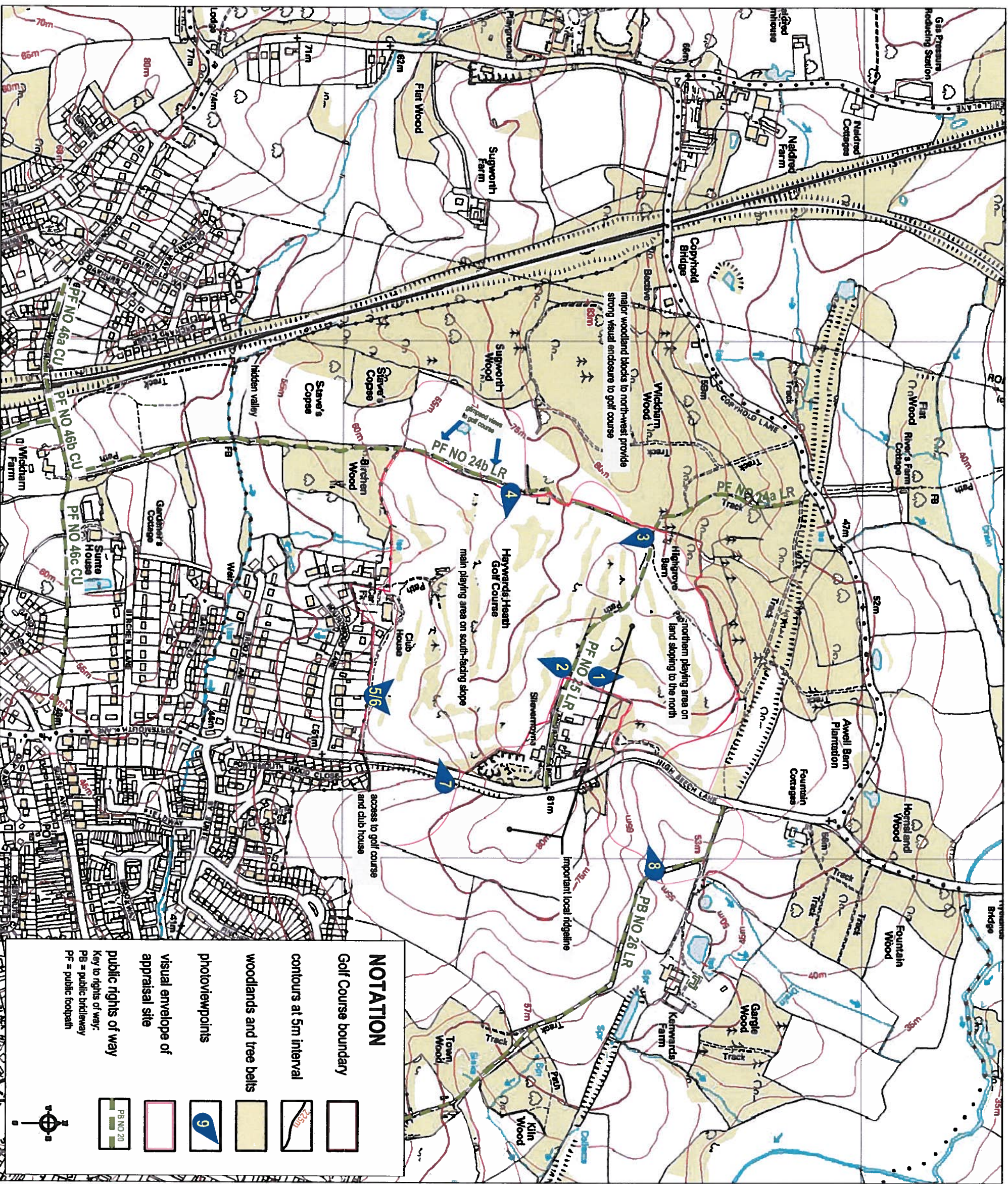


Key:

- ★ Proposed on-site Community centre
- Recreation ground / Leisure Centre
- Primary School
- College
- Retail
- Rail Station
- Off road walk / cycle route
- On road walk / cycle
- Suitable walking route - Footway



APPENDIX H



NOTES

REV NO

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DRAWING NAME
LANDSCAPE CONTEXT

CLIENT
HAYWARDS HEATH GOLF CLUB LTD

PROJECT NAME
SHLAA SUBMISSION

JOB NO
MC286

DWG NO
L.001

SCALE
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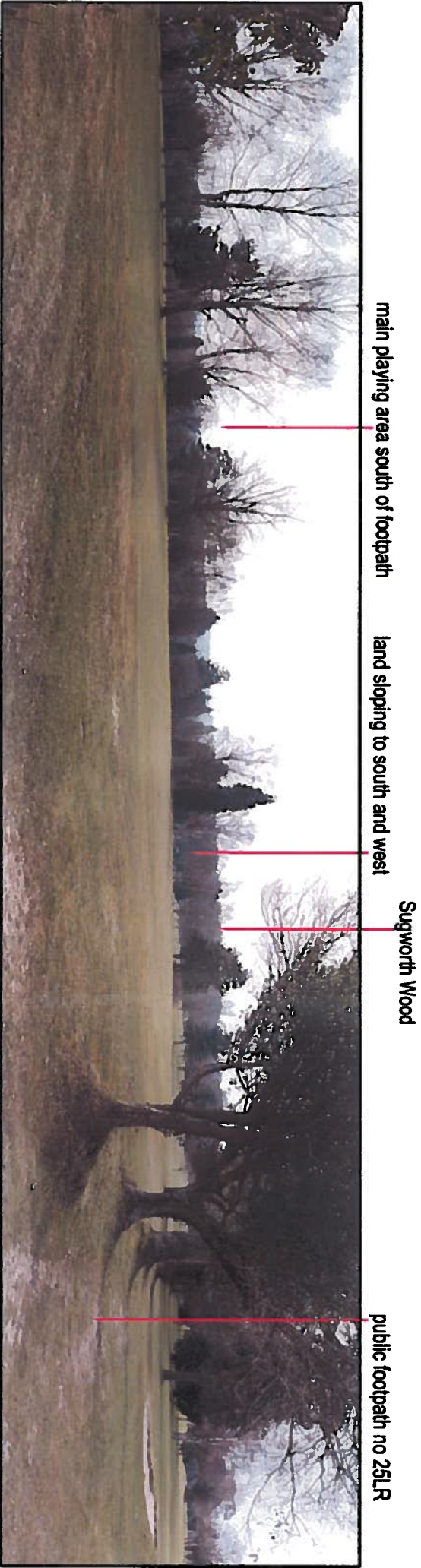
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APPENDIX I



Photograph 1:

Looking north-west across part of northern playing area. Public footpath no. 25LR is on the right of the view. Note: plantation of birch and conifers concealing views to Wickham Wood.



Photograph 2:

Looking south-west across main playing area south of footpath. Note: uniform character of mown grass with individual trees or small copses



Client: Haywards Heath Golf Club Ltd
Project: SHLAA submission
Visual Analysis



Photograph 3:
Looking south-east across higher part of main playing area south of public footpath no. 25LR from near Highgrove Barn. Note: uniform character of golf course landscape with tree cover screening longer views to south.



Photograph 4:
Looking east across main playing area from public footpath no.24b LR. Note: pronounced slope to south with tree cover concealing longer views; stoned footpaths and clipped hedges; even age structure of trees.



Client: Haywards Heath Golf Club Ltd
Project: SHLAA submission
Visual Analysis

Photos
3-4

access road adjoining well-vegetated boundary
of houses on Roundwood Lane



Photograph 5:

Looking north-west across southern part of golf course playing area from Golf Club access road. Note: more level ground adjoining houses on Roundwood Lane.

steeply-sloping ground adjoining High beech Lane tree belt along High Beech Lane local ridgeline to east of High Beech lane housing at north end of Portsmouth Wood Close
access onto High Beech Lane



Photograph 6:

Looking north-east from Golf Club access road towards High Beech Lane. Note: local ridgeline to east, closing off longer views and tree belt along High Beech Lane.



Client: Haywards Heath Golf Club Ltd
Project: SHLAA submission
Visual Analysis

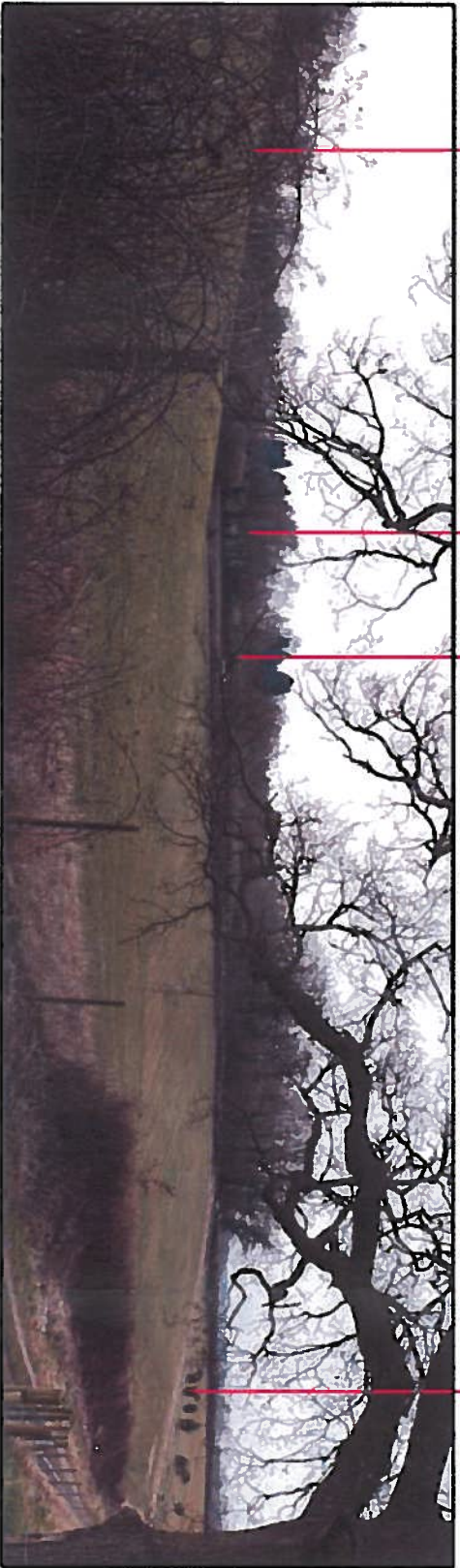


High Beech Lane (carriageway out of view)

mature trees and understorey vegetation on steep bank adjoining road forms partial visual barrier

Photograph 7:

Looking west across High Beech Lane into the main playing area of the golf course. Note: High Beech Lane is a sunken road where it passes the site.



northern part of golf course visible behind tree screen
view of golf course closed off by rising ground
High Beech Lane

public brideway

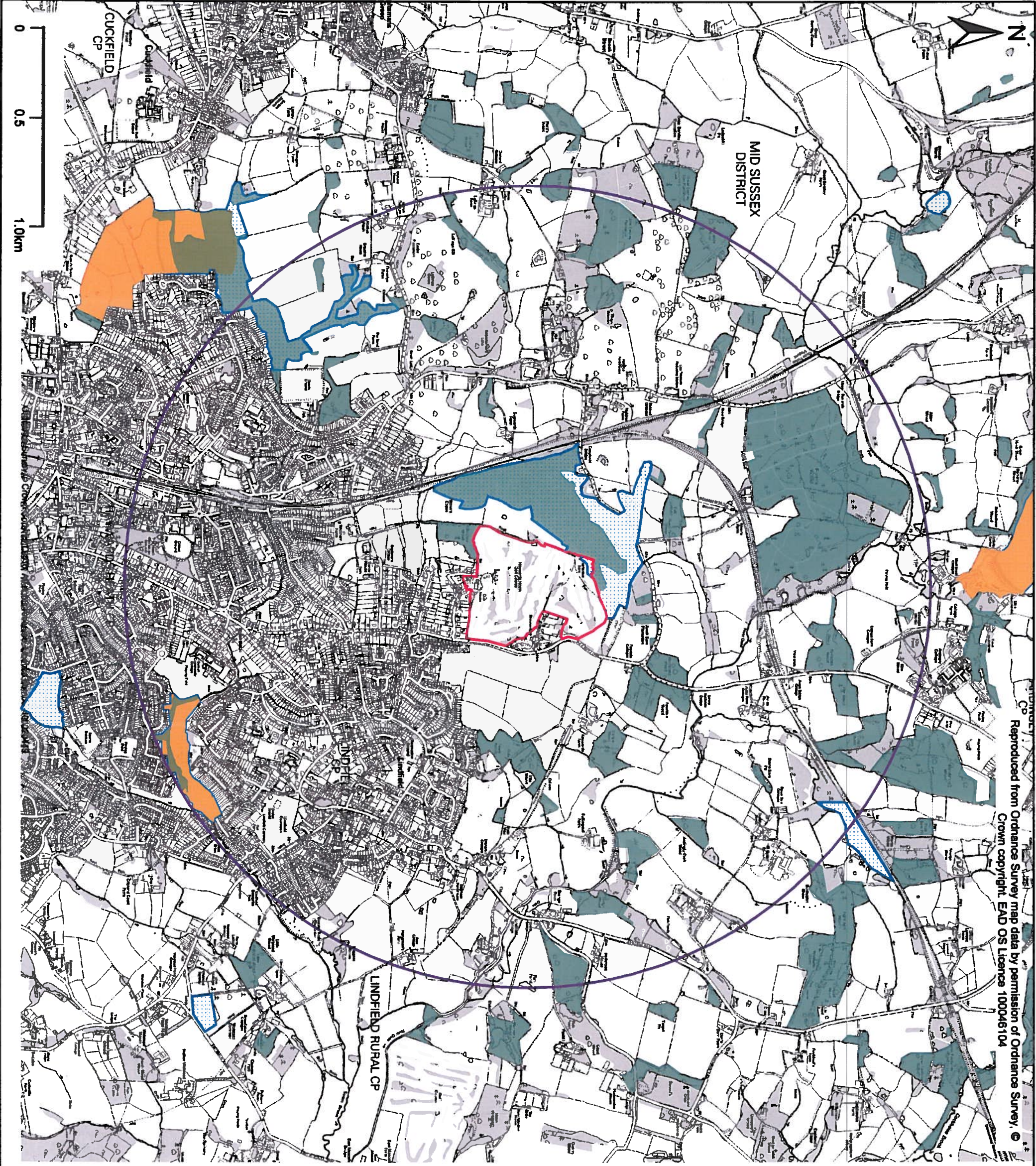
Photograph 8:

Looking south-west from public brideway 26LR towards northern part of golf course. Note strongly-undulating landform and golf course glimpsed behind tree screen on High Beech Lane








Client: Haywards Heath Golf Club Ltd
Project: SHLAA submission
Visual Analysis

APPENDIX J



Key

-  Ancient woodland
-  LNR
-  SNCI
-  2km search area
-  Site boundary

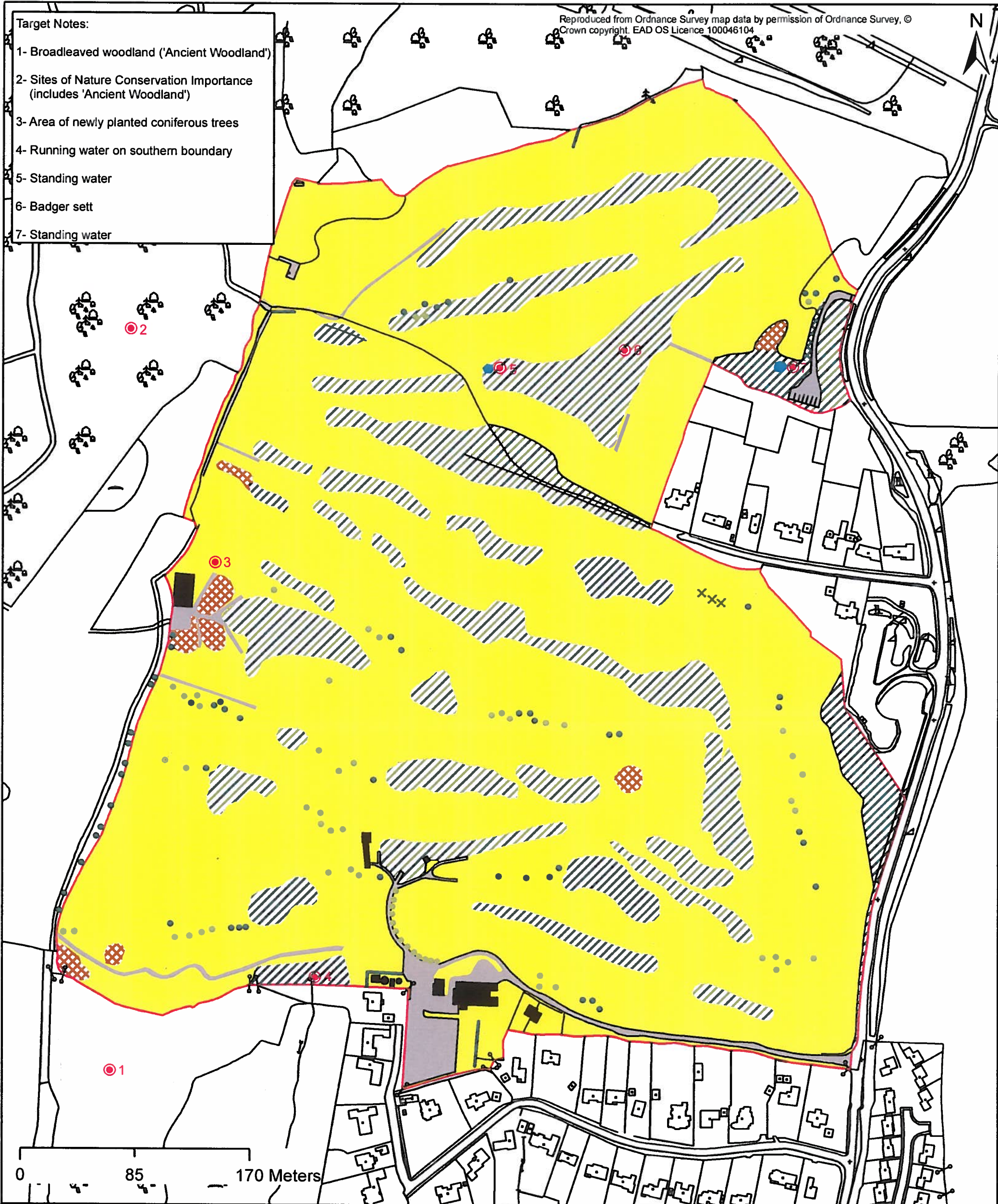
eadd
ecological consultants

Haywards Heath Golf Club Ltd

Land at Haywards Heath
Golf Course

Designated Sites within 2km of site

APPENDIX K



Key

Amenity grassland	Introduced shrubs	Site boundary
Broadleaved woodland	Mixed plantation woodland	Species-poor hedgerow
Building	Scattered broadleaved tree	Standing water
Dense scrub	Scattered coniferous tree	Target note
Hardstanding	Scattered scrub	

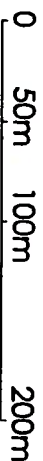
ead ecological consultants

Haywards Heath Golf Club Ltd













Land at Haywards Heath Golf Course

Phase 1 Habitat plan

APPENDIX L



- KEY**

 -  HAYWARDS HEATH GOLF CLUB LTD SITE BOUNDARY
 -  HOUSING AREAS
 -  NEIGHBOURHOOD CENTRE
 -  INDICATIVE ROAD NETWORK
 -  OPEN SPACE
 -  EXISTING WOODLAND
 -  NEW PLANTING
 -  EXISTING PUBLIC FOOTPATHS
 -  EXISTING ACCESS ROAD TO BE RETAINED AS PUBLIC FOOTPATH, CYCLEWAY AND EMERGENCY ACCESS
 -  NEW FOOTPATH LINK
 -  NEW TREE LINED AVENUES
 -  POSSIBLE PRIMARY SCHOOL SITE

DATE
March 2010