

Lindfield and Lindfield Rural Neighbourhood Plan

Report by Examiner

Graham Self

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Introduction

1. I was appointed in April 2015 as the independent examiner for the Lindfield and Lindfield Rural Neighbourhood Plan. The plan has been prepared by two parish councils (Lindfield and Lindfield Rural), with the support of the local planning authority (Mid Sussex District Council) and other bodies.
2. The examiner's role is to provide an independent review of the plan and to make recommendations in accordance with the 2011 Localism Act and related regulations. In particular, the examiner has to consider whether the plan meets certain "basic conditions", satisfies legal requirements, and identifies an appropriate area for a referendum.
3. In order to act as examiner I am required to be appropriately qualified. I am a chartered town planner with previous professional experience in local government, consultancy and the Planning Inspectorate. I am independent of Mid Sussex District Council and of the parish councils involved in this plan, and I have no interests in any land or property in or near Lindfield.
4. The basic conditions, which are set out in the legislation,¹ are intended to ensure that neighbourhood plans fit with their wider context. In summary, the plan must:
 - have appropriate regard to national planning policies and guidance;
 - contribute to achieving sustainable development;
 - be in general conformity with the strategic policies of the development plan; and
 - be compatible with European Union law and human rights obligations.
5. The policies of neighbourhood plans should also relate to the development and use of land in a designated neighbourhood area, should be prepared by a qualifying body, should specify the period for which they are intended to have effect, should not include provisions on excluded development,² and should not cover more than one neighbourhood area.
6. National policy is set out in the National Planning Policy Framework ("NPPF"), published in 2012. National Planning Practice Guidance ("NPPG") provides advice on the preparation of neighbourhood plans and describes the key stages, leading ultimately to such plans being part of the statutory development plan for the relevant area if passed by a simple majority at a referendum.
7. Under current legislation and policy, examinations of neighbourhood plans may be carried out on the basis of written representations or may include public hearings, although the guidance in the NPPG is that most examinations are not expected to include a public hearing. I have undertaken this examination by written representations.³ Where I have needed to ask questions for clarification or for information, I have done so by emails copied to both the planning authority

¹ The legal source of these basic conditions is the Localism Act 2011, which inserted Schedules 4A and 4B into the Town and Country Planning Act 1990. I have paraphrased the Basic Conditions here.

² "Excluded development" refers to matters such as minerals or waste development or national infrastructure projects which are not relevant here.

³ The written representations passed to me for consideration included a request that a public hearing be held and a request to speak at a hearing if one were held. I have considered these requests but decided that a hearing was not necessary in this instance.

and the Parish Councils, through the persons nominated as the point of contact for these bodies.⁴ I am grateful to those involved in responding to my questions.

Format of Report

8. I have set out this report in the following sequence. This Introduction refers to various background matters including the reference documents supplied to me, the written representations submitted during the most recent period of consultation on the Neighbourhood Plan, and the examination procedure. In the next section I cover some general points relating to the development plan, the neighbourhood plan area, preparation procedures and regulatory requirements. The policies of the plan are then considered in plan sequence, followed by other matters, conclusions and recommendations.
9. In addition to recommendations, this report contains what I have termed suggestions. The *recommendations* cover matters where I consider a specified action needs to be taken. My *suggestions* relate to points of generally lesser importance, where I think changes are optional.

The Neighbourhood Plan and Other Documents

10. The version of the Lindfield and Lindfield Rural Neighbourhood Plan ("LLRNP") which I have examined is the "submission plan" which was submitted to Mid Sussex District Council in February 2015. Apart from the Neighbourhood Plan itself, the main source documents which I have read or referred to, all of which were sent to me by the District Council, are as follows.
 - Mid Sussex Local Plan, May 2004.
 - Mid Sussex District Plan 2014-2031 Pre-Submission Draft, March 2015.
 - LLRNP Statement of Consultation, December 2014.
 - LLRNP Community Engagement, November 2014.
 - LLRNP Basic Conditions Statement, December 2014.
 - LLRNP Checklists.
 - Strategic Environmental Assessment Screening Report, January 2015.
 - Habitat Regulations Assessment Screening Report, 5 February 2015.
 - Habitat Regulations Assessment Approach to Neighbourhood Plans (undated).
 - Lindfield Buildings Overview (undated).
 - Local Green Spaces in Lindfield Parish (undated).
 - Schedule (untitled) summarising comments on the draft plan by 77 correspondents and listing changes to the plan with observations and recommendations.
11. Other information supplied to me includes emails sent on behalf of both the Parish Councils and the District Council setting out responses to questions I raised, and a schedule of past "windfall completions". I have also referred to various documents which I have found published online, including the District Council's draft Housing and Economic Development Needs Assessment (HEDNA) dated February 2015, and a planning committee report on an application in 2013.

⁴ It should be noted that the District Council's responses were expressed as an officer response.

Representations

12. The closing date for representations to be made following the most recent public consultation on the submission version of the Neighbourhood Plan was 26 March 2015. Those who made representations are listed in Appendix 1. I have taken account of these representations where appropriate in examining the plan.

General Matters

The Development Plan

13. The development plan current for the Neighbourhood Plan area at the time of writing consists of the "saved policies" of the Mid Sussex Local Plan 2004. A new development plan (the Mid Sussex District Plan 2014-2031 is being prepared but is not yet finalised. It reached examination stage in December 2013 but was withdrawn from the examination. It is due for further consultation in May and June 2015 and then for re-examination later in the year.

Neighbourhood Plan Area

14. The plan area consists of the two parishes of Lindfield and Lindfield Rural. The Lindfield parish is immediately north-east of Haywards Heath. The area covered by Lindfield Rural parish partly surrounds Lindfield to the north, north-east, east and south-east.

Preparation Procedures and Regulatory Requirements⁵

15. The two parish councils have together formed the qualifying body responsible for the preparation and submission of the Neighbourhood Plan. A joint working party, which later became a "steering group" was formed in 2012. A questionnaire was distributed to all households in both parishes to obtain the community's views on matters which should be considered by the Neighbourhood Plan, and open days were held in Lindfield and Scaynes Hill. Action in Rural Sussex (AiRS) were commissioned to analyse responses to the questionnaire and to provide additional advice. Four "focus groups" worked on various issues from February 2013. A planning workshop was held in May 2013 and several "pop-in" sessions were held during 2013. Meetings of the Steering Group in Lindfield and Scaynes Hill were held in public, with minutes published on the parish websites.
16. A "State of the Parishes" report was published in May 2013 summarising evidence on which the Neighbourhood Plan is based. The results of a housing needs survey were also published in May 2013. A "pre-submission" plan was published in November 2013. This was subject to public consultation between 1 November and 13 December 2013. About 62 responses to this plan were received and various amendments to the draft plan were then made. The Submission Plan was submitted to the District Council for the standard six-week period of consultation prior to the examination. Some changes were evidently also made to allow for recent changes in local and national planning policies.
17. The plan period (2014-2031) is stated on the outside cover of the plan, and within it. As is mentioned in paragraph 3.7 of the plan, it is expected that the Neighbourhood Plan will be formally reviewed on a five-year cycle or to coincide with the review of the District Plan if this cycle is different.

⁵ The source of most of the information reported here about the plan preparation procedures is the Community Engagement report of November 2014 or the Statement of Consultation of December 2014. The above is only a summary - a fuller timetable of events is contained in the latter document.

18. In January 2015 Mid Sussex District Council issued a Screening Report, the purpose of which was to determine whether the Neighbourhood Plan would require a Strategic Environmental Assessment ("SEA") under European Directive 2001/42/EC and associated UK regulations. This screening process is based on standard criteria to determine whether the plan is likely to have "significant environmental effects". In summary, the screening process concluded that no significant environmental effects would be likely to occur and therefore no SEA was required. This conclusion was reached having particular regard to the fact that the plan does not allocate specific sites for development, but has "criteria-based" policies aimed at directing most development to the existing built-up area where the scale of development is considered likely to be small.
19. A draft of the screening report was subject to consultation with three statutory bodies (English Heritage, the Environment Agency and Natural England). The last of these bodies noted that provided the policy to direct development to the existing built-up area boundary was adhered to, there should be no planned development within the "buffer zone" for Ashdown Forest SPA and SAC.⁶
20. The Basic Conditions Statement presents the Parish Councils' view on how the Neighbourhood Plan relates to national planning policy, to sustainable development, to the development plan, and to EU legislation. The position of the Neighbourhood Plan in respect of the emerging District Plan is also mentioned, and is described as "challenging". I comment further on this matter when considering Policies 1 and 2 below.
21. One of the submitted objections⁷ complains that the plan preparation process prevented local residents from knowing details of the emerging plan for about a year and that the plan only reflects the preferences of parish councillors and a limited group of other people. The evidence supplied to me indicates that at various stages during preparation, the draft plan was publicised for consultation. According to a schedule of representations among the documents sent to me, Mr Hill made a number of comments on the plan in 2013, some of which resulted in changes being made. I do not know the precise details of why there was a period when work on the plan was not open to the public, but bearing in mind that most of the work was being undertaken by volunteers there are bound to have been times when public involvement would be limited, and there is no evidence that unreasonable or improper secrecy occurred.
22. The District Council has confirmed (in a letter on 17 February 2015) that the council is satisfied that all necessary legal requirements have been met in the preparation of the Neighbourhood Plan.
23. In summary, the information available to me shows that the Neighbourhood Plan has been prepared by a properly constituted qualifying body, that the plan covers a properly designated area, and that subject to points which I raise later in this report, other procedural requirements relating to the preparation process were met.

⁶ Special Protection Area and Special Area of Conservation.

⁷ This refers to a written representation by "D W Hill". In attempted politeness, I refer later to "Mr" Hill, but this is a guess and I apologise if it is incorrect.

The Plan and its Policies

24. In this section, where no reference is made to a policy it is because no objections have been raised to it and I have no comments on it.

Relationship with Local Plan and Draft Mid Sussex District Plan

25. The timing of the Neighbourhood Plan has evidently caused problems. The Mid Sussex District Plan would potentially have provided a much more up to date context for the Neighbourhood Plan than the 2004 Local Plan, which was prepared long before current national policy guidance; but as noted in paragraph 4 above, the legislation requires that the Neighbourhood Plan be in general conformity with the strategic policies of the development plan for the area, and this refers to the 2004 Local Plan, since the emerging District Plan does not yet have development plan status.
26. This situation illustrates an unsatisfactory aspect of current plan preparation procedures and legislation, under which the Neighbourhood Plan is required to be in general conformity with the strategic policies of an out of date plan, whilst having regard to more recently updated national policies and guidance, and also taking account of an emerging draft development plan which is at a fairly advanced stage towards becoming statutory. On this matter, national planning practice guidance states:
- "It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan. This is because Section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved by the decision maker favouring the policy in the last document to become part of the development plan."
27. On the key issue of future housing provision, the emerging District Plan has more weight than might otherwise apply because as currently drafted (the Pre-Submission Draft dated March 2015), the District Plan proposes to rely on neighbourhood plans to make provision for sufficient sites for housing development. The draft District Plan also states (on page 3): "Neighbourhood Plans will need to be in conformity with the District Plan and national policy guidance".
28. Policy DP5 of the draft District Plan refers to the overall provision of new housing including a "strategic development" to the north and north-west of Burgess Hill. It then refers to a residual figure of 1,801 new homes, and states (in part):
- "The preferred strategy is for these 1,801 new homes to be delivered through Neighbourhood Plans....In the event that Neighbourhood Plans do not deliver the required amount of development, the District Council will prepare a Site Allocations Development Plan Document."
29. The housing strategy of the 2004 Local Plan reflected the aims of the 1993 West Sussex Structure Plan and only projected housing numbers to 2006. The 2004 plan also pre-dated the approach to plan-making set out in the NPPF, which includes assessments of the relevant housing market and land availability. For that reason, there is considerable force in the contention by several objectors that the Neighbourhood Plan does not conform with national guidance.
30. The claim by one objector (Wates Developments Ltd) that the Neighbourhood Plan's approach to housing policy is "perverse" is too strong a criticism. Nevertheless, in the light of the factors just mentioned, it seems to me that notwithstanding the "basic condition" requirement for the Neighbourhood Plan to be in general conformity with the 2004 Local Plan, it is of at least equal or

possibly greater importance that the Neighbourhood Plan should not conflict with, and should help to support, the emerging District Plan.

31. I comment on the policies below with the above considerations in mind.

Policies 1 and 2

32. These two policies together are at the core of the plan and are the subject of several objections. A number of issues arise which I assess below and then draw conclusions.

Built-up Area Boundaries

33. The first point I have to make relates to Policy 1 and the way the boundaries of the built-up areas of Lindfield and Scaynes Hill are shown in the Neighbourhood Plan.
34. Policy 1 of the plan states (among other things) that "only development proposals within the built up area boundaries of Lindfield and Scaynes Hill, as shown on the Proposals Map, will be supported". This means that outside the defined built-up area boundary, there will be no support for fairly minor development proposals including small-scale extensions to buildings or changes of use of types which may be acceptable, and I doubt that such "blanket" provision was really intended.
35. Be that as it may, the text in paragraph 4.9 of the plan refers to the built-up area boundary defined in the 2004 Local Plan and says that this boundary "is restated on the LLRNP Proposals Map". But the Neighbourhood Plan does not contain an "LLRNP Proposals Map" showing, or restating, the built-up area boundary. There is a map on page 40 labelled "Lindfield - Inset Proposals Map" and two other maps on page 41 showing "Local Greenspace Designations" for Lyoth Lane and Scaynes Hill. None of those three maps show a built-up area boundary. There are two maps (Figures C and D) labelled "2004 Mid Sussex Local Plan Proposals Map". The one relating to Scaynes Hill shows a built-up area boundary. On the Lindfield map, it is difficult to discern where the boundary line is intended to be, although a black line which could be the edge of the built-up area is visible in places. On this type of potentially important matter, which could be the subject of argument by parties involved in planning applications or appeals, any need for guesswork or room for alternative interpretation should be eliminated.
36. The comments I have made above are mine, but the same subject is referred to for rather different reasons in the written submission by Mr K Falls. In one of his comments he contends that Policy 1 is at best very unclear in respect of the built-up boundaries being defined. I agree.
37. In response to a question I raised on this matter, the District Council sent me a map showing a green line labelled as the "built-up area boundary" for Lindfield. (For later reference purposes I shall call this map Plan X.) This line is evidently based on the 2004 Local Plan and is what I would term a "policy boundary" rather than an "actual boundary" since it excludes some pockets of existing built development on the fringe of the settlement. More significantly, it also excludes a large area south-east of Lindfield (south-east of Gravelye Lane) where new housing and other development has partly been built and where development is under way in implementation of a planning permission granted in Spring 2013.⁸

⁸ I understand that part of this site is known as "Heathwood Park" (a marketing description used by Barratt Homes or BDW Trading Ltd) and part as "Kaleidoscope" (Croudace Homes Group Ltd). In some written representations, there are also references to "the Gravelye Lane settlement", but I understand that this label may refer to a different area.

38. The supporting text to Policy 1 states that the effect of the policy is to confine housing and other development proposals to "the established built up area boundaries of Lindfield and Scaynes Hill". This statement does not take account of the fact that "the established built up boundary" does not now follow the green line on Plan X. The development following the 2013 planning permission has in effect altered the extent of the established built up area.
39. Although I appreciate that it is difficult for the Neighbourhood Plan to allow for frequent changes, the planning permission for development south-east of Gravelye Lane was granted around two years ago, construction started in 2014 (according to the Statement of Consultation), and the plan should take account of this situation. The plan itself accepts (in paragraph 4.10) that the built up area boundaries "will need to be redrawn in due course to take account of recent planning consents". This suggests to me that the boundary line is meant to reflect the *de facto* or actual built-up area, not just the policy area. If that is so, it would be better for the line to be redrawn now, rather than in the very near future. The alternative is that the plan is likely to be perceived as out of date so quickly that it would have little weight in planning decisions. I return to this point in paragraphs 59-60 below.

Housing Provision and Emerging District Plan

40. The Foreword to the Neighbourhood Plan refers to a housing needs survey and recognises that there is a considerable local need for affordable housing, which will not be satisfied by the Barratt Homes (formerly Wates) development. The writer of the Foreword expresses disappointment at the fact that the plan does not make provision for this need. This lack of provision is a point made by a number of objectors. For example, Mr Kerslake opines that "the plan simply gives up on affordable need" and although that may be a rather harsh allegation, it has some justification.
41. Other objectors have drawn attention to the lack of any specific site allocation for housing development. In principle, there is nothing wrong with having criteria-based policies to help define the nature of development which would be acceptable and where it should or should not take place. However, the plan seeks to confine all development to the built up area - defined as smaller than the existing built up area - and relies on "windfall" sites for housing development. This aspect of the plan appears to be based on little more than an assumption that windfall sites will continue to become available as they have in the past. The rate quoted in the plan is an average of 14 new homes each year over the last 25 years. There does not appear to be any clear evidence that past rates of windfall development are likely to continue.⁹ Moreover, such sites are unlikely to provide any affordable housing because developers usually need reasonably large-scale projects for affordable housing to be a financially viable proposition.
42. In the draft District Plan, Lindfield is classified as a "Category 2" settlement. This is the second out of five categories ranked with reference to factors such as the possible sustainability of development; it relates to settlements which have a good range of services and facilities including employment opportunities and access to public transport. The District Plan also recognises that in order for villages to thrive, in many cases it is necessary to expand beyond the existing

⁹ There is also some reason to believe that the annual rate of windfall housing development may be declining: in the five years up to 2013, the average annual rate was about 7 dwellings per year gross, around half the rate of the previous five years and lower than previous five-year periods of the 25 years [source: figures supplied to me in response to one of my questions], although such trends can be affected by general economic conditions.

- built-up area. Lindfield is adjacent to Haywards Heath, which is a "Category 1" settlement in the District Plan.
43. Policy DP6 of the District Plan is partly aimed at preventing the coalescence of towns and villages. This policy (as currently drafted) also states that the expansion of settlements will be supported where the site is allocated in a Neighbourhood Plan or subsequent Development Plan Document, where the site adjoins an existing settlement edge and where the development is demonstrated to be sustainable having regard to the settlement hierarchy.
44. According to the Basic Conditions Statement, one reason why the Neighbourhood Plan did not allocate specific sites for new housing development was because no sites adjoining the boundaries of the built-up areas were promoted for inclusion when landowners were invited to do so.¹⁰ This is a weak argument. Development plans should essentially be based on an assessment of what should be done in the public interest, and although "deliverability" is a relevant factor, plans should not depend on the current willingness of landowners to put their land forward for development. Those involved in preparing the Neighbourhood Plan seem to have done all they could to encourage local participation, and I do not know why landowners did not propose these sites during earlier consultation phases. The fact remains that specific sites adjoining the built-up area have been promoted - albeit belatedly - by means of objections to the plan.
45. Objectors have submitted various arguments about housing numbers. Wates Developments Ltd contend that at the very least, the Neighbourhood Plan should be looking to allocate land to provide for 280-300 dwellings. Mr Kerlake puts forward figures of 272 or 380 new households for Lindfield and 111 or 155 for Lindfield Rural for the period 2014 - 2031, allowing for a disproportionately high share of housing in Burgess Hill and for other factors.¹¹
46. Other objectors make more general criticisms about the lack of a full housing need assessment and about site allocations in the Neighbourhood Plan, and say that particular sites could help to meet a local and District-wide need. Mr D W Hill says that the plan as drafted would prevent the amount of housing development required to meet the numbers allotted to the parishes in the District Plan. Taylor Wimpey UK Ltd say that the site in which they have an interest at Gravelye Lane and Scamps Hill should be allocated for development and could accommodate up to about 150 dwellings, though even then there would be a shortfall of provision. Reside Developments Ltd suggest that the site east of High Beech Lane could provide about 50 residential units. D M H Stallard argue that land adjacent to Barn Cottage, Scaynes Hill should be allocated and is suitable for the development of about 30 dwellings.
47. In their response to one of my questions, the Parish Councils said the housing needs survey carried out for the Neighbourhood Plan demonstrated that "whilst there is a clear need, the Wates/Barratt development would go a long way to meet that need".¹² I am sceptical about that statement for two reasons. First,

¹⁰ Evidently the only site which was put forward was at or near Walstead School, well detached from the main built-up area.

¹¹ The first of these figures for each parish (272 and 111) excludes any upward revision arising from the latest draft District Plan. The second, higher figure (380 and 155) is Mr Kerlake's calculation allowing for the latest draft District Plan.

¹² It is rather ironic that the Neighbourhood Plan now seeks to rely on this development to meet a housing need, given that members of the Housing Focus Group opposed this development when they were preparing the plan [source: Consultation Statement].

the survey seems to have been limited in scope, as it was apparently mainly based on waiting lists but did not include a full objective assessment of housing need of the type carried out for the District Plan. Secondly, this claim differs subtly from the Neighbourhood Plan itself, specifically the plan's statement about affordable housing that "it is clear....that there is a considerable current local needthe Barratt Homes (formerly Wates) development allocation will not satisfy even this current demand....the local need for affordable housing is likely to continue throughout the plan period".

48. I can see why there has been considerable opposition locally to the prospect of any substantial new housing development in the Neighbourhood Plan area. As is stated in the plan, given the recent history of planning permissions since 2010, about 415 new dwellings have been (or are being) built in large developments during the last four or five years.¹³ The consultation process showed that many local residents feel the area has "done its bit" to make land available for housing development. This view is understandable, and it has generated support for the Neighbourhood Plan. It is also in line with national and local policies aimed at preserving the countryside as much as possible. But if Lindfield as a Category 2 settlement does not make any contribution except for windfall sites, pressure is likely to be put on other, perhaps more rural, locations in Mid Sussex.
49. As has been pointed out by an objector, the figure of 415 dwellings mentioned above equates to just 3.75% of the District's housing requirement as envisaged in the draft District Plan. Looked at in that way it is not a particularly major contribution, especially for a Category 2 settlement assessed to be capable of accommodating growth sustainably.
50. There is evidence of local fear about overloaded infrastructure; but substantial financial contributions for education, health, transport and other facilities were evidently involved in legal agreements attached to the 2013 planning permission, and such payments could be expected from future developments, in line with policies in the District Plan aimed at ensuring that local communities receive contributions from the Community Infrastructure Levy and Section 106 agreements. I also note that although the Neighbourhood Plan mentions (in a section on community views) "doctors' patient list oversubscribed and Lindfield Medical Centre unable to be further extended", the relevant local NHS body did not oppose the development of 230 houses permitted in 2013.¹⁴

Household Formation as a Factor in "Housing Need"

51. It might be useful for me to explain here that a key cause of increased demand and need for housing,¹⁵ nationally and locally, is declining household size. Because of this trend, new housing is required even to enable existing levels of population to be maintained in places like Lindfield and Scaynes Hill. Obviously there is migration into and out of the parishes, but a good deal of housing need is generated by people currently living in the area. To illustrate this point, taking a total population of 8,500 at an average household size of 2.5, the total number of dwellings would be 3,400. At an average household size of 2.2 the total number of dwellings would be 3,864, and at a household size of 2.1 this figure would be

¹³ The plan refers to 120 new houses in January 2010, 65 in December 2010 and 230 in April 2013.

¹⁴ Source of information in this paragraph: MSDC Planning Committee report, 21 May 2013 (published online). This report refers to the provision of about £570,000 and £611,000 to the education authority (for primary and secondary education respectively) and states that the local NHS trust sought a payment through a Section 106 agreement of over £100,000 for surgery improvements.

¹⁵ Demand and need are not the same thing, as demand is influenced by price, but for present purposes the difference does not matter.

4,048. Putting this another way, to maintain a population of 8,500 whilst allowing for a decline in household size from 2.5 to 2.2 would require about 464 new dwellings, and for a decline in household size to 2.1 would require some 648 new dwellings.

52. I stress that these figures are only illustrative, but are based on the statistics contained in the Neighbourhood Plan¹⁶, and I hope may help to show why even quite substantial provision of new housing does not necessarily arise from, or cause, any increase in population. The word "growth" can sometimes be misunderstood as referring to population, and the Neighbourhood Plan itself perceives that Lindfield "will grow by 20% over the next decade as it accommodates 1,000 more residents".¹⁷ It is not clear whether the term "Lindfield" here is meant to refer to both parishes (this is an example of the point made by Mr Falls about the accuracy of some naming), but either way, even assuming that all the dwellings permitted since 2010 result in 1,000 additional residents (which seems unlikely at current average household size in this area), the 20% figure appears too high.¹⁸

Other Aspects of Relationship with District Plan

53. National policy guidance refers to the need for neighbourhood plans to "support the strategic development needs of Local Plans", and to "plan positively to support local development".¹⁹ The implication is that where the statutory development plan is well out of date, considerable weight should be accorded to an emerging, more up to date development plan. The NPPF also refers to the need for Local Plans to "boost significantly the supply of housing" - and in Mid Sussex, the District's current policy is for neighbourhood plans to take on the site allocation part of this task.
54. According to a recent assessment by the District Council carried out as part of the District Plan preparation,²⁰ the 2014-2031 "housing need" for the District is 627 dwellings per year. This figure is higher (650 dwellings per year) in draft policy DP5 of the District Plan, giving a total over the plan period of 11,050 dwellings. A proportional allocation to parishes based on their population and household numbers indicates an "objectively assessed need" for guidance purposes for the two parishes in the Neighbourhood Plan area of 652 dwellings. The HEDNA document states that the parish figures are only a guide, but also points out that much housing need arises from household formation within the existing population, so where people live now is a reasonable guide to the location of housing need.
55. It is appropriate to allow for policy-related effects including the prospect of substantial development near Burgess Hill, for the 230 dwellings permitted in 2013 and for windfall sites. Even allowing for those factors, the provision of land for housing in the Neighbourhood Plan area is significantly less than the need

¹⁶ According to the statistics in the Neighbourhood Plan, the total population of the two parishes in 2011 was 8,469. Average household size was about 2.24 in Lindfield Parish and about 2.5 in Lindfield Rural Parish. Some 17 years before then in around 1994 (ie equivalent to the length of time the Neighbourhood Plan is planning for into the future) household sizes would almost certainly have been significantly larger. In the further past, average household size in this part of England would typically have been 3 to 3.5.

¹⁷ The quotation is from paragraph 2.41 of the plan. The population of the two parishes is stated in the plan as 5,836 in Lindfield and 2,633 in Lindfield Rural.

¹⁸ 1,000 is about 12% of 8,469 or 17% of 5,836.

¹⁹ These quotations are from paragraph 16 of the NPPF.

²⁰ Housing and Economic Needs Assessment (HEDNA) February 2015.

- indicated for guidance in the District Council's assessment. It is also clear that if the Neighbourhood Plan, taken together with other neighbourhood plans, does not allocate enough land for housing to meet future need, the District Council will in effect impose allocations through a site allocations plan.
56. Another relevant factor is the reason why the emerging District Plan was withdrawn from examination. This apparently happened because the inspector appointed to examine the District Plan found that the District Council had not met the legal duty to cooperate with neighbouring planning authorities. Since then, work has been carried out to gain a clearer picture of the housing needs of neighbouring authorities, including urban areas which are looking to Mid Sussex to help meet housing needs for which they do not have land available.²¹ In these circumstances it seems most unlikely that the projections of objectively assessed housing need for Mid Sussex could end up being lower than in the latest draft plan: if anything, these projections are more likely to be higher.
57. I have mentioned in paragraph 44 above one reason why the Neighbourhood Plan chose not to allocate land for housing development. The other reason quoted in the Basic Conditions Statement is that the policy context for housing supply is uncertain, given the withdrawal of the draft District Plan from examination.
58. There is a circular argument here: the Neighbourhood Plan is seeking to become part of the statutory development plan ahead of the District Plan; the District Plan is aiming to rely on neighbourhood plans for the allocation of housing land; but this Neighbourhood Plan does not make any such provision because it is ahead of the District Plan and so the policy context is uncertain. If all neighbourhood plans in this situation were to quote such uncertainty as a reason for not allocating any land for residential development, housing needs might never be met.
59. One of my questions to the Parish and District Councils was to find out why the built-up area defined in the Neighbourhood Plan excluded the part-built housing development south-east of Gravelye Lane for which planning permission was granted in 2013. The District Council evidently consider that it would be "logical and sensible" to alter the boundary of the built-up area so as to include this site. When asked why the District Council had not made this point in their representations on the plan, part of the response was to the effect that if the 2013 planning permission site were included in the built-up area, the Neighbourhood Plan would probably be rejected at a referendum because of organised local opposition, leaving the built-up area boundary "to be picked up [which I take to mean 'revised' or 'altered'] through the emerging District Plan or by means of a development plan document which would not be subject to a referendum".
60. It seems to me from this evidence that the District Council consider the Neighbourhood Plan to be flawed, but would prefer to have a flawed plan pass a referendum and then be overridden by development plan procedures, rather than getting the Neighbourhood Plan in order from the start. In my judgment there is little point in producing a plan which purports to be for a period ending in 2031 but is formulated just to get it through a referendum and then appears likely to be superseded very soon, perhaps within months. Nor would that be the sort of "positive planning" mentioned in national policy guidance.

²¹ Source: Report to District Council in November 2014 by Head of Economic Promotion and Planning (published online); also information from District Council supplied in response to my written questions.

Affordable Housing Threshold

61. Several objectors have drawn attention to an issue relating to the affordable housing "threshold" in Policy 2. The limit of ten or fewer net new homes specified in Policy 2, combined with the requirement in sub-paragraph (iii) of the policy that on-site affordable homes must be provided "wherever feasible and viable", conflicts with recent national policy guidance to the effect that developers of sites of less than ten homes are not required to provide affordable housing. The policy criterion that "some homes" should be allocated to households with a local connection is also likely to be impracticable and not capable of being delivered if housing development is limited to small sites within the built-up area as defined on Plan X. This is an aspect of the Neighbourhood Plan which partly arises from unfortunate timing in relation to new national policy statements.²²
62. The District Council suggest that the policy be amended to a higher number (11-14 dwellings) to allow for affordable housing to be provided through windfall development in accordance with paragraph 55 of the NPPF. I agree with the District Council in that national policy guidance aimed at encouraging the provision of affordable housing would probably be frustrated if the ten-dwelling threshold were to be applied. But simply raising the threshold to, say, 14 or 15 dwellings would not necessarily solve the problem, since windfall sites tend to be small and the higher the number of dwellings specified, the less likely it would be that such sites would become available to provide any affordable housing. Any "rural exception sites" which might be the subject of planning applications are also likely to be small.
63. I recognise that many local people, including for example Mr de Lande Long who makes this point in his representations, would prefer to see affordable housing as part of small-scale developments; but the economics of housing development mean that such a desire is impractical in most circumstances.
64. On a more detailed point, the text of the plan at paragraph 4.14 relating to Policy 2 states: "The policy also makes clear that proposals for greater than that number of new homes [ie greater than ten] within the boundaries will be resisted". In fact as far as I can see, Policy 2 does not make clear any such resistance - it merely expresses support for development proposals of ten or fewer net new homes within the built-up area boundaries. This leaves Policy 2 as neutral towards proposals for more than ten homes.

Conclusions on Policies 1 and 2

65. From the information available to me I judge that Policies 1 and 2 of the plan as currently drafted are flawed in ways which I summarise as follows:
- The plan does not have sufficient regard to the emerging Mid Sussex District Plan. The status of Lindfield as a Category 2 settlement in that plan, and the related implications for the suitability of the area for new housing, appear to be set aside or given little weight.
 - Insufficient provision is made for future housing development, contrary to national policy. In particular, a need is identified for affordable housing for which the plan does not offer any effective response.
 - The boundary of the "built-up area" (taking this as the green line on Plan X) does not reflect the established situation on the ground resulting from recent planning permissions.

²² A response to a question from me referred on behalf of those who have worked on the Neighbourhood Plan to "changing goal posts" and I can appreciate the feeling behind this comment.

- The fact that local landowners did not promote possible development sites while the plan was being prepared appears to have been regarded as a major reason for not allocating any land for housing development, despite the planning authority having assessed several sites as being available and potentially suitable for such development subject to allocation in a neighbourhood plan.
66. Having studied all the relevant evidence, I consider that if Policies 1 and 2 of the Neighbourhood Plan were to remain with their present scope (as defined by the built-up area boundary), the housing provisions in the plan would soon be superseded or overridden by a District-wide Supplementary Planning Document, which would allocate one or more sites on the edge of Lindfield for residential development. This would be bound to take into account that the recent development south-east of Gravelye Lane has in effect changed the boundary of the built-up area, in such a way that neighbouring land to the north-west which is as yet undeveloped will now be largely within the built-up area.
67. I know that the authors of the Neighbourhood Plan are particularly concerned about possible coalescence between Lindfield and the hamlet of Walstead. Nevertheless, an investigation for the planning authority has found that a site next to the junction of Gravelye Lane and Scamps Hill is well-contained, with no environmental constraints, that development here set back from site boundaries (with access to Gravelye Lane) should not contribute to the coalescence of settlements, and that access to key services is good.²³ The District Council has found that this site is suitable, available and achievable; and it can reasonably be argued that any coalescence with the Walstead hamlet has already happened as a result of the development permitted in 2013.²⁴ Although other sites may appear to be possible candidates for development, they are evidently subject to more issues such as drainage or access.
68. Drawing all those threads together, I consider that at least one site should be allocated for housing development in the Neighbourhood Plan, as a contribution to meeting the needs of the area. The most suitable candidate, assuming the built-up area is amended as described above, appears to be the land labelled as Site 6 in the Strategic Housing Land Availability Assessment. However, the allocation of this site - which would be the practical effect of including it in the built-up area and so subject to Policies 1 and 2 - may create a requirement for environmental assessment.²⁵ I have taken account of this point in drawing overall conclusions and framing my recommendations.

Policy 3 - Small Businesses

69. Mr Neil Kerslake submits in his statement that the Neighbourhood Plan is deficient in failing to conform with strategic policy, as he says is required in paragraph 184 of the NPPF and in Policy DP2 of the draft District Plan (which relates to "sustainable economic development").

²³ Source: Draft Mid Sussex Strategic Housing Land Availability Assessment, February 2015 (site 6). This assessment appears to have been expressed as relating to the gap between Lindfield and Scaynes Hill but must logically also apply to the gap between Lindfield and Walstead - and that is evidently [source: paragraph 3 of an email to me of 29 April 2015] how the Neighbourhood Plan group has interpreted it.

²⁴ Source: email to me of 27 April 2015 - this is expressed as a personal officer opinion but is on behalf of the District Council.

²⁵ As is stated in the District Council's Strategic Environmental Assessment Screening Report document (January 2015), an SEA may be required where a neighbourhood plan allocates sites for development. "Windfall" development proposals would come forward without a neighbourhood plan in place and so would not be considered to constitute a significant environmental effect.

70. A weakness in Mr Kerslake's argument (which also applies to some of the other points he makes) is that he relies on comparing the Neighbourhood Plan with "strategic policy" in the draft District Plan; he contends that neighbourhood plans must be in conformity with the strategic policies of that plan. The test to be applied here is whether the Neighbourhood Plan has appropriate regard to the draft District Plan - this is a less stringent test than the requirement to be "in general conformity with strategic policies". The supporting text to Policy 3 in the Neighbourhood Plan mentions Policy DP2 of the District Plan and I consider that this aspect of the plan has sufficient regard to the draft District Plan to meet this lesser test. The area of the Neighbourhood Plan has a mostly residential or rural character with mostly small-scale commercial enterprises, and the criteria-based policy on small businesses appears suitable for such an area.

71. I conclude that no amendment to Policy 3 is necessary.

Policy 4 - Lindfield Village Centre

72. This policy states that the Neighbourhood Plan defines the Lindfield village centre on the Proposals Map. When applying the policy, it may well be necessary to know whether or not a specific property is inside or outside the defined policy boundary. Because of the scale of the Lindfield Inset Proposals Map when reproduced on an A4 size page it is difficult to discern individual property boundaries. I suggest that to minimise scope for dispute, this map should be reproduced more clearly at a larger scale.

73. The policy provides that development proposals that will result in the loss of any village centre units within existing A1 use will be resisted, and also states: "Proposals to create new village centre units will be supported". I assume - but I am not certain - that this latter reference to "village centre units" is meant to refer to village centre "A1" units, not just any units of any property in the village centre. A minor re-wording could clarify this. I also suggest that the derivation of the term "A1" could usefully be explained, perhaps in a footnote or glossary, since some readers of the plan will not be familiar with the relevant legislation (the Town and Country Planning (Use Classes) Order 1987 as amended).

Policy 6 - Local Green Spaces

74. Comments are made on this policy by Sport England, by Southern Water and by Wates Developments Ltd. Sport England are concerned that not all playing fields within the plan area are protected by Policy 6. Three in particular are mentioned: Lindfield Common; Great Walstead School; and Blackthorns Community Primary School. Sport England recommend that all playing fields should be protected from development, and that the plan should include a separate policy to protect playing field, sports and recreational buildings. Southern Water are concerned that policy 6 could prevent development which may be required to provide necessary infrastructure such as water treatment plants. Amended wording to policy 6 is suggested. Wates Developments Ltd comment on the proposed Local Green Space designation for land at Lyoth Lane and point out that only part of this land is allocated under a legal agreement for use as public open space.

75. The document headed "Local Green Spaces in Lindfield Parish" reports on a survey which was undertaken to identify land which would merit protection as Local Green Spaces. Some open spaces have protection through other policies or normal planning controls. From my reading of this report, it seems to me that the Neighbourhood Plan strikes a reasonable balance between protecting those sites for which special safeguarding would be appropriate and other land. It is not necessary or appropriate to designate every playing field or school sports pitch as Local Green Space.

76. Southern Water's concern is understandable, though the policy wording, under which development proposals "not ancillary to the use of land for public recreational purposes....will be resisted" would not rule out essential infrastructure projects - such projects would only be "resisted". Nevertheless I think it would be reasonable to allow for the possibility that there might be exceptional circumstances where development such as a small pumping station might be required in the public interest on or under land designated as Local Green Space; such a possibility is incorporated into the amended wording I recommend below.
77. The map in the Neighbourhood Plan showing the Local Green Space site off Lyoth Lane appears to have included too large an area, as it covers a strip of privately owned land which has been defined in a Section 106 agreement for use only as a means of access on foot and by maintenance vehicles. This land (shown hatched purple on the map attached to the written representation for Wates Developments Ltd) should be excluded from the Local Green Space designation.
78. A minor adjustment to the wording of Policy 6 is necessary for grammatical reasons. The phrase "Development proposals on land that is not ancillary.....", appears to be incorrectly constructed because the word "that" refers to the nearest preceding noun, which is "land". As far as I can tell, the intention here is to refer to *development proposals* which are not ancillary, rather than to *land* which is not ancillary; and in any case, the concept of "ancillary land" has no real meaning. Policy 6 contains a reference to "the Proposals Map". I return to this point later.

Policy 7 - Areas of Townscape Character

79. The comment above about the scale of the map showing the boundary of policy areas is also applicable to this policy, although on the Lindfield Inset Proposals Map, it is easier to discern the precise boundary of the areas coloured pale brown than the red-coloured areas.

Policy 8 - Allotments

80. The representation by Mrs Phia Castillo refers to the provision of allotments and expresses hope that residents of Scaynes Hill will soon have allotments in the village. I invited comments from the District and Parish Council's on this matter and it is clear that all three bodies would support the allocation of a site in Scaynes Hill for allotments in principle. Lindfield Rural Parish Council is evidently aware of a suitable site but will only consider making it available for allotments when sufficient applications for allotments have been made by local people.
81. It seems from the information supplied to me that the only thing preventing land being used for allotments is lack of enough applicants to make a scheme financially viable. If so, that does not prevent land being allocated for allotment use in a neighbourhood plan. However, if the site involved is unlikely to become available because of what seems to be an ownership constraint, a site-specific policy would probably not be capable of being implemented. In the circumstances I am not in a position to recommend any change to the plan. Policy 8 supports proposals to establish new allotments within Lindfield and Scaynes Hill (subject to provisos), and to resist the loss of any existing allotments. That appears to be as far as the plan can reasonably go.

Other Objections or Comments Not Covered Elsewhere

Suggested Additional Policy - Southern Water

82. Southern Water propose a new policy stating: "New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the development plan".
83. I do not disagree with Southern Water's argument that waste water treatment is essential for public health and a clean environment, as is stated in the National Policy Statement for Wastewater. However, it is not necessary or practicable for the Neighbourhood Plan to set out policies to cover every possible type of development - however useful or beneficial - which may be proposed during the life of the plan.
84. Moreover, Southern Water's case for an additional policy only goes so far as to say: "Over the life of the NDP it could be that we need to provide new or improved infrastructure". The words "could be" show that at present there is no known pressing need of the sort which could justify including a special policy in the plan. I conclude that the additional policy suggested by Southern Water is not necessary.

Assets of Community Value

85. English Heritage supports the fact that Proposal 1 identifies assets of community value, but notes that several of these are historic buildings which appear to have particular communal value. EH suggests that it may be expedient to recognise this value by compiling a local list of non-designated heritage assets identified as buildings of merit which could receive the additional attention afforded by policy in the local plan.
86. As I mention elsewhere (paragraph 93), I think English Heritage have read Proposal 1 as if it were a policy of the plan. I invited the views of the District and Parish Councils on the representation by English Heritage. The District Council does not currently have a local list of heritage assets and does not have the resources to maintain such a list. What the Parish Councils were looking at were particular assets of community value, whether or not these could be said to be heritage. Having considered the representations and the views of the councils, I do not see any need to amend the plan

Comments on Text of Plan by Mr Ken Falls

87. Mr Falls makes nine comments on the text of the plan. I have mentioned one of these (Number 6 in his representations, on Policy 1 and the definition of the built-up area boundary) in paragraph 36 above. Most of the remainder of Mr Falls' comments concern the accuracy of references in the text of the plan to Lindfield or "the village of Lindfield" or "Lindfield Parish". He also opines that "the Gravelye Lane settlement" appears to be not properly covered by aspects of the plan which mention named settlements, for example where the plan refers to its vision for "the settlements of Lindfield and Scaynes Hill".
88. These detailed points are matters of textual precision which need to be considered by a person with local knowledge. In my view the references in the text to "the Gravelye Lane settlement" are potentially confusing anyway, bearing in mind that parts of the plan refer to the two (not three) settlements of Lindfield and Scaynes Hill. If possible a different "label" for the area near Gravelye Lane should be found.

Other Aspects of the Plan's Format or Content

89. The District Council point out that the first policy of the plan is not reached until page 25 and suggest that some of the preamble should be reduced. I think the section headed "Selected Statistics" would be better placed in an appendix. Other parts of the text prior to the policies, for example where there are substantial quotations from the High Weald AONB, could also be shortened so that the background information is made more concise.
90. The District Council suggest that an additional paragraph be included in the plan to reflect the fact that the council has undertaken a further screening exercise on the submitted plan (that is to say, additional to the screening mentioned in paragraphs 1.5 and 1.6 of the plan, confirming that a Strategic Environmental Assessment is not required. I leave this point to be considered by those involved, bearing in mind what I say elsewhere in this report about the possible need for an SEA if a site for residential development is allocated, or in effect allocated by being brought within the built-up area subject to Policy 1, in an amended plan.
91. There are several references in the text of the plan to "the Proposals Map". As I have previously noted (paragraph 35) there is no "Proposals Map" for the Neighbourhood Plan as such. The inconsistency is particularly important when it concerns the terms of policies, which it does in several policies. For example, Policy 6 states that the Neighbourhood Plan designates Local Green Spaces"as shown in the Proposals Map". These references need to be corrected.
92. In paragraph 5.1 of the plan there is a reference to non-statutory proposals. As is correctly explained in the subsequent text, such proposals cannot form part of the statutory land use policy provisions of the plan. Bearing that point in mind, I consider that the words in paragraph 5.1 referring to "a series of non-statutory proposals contained in the plan" could be potentially misleading. Indeed, the heading of Section 5 of the plan ("Implementation") and some of the introductory text of this section gives the impression that the proposals described here are an integral part of the plan. The confusion which may arise is shown by the representation by English Heritage - that body seems to have believed that Proposal 1 (concerning Assets of Community Value) would have the same status as a plan policy.
93. I consider that at the very least, the phrase "contained in the plan" should be omitted from paragraph 5.1, but it would be better if Section 5 on implementation were confined to what is written in paragraphs 5.3 and 5.4. The descriptions of the proposals would then be better placed in an annex or appendix, so that their status is clearer - that is to say, information about them is included in the neighbourhood plan document because they are aspirations of the local community but they are not part of the plan itself.

The Referendum Area

94. One of an examiner's duties is to recommend whether the referendum area should extend beyond the neighbourhood plan area. If and when the Neighbourhood Plan is subject to a referendum, I do not see any reason why the referendum area should be any different from the area covered by the two parishes.

Conclusions

95. A great deal of time and effort has clearly gone into the preparation of the Neighbourhood Plan, largely involving volunteers. Those who have worked on the plan have faced difficulties relating to timing and the withdrawal of the Mid Sussex District Plan. I sympathise with them; nevertheless I have to make what I believe to be the right judgment on the evidence before me.
96. Although neighbourhood plans can precede local plans, I have found that in this instance the submission version of the plan would not provide for a housing need identified by its own research and would not have appropriate regard for the emerging District Plan. Therefore I find that unless it is amended, the Neighbourhood Plan would not comply with national policy about positive planning to support local development needs, and would not be "aligned with the strategic needs and priorities of the wider local area".²⁶ Objections have been raised to the plan along these lines, and the objections have weight.
97. I also find that various more detailed amendments should be made to the plan, as set out in the recommendations and suggestions which follow.

Recommendations

The numbers in square brackets below give the paragraphs in the report which are the main reference sources for the recommendations or suggestions.

98. I recommend that:
1. A "Proposals Map" showing the built-up area boundary clearly for Policies 1 and 2 should be included in the plan. [35-39]
 2. The boundary of the built-up area should be amended so that the 2013 planning permission site (coloured purple on Plan X) and the land immediately to the north-west (Site 6 in the draft Strategic Housing Land Availability Assessment February 2015) are included in the built-up area. [33-68, 96]
 3. Assuming the above recommendation is accepted, no amendment to the wording of Policy 1 would be necessary. In Policy 2, the restriction to "10 or fewer net new homes" should be omitted. [61-63]
 4. A "re-screening" should be carried out to assess the possible need for a strategic environmental assessment resulting from the amendments recommended above. [68]
 5. The text of the plan should be reviewed so that references to the built-up area and to sites allocated for housing development in the paragraphs explaining Policies 1 and 2 are amended in line with the changed built-up area boundary. References in the Foreword to the 10-unit threshold for affordable housing provision and to the absence of any allocated sites for affordable or other housing should also be amended for consistency. [97]
 6. The last paragraph of Policy 6 should be re-worded so that it reads: "Proposals for development which would not be ancillary to the use of Local Green Spaces for public recreational purposes and would not be permitted under development plan policies in respect of protecting open spaces will be resisted unless it can be shown that there is an exceptional public interest need." [76, 78]
 7. References in the text of the plan to places or locations such as "Lindfield", "Lindfield village" and "the Gravelye Lane settlement" should be reviewed

²⁶ NPPF paragraph 184.

- to try to remove any possible ambiguity about which specific areas are being referred to. [87-88]
8. The map showing the designated Local Green Space area off Lyoth Lane should be amended so that it shows only the area subject to a Section 106 agreement for the provision of public open space. [77]
 9. The reference to proposals "contained in the plan" should be amended to make it clearer that the "proposals" do not have the same status as the policies (see also the related suggestion No 4 below). [92-93]
99. I also recommend that subject to the above amendments, and provided that their implementation does not conflict with any environmental assessment which may be required following a screening exercise, the plan as amended be taken forward to a referendum covering the area of the two parishes.

Suggestions

100. I make the following suggestions.
1. Some of the background information presented in the plan, particularly the census statistics, should be placed in an appendix or appendices to bring the part of the plan dealing with policies nearer the beginning of the document and to make the introductory material more concise. [89]
 2. Some minor amendments should be made to the wording of Policy 4 and the related text to clarify the references to "village centre units" and "A1 uses". [72-73]
 3. The "Inset Proposals Map" showing the Lindfield village centre and other policy boundaries should show the policy boundaries more clearly. [72]
 4. Consideration should be given to placing the section dealing with "Proposals" in an annex or appendix. [92-93]

The Next Stage

101. The recommendations of a neighbourhood plan examiner are not binding. It will now be for the District and Parish Councils to consider my recommendations and the reasons behind them, and to consider whether the plan can be changed to address those reasons, before deciding what action to take.

Graham Self MA MSc FRTPI
10 May 2015.

APPENDIX 1: REPRESENTATIONS

<u>Name</u>	<u>Main Topics</u>
Castillo, Mrs P	Allotments.
D M H Stallard	Housing; policies 1&2; site adjacent to Barn Cottage.
de Lande Long, Mr G	Support for plan.
de Lande Long, Mrs L	Support for plan.
English Heritage	Comments on heritage assets.
Environment Agency	No comments.
Falls, Ken	Various comments on text of plan.
Gatwick Airport Ltd.	No concerns with regard to aerodrome safeguarding.
Highways Agency	No comments.
Hill D W	Plan preparation process, housing development, Local Green Spaces.
Kerslake, Neil	Housing provision and related policy; Policy 3; plan preparation procedure.
Lowry, Yasmin	Supports plan.
Mid Sussex DC	SEA screening; format of NP; Policy 2 (affordable housing threshold).
Natural England	Information about High Weald AONB Management Plan and Ashdown Forest SAC.
Reside Developments Ltd	(Agent: Barton Willmore.) Housing provision; land east of High Beech Lane.
Southern Water	Policy 6 and infrastructure provision.
Sport England	Comments on Policy 6.
Taylor Wimpey Ltd	(Agent: Woolf Bond Planning.) Housing provision and related policy wording; land east of Gravelye Lane.
Thames Water Utilities Ltd	(Agent: Savills.) No comments.
Theatres Trust	Supports Policy 9.
Wates Developments Ltd	(Agent: Judith Ashton Associates.) Housing provision and related policy; Policy 6 in relation to land at Lyoth Lane; land east of Northants Brook and south of Scamps Hill.