

Hassocks Neighbourhood Plan - Summary of Representations

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
38	1	Mr G H Marples					

Comments

I have been a resident of Hassocks for over 40 years, have lived at the above address for the past two and a half and been a ward member for Hassocks on Mid Sussex District Council since 2003.

I declare a prejudicial interest in respect of Site 4 in the draft plan as it backs on to the rear of my garden. As the Plan links site 4 to site 13 (Clayton Mills) I think I should declare an interest in the latter as well, even though it does not directly affect me and I would not normally have declared an interest in it.

I support the inclusion of some of the sites proposed, recognising local housing need and the popularity of Hassocks with its sense of community, good schools and rail transport links. Roads are already congested but are probably no worse than many places. This is the price we pay for modern living, prosperity and high dependence on private cars.

My comments on those sites which, for me, raise concerns are as follows:

Land around Friars Oak, Sites 9 and 16.

Until recently, I lived for over 40 years within half a mile of these sites. There is a “hybrid” planning application for circa 120 houses in this area currently being assessed but I support the draft plan’s recommendation that it should be designated as a Local Green Space for several reasons.

In no order of significance, I have already expressed concerns about vehicular access to the proposed site off the A273 and the additional air quality issues the resultant traffic would create at Stonepound Crossroads, a short distance to the south. The pending outcome of the public inquiry into the planning appeal in respect of Ham Fields, which is closer to the crossroads, will inform present thinking on the air quality issues which are a local concern, with no apparent effective measures available to ease/solve the problem.

That said, I am supportive of the proposed development to the west of the A273, on part of the existing Hassocks Golf Club 9 (Site 15), even though this would similarly contribute the adverse air conditions at Stonepound. My thinking is that access to the site would be safer than on sites 9 and 16 and with golf club membership and “golf society” business in a slow, general decline, there are sure to be adverse effects on revenue streams in such a capital intensive business. I understand the present owner’s predicament and his ambition to release part of the course for housing, whilst still providing recreational facilities, albeit on a smaller scale.

Returning to sites 9 and 16, there is a long and well established use of this land for informal recreational activities (walkers, pet owners etc) and is a natural setting for fauna and flora. Its loss would be a blow to residents in that part of Hassocks, despite the fact that it very prone to flooding and in parts of winter may not be accessible.

The flooding issues would be exacerbated by more housing (particularly to the north and north west of the site) and are known to be being assessed by several relevant agencies as part of the planning process. However, my conclusion is that it should remain undeveloped, forming a “green lung” in that part of the village. People have no wish to be completely surrounded by housing estates and we need to strike a balance!

Clayton Mills, Site 13

The present, completed development of some 250 homes was commenced in 2007, taking about 5 years to complete. Planning approval was granted after a public enquiry at which the planning authority – Mid Sussex District Council- stood as the sole objector to the plans, a number of other objectors having withdrawn over time.

By way of context, the District Council had not included the now Clayton Mills in any of its land assessment work up to that point, despite the fact that the area had, I believe, been seen as the second phase of the “Hassocks bungalow development scheme”. That did not take place because of the outbreak of the Second World War and it is rather surprising that the land was not developed in the ensuing 60 years!

In the build-up to the existing District Plan, a planning inspector designated the land now known as Clayton Mills as a “reserve site”, which effectively put the site “into play” from any potential developers’ viewpoint. In making his/her decision, he /she said words to the effect that the site was “the countryside intruding into a built –up area.” I think that was a sensible assessment.

This context is important for, although housing needs change, if Site 13 is included in the Neighbourhood Plan - and eventually developed- the reverse would be true – the built-up area would be intruding into the countryside!

Additionally, during the planning process and appeal, great emphasis was placed on the need to protect the strategic gap between Hassocks and Burgess Hill, to the north. That is why the bund was created (so that the development was “screened”) and adjoining amenity land – now maintained by residents of the privately owned houses in Clayton Mills – provided to protect a “buffer” and to respect the distinction of separate communities which is such a feature of Mid Sussex.

If the proposed 140 houses are built, these features would disappear, lead to the erosion of the strategic gap between Hassocks and Burgess Hill and with the increase in the local population the amenity land would need to be replaced to protect the quality of life for the local community. This does not appear to have been addressed in the Plan and I submit that Site 4 may a suitable replacement? (see below)

At the public inquiry which led to the granting of planning permission at Clayton Mills, concerns about the impact on local infrastructure (notably roads, schools and doctors’ surgeries) were mainly disregarded by the statutory consultees who were subsequently proved wrong in their assessments.

The proposals in the Neighbourhood Plan would highlight similar infrastructure issues and whilst it may be considered premature at this stage, they should be borne in mind, both during the Plan process and during any subsequent planning application.

Land to the north of Mackie Avenue. Site 4

Land to the north of Mackie Avenue forms the existing parish boundary and is part of the strategic gap between Hassocks and Burgess Hill. In the Hassocks Neighbourhood Plan conditions it states:

“The policy seeks to firmly resist development beyond existing built-up area boundaries.”

This parish imposed restriction appears to have been disregarded in the Plan process and I consider the condition to be sensible, important and should be respected.

Additionally, if developed as proposed, the erection of almost 40 houses on Site 4 would give the appearance of an ugly rectangular “carbuncle”, intruding into some attractive countryside and would erode the strategic gap.

The development would be bounded to the north by a well used and long established public footpath. If it goes ahead, the development would, at a stroke, destroy much of the pleasure derived by its users who would be reduced to riding or strolling through a housing estate!

This intrusion into the countryside and its ugly, rectangular appearance would be emphasised because the owner of the land between Site 4 and Ockley Lane (previously described on Plan maps as Site 4A) has declared that 4A is not available for development.

The attraction of the strategic gap at this point, looking north to the already visible houses in Burgess Hill must be stressed and I endorse the comments made by the Chairman of the parish council, Cllr Ian Weir, at a meeting of the N.P Working Group on 4 February 2016 when he said “the footpath to the North (sic) of the site has attractive views and it would be important to maintain these”.

The topography of the land in which the footpath is located means that the views both to the north and south of the path are important and, for users, create a feeling of being in the open countryside. Damage to this amenity, brought about by a housing site outside existing parish boundaries would be a serious loss to residents and future generations.

I repeat my suggestion, above, that the best alternative use for Site 4 would be to designate it as a Local Green Space for the same reasons as the land at Friars Oak, mentioned earlier. As such, it would replace the amenity land which would potentially be lost at Clayton Mills.

Access issues. Sites 4 and 13

The minutes of the meeting of 4 February, state that access to these sites would be from Ockley Lane with access in - and crossing -the strategic gap, inter alia, because the land owner of Site 4A has not made it available for development.

Those minutes also mention the concerns about the routing of this access road expressed Cllr Weir but do not make any mention of the points at which the road would cross the existing public footpath. Loss of amenity for walkers etc. appears inevitable and I highlight this as an issue at this stage, even though it would also be considered should an application be considered.

Should the road be built, it seems inevitable that the next stage would be to seek more housing to the north (towards Burgess Hill), leading to the further erosion of the strategic gap. Such speculation is outside the remit of the current Neighbourhood Plan work but someone needs to think about the full implications of village expansion.

Other issues, concerning the Neighbourhood Plan process.

I cannot ignore local concerns about how the recommendations, now being considered in the Regulation 16 Consultation, were arrived at. I know that some residents have raised this issue in their submissions at various times and these are my personal observations, conditioned by the views made to me. I have not had any more involvement in the Plan process than any other Hassocks resident not directly engaged with the Working Group.

During the process, there have been resignations. First, the initial Chairman of the Working Group resigned (reasons not known) to be succeeded in that role by a parish councillor who had been the original driving force behind the “Protect Ham Fields” project, established to provide opposition to a proposed housing development on London Road, Hassocks.(Recently the subject of a public planning inquiry with inspector’s decision awaited)

The Working Party’s replacement chairman had not become a parish councillor until after a planning application was submitted for a housing development on Ham Fields. The common view held is that his motivation was the fact that his house backs on to Ham Fields, as did the home another councillor/ resident of London Road, Hassocks. The latter was similarly involved with the “Protect Ham Fields” organisation and whilst this councillor has since moved away, they remain on the Working Group.

Although not a member of the Working Group, another near neighbour of its chairman and whose house also abuts the site, has since become a parish councillor.

The total membership of the Working Group is 12 (including both “full” and co-opted members) of whom 5 live, or have lived, within about a quarter of a mile of Ham Fields. This seems disproportionate and leads to cynicism about the process by which sites came forward for consideration by residents. Those involved in the process declared prejudicial interests.

These concerns were heightened with the contemporaneous resignations of the Chairman of the parish council and the Clerk some months ago. Again, no reasons were published but the general assumption is that these unprecedented resignations were related to the Neighbourhood Plan process.

The important Plan work has become divisive. The general impression from the public meetings was that residents affected by proposed sites to the west of the railway line voted in favour of sites to the east and vice versa. To those not directly impacted, it was a matter of some indifference and I know some did not take the opportunity to vote!

Such voting patterns are probably commonplace and I cannot think of a way to get a better outcome but in their totality, many residents have doubts about the process, largely brought about by the unexplained resignations and the composition of the Working Group and its chairmanship. With hindsight, some of these concerns could have been overcome should an alternative, “independent” chairman have been appointed, always assuming that there was a suitably qualified and willing volunteer?

How would all this appear to the “Man on the Clapham Omnibus”?

I would have let down a number of residents had I not brought their concerns, and mine, to your attention at this stage of the process.

Restoring confidence in the Neighbourhood Plan process.

The Mid Sussex District Plan has been submitted but until it is approved by the inspectorate, the District does not have a five year housing supply and so Hassocks “ is at the mercy” of developers who see the village as a desirable place to build because of high buyer demand.

As we have seen in other parts of the District, where there is an assumption of planning approval, we cannot rule out the possibility that, for example, both Ham Fields and Friars Oak Fields could be approved after due process.

If that is so and the sites identified in the Neighbourhood Plan are also “delivered”, the total number of houses would significantly exceed calculated housing need which is a key driver for the Plan itself.

Add to that the public perception issues described above and I believe there is a case for the inspector appointed to adjudicate on the Hassocks Neighbourhood Plan to conduct their assessment in public rather than by written submissions.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
108		Ms H Hyland	Environment Agency				

Comments

Hassocks Neighbourhood Plan Consultation – Regulation 16 Publicity Period

Thank you for consulting us on the Hassocks Neighbourhood Plan Submission document.

Please find attached the comments that we sent previously for the Pre-Submission consultation.

Flood Risk

We are pleased to see that the Hassocks Golf Club and the Land North of Clayton Mills proposed allocations have been directed to the areas at the lowest probability of flooding and that they are both located within Flood Zone 1.

In our previous comments we identified that the National Tyre Centre proposed allocation is in Flood Zone 3 as identified in our published flood maps i.e. it is in an area at highest risk of flooding. The submission document states that the majority of the site is in Flood Zone 1. It would appear that the Neighbourhood Plan has not used the appropriate flood maps to identify which zone the site falls in. As the site is in Flood Zone 3, in accordance with the National Planning Policy Framework (NPPF) para 100-102, the Sequential Test should have been undertaken when allocating this site to ensure development is directed to the areas of lowest flood risk. The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. The Sequential Test should be informed by the Local Planning Authorities Strategic Flood Risk Assessment (SFRA).

Mid Sussex District Council (MSDC) has undertaken a Level 1 Strategic Flood Risk Assessment (SFRA) which was published in June 2015. The flood risk on the National Tyre Centre site was not considered in this document. A Level 2 SFRA would be needed as evidence to support any allocation in flood zone 3, together with a Sequential Test. MSDC has also published a Sequential Test in August 2016 as evidence to support the Mid Sussex District Local Plan 2014-2031. The National Tyre Centre site is not assessed in this document either. For this reason, we consider that the allocation of the site is unsound as the:

- flood risk on the site has not been properly assessed; and
- Sequential Test has not been passed.

It is important that the Plan considers whether the flood risk issues associated with the site can be safely managed to ensure development can come forward. Without this understanding we are unsure how you can demonstrate that your Plan is in compliance with the NPPF in this regard.

Contaminated Land

We are pleased to see that the Neighbourhood Plan is now referencing the fact that due to past and present uses of the National Tyre Centre site, there may be contamination on-site and the risks of contamination will be investigated.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
117		Mr D Bowie	Highways England				Neutral

Comments

Thank you for consulting Highways England regarding the above seeking a response no later than 8 September.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England will be concerned with plans or proposals that have the potential to impact on the safe and efficient operation of the SRN.

Having assessed the document and taken in to account any other material considerations we have no comments on the plan, subject to caveat (2) below.

However, it should be noted that

- 1) We will still wish to be consulted on any applications that could impact on the safety or operation of the SRN.
- 2) We will still wish to work with Mid Sussex Council throughout the production and/or monitoring of its Local Plan or any other relevant documents, in order to ensure that the cumulative effects of all growth and development within the district and/or elsewhere as relevant is appropriately modelled, assessed and mitigated. We are somewhat concerned that a number of Neighbourhood Plans are coming forward in advance of this more strategic outlook and assessment. Therefore we remain unclear whether the cumulative impacts arising from the separate Neighbourhood Plans are able to be accommodated and look forward to receiving convincing evidence on this matter in due course.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
192		Mr C Owen	West Sussex County Council				

Comments

Thank you for the opportunity to comment upon the Regulation 16 Submission Version of the Hassocks Neighbourhood Plan. Given that the submitted Hassocks Neighbourhood Plan (HNP) includes the proposed allocation of small-scale housing, it should be noted that this will be subject to the resolution of any highway safety and access issues at the planning application stage or as part of a consultation on a Community Right to Build Order.

Chapter 5: Community Infrastructure

Policy 12: Education Provision – It is requested that the wording of paragraph 5.17 be amended as follows (changes in red):

5.17 Whilst the need in principle has been established, detailed feasibility work has yet to satisfactorily progress is required to investigate the availability and suitability of potential sites for a new school. This work is not yet complete and, on this basis, it is not possible to identify and allocate a specific site for the provision of a new school within the Neighbourhood Plan.

Chapter 6: Housing

In our response to the HNP Regulation 14 consultation we raised concerns over the potential combined impacts of the proposed housing allocations upon the A273/B2116 signalled junction at Stonepound Crossroads where traffic congestion regularly occurs during peak periods and which is situated in a designated Air Quality Management Area (AQMA). Following our subsequent discussions with the Parish Council about the need for an adequate transport evidence base Mid Sussex DC commissioned consultants Amey to undertake additional work as part of their modelled assessment of all development proposals contained in the Pre-submission Mid Sussex District Plan. This additional work has formed part of the Mid Sussex Transport Study and provides an analysis of the impacts of District Plan development including the housing allocations proposed in the HNP.

Amey's analysis indicates that in the 2031 AM peak hour, when flows are generally higher than in the 2031 PM peak hour, District Plan development is unlikely to result in significant changes in flows on individual arms of the Stonepound Crossroads junction when compared to the situation without District Plan development. The reason for this is likely to be traffic using alternative routes to avoid congested parts of the network including the junction itself.

The modelling has also indicated that some increases in delays to movements through the junction would occur that slightly exceed our acceptable threshold values for development impacts. However in reality the signals have the capability to optimise settings and rebalance delays between the approaches to the junction. The modelled delays therefore represent a "worst case" that is unlikely to occur in practice.

For many of the vehicle trips that would be generated by the proposed Neighbourhood Plan allocations, particularly those sites located to the east of the railway line through Hassocks, there are alternative routes available that do not involve passing through Stonepound Crossroads. Therefore, based on Amey's analysis, we consider that the combined impacts of the proposed allocations upon the operation of the Stonepound Crossroads junction are unlikely to be severe, subject to appropriate mitigation.

Our overall conclusion from the evidence provided is that the traffic issues at Stonepound Crossroads do not constitute a "showstopper" for the residential allocations proposed in the HNP. In the case of any planning applications submitted in respect of these sites it is likely that WSCC will seek financial contributions towards improvements to the junction or other local infrastructure, subject to the outcomes of the associated transport assessments which will be expected to take account of other developments

committed at that time.

We are aware that there other local proposed housing sites currently in the planning system. Because the current status of these sites is that they are uncommitted they have not been tested in Amey's assessment. Where possible we will require the transport assessments for these sites to take account of the cumulative impacts of other sites of similar status, including the allocations proposed in the submitted HNP, through sensitivity testing.

Chapter 8: Transport

Aim 11: Footpaths and Accessibility – Further to our response to the HNP Regulation 14 consultation we would welcome para 8.26 being updated to refer to West Sussex County Council's Rights of Way Improvement Plan as recommended on page 92 of the published Hassocks Neighbourhood Plan Consultation Statement, June 2016.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
2335	1	Mr C Hough	Sigma Planning Services	Rydon Homes	1		

Comments

Policy 1 – Burgess Hill Gap

Policy DP11 Preventing Coalescence of the Submitted District Plan states that “Local Gaps can be identified in Neighbourhood Plans, where there is robust evidence that development within the Gap would individually or cumulatively result in coalescence and the loss of the separate identity and amenity of nearby settlements. Evidence must demonstrate that existing local and national policies cannot provide the necessary protection.

No substantial evidence supports the Neighbourhood Plan in its allocation of this gap and as such the boundaries of the Gap, as shown on the Proposals map require to be properly assessed and re-drawn because :-

-They have not been the subject of any proper assessment forming part of the evidence base. There is therefore insufficient justification for the positioning of the boundary around the northern edge of Hassocks.

-Friars Oak Field, lying to the west of the railway and east of London Road should be excluded from the Gap designation to reflect a new allocation for housing (see other representations) or at least to allow for ... reasonable settlement expansion in the future to meet housing need and to make the Gap policy more credible, flexible, reasonable and less likely to be overridden on appeal.

-The Hassocks Neighbourhood Plan Sustainability Appraisal (June 2016) states the following for Shepherds Walk “The site is within the defined Strategic Gap. Development would introduce built form onto currently open and undeveloped land and reduce the openness between Hassocks and Burgess Hill. However, unlike the Local Gaps around the village, the Strategic Gap is larger and more robust and therefore has greater capacity for development”. This lends support to the potential for Friars Oak Field to be excluded from the Gap in order to continue to meet future housing needs. This would still retain the separate identity and amenity of the settlements.

-The exclusion of land at Hassocks Golf Club to the west of London Road from the Gap is inconsistent and amounts to a protrusion, bringing development considerably further north than currently and narrowing the Gap in an uneven and illogical fashion. The southern boundary of the Gap is therefore significantly less clear cut and rational than it should be.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
2335	2	Mr C Hough	Sigma Planning Services	Rydon Homes	3		

Comments

Policy 3 : Local Greenspaces. LGS1 Land to the north of Shepherds Walk should be omitted from the list of Local Greenspaces. No proper justification has been advanced to warrant this designation.

Paragraph 76 of the NPPF states that:

Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed and be capable of enduring beyond the end of the plan period.

Furthermore Paragraph 007 Reference ID:37-007-20140306 of the Planning Practice Guidance states that

Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making” As indicated by these representations there is need for more housing land to be identified at Hassocks.

The criteria for Local Greenspace Designation are set out in Paragraph 77 of the Framework. This designation “will not be appropriate for most green areas or open space” and should only be used where the land is:-

- in reasonably close proximity to the community it serves.

- demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife and

- is local in character and is not an extensive tract of land.

All the criteria have to be satisfied for a designation to be justified.

1. Proximity – the site has very little community use at present, limited to use of the recreational footpath along its southern boundary and occasional unauthorised dog walking. It is in reasonably close proximity to the adjacent Shepherds Walk residential estate but is not easily accessible to or enjoyed by most of the community of Hassocks. It is not visible from London Road and is only overlooked from the upper storeys of a handful of residential properties in the Shepherds Walk estate which back onto it. It is therefore not physically or visually accessible to most of the community of Hassocks.

2. Demonstrably special with a particular local significance. There is no evidence to support this characteristic. The site comprises two ordinary agricultural fields on the edge of the settlement. It has never been identified by any planning policy designation or other recognised document as having any particular significance in terms of scenic beauty, heritage interest, recreation or ecology. It lies between a main road and a main line railway and is bordered by a housing estate. It therefore does not have any particular tranquillity compared to other sites around the periphery of Hassocks. It does not lie in the AONB or any designated area of Special Landscape Value. Other sites to the south of the village are within the AONB and have greater significance in terms of landscape beauty. The attached ecological assessment confirms that it has no particular richness of wildlife compared to other sites in the area. The attached landscape assessment confirms that the site does not demonstrate any special landscape importance.

The attached heritage assessment confirms that it has not great historical significance. The attached aerial photographs confirm that the land has been used for active agricultural cropping up to at least 2006 and has only been left fallow in recent years but there is no reason why the agricultural cropping could not re-commence. The attached survey of usage of the footpath along the southern boundary of the site confirms light recreational usage.

3. Extensive Tract of Land – it is not clear from the guidance what is meant by “extensive” and judgement has to be exercised. The proposed designation has an area of 6.7 ha which is relatively large. However, there is no recognisable change of character or physical boundary to the north and the site is of similar character to the entire area up to Burgess Hill to the north. As such it does form part of an extensive tract of land from which it is not obviously distinguishable.

For these reasons it is considered that the land fails to meet any of the required criteria with any material degree of robustness or credibility.

The Council’s SHLAA (April 2016) assessment of the site concluded that it was suitable for development and makes no mention of any particular significance as Local Greenspace. In the Minutes of a Meeting held between Mark Bristow (MB) the Neighbourhood Planning Officer of Mid Sussex District Council and the Neighbourhood Plan Working Group on 6th April 2016 (attached to Basic Conditions Statement) it is recorded that MB held concerns regarding Friars Oak LGS designation as it may be perceived as an excessively large tract of land. MB highlighted the extent to which the LGS spreads north and the need for it to relate well to the community. No such specific reservations about any other site proposed for LGS designation are mentioned.

The evidence base – Proposed Local Green Spaces document refers to a written case for designation having been put forward by local residents but this does not appear on the Council’s website as part of the evidence base for the Plan. The criteria set out in relation to landscape character, heritage, wildlife and recreational significance contain nothing that is not ordinarily shared by most countryside areas on the edge of a settlement and there is no feature of particular significance. The comments are very general and do not demonstrate any detailed examination to reveal local importance. The assessment recognises that the site is a potential housing allocation.

In the Responses to the Regulation 14 Consultation set out in the HNP Proposed Local Green Space Sites – NPWG Response Paper June 2016 the NPWG explain their approach to LGS designation. (Pages 18 & 19). The views of the local community were built into the assessment through reference to the preferences expressed on housing site allocations.

This is confirmed in the NPWG response to stakeholder representation on the Reg 14 Consultation (see table Page 19). The NPWG response states:-

“There has been widespread objection to the proposals for housing development on this site from across the local community. This demonstrates that the site is valued by local people”.

Opposition to a residential development proposal is therefore the primary evidence put forward by the NPWG in support of the proposition that the site is “demonstrably special” and “holds a particular significance” to the local community. This is not a valid or robust basis upon which to make such a designation. There has been no specific consultation upon the point other than the Reg 14 Consultation where the designation was already a proposal.

The Response again records the reservations by MSDC about the suitability of the land north of Shepherds Walk for LGS designation including queries about its extent. It is also notable that the criteria for designation as LGS set out on Pages 5 and 6 of the NPWG Response Paper do not reflect the criteria set out at Paragraph 77 of the Framework because they omit any reference to the need for the criteria to show that the site characteristics are demonstrably special and of particular local significance. It is concluded that the assessment is lightweight, has been unduly influenced by objections to a development proposal on the land and the evidence base falls considerably short of the standard required for such an important designation which the Framework says will not be appropriate for most green areas or open space.

Examples of the rejection of LGS proposed allocations in other Neighbourhood Plans are attached.

1. Backwell Neighbourhood Plan – the expectation was that substantive and compelling evidence should be presented on which to base any such designation. In that case 19 ha of land was concluded to be an extensive tract of land.

2. Chapel-en-le-Frith Neighbourhood Plan – multiple sites were assessed and some were accepted and others were rejected. Site 7 was rejected because it was part of the surrounding countryside rather than local in character even though, in that case it had historical and possible wildlife significance. Site 11 was rejected because it was ordinary and had no special qualities and Sites 13, 14, 17 and 19 likewise.

3. Storrington, Sullington and Washington Neighbourhood Plan – 25 acres of LGS were identified in the submitted plan but the evidence base and generic statements did not amount to robust evidence to support each proposed designation. The Hassocks NP does list each site and indicates what is thought to be special but the justification is generic and does not provide robust reasoning or explanation as to what is special about the site.

4. Slaugham Parish Neighbourhood Plan – there was little evidence to demonstrate why the land was special and held a particular local significance. It was admitted by some participants at the Hearing that the reason for the proposed designation was to prevent development on the site.

It is the case in relation to the land north of Shepherds Walk that a planning application, currently undetermined, has been submitted by Rydon Homes Ltd for residential development on this site. It is Rydon's view that the impetus for the designation of the land as LGS stems largely from local opposition to their housing proposal. This has involved very strong lobbying by a local opposition group (see Minutes of Parish Council Meeting 22nd September 2015). The Neighbourhood Plan should be a positive document and not be used as a means to frustrate development. The land is privately owned and there is no prospect of public access being secured to implement any community use. Ironically the Rydon development proposal includes an extensive area of open space (approx. 4.07 ha) alongside the Herring Stream and beyond to the north. This would be offered to the Parish Council and would provide a very attractive area of Local Open Space for the use of existing and future residents alike. Delivery of local public green open space can therefore be secured – including the feature of the area alongside the Herring Stream – with more certainty than through the designation of the land as LGS in the Neighbourhood Plan. A copy of the latest Masterplan is attached.

The basic conditions are not met because the Plan fails to have proper regard to the National Guidance in Paragraph 77 of the NPPF.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
2335	3	Mr C Hough	Sigma Planning Services	Rydon Homes		26-27	

Comments

Housing Need - the Submission Neighbourhood Plan significantly understates the number of dwellings for which housing provision should be made at Hassocks in order to meet objectively assessed housing needs at Local and District level. It therefore does not meet the basic condition of having regard to national planning policy advice.

Under the heading of “Delivering a wide choice of high quality homes” Paragraph 47 of the Framework requires Local Planning Authorities to boost significantly the supply of housing and, inter alia, to meet the full objectively assessed needs for market and affordable housing in the housing market area. It is not the function of Neighbourhood Plans to assess and meet strategic housing requirements and often – as in this case – the Plan progresses in advance of an updated strategic housing requirement being established. In this situation the NP can either :-

-~~M~~Make no housing allocations and leave the allocation to the District Plan or

-~~A~~Attempt to anticipate the likely housing requirement and allocate sites accordingly, or

-~~I~~Identify a minimum number of housing allocations and also identify a pool of reserve sites that can be called upon in the event that they are required to meet strategic housing needs when they are confirmed in the Local Plan.

In the present case the NP attempts to anticipate the housing requirement. It therefore takes upon itself an onus to examine carefully and respond to the background evidence on objectively assessed housing need that underlies District Plan preparation at the present time. It also has to take on board strategic issues of housing distribution. A failure to carry out a housing assessment with due care and robustness that correctly predicts the strategic housing requirement will put the Plan at risk of being considered out of date soon after it is made when the District Plan is adopted. It is Rydon’s view that the Plan has failed to make an accurate and reasonable prediction of the Districtwide housing need and distribution and that, as a result, it is not having due regard to Paragraph 47 of the Framework.

The Basic Conditions Statement (June 2016) makes no mention of the need to contribute to meeting objectively assessed housing needs in the housing market area. It refers only to local needs, particularly affordable housing. This is a significant omission for a plan that purports to be seeking to predict objectively assessed strategic housing need. The Strategic Objectives of the Plan make no mention of the scale of housing proposed or meeting housing need – at local or strategic level. The Plan therefore falls short of any meaningful ambition to meet strategic or indeed affordable housing needs and therefore runs contrary to guidance in the NPPF.

There have been 3 iterations of a Housing Need Assessment in the NP process. None of these follow the conventional methodology set out in Planning Policy Guidance. The 2014 HNA uses the MSDC Local Housing Assessment (2011) as a template and derives percentage changes in Household Formation, Demography and the Economic situation from the District. It then applies them to the local situation in Hassocks. This is a very crude and unreliable approach which assumes an evenness of housing demand and distribution from the District to the local level. The information date – pre 2011 – is also out-dated. Ranges are then introduced to cover selected scenarios which gives artificial flexibility. The conclusion is that there is a need for between 250 – 400 additional houses.

The 2015 HNA applies basically the same flawed approach but changes to the National household formation rate, the MSDC population and economic forecasts, change the need range to 200 – 500 additional houses.

The 2016 HNA does the same again with further changes in the percentages but comes up with the same conclusions as 2015 namely that the housing requirement is between 200 – 500 additional houses.

The range is then reduced to 250 – 400 houses arbitrarily on the unsubstantiated assumption that some growth for Hassocks will be accommodated at Burgess Hill.

The MSDC Local Housing Assessment is based on the 2001 Census (The 2011 Census was not available) and ONS Population estimates 2010. It calculated household formation rather than using ONS household estimates. It is not an up-to-date or robust basis for household projections in 2016 and local interventions and adjustments make it even more unreliable.

Contrary to their own HNA the Parish Council resolved at an Extraordinary Parish Council Meeting on 22nd September 2015 that a Housing Need range of 210 – 270 dwellings should be included in the NP. Copies of the Minutes and Agenda from that meeting are not included in the identified evidence base and are therefore now attached. There is no explanation in the Agenda or record of discussion in the Minutes to explain why this range was selected other than being the recommendation of the NPWG. Ultimately sites are allocated in the Submission NP for 280-290 new homes under Policy 13 rather than in the range 210 – 270 dwellings. Again no justification for this further change is given.

The failure to follow established methodology, the crudeness of the methodology utilised, the use of out-of-date baseline information and the variable, arbitrary and unexplained selection of the range of housing provision ultimately included within the Submission NP leave Rydon Homes Ltd with no confidence in the robustness of the evidence base. The housing figure in the Plan has not been properly substantiated.

The Housing and Economic Development Needs Assessment (HEDNA) update was published by the District Council in November 2015. It aims to set out the methodology and calculation of the District's housing and economic development need. The document is not referred to in the documents forming the evidence base of the NP. A copy is therefore now attached. The HEDNA follows PPG methodology guidance and a selected continuation of 2008 and 2011 household projections to reflect prevailing economic conditions. This approach may be subject to scrutiny at the Local Plan Examination but justification is provided.

The latest 2014 DCLG Household Projections show an increase of 1619 dwellings or 65 dwellings per annum (2014 – 2039) for Mid-Sussex District so the most recent trend is an increasing need for housing. This is confirmed in the latest HEDNA (August 2016) which increases the annual housing provision for the District from 695 dpa to 754 dpa (copy attached).

At Paragraph 8.23 of the November 2015 HEDNA, under the heading of "Implications for Neighbourhood Plans" the household projections (2012) are distributed to each town/parish based on the proportion of the District's households or population that were in each parish at the time of the 2011 Census. The figures for Hassocks (Table 24) are 649 on the basis of household split and 611 on the basis of population split with an average housing requirement of 630 dwellings. These figures are given as an indication of the level of need within each parish and Paragraph 8.24 of the HEDNA says they can be used to guide Neighbourhood Plans with respect to housing need and inform evidence alongside any other local evidence.

The NPWG were aware of this advice and their HNA includes the conclusion that the Hassocks requirement :-

"... is more likely to lie in the range between 250 and 400 additional houses as opposed to the 630 additional houses based on an average of a proportional split based on household and population bases in the MSDC HEDNA"

This conclusion assumes a distribution of strategic housing provision away from Hassocks for which there is currently no evidence. The distribution proposed by the emerging District Plan is not yet settled. Furthermore, the Northern Arc development which will provide most of the growth at Burgess Hill is a very large development which is unlikely to be completed during the District Plan Period to 2031. There are currently no planning consents and major infrastructure works are required to be put in place prior to houses being occupied. There are unlikely to be any completions within 4 years and then the 3 developers are unlikely to produce more than 50 dwellings per annum per outlet making an average annual expected completion rate of 150 per annum. This means that the maximum completions figure that can be expected by 2031 is 1650 dwellings. This is less than the average share for Burgess Hill in the HEDNA of 2378 dwellings. There is therefore a potential shortfall of delivery at Burgess Hill and no realistic prospect of additional capacity to allow for under-provision at Hassocks.

In any event these are matters for the District Plan and the Neighbourhood Plan should not be prepared upon any unrealistic and unquantified assumptions about what housing distribution figures it may contain.

The Submission NP contains no assessment of the need for affordable housing in the village. This is a significant omission and the housing provision assessment is incomplete without a local housing needs survey and an assessment of the need for social housing in the village. Paragraph 47 of the Framework seeks to ensure that full objectively assessed need for affordable housing is met. The submission NP does not attempt to do this and is therefore in conflict with the basic conditions that require NPs to have regard to national policies and advice.

Decisions about the amount of new housing to be built at Hassocks have to have regard to its position in the hierarchy of settlements across the District. This hierarchy is long-established and its latest manifestation is in the Submission version of the emerging District Plan. This confirms that the amount of development planned for in each settlement will need to have regard, inter alia, to this hierarchy. This point is also acknowledged at Paragraph 6.7 of the Submission SHNP. However there is nothing in the evidence base or the policies of the SHNP that assesses the implications of this hierarchy and what it means for housing provision in Hassocks. In the hierarchy, which is based on comparative

sustainability, Hassocks is a Category 2 settlement, sitting below the three main towns of Burgess Hill, East Grinstead and Haywards Heath. There are a total of 6 Category 2 settlements which are larger villages acting as Local Service centres providing key services in the rural areas of Mid Sussex. They serve the wider hinterland and benefit from a good range of services and facilities including employment opportunities and access to public transport. Hassocks is one of the largest of these villages and is the only one that has a main line railway station. It can be reasonably described as the most sustainable village across the District. As such it has an important role to fulfil in meeting strategic housing provision in the most sustainable way. Acceptance and assessment of this role is absent from the SHNP and this is contrary to the basic conditions which require the NP to contribute to the achievement of sustainable development and to be in general conformity with the strategic policies contained in the development plan for the area. The lack of recognition, acceptance and assessment of this role in producing housing numbers in the NP is a material omission that runs contrary to the settlement hierarchy in the adopted Local Plan and the emerging District Plan.

CONCLUSION

The housing provision figure in the SHNP as set out in Policy 13 is fundamentally flawed in terms of methodology, arbitrary assumptions that are not supported by the evidence base, disregarding the advice of the HEDNA without substantive reasons, failing to carry out any quantitative assessment of local housing needs for affordable housing and failing to have regard to the need for Hassocks to play a part in the delivery of sustainable development reflecting its elevated level in the settlement hierarchy of the District. These flaws run contrary to basic conditions 8 (2) (a), (d) and (e). The current housing numbers are inadequate and the Parish Council should be invited to either withdraw all proposed housing allocations or carry out a more appropriate, compliant and extensive assessment of the objectively assessed housing need for market and affordable housing and bring forward sufficient new housing allocations to meet that need.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
2335	4	Mr C Hough	Sigma Planning Services	Rydon Homes		27 & 28	

Comments

The proposed allocation at Hassocks Golf Club in Policies 13 and 14 is not in accordance with the principles of sustainable development and therefore is not in accordance with the basic conditions. It is a fundamentally unsuitable site that is remote from the village, on the wrong side of London Road and is not a natural extension of the existing settlement boundaries. It lies in the Burgess Hill Gap and does not amount to a logical incursion into the Gap that minimises any impact on its function. It involves the loss of an existing sports facility in the form of an 18 hole golf course which is contrary to Sport England (who have not been consulted), National and Local Plan Policy. Any replacement 9 hole golf course is inadequate compensation for the loss of an 18 hole course and requiring the new golf course to be owned by the Parish Council is a totally inappropriate and improper policy which detracts from the integrity and credibility of the NP. It is not compliant with Paragraph 122 of the CIL Regulations because ownership of the golf course is not "necessary" for the new housing or local community infrastructure.

Rydon are concerned that this site is being selected for its remoteness from the settlement which minimises local objection. This is not supportive of sustainable development and is not good planning.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
2335	5	Mr C Hough	Sigma Planning Services	Rydon Homes		29&30	

Comments

The proposed allocation of housing on land to the north of Clayton Mills has not been carefully and properly assessed in that :-

-The land is already identified as public open space to serve existing development and is required by condition to serve that purpose. It is also allocated as a recreation area on the adopted Local Plan and subject to Policy KH2 which requires the area to be laid out as playing fields. The proposed allocation is contrary to this policy of the adopted Local Plan and therefore does not satisfy the Basic Conditions – copies attached.

-The planning consent for the Mackie Avenue development was granted on appeal in March 2007 (copy attached) and Condition 5 (Appeal B) requires that the open space areas should remain undeveloped. This is re-iterated by the S106 Obligation (copy extract attached) which requires the open space to be laid out and planted in accordance with the approved scheme and thereafter maintained by the District Council.

-The loss of this area of open space would be contrary to Policies B6 and R2 of the adopted Local Plan which seek to prevent the loss of public open space. There is therefore conflict with the Basic Conditions.

-The suggestion of providing compensatory open space beyond the northern edge of the proposed allocation
a) is not readily accessible to existing residents of Clayton Mills/Mackie Avenue and is therefore not fit for purpose.

b) is not shown on the Proposals Map

c) has not been the subject of Regulation 14 consultation in that the draft plan proposed that the compensatory open space should be within the allocation site. The change to provision being to the north of the allocation site has not been assessed in terms of its feasibility, sustainability, availability, impact on the Burgess Hill Strategic Gap and impact upon landscape and ecological interests. Public open space is an urban use and its impacts should be properly assessed and consulted upon rather than introduced at a late stage in the final submitted version of the Plan.

-No suitable access to the site has been demonstrated to be available and no assessment of highway impacts has been carried out as part of the evidence base of the Plan.

-There is considerable local objection from the existing residents of Clayton Mills/Mackie Avenue based on the loss of their open space and the potential impact of traffic upon their amenity and safety.

-The Sustainability Appraisal does not assess the extended site to the north of the proposed allocation site.

For these reasons the proposed Allocation does not comply with the Basic Conditions in that there is conflict with the statutory development plan, the impacts of the proposal have not been properly assessed and the correct procedures for identification on the proposals map, consultation and sustainability assessment have not been followed.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
2335	6	Mr C Hough	Sigma Planning Services	Rydon Homes		38	

Comments

The reference in AIM 7 Safety to supporting a tunnelled replacement to the footpath crossing the railway is misplaced because:-

- There is no identified safety issue with the crossing. Network Rail regard it as being safe and there is no history of accidents.

- There is no proposal to provide a tunnelled replacement and therefore no current possibility of implementation.

- There is an existing pedestrian tunnel under the railway linking the Shepherds Walk and Clayton Mills housing estates but no obvious reason why significant pedestrian traffic between the two residential areas is expected. Pedestrian routes to the village centre and railway station from Shepherds Walk and adjacent areas, including the proposed Rydon development, can conveniently and safely use the existing tunnel.

Item 3 of AIM 7 should therefore be removed as being unnecessary and having no realistic prospect of implementation

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
2335	7	Mr C Hough	Sigma Planning Services	Rydon Homes			

Comments

The following general points are made:-

1. The Mid Sussex Guidance Note on representations on the submitted SHNP is misleading in that it describes national policy and advice as being contained in the NPPF and provides a web link to this document only. This implies that the NPPF is the only relevant source of national policy and guidance. Clearly this is not the case and other sources of advice – particularly Planning Policy Guidance – are also important in terms of the compliance of the NP to meet the basic conditions. To the extent that the way this part of the Guidance Note is phrased suggests that the NPPF is the only source of reference that needs to be visited. The consultation process is fundamentally flawed as a result. This issue needs to be rectified now because of possible subsequent legal challenge on this and the lack of due process and consultation on the Mackie Avenue/Clayton Mills Housing Allocation could give rise to avoidable delays in the making of the Plan.

2. The evidence base is inadequate and lacking in some critical documents, assessment and explanation. Examples are:-

- There is no overall highways impact assessment underlying the proposals in the Plan

- Spurious assumptions are made such as a threshold of 1km for highways impact upon the air quality at Stonepound Crossroads rather than evidence based assessment.

- The justification from local residents for the proposed allocation LGS1 is not part of the evidence base and is therefore not available for comment.

- The Sustainability Appraisal is inconsistent e.g. compare the assessments of potential housing Sites 13 and 9.

- The HEDNA and Housing Need Document 2014 do not form part of the identified evidence base.

- The Mid Sussex Local Plan 2004, Small Scale Housing Allocations 2008 and the submission District Plan are not listed in the identified evidence base.

On the Hassocks All Constraints Maps no distinction is made between the Local Gaps and Strategic Gaps identified on the Mid Sussex Local Plan 2004 Proposals Map. However the Sustainability Appraisal states that the Strategic Gap is larger and more robust than the Local Gaps. This distinction should have been clarified by the different types of Gap being appropriately identified on the constraints map.

There is a general informality and lack of justification in the quoted evidence base on the relevant websites which undermines the consultation process and also confidence in the robustness of the Submission Plan and its compliance with due process and the Basic Conditions. Whilst the standard of presentation of Neighbourhood Plans is not as demanding as that which might be expected of a Districtwide Plan, basic standards of presentation, clarity, justification and consistency should be met in order to achieve meaningful consultation and a robust Plan. The SHNP falls short of meeting these basic standards.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
2490		Mr S Ankers	South Downs Society				Support

Comments

Hassocks Neighbourhood Plan .

The Society's objective is to conserve and enhance for public benefit the beauty and amenities of the South Downs in and within the vicinity of the South Downs National Park. We have nearly 2000 members and are the national park society for the South Downs National Park.

In line with our objective we have taken an interest in this Neighbourhood Plan as the Parish lies partly in the National Park.

We are pleased that the Plan acknowledges the high quality of the landscape in the Parish which includes the important chalk scarp slopes.

Also in the strategic objectives the Plan rightly recognizes the importance of Hassocks as a gateway to the National Park with its good transport links, network of rights of way and cycle hire facilities.

The Plan is strongly underpinned by reference to the emerging South Downs National Park Local Plan.

We very much welcome the inclusion of Policy 5 which has specific regard to National Park purposes reflecting the significance of this special landscape and its need for special protection as set out in the NPPF. We would draw your attention however to the reference to the 1995 Environment Act which could be usefully extended to section 62 of the same Act which imposes a duty to have regard to the Park's designation.

We applaud the fact that in selecting sites for housing , those in or adjacent to the NP, have been rejected in favour of those outside the park ,which will have limited impact on its setting or views into or out from the Park.

Finally, Policy 3 which designates Local Green Spaces is a valuable policy component which will safeguard those views e.g. – the land to the south of Downlands school.

To the extent of the areas which are within our Society's remit we therefore support this Neighbourhood Plan.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
10216	1	Mr R Ticehurst					

Comments

Transport

Parking – Aim 6 page 37/38. Support is only stated for Station parking. There is presumably therefore no support for alleviating other problems mentioned in the Plan. Commuter parking is causing congestion, depriving many residents from parking near their own house and shoppers from parking near shops etc. Support for parking should be widened in the Plan to include this increasing problem. Only extra parking at or near the station will solve this but will no doubt be expensive. A much cheaper option used in many towns and villages with the same problem is to ban parking from 1-2pm in local roads. (The proposed loss of staff parking spaces at the Infants School exacerbates the problem and there is a shortage of spaces at the other two schools as well which forces staff and visitors to park in adjacent roads.)

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
10216	2	Mr R Ticehurst					
Comments							
Housing							
Policy 14, page 27, Golf Course. Clearly this development will have an impact on Policy 2 (Hurstpierpoint Gap) and Policy 7 (Air Quality at Stonepound). If it is deemed by a government inspector that the development at the Golf Course does not close the Gap then presumably the same will apply to Ham Fields? In which case both will go ahead on that criterion putting even more pressure on schools, parking, air quality, health service, other infrastructure etc.							
Both developments equally affect Stone Pound Air Quality so whatever the decision at appeal relating to Ham Fields will affect both. No sizeable development should be allowed at either of these sites (or subsequent ones near Stone Pound) until the Air Quality meets the required standard.							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
10216	3	Mr R Ticehurst					
Comments							
Community Infrastructure							
Policy 12 Education. It should be emphasised in the Plan that no development should take place until every child in the parish is guaranteed a place in a local school and especially until a new infant school is built and open.							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
10216	4	Mr R Ticehurst					
Comments							
Environmental and Heritage							
Policy 7 Air Quality Management page 18 4.30. As stated above this resolve not to support any development that adversely affects Stone Pound's Air Quality is paramount until standards are met.							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
10216	5	Mr R Ticehurst					
Comments							
Summary:- I look forward to public debate on these and other issues but so far no opportunity has been given for this to happen. Presumably this will take place during the voting period (preferably before this though) so that we all share ideas to achieve the best possible Plan. The whole process for producing a NP is summed up by the word 'consultation' embedded in every step. I would like to know what my neighbours think and work with them to help the working group to come to solutions that meet most people's aspirations (even at this late stage). I presume that the three villages (Hurstpierpoint, Ditchling and Hassocks) have consulted each other on their NPs as there are many issues that affect all three?							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
15175		Mr T Slaney	South Downs National Park Authority				
Comments							
Page No							
Section							
Comments							
SDNPA Recommendation							
1							
Map							
It would be helpful to clearly identify the National Park boundary							
Identify SDNP boundary							
11							
Error in page numbering – Page 10 appears to be missing							
Re-number pages							
Policy 1 & 2 Gap policies							
We welcome the inclusion of the criteria relating to relative tranquillity, in relation to noise and light pollution and dark night skies.							
The setting of the South Downs National Park (SDNP) is important to preserving the landscape character and relative tranquillity, and has recently been designated as an International Dark Sky Reserve.							
The Hassocks Neighbourhood Development Plan (HDNP) should have regard to the setting of the National Park in relation to any development proposals close to the National Park boundary.							
Include reference to the SDNP in the policy and supporting text.							
17							
Policy 5							
South Downs National Park							
For clarity, the words ‘South Downs’ should be used before ‘National Park’							
Amend the policy wording to: ‘Development proposals within the South Downs National Park will be supported where they;							
<ul style="list-style-type: none"> • Have regard to the purposes and duty of the National Park Authority; • Conserve and enhance the landscape character, scenic beauty, wildlife and cultural heritage of the South Downs National Park. 							
Development proposals in land adjacent to the South Downs National Park will be supported where they have regard to the setting of the Park.’							
26							
Housing Chapter							
The Plan includes no reference to waste management and minerals supply.							
Suggest including requirement to provide adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service”							
The Parish Council may therefore wish to include text within objective 6 that takes account of the sustainable management of waste.							
Include additional wording to policy or supporting text.							
27							
Policy 13							

Housing Allocations

We note that sites allocated within the Hassocks NDP are to the north of the existing settlement or within the settlement area and will therefore have minimal or no detrimental impacts on the setting of the National Park.

28

Policy 14

Hassocks Golf Course

The Golf Course site does not relate well to the existing built form and pattern of development in Hassocks, as it is dissected from the town by the A273. The site is likely to be visible from prominent positions within the SDNP, such as Wolstonbury Hill however will be viewed against the backdrop of existing development. It is considered that with appropriate landscape screening and sensitive design, layout and external lighting infrastructure, development on this site will not be detrimental to the setting of the SDNP. We recommend the following additional criteria for Policy 14 to ensure potential impacts are minimised:

☑ Provide appropriate landscaping and sensitive design to mitigate the impact on near and long views of the site

☑ Conserve and where possible enhance the relative tranquillity in regards to lighting and dark night skies

Include additional policy criteria to minimise potential detrimental impacts on the setting of the National Park.

30

Policy 15

Land North of Clayton Mills and Mackie Avenue

Land North of Clayton Mills and Mackie Avenue is considered to be unlikely to have a detrimental impact on the setting of the SDNP. Viewed from a prominent elevated position such as Ditchling Beacon, it will be seen in the context of and against the backdrop of the existing built up areas of Hassocks and Keymer. There may be views of the site from within the National Park to the east (e.g. footpath between Oldland Mill & Broadhill), however with appropriate landscape screening and sensitive design, layout and external lighting infrastructure it is considered that development on this site will not be detrimental to the setting of the SDNP. We recommend the following additional criteria for Policy 15 to ensure potential impacts are minimised:

☑ Provide a significant landscape buffer to the northern edge, and where necessary to the east of the site to screen views from the National Park

Include additional policy criteria to minimise potential detrimental impacts on the setting of the National Park.

☑ Conserve and where possible enhance the relative tranquillity in regards to lighting and dark night skies

33

Policy 20

Reuse of Rural Buildings for Residential use

The policy repeats in part NPPF para.55. The repetition is unnecessary, risks creating significant confusion and may in places be in conflict with higher level policy.

The South Downs Local Plan has an emerging policy SD49 Conversion of Redundant Agricultural Buildings which relates to all types of conversion of agricultural building, not just those designated as heritage assets.

For the parts of the Hassocks Neighbourhood Area that fall within the National Park boundary, we would recommend greater alignment with this emerging policy to ensure the cultural heritage of the National Park is appropriately conserved and enhanced. The policy should seek to minimise the extent of reconstruction and ensure sensitive design so that the building character is not substantially harmed. We would also recommend the policy applies to non-residential conversions.

Review policy wording

35

Policy 21

Tourism

We welcome the support for more visitor accommodation in the parish which will support the rural economy and may increase the number of visitors to the National Park.

Hassocks is a gateway train station into the National Park and plays an important role in enabling sustainable tourism.

The SDNP Local Plan has an emerging policy SD20 Sustainable Tourism and the Visitor Economy which seeks to ensure an appropriate balance between the needs of visitors,

provide benefits to the local economy and not adversely impact the environment. Where Hassocks NDP policy applies in the National Park we would recommend greater alignment with this emerging policy to ensure appropriate regard for the statutory Purposes of the National Park. Proposals should be supported where they provide opportunities for visitors to increase their awareness, understanding and enjoyment of the special qualities of the National Park, minimise the need for travel by private car, and not detract from the experience of other visitors or affect the character, appearance and amenity of the area.

Review policy wording

Minerals and Waste

The Plan includes no reference to waste management and minerals supply.

The latest West Sussex County Council Annual Monitoring Report notes that the parish does not include any the waste and minerals facilities.

There appears to be no conflict with the policies included in the following minerals and waste plans:

- ☒ West Sussex Waste Local Plan (2014)
- ☒ West Sussex Minerals Local Plan (2003)
- ☒ The emerging Joint Minerals Local Plan

However some text referencing these plans would be useful as they do form part of the overall development plan for the area.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
16749		Miss Natalie Bumpus	Wealden District Council				

Comments

Thank you for the opportunity to comment on the Hassocks Neighbourhood Plan Submission Version – June 2016. Of particular interest and relevance to Wealden District Council is the matter of the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC) and the Neighbourhood Plan's potential impact upon this site. In this regard Neighbourhood Plans have to be compatible with European Directives to meet basic conditions including Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora (the Habitats Directive).

The Habitats Directive is transposed into national legislation through The Conservation of Habitats and Species Regulations 2010 (Habitat Regulations). The Habitat Regulations set out a requirement that for a Habitats Regulation Assessment (HRA) to be applied to all land use plans to assess the potential effect of a plan against the conservation objectives of SPAs, SACs and Ramsar Sites. Under the Habitat Regulations (Regulation 61 & 102), competent authorities have a duty to assesses likely significant effects and if necessary undertake an Appropriate Assessment (AA).

It is noted that the Neighbourhood Plan Submission Version makes no reference to the Ashdown Forest in the main document, although a Habitats Regulation Assessment (HRA) Screening Report accompanies the Plan. The HRA Screening Report refers to the findings and information contained in the Habitats Regulation Assessment carried out by Mid Sussex District Council for the District Plan, and that the Neighbourhood Plan for all intents and purposes, will rely on the District Plan and its HRA.

It is understood that the District Plan, whilst having been submitted for examination, has yet to be adopted and so the HRA and the resultant policies are not yet agreed. On this basis, it is considered that the Neighbourhood Plan must fully consider the Habitats Regulations in relation to its proposed policies.

In relation to the Ashdown Forest SPA and SAC paragraph 5.4 of the HRA Screening Report states that in combination effects with other Local Plans have been considered as part of the overall development assessed in the HRA of the District Plan. However this is only in regards to recreational pressure on the SPA and does not reference the SAC and nitrogen deposition. It is considered that the likely significant effect of nitrogen deposition, alone and in combination, on Ashdown Forest SAC should be considered in the HRA Screening Report of the Hassocks Neighbourhood Plan Submission Version and this is a significant omission.

Having regard to the above, if the Neighbourhood Plan were adopted prior to the District Plan it would be based on information that has not been tested or adopted. The Neighbourhood Plan will form the development plan for Hassocks and as such needs to have its own HRA in regards to the Ashdown Forest SPA and SAC. Furthermore the District Plan does not identify the Neighbourhood Areas and so it is difficult to identify whether the proposed development contained within the Neighbourhood Plan has been fully considered as part of the District Plan HRA. Notwithstanding this, Wealden District Council has made representations regarding the Mid Sussex District Plan HRA with regards to the likely significant effect of the Plan on the Ashdown Forest SAC, which is attached for information.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
16749	1	Miss Natalie Bumpus	Wealden District Council				
Comments							
This is the attachment.							
<p>The HRA of the District Plan identifies that the housing requirement for the District will be delivered through allocations and Neighbourhood Plans, it further states (paragraph 6.5.1) that “The majority of towns and parishes in the District are committed to preparing their own Neighbourhood Plan, but it is not currently known precisely how many homes could be delivered within 7km zone around the Ashdown Forest over the plan period.” Notwithstanding this the HRA identifies a transport study which tested a number of development scenarios which included strategic sites at Burgess Hill and housing likely to come forward elsewhere which was distributed proportionally according to defined zones (paragraph 5.4.12).</p> <p>Taking into account the affected road, paragraph 5.4.12 states that the AADT traffic flow on the A26 in 2031 is predicted to change by +30 without remedial traffic interventions or by +42 with transport interventions. Traffic flows on the A22 are predicted to fall by 302 and 107 in the scenario with transport interventions. It is concluded in paragraph 5.4.13 that air pollution impacts from road traffic are not considered significant as all projected traffic increases are expected to fall well below 1000 AADT. Section 5.5 of the HRA considers the in combination traffic flow on the A22 with Wealden District Core Strategy, however the in combination assessment does not tackle the impact on the A26. This is of relevance to Wealden District as it would not wish to see any in combination effect prejudicing the delivery of the strategic development areas identified in WCS4 of the adopted Wealden District Core Strategy.</p>							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
17558		Amanda Purdye	Aerodrome Safeguarding	Gatwick Airport Limited			Neutral
Comments							
<p>Our Ref: LGW3261</p> <p>Thank you for your email dated 22 July 2016 regarding the above mentioned consultation. The parish is around 24km South of Gatwick Airport, therefore it is outside of our ‘physical’ 15km safeguarding area. At this distance we would only need to be consulted if there were any wind turbines proposed. We would then request that the airport is notified at the earliest possible opportunity as wind turbines have the potential to impact on radar.</p> <p>Thank you for giving us the opportunity to comment on this document.</p>							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20070		Ms Catherine Tonge	Natural England				

Comments

Thank you for giving Natural England the opportunity to comment on Hassocks' Neighbourhood Plan.

None of the allocations seem likely to impact on designated sites or important habitats so we have little to add to our previous comments on earlier stages of the Plan.

It may be helpful, for non locals, to specifically name the SSSI referred to in the policies (Clayton to Offham Escarpment)

There is currently significant pressure from consultations on land-use proposals and appeals, the completion of local plans, the review of existing plans and work on neighbourhood plans (there are over 500 parishes in Kent and Sussex). This makes it difficult to devote the time that consultations deserve. If there are issues I have not covered, please let me know and I will respond as quickly as possible.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20123	1	Mr S Clayton					Support

Comments

Please treat this email as my comments for the Hassocks Neighbourhood Plan publication stage consultation.

I would like to register my general support for the Hassocks Neighbourhood Plan. It appears to be the best way forward for the community and Hassocks Parish Council are to be commended for their efforts in producing the plan.

Specifically I would like to support the designation of Local Green Space for Friars Oak Fields (land to the north of Shepherds Walk - LGS1). The LGS1 site is indeed a very special place for the community.

There were some objections raised by Sigma Planning in respect of LGS1 which are documented on page 19 of [hassocks_np_replacement_appendix_20_of_consultation_statement.pdf](#). The objections made by Sigma Planning are based on incorrect assertions, and I would like to set the record straight on these.

(1) "The site is not in close proximity to the community it serves and is only accessible by a small part of the community". This is incorrect. The site is immediately adjacent to existing housing in Shepherds Walk and is easily accessible from literally hundreds of houses on the western side of the railway via the stile on Shepherds Walk Green. It really could not be any closer to the community it serves!

(2) "The footpath across the site is not widely used and it crosses the railway". It is incorrect to say that the footpath across the site is not widely used. The footpath is very frequently used by the multitude of local residents who regularly use the fields for informal recreation, dog-walking etc. These people all use the footpath across the site, accessed most usually from the stile on Shepherds Walk Green or the entrance from London Road. The fact that the footpath ultimately leads to the railway crossing at the eastern edge of the site is irrelevant and the vast majority of people using the footpath across the fields will not use the railway crossing. Sigma Planning are basing their statement that the footpath is not widely used on measured statistics of the number of pedestrians who actually cross over the railway tracks via the level crossing. They have not counted the numbers of people using the footpath in the fields.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20130	1	Mrs L Brewer					Support

Comments

Response to Hassocks Neighbourhood Plan Regulation 16 – June 2016

The Neighbourhood Planning Process ensures that the local people get the right types of development for their community. What it did not initially detail was how much work and cost was required to complete this process. The Hassocks Neighbourhood Planning committee should be commended for the amount of time and effort they have all put into producing this document. The Parish Council have invested a considerable amount of funds in this process. This was done to protect the village from the numerous developers who were circling the village wanting to build in all areas. If this were allowed to happen then the village would have increased by nearly 20%. The schools and health facilities are at bursting point.

The Neighbourhood Plan process went through the usual consultations with local people being given the opportunity at each stage to express their opinion. Many people put forward suggestions and comments.

The Parish profile is correct. It is very close to Burgess Hill on the Northern edge and there needs to be a way to protect the village from merging into the larger conglomeration of Burgess Hill.

The Herring Stream is an important chalk stream and would be in danger of being destroyed by any development nearby. It floods and puts housing at risk through the village and beyond.

Bus transport into the village is almost non-existent with most services running North, South between Haywards Heath and Brighton, missing the village altogether. There is a regular but currently erratic service to London and Brighton. I understand the ticket office is under threat of closure. Hassocks station is often skipped if the service is running late.

Stone Crossroads is a great concern for those who live nearby or who travel through it. There is little that can be done to redirect the traffic as there are few alternatives in the area. Much is said about the pollution levels but my concern is that although the levels are given as an average, there must be many times when the pollution levels are much higher than the recommended minimum, probably when children are walking to school in the mornings.

I totally agree with the Vision and Objectives of the plan. Protecting the gaps and creating Local Green Spaces will prevent the village from being joined to other villages or the town.

Community infrastructure is vitally important. I live in an area of Hassocks where the children could not get into the local school because they were too far away! The school requirements were underestimated when Clayton Mills development was built five years ago and those who live further out have been penalised. This was in some way alleviated by increasing the school last year but I understand that that school has been required to add a further intake class this September. The doctors' surgery has not been enlarged.

The housing need and development areas have been through the consultation processes and it was very clear where the locals were for or against development. These views were taken into account in the Neighbourhood Plan.

A 20mph speed limit through the village would be a good idea.

Thanks to all who have given their time and energy to seeing this plan through. I support the plan wholeheartedly.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20271		Ms Zoe Hughes	Sport England				Neutral

Comments

Thank you for consulting Sport England on the above Neighbourhood Consultation.

Planning Policy in the National Planning Policy Framework identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.

It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, 'A Sporting Future for the Playing Fields of England – Planning Policy Statement'.
<http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/>

Sport England provides guidance on developing policy for sport and further information can be found following the link below:
<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>

Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations.
<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/>

If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes.
<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

If you need any further advice please do not hesitate to contact Sport England using the contact details below.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20272		Mr John Fleming	Gladman Developments				

Comments

4.1 Context

4.1.1 These representations are made in response to the current consultation on the submission version of the HNP under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. This section highlights the key points that Gladman would like to raise with regard to the content of the neighbourhood plan as currently proposed.

4.2 Neighbourhood Plan Policies

Policy 1: Hassock-Burgess Hill Gap and Policy 2: Ditchling Gap and Hurstpierpoint Gap

4.2.1 These policies seek to implement a number of strategic gaps on the basis of the contents contained in the adopted Development Plan. It is important to note that the adopted Development Plan was prepared in accordance with a previous era in national planning policy. The Framework does not seek to prevent growth adjacent to existing settlements on greenfield sites where they would not lead to the coalescence of settlements. It is considered that the continuation of the policy is a strategic matter, notwithstanding the fact that the emerging Local Plan suggests that local gaps can be identified by neighbourhood plans, this has yet to be endorsed by the Inspector at EIP.

4.2.2 Gladman submit that new development can often be delivered on the edge of settlements without leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character. In such circumstances, we question whether the purpose of the proposed gap designations, particularly if this would prevent the delivery of otherwise sustainable and deliverable housing sites from coming forward as it appears to do so, in a manner that is strictly prohibited by the PPG which states 'all settlements can play a role in delivering sustainable development in rural areas and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence'

4.2.3 In addition, the requirements of both policies appear to be more onerous than that established through the emerging Local Plan which allows for some degree of flexibility. Further, in line with the above guidance contained in the PPG emerging Policy DP11 makes clear that these can only be identified where there is robust evidence that development within the Gap would individually or cumulatively result in coalescence and the loss of separate identity and amenity of nearby settlements. This evidence must demonstrate that existing local and national policies cannot provide the necessary protection. No evidence has been produced to demonstrate that this requirement has been met.

Policy 3: Local Green Spaces

4.2.4 This policy seeks to designate a total of 7 sites as Local Green Space (LGS). Paragraph 76 of the Framework sets out the role of local communities seeking to designate land as LGS and makes clear that this designation should be consistent with the local planning of sustainable development in the wider area. It states that:

"Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.

4.2.5 Further guidance is provided at paragraph 77, which sets out three tests which must be met for the designation of LGS. It states that:

"The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- ☐ where the green space is in reasonably close proximity to the community it serves;
- ☐ where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

Where the green area concerned is local in character and is not an extensive tract of land"

4.2.6 Taking the requirements of the Framework and PPG into account, it is essential that when allocating LGS that plan makers can clearly demonstrate that the requirements for its allocation are met in full, and that they are capable of enduring over the plan period and beyond.

4.2.7 Whilst the aspirations of the proposed LGS are noted, Gladman does not consider that some of the proposed LGS are able to meet all of the three tests listed above. Despite the evidence base relating to the proposed LGS, Gladman is concerned that in some instances the evidence fails to demonstrate why the green area is 'demonstrably special' to the local community in a sufficient manner. Further, many of these areas cover what could be considered as extensive tracts of land contrary to the advice and guidance issued by the Secretary of State. The issue regarding what constitutes an extensive tract of land has been previously explored in numerous Neighbourhood Plan Examinations for both emerging and made Neighbourhood Plans, the following Examiner's Reports are of particular importance:

The Examiners's Report to the Sedlescombe Neighbourhood Plan recommended the deletion of LGS measuring approximately 4.5ha as this constituted an extensive tract of land.

The Examiners's Report to the Oakley and Deaner Neighbourhood Plan recommended the deletion of LGS measuring approximately 5ha and also found it to be not local in character.

The Examiners's Report to the Alrewas Neighbourhood Plan identified that both sites proposed for LGS designation 'in relating to the overall size of Alrewas village' composed of extensive tracts of land measuring approximately 2.4ha and 3.7ha.

The Examiners's Report to the Brixworth Neighbourhood Plan recommended the deletion of three proposed LGS due to the lack of evidence supporting their designation. In doing so, the Examiner recommended the deletion of 1 LGS measuring approximately 2.7ha.

4.2.8 In light of the decisions above, Gladman recommend that the Parish Council reconsider the proposed designations and supporting evidence base to ensure that the proposed designations meet all the three tests required by the Framework prior to submitting the Plan for Examination. Failure to do so may result in the proposed designations being found contrary to basic conditions (a) and (d).

Policy 13: Housing Allocations

4.2.9 Whilst Gladman welcome the Parish Council's decision land to contribute towards the delivery of local and district wide housing need, we are concerned that the restrictive approach taken by alternative policies may restrict the ability of future sustainable development proposals coming forward should this need be identified.

4.2.10 At present, the HNP is progressing at a point in time where the housing needs for the district are currently uncertain. Whilst the Parish Council has undertaken its own evidence on housing needs this does not constitute a Framework and PPG compliant assessment of housing needs. Accordingly, the HNP should have included a commitment through the allocation of housing reserve sites due to the significant uncertainty whether MSDP will meet the district s housing needs in full.

4.2.11 Further, Gladman does not support the use of wording up to as this does not allow for any flexibility and unnecessarily places a cap on those sites that have been allocated.

Policy 17: Windfall Development

4.2.12 This policy states that applications for residential development on unidentified sites within the defined built up area will be considered on their merits against the policies of the adopted Development Plan Documents.

4.2.13 Gladman submit that this policy acts to unnecessarily precludes the delivery of windfall sites beyond the existing built up area. The use of a tightly drawn settlement boundary will likely act to contain the physical growth of the settlement at a point in time when the housing needs for the district are uncertain. Furthermore, this policy does not allow the decision maker to apply this policy consistently and with ease in accordance with the requirements of national policy given that it only relates to windfall proposals coming forward within the settlement boundary, it does not provide any clarity over how windfall proposals beyond this artificial limit will be considered.

4.2.14 Policy 17 is inconsistent with basic conditions (a) and (d).

5 Conclusions

5.1 Assessment against the basic conditions

5.1.1 Gladman recognise the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national policy and the strategic requirements for the wider local authority area.

5.1.2 Through this consultation response, Gladman have sought to clarify the relationship of the HNP as currently proposed with the requirements of national planning policy and the wider development needs and strategic policies in the adopted development plan and the direction the Council is seeking to take through its emerging Local Plan. Whilst the HNP is being brought forward ahead of an up-to-date Framework and PPG compliant Local Plan, it has not sought to include any contingency measures as advised by the PPG.

5.1.3 Gladman is concerned that the use of a tightly drawn settlement boundary and the proposed local gaps will likely act to prevent the delivery of sustainable growth opportunities from coming forward contrary to the national policy imperative which seeks to boost significantly the supply of housing.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20319	1	Mr A Ross	Nexus	Gleeson Developments Ltd			

Comments

Aims and Policies

1.1 The HNP identifies a series of Aims, Objectives and Policies. Paragraph 1.22 of the HNP notes that the items identified as Aims are outside the remit of the HNP and are not policies but instead record 'local aspirations'. However, the Objectives and particularly the Aims are presented in the HNP in the same format as Policies. This will ultimately be confusing for consultees and decision-makers as it is of course only development plan policies that carry development plan weight.

Suggested Change

1.2 Accordingly, we suggest re-formatting throughout the NP so that policies are shown, as they are, in boxes, with Aims shown differently to make a clear distinction between policy and aspiration.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20319	2	Mr A Ross	Nexus	Gleeson Developments Ltd			

Comments

Basic Conditions Statement

1.1 As is required by Regulation 15 of Neighbourhood Planning (General) Regulations 2012, the Parish Council has produced and submitted a statement explaining how the proposed neighbourhood development plan (the HNP) meets the requirements of paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. In doing so the Parish Council has accorded with the statutory requirement i.e. to submit a Basic Conditions Statement. It is important however, to say that this Basic Conditions Statement June 2016 ("BCS") demonstrates that the HNP has actually met the basic conditions – it is simply the Parish Council's case that it has.

1.2 For reasons set out elsewhere in our representations, it is demonstrably the case that key elements of the HNP, most notably the identification of housing need, the allocation of sites for housing and Local Green Space, and the allocation of the Hassocks / Hurstpierpoint Gap, do not meet the basic conditions. The specifics for each issues are set out in detail elsewhere in our representations. This section of our representations identifies some specific issues from the Basic Conditions Statement itself, which highlight / confirm the issues we have identified elsewhere.

Regard to National Planning Policy

1.3 Section 5 of the BCS addresses each chapter of the HNP in turn and summarises, in the Parish Council's view, why it is appropriate to make the HNP having regard to national policies and advice.

1.4 In focussing upon 'Chapter 6: Delivering a wide choice of high quality homes', the BSC identifies at paragraph 5.20 the requirement of the NPPF to boost significantly the supply of homes, and for housing applications to be considered in the context of the presumption in favour of sustainable development. Paragraph 5.21 then summarises, in the Parish Council's view, the other key elements of housing policy from the NPPF.

1.5 Fundamentally, however, the Parish Council's summary fails to include any reference to the most fundamental element of the NPPF in relation to housing delivery – the requirement of paragraph 47 to use their evidence base to ensure that Local Plans meet the full, objectively assessed needs for market and affordable housing in the housing market area i.e. a focus on the delivery of more houses. This is re-enforced by the requirement of paragraph 16 of the NPPF (bullets one and two) which are clear that neighbourhood plans should support the strategic development needs of Local Plans, and plan positively to support local development.

1.6 The Parish Council's fundamental omission at paragraph 5.21 is telling because, as is set out at paragraph 5.22, HNP Strategic Objective 3 in relation to housing is to provide "...the opportunity for appropriately sized, affordable and sustainable housing". As can be seen, and as referenced elsewhere in our representations, this Objective focuses on the type and tenure of housing proposed, with no reference at all to the delivery of a number of new homes which would meet needs in Hassocks and, importantly, making an appropriate contribution to the housing needs of Mid Sussex District having regard to the sustainability of Hassocks and its position in the settlement hierarchy (it sits below only the main towns of Haywards Heath, Burgess Hill and East Grinstead). This is a flaw that has permeated the Parish Council's entire approach to the identification and provision of housing in the HNP.

1.7 Furthermore, as referenced elsewhere in our representations, the Parish Council's evidence base in terms of identifying housing need has wholly ignored the guidance as set out at paragraph 47 of the NPPF and ID2a-001 of the PPG in terms of ensuring that housing provision meets the full objectively assessed needs for both market and affordable homes.

Contributing to the Achievement of Sustainable Development

1.8 As referenced previously in these representations, the Parish Council is proposing the designation of LGS2 in the absence of any robust evidence and in a manner which is contrary to the fundamental and clear requirements of paragraphs 76 and 77 of the NPPF. This in itself is a fundamental and fatal flaw.

1.9 However, the proposed designation of LGS2, in the absence of any robust evidence, also prejudices the achievement of sustainable development which is, as set out at paragraph 6 of the NPPF, the '...purpose of the planning system.'

1.10 As set out on page 2 of the NPPF, Resolution 42.187 of the United Nations General Assembly defined sustainable development as; "...meeting the needs of the present without compromising the ability of future generations to meet their own needs."

1.11 The making of a LGS designation, in accordance with paragraph 77 of the NPPF, rules out new development other than in very special circumstances. As such, it can be seen that it applies a restriction equivalent to Green Belt. The making of such a restrictive and long term designation, in the absence of robust evidence, would prejudice the ability of future generations to meet their own housing needs and as a consequence, prejudice the ability to achieve sustainable development. As such the HNP fails this basic condition test.

General Conformity with the Strategic Policies of the Development Plan

1.12 The BSC identifies at Section 7 the need for the HNP to be in general conformity with the development plan. It first considers the conformity of its policies with the adopted Mid Sussex Local Plan 2004 but, at paragraph 7.5, recognises that MSDC is producing a District Plan for the period to 2031 (the same period as the HNP). As such, the BSC also considers the conformity of its policies against those of the emerging District Plan.

1.13 We note specifically that on page 16 of the BSC it identifies Policy C3 of the Local Plan (Local Gaps) and cross-references Policy 2 of the HNP which allocates, inter alia, the Hassocks – Hurstpierpoint Gap. However, as set out in our representation to HNP Policy 2, Policy C3 of the Local Plan is acknowledged by MSDC (and a series of appeal Inspectors) to be out of date, as it was defined based upon housing requirements as they were in 2004 and before publication of the NPPF. MSDC proposes to replace this policy with Policy DP11 of the emerging District Plan which no longer identifies a Local Gap in this location, and instead establishes a more general policy presumption against coalescence albeit allowing, where robust evidence can be presented, the allocation of Local Gaps in neighbourhood plans where it can be demonstrated that existing local and national policies do not provide the necessary protection. The BSC identifies Policy DP11 of the emerging District Plan on page 33 and in response, again simply cross-references four separate policies, including Policy 2 (Hassocks – Hurstpierpoint Gap).

1.14 As set out in our representations to Policy 2, the BSC demonstrates and evidences the Parish Council's failure to address the issue of the Gap in conformity with the up to date policies of the development plan. The BSC confirms again that the Parish Council has simply rolled forward the Local Gap designation from the Local Plan 2004, and has not provided any evidence to justify the need for this designation moving forward (contrary to the express requirement in Policy DP11 of the emerging District Plan), or reviewed the extent of the land included within this designation to determine whether it should all be covered by a Gap designation.

1.15 Given that Policy C3 of the Local Plan 2004 is out of date, and that the policies of the emerging District Plan are the only policies produced cognisant of (and theoretically consistent with) the policies as expressed in the NPPF and NPPG, it is evident that compliance with Policy DP11 of the emerging District Plan is key in this regard. This requires robust evidence of the need for a Gap. No such evidence has been produced and the BSC confirms that, contrary to Policy DP11, the Parish Council has simply rolled forward the Local Gap designation from the 2004 Local Plan.

Compliance / Compatibility with EU Obligations

1.16 To accord with the basic conditions the Parish Council must demonstrate that the making of the HNP would not breach, and is compatible with, EU obligations. The primary consideration in this regard, as accepted by the Parish Council's 'Basic Conditions Statement' June 2016, are the provisions in relation to Strategic Environmental Assessment as set out in the Strategic Environmental Assessment Directive (Directive 2001/42/EC ("the SEA Directive")). Article 5 of the SEA Directive requires, amongst other things, that an environmental report is prepared in which the likely significant effects of implementing the plan or programme, and reasonable alternatives, are identified, described and evaluated as clarified by Annex 1 of the Directive. Annex 1 provides, inter alia, that the environmental report shall include an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken.

1.17 Regulation 8(2) and 3(a) provide that a plan cannot be adopted without taking account of the environmental report for the plan.

1.18 As was held in the case of *Save Historic Newmarket Ltd v Forest Heath DC* [2011], to comply with the SEA Directive, the environmental report must ensure that it is possible for the consultees to know from it what were the reasons for rejecting any alternatives.

1.19 In the case of the HNP, the environmental report required by the SEA Directive is the Sustainability Appraisal. However, the publication of a document entitled 'Sustainability Appraisal', which claims to incorporate the SEA requirements, does not of itself demonstrate compliance. The content of that Sustainability Appraisal must of course accord with the relevant provisions of the EU Directive.

1.20 There are a series of fundamental flaws in the Sustainability Appraisal which means that it is not compliant with the SEA Directive:

i. in considering the merits of potential residential sites at Hassocks, the Sustainability Appraisal (Appendix 2) assesses each potential site against a series of identified SA Objectives, and provides a limited amount of text for each purporting to summarise the positive and negatives associated with it. However, there is no information to explain why the sites identified in Policy 13 of the HNP have been allocated and the reasonable alternatives, which include Site 2, discounted. This is of itself, as was the case in *Save*

Historic Newmarket, a failure to comply with the requirements of the SEA Directive; and
 ii. the Sustainability Appraisal contains, as set out earlier in our representations, material errors of fact which have gone to the heart of the site allocation process in the HNP; and
 iii. as set out elsewhere in our representations, and set out in detail in the submitted legal Opinion, the actions of both the Parish Council and its advisors give rise to an appearance of apparent bias.

1.21 For these reasons it is evident that the Sustainability Appraisal does not comply with the requirements of the SEA Directive. On that basis, the HNP does not accord with the basic conditions.

Basic Conditions / Changes Sought

1.22 The BSC confirms that key elements of the HNP do not meet the basic conditions.

1.23 Most notably, the Parish Council's failure to recognise the NPPF requirement to focus on delivering the right number of homes has filtered through to the Strategic Objectives of the HNP (Strategic Objective 3 makes no reference to delivering the right number of homes) and has in turn filtered through to the Parish Council's flawed approach to housing in the HNP.

1.24 In addition, the BSC confirms again that the Parish Council has seen the identification of a Gap between Hassocks and Hurstpierpoint as the mere rolling forward of the Local Gap identified in this location by Policy C3 of the Local Plan 2004. However, this policy is demonstrably out of date and the more recent (and NPPF compliant) Policy DP11 of the emerging District Plan, does not allocate Local Gaps and requires the Parish Council to produce robust evidence to justify any Gap designation. No such evidence is provided.

1.25 Accordingly, the BSC confirms that the HNP fails to meet the basic conditions test in that it is demonstrably the case that the HNP is not in general conformity with the strategic policies of the development plan and that it is not appropriate, having regard to national policy, to make the HNP.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20319	3	Mr A Ross	Nexus	Gleeson Developments Ltd		2	

Comments

HNP Chapter 1: Introduction (Paragraph 1.11)

1.1 Paragraph 1.11 identifies that the emerging Mid Sussex District Plan identifies a need for 1,730 homes to be allocated through neighbourhood plans in the District. However, it should be noted that the housing requirement in the emerging District Plan is subject to significant unresolved objection, on the basis that it is not a robust and accurate reflection of objectively assessed needs and too low and does not make an appropriate contribution to accommodating the unmet needs from other more constrained districts in the Housing Market Area, most notably Crawley and Brighton & Hove.

1.2 Against this background, and given that the HNP is progressing in advance of the District Plan, the housing requirement identified in the HNP, even when robustly identified (which it is not as set out in our representations to Policy 13) must not be expressed as a cap as to do so is contrary to, inter alia, paragraph 14 of the NPPF and the presumption in favour of sustainable development.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20319	4	Mr A Ross	Nexus	Gleeson Developments Ltd		12	

Comments

HNP Chapter 4: Environment and Heritage (Paragraph 4.4)

1.1 It is correct to note that the emerging District Plan (Policy DP11) allow for Gaps to be identified through neighbourhood plans as a matter of principle. However, this support is provisional, and Policy 11 of the emerging District Plan specifically and deliberately states that such Gaps can only be identified if there is robust evidence that such an additional designation is needed.

1.1 For the purposes of accuracy, it is important that paragraph 4.4 of the HNP is amended to accurately reflect the provisions of Policy DP11 of the emerging District Plan which does not provide carte blanche for the allocation of Gaps in neighbourhood plans and does in fact set a high bar in terms of evidence requirements to justify any such designations.

Changes Sought

1.2 Amend paragraph 4.4 to more accurately reflect the provisions on Policy DP11 of the emerging District Plan.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20319	5	Mr A Ross	Nexus	Gleeson Developments Ltd		42	

Comments

HNP Chapter 9: Implementation and Delivery (Paragraph 9.2)

1.1 Paragraph 9.12 states that 'The Hassocks Neighbourhood Plan will provide a long term planning framework for the Parish.' This is correct insofar as it goes but for accuracy and to avoid confusion in years to come, it should be amended to acknowledge the fact that once / if the HNP is made, it is then the Mid Sussex District Plan and the HNP that are the development plan and together provide the long term planning framework for the Parish.

Change Sought

1.2 Amend paragraph 9.1 to acknowledge that it is the Mid Sussex District Plan (once adopted) and the HNP (once made) that would be the development plan and which would, together, establish the planning framework for the Parish.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20319	6	Mr A Ross	Nexus	Gleeson Developments Ltd	2	14	

Comments

1.1 The HNP identifies a Gap between Hassocks and Hurstpierpoint, as shown on the Proposals Map and referenced in Policy 2. Cross-reference to the Local Gap as allocated in the MSDC Local Plan 2004 shows that the extent of the Gap proposed in the HNP is the same as that in the adopted (but out of date) Local Plan.

1.2 We take no issue with the potential identification of a Gap in this location but there are two fundamental failings in the Parish Council's process in this regard:

- i. there is a total lack of evidence to justify the need for the Gap allocation, contrary to the requirement of Policy DP11 of the emerging District Plan; and
- ii. there is a total lack of evidence to justify the extent of the land identified within the Gap, which should not include any more land than is required to fulfil its function.

1.3 We address each matter in turn below.

Need for a Gap Designation

1.4 A Local Gap between Hassocks and Hurstpierpoint is allocated by Policy C3 of the MSDC Local Plan adopted in 2004 (although there is no available evidence to confirm that any assessment of the land required to fulfil a Local Gap function took place and instead it appears that it was simply a case of identifying all of the land between the settlements of Hassocks and Hurstpierpoint). MSDC accepts, however, and it has been accepted by Inspectors at a multitude of appeals, that Policy C3 is out of date. As such it is not appropriate for the HNP to simply roll this Local Gap, which was identified having regard to development requirements as they were in 2004 (rather than as they are in 2016), forward.

1.5 With this in mind the emerging MSDC District Plan does not propose to allocate Local Gaps at all. Instead, Policy DP11 seeks generally to prevent development that would result in the coalescence of settlements. Whilst it does facilitate the allocation of Gaps in neighbourhood plans, it does so only where:

"..there is robust evidence that development within the Gap would individually or cumulatively result in coalescence and the loss of separate identity and amenity of nearby settlements. Evidence must demonstrate that existing local and national policies cannot provide the necessary protection" (emphasis added).

1.6 Given that the HNP cannot rely on Policy C3 of the adopted Local Plan, as it is demonstrably out of date it should, as the Parish Council accepts, have regard to the emerging District Plan. Accordingly, to justify the allocation of the Gap between Hassocks and Hurstpierpoint the Parish Council must carry out two key pieces of work;

- i. consider whether a Local Gap is required at all given the provisions of Policy DP11 of the emerging District Plan which only allows development where it can be demonstrated that it would not result in coalescence of settlements and would not have an unacceptably urbanising effect on land between settlements; and
- ii. if a need is identified, examine what the boundaries of a Local Gap should be by identifying the extent of the areas of loss that would result in coalescence and the loss of the separate identity and amenity of settlements.

1.7 The Parish Council has not produced any evidence, let alone robust evidence, to justify either the need for, or the extent of, a Local Gap in this location.

1.8 As referenced in our representation to Policy 13, Mr Mayhew ultimately accepted at the recent Public Inquiry, at which proposals for residential development on Site 2 were heard, that this was correct. As set out elsewhere in our representations there is clear evidence, supported by MSDC, that development can be accommodated on Site 2 (Land at The Ham) without compromising the function of the Local Gap.

1.9 The Hassocks Parish Landscape Character Assessment identifies this land as being within character area F (Ham Fields Greensand ridge). However, this simply recognises that '..the area forms part of the local countryside gap between Hassocks and Hurstpierpoint', and that "The area is part of the local gap between Hassocks and Hurstpierpoint." The Character Assessment provides no review of the necessity for a Gap in this location and it is evident that the Parish Council has simply taken the Local Gap as identified in the out of date Local Plan 2004 as an absolute constraint – a definitive position that did not require justification.

1.10 This approach is fundamentally flawed and is contrary to Policy DP11 of the emerging District Plan.

Extent of the Gap Designation

1.11 In addition to failing to provide any, let alone robust, evidence of the need for a Gap in this location, the Parish Council has similarly failed to provide any evidence to justify the extent of the proposed Gap in this location.

1.12 As with all proposed allocations, particularly those which seek to restrain development, it is important to ensure that the allocation only includes as much land as is

necessary to fulfil its function. As such the Parish Council must produce evidence not only to justify the need for a Gap in principle, but also robust evidence which justifies the extent of the land proposed within the Gap as identified in Policy 2 and illustrated on the Proposals Map. However, there is no such evidence.

1.13 As referenced previously, the Hassocks Parish Landscape Character Assessment identifies this land as being within character area F (Ham Fields Greensand ridge). However, this simply recognises that ‘..the area forms part of the local countryside gap between Hassocks and Hurstpierpoint’, and that “The area is part of the local gap between Hassocks and Hurstpierpoint.” The document provides no review of the extent of the Gap required in this location and it is evident that the Parish Council has taken the Local Gap as identified in the out of date Local Plan 2004 as a fix – a definitive position that did not require justification.

1.14 Even on the assumption that a Gap is justified in principle, it is evident that the Local Gap as identified in the Local Plan 2004 (now replicated in the HNP) does include more land than is necessary to fulfil its function as MSDC had no objection to the application for the development of Site 2 (Land at the Ham) on Gap grounds (or any other grounds), confirming that the development of this site would not be materially detrimental to the ability of land between Hassocks and Hurstpierpoint to ensure that it provided adequate separation (Appendix 1).

1.15 Furthermore, detailed evidence produced by fabric on behalf of the promoters of Site 2 demonstrates clearly that not all of the land between Hassocks and Hurstpierpoint in this location is required in order to fulfil its function in terms of retaining the separate identity of the two settlements. As demonstrated clearly on Figures 4 – 7 produced by Fabrik and considered at the recently re-convened Public Inquiry (Appendix 2), the eastern and western part of the Gap are influence by western edge of Hassocks and the eastern edge of Hurstpierpoint respectively. The land parcels which remain uninfluenced by the developed edges of Hassocks and Hurstpierpoint and, as a consequence, the key area of the Local Gap in terms of fulfilling its function, are limited to those located centrally within the Local Gap as defined in the Mid Sussex Local Plan 2004.

1.16 As such it is evident that had the Parish Council carried out, as it should have, a review not only of the need for a Gap but also, in the event that a Gap was required, the extent of land required to fulfil this Gap function, it would have been evident that Site 2 can accommodate development without undermining the purposes of the Gap.

Basic Conditions / Change Sought

1.17 In the absence of evidence to justify the need for, or extent of, the Gap proposed between Hassocks and Hurstpierpoint, the HNP is not in general conformity with the strategic policies of the development plan and it is clearly not appropriate, having regard to national policy which seeks to ensure that multiple layers of policy are not provided unnecessarily, to make the HNP.

1.18 The Gap designation must be deleted, although the land would of course be protected in any event by existing countryside policies of restraint and the provisions of Policy DP11 of the emerging District Plan which seeks to ensure that coalescence is prevented.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20319	7	Mr A Ross	Nexus	Gleeson Developments Ltd			

Comments

1.1 On behalf of Gleeson Developments Limited, we object to the Hassocks Neighbourhood Plan (HNP) which fails the basic conditions as set out at paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. The HNP should not be made as:

- i. it fails, in numerous ways, to have regard to national planning policy;
- ii. it does not contribute to the achievement of sustainable development;
- iii. it is not in general conformity with the strategic policies of the development plan; and
- iv. it is not compliant with EU obligations, specifically the Strategic Environmental Assessment Directive 2001/42/EC

1.2 In addition, but also of fundamental importance, the HNP is infected with the appearance of bias and conflict of interest both in terms of the decision-makers (Hassocks Parish Council) and its professional advisors (Dowsett Mayhew).

1.3 As a consequence, the Parish Council needs to cease progress on the HNP and start the process again founded on fresh evidence produced by genuinely independent expert advice not infected with conflict of interest and considered by the Parish Council to be similarly free from bias. Without such action the HNP, if made, is liable to legal challenge in the High Court.

1.4 Given the fundamental issues raised, if the HNP is to progress to an Examination at all, it is essential that it is considered at an Examination in Public rather than simply by written representations.

1.5 More specifically, our objections can be summarised as follows:

Housing Issues

- ☒ Assessing housing need – the process by which the Parish Council has identified housing need for the purposes of the HNP is wholly arbitrary, is not based on robust or credible evidence, ignores the need for affordable housing and does not accord with national policy guidance as set out in the NPPG;
- ☒ The approach to housing – the housing requirement identified in the HNP is presented as a cap on development, which is contrary to the requirements of paragraphs 14 and 184 of the NPPF given that the HNP is running ahead of the District Plan and, therefore, ahead of a tested and endorsed District-wide housing requirement;
- ☒ The identification of constraints – the Parish Council’s identification of constraints at Hassocks is flawed, which has in turn undermined the credibility of its assessment process;
- ☒ The making of housing allocations – the allocation of specific sites is undermined by fundamental flaws in the Parish Housing Land Availability Assessment and Sustainability Appraisal. It is clear also that the allocation of sites was more of a popularity contest than a robust assessment of the genuine merits of the sites.

Hassocks – Hurstpierpoint Gap

- ☒ There is a total lack of any evidence to justify the need for, or extent of, the Hassocks – Hurstierpoint Gap as identified in the HNP, contrary to the requirement of Policy DP11 of the emerging District Plan.

Local Green Space

- ☒ There is no evidence to demonstrate that LGS (Land at the Ham) meets the requirements for a Local Green Space allocation having regard to paragraphs 76 and 77 of the NPPF, and it is clearly being used as a tool to obstruct housing delivery on a site considered to be suitable by both the promoters and Mid Sussex District Council

Sustainability Appraisal

- ☒ The Sustainability Appraisal that supports / informs the HNP is legally flawed in failing to identify why reasonable alternatives were discounted, SA Objective 7 does not accord with the requirements of the NPPF and there are a plethora of errors in the SA which mean that the scoring in the SA is so flawed that it cannot be considered to be a reasonable and robust assessment of the merits of the available options.

Appearance of Bias / Conflict of Interest

- ☒ Mr Credland’s role as Chairman of the Neighbourhood Plan Working Group (NPWG), Chairman of Save Ham Fields (the group established to oppose development at Site 2) and as a member of the Parish Council who voted on the HNP, gives rise to the appearance of bias on acknowledged prejudicial interests such that to make the HNP would be

unlawful. Secondly, that Mr Mayhew, as a professional town planner, in opposing the development of Site 2 and ostensibly providing “objective” assessments of development locations and related policies, also gives rise to the appearance of bias such that none of his advice / documents can safely be relied upon by the Parish Council, the District Council, the public or an Examiner

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20319	8	Mr A Ross	Nexus	Gleeson Developments Ltd	3	15	

Comments

HNP Policy 3: Local Green Space

Introduction

1.1 The HNP proposes to allocate LGS2 (Land at the Ham) as a Local Green Space (“LGS”). It has produced two evidence base documents which purport to justify this allocation (amongst others):

- i. the paper entitled ‘Proposed Local Green Spaces (LGS) and Enhanced Footpaths (EP) published in July 2015 to support informal consultation; and
- ii. the paper entitled ‘Proposed Local Green Space Sites’ published in 2016 to support the Regulation 16 NP consultation.

1.2 The latter is the most recent and more detailed document and actually incorporates the first document as Part 1 (albeit updated to address points of accuracy raised by land owners), with Part 2 comprising a response to the objections raised as part of the earlier public consultation. Accordingly, the 2016 document is the most recent and comprehensive document and, therefore, provides the Parish Council’s up to date evidence base in this regard.

1.3 The Parish Council’s case for the allocation of LGS2 is set out on pages 6 and 7 of the LGS Paper 2016, although it is important to note that the Parish Council’s decision to allocate LGS2 was made based upon the original July 2015 evidence base document. There is no clear evidence in either the 2015 or 2016 documents to confirm the rationale for the identification of the two fields that comprise LGS2 as they are no different to any other fields around Hassocks.

1.4 The 2016 document identifies the site and then purports to address how it meets the criteria for designation as a LGS (as set out at paragraph 77 of the NPPF). Before considering more substantive issues, we note that the statement on page 6 that LGS2 “..partially adjoins Belmont Recreation Ground” is factually incorrect. This statement relates to Site 2 as promoted for residential development by Gleeson Developments Ltd. but it can be seen from the plan on page 4 of the LGS Paper 2016 that the LGS2 site does not adjoin the recreation ground. As such, either the LGS map, or the assessment text, is incorrect.

1.5 The LGS Paper 2016 identifies that the Parish Council considers that LGS2 is:

- i. in reasonable proximity to the local community;
- ii. is not an extensive tract of land;
- iii. that there are views across the area from the public footpath and adjoining houses on London Road;
- iv. that the area has ‘rich archaeological potential’;
- v. that there is wildlife value in the hedgerows, grazing land and mature trees; and
- vi. the area is used by local people for informal recreation and is highly valued for its rural character and tranquillity.

1.6 However, no evidence is provided to justify these statements.

1.7 Part 2 of the LGS Paper 2016 then identifies the comments made by landowners / promoters at Regulation 14 stage, and provides the response of the Parish Council Neighbourhood Plan Working Group (“NPWG”). With regard to LGS2 the objections made on behalf of Gleeson Developments Ltd, and the responses of the NPWG, are summarised on pages 19 to 21.

1.8 We fundamentally object to the allocation of LGS2 (Land at the Ham). The proposed designation is fundamentally flawed for the following reasons:

- i. the LGS Paper 2016 provides no evidence that the site is demonstrably special to the community in any way, contrary to the requirements of paragraph 77 of the NPPF; and

ii. there is no evidence that the site holds particular local significance for any of the reasons identified by paragraph 77 of the NPPF.

1.9 On this basis the allocation of LGS2 fails the basic conditions test identified at paragraph 8(2) (a) of Schedule 4B of the Town and Country Planning Act (as amended) in that it is clearly not appropriate, having regard to national policies and advice, to make this allocation and it must, therefore, be deleted.

Policy Background

1.10 NPPF paragraph 76 allows neighbourhood plans to identify, for special protection, green areas of ‘particular importance to them’ as a Local Green Space (“LGS”). The paragraph is clear that such an allocation will rule out new development other than in ‘very special circumstances’. Accordingly, it can be noted that an LGS designation affords a level of protection similar to the Green Belt. Given the significant implications of a LGS designation, NPPF paragraph 76 is clear that such designations must be consistent with the local planning of sustainable development and ‘complement’ investment in, inter alia, sufficient homes. As such, it can also be noted that a LGS designation should complement and not hinder the sustainable delivery of sufficient homes in an area.

1.11 Given the level of protection afforded by a LGS allocation, NPPF para 77 is clear that such designations ‘will not be appropriate for most green areas of open space’. Accordingly, paragraph 77 adds that such a designation should only be used:

- i. where the green space is in reasonably close proximity to the community it serves;
- ii. where the green space is demonstrably special to a local community and (emphasis added) holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife; and
- iii. where the green land concerned is local in character and is not an extensive tract of land.

1.12 National Planning Policy Guidance (“NPPG”) adds a little more detail to paragraphs 76 and 77 of the NPPF in terms of the practical application of this policy. The NPPG (ID 37-007) states that LGS designations must be consistent with local planning for sustainable development in the area and that, in particular, plans will need to identify sufficient land in suitable locations to meet identified housing needs and that a LGS designation “..should not be used in a way that undermines the aim of plan making.” The NPPG (ID 37-14) notably adds that a LGS designation;

“..should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name”.

1.13 Given the significant implications of a LGS designation the NPPF / NPPG require that, and it is consistent with the approach adopted in other neighbourhood plan Examinations, significant focus is given to the Parish Council’s case to justify the LGS designation, cognisant of national guidance that a LGS designation will not be appropriate for most areas of green space.

NPPF paragraph 77 bullet 1: Is the green space in ‘reasonably close proximity to the community it serves’?

1.14 In relation to LGS2, the LGS Paper 2016 states simply on page 6 that the site has ‘reasonable proximity to a local community’ on the basis that it is adjacent to properties on London Road, partially adjoins Belmont Recreation Ground (which it does not as referenced previously) and is overlooked by properties to the south. Even without the error, this is simply a description of the site’s location as opposed to compliance with the requirement. This part of the NPPF paragraph 77 test requires the Parish Council to do three things:

- i. to firstly identify where the ‘community’ is;
- ii. to identify the evidence that demonstrates that the proposed LGS ‘serves’ this community; and
- iii. to then demonstrate that the proposed LGS is in close proximity to this community.

1.15 Simply stating that the site is close to some existing houses, and overlooked by some others, as the Parish Council has done, is not sufficient to satisfy this test. This is a fundamental failing as if the Parish Council is unable to identify clearly the community in question, and evidence that the LGS serves this community, it is consequently unable to demonstrate that it is in reasonable proximity to it. On that basis, the proposed designation must fall at the first hurdle as all of the NPPF paragraph 77 criteria must be met in order for such a designation to be justified. It is also important to note that an LGS designation must be based upon the role that a site plays now as opposed to what role it might serve were it to be designated as an LGS.

NPPF paragraph 77 bullet 2: Is the green space demonstrably special to a local community and hold a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife (emphasis added)

1.16 Assuming that the first test of NPPF paragraph 77 can be met (which it cannot as set out above), this second test is the most detailed in assessing the suitability of land for an LGS allocation. It requires evidence to demonstrate that the site is ‘demonstrably special’ to the identified community that it serves, and that it has ‘particular local significance’ to this community. We address each these issues in turn below.

Is LGS2 ‘demonstrably special’ to a local community?

1.17 To satisfy this test, the Parish Council must identify who the relevant local community is, where they are and provide evidence to demonstrate this. It has failed to do so.

1.18 Even on the assumption that the Parish Council had identified the local community which LGS2 purportedly serves, the Parish Council has in any event failed to provide evidence to justify that it is 'demonstrably special' to this local community. The only reference that we can identify in this regard is on page 6 of the LGS Paper 2016 where it is alleged, under a sub-title heading 'Site and Location', that 'The area is highly valued by local residents and walkers.'

1.19 Walkers are not of course the local community that the Parish Council suggests is in close proximity to this site (and could not reasonably be said to be such a community). Even if they could, it is incumbent upon the Parish Council to evidence who these walkers are and the value that makes it demonstrably special to them. Not only are the walkers not evidenced but the purported 'value' is similarly wholly evidenced. Furthermore, the footpath that crosses the site, and presumably provides the 'value' referenced by the Parish Council, exists already and is protected by other legislation.

1.20 Neither the LGS Paper 2016 nor the HNP provide any evidence to demonstrate that LGS2 is demonstrably special to the local community. A statement is made on page 3 of the LGS Paper 2016 that all of the identified LGS sites meet this criterion, but no evidence is provided in this regard.

1.21 Accordingly, the second test of paragraph 77 of the NPPF is failed.

1.22 On behalf of Gleeson Developments Ltd., we made similar comments to the Regulation 14 version of the HNP, and we note that these are summarised in Part 2 of the LGS Paper 2016 (page 18 onwards). However, the Parish Council's response, as documented on page 19 of the Paper, states simply that:

'In the region of 300 local people raised objections to the Ham Fields application. This in itself demonstrates how the site is valued by local people.'

1.23 This response from the Parish Council makes it clear that the proposed LGS2 designation has been advanced due to opposition to proposed housing in this location. For obvious reasons, this is not an approach supported by paragraph 77 of the NPPF. Instead, the designation of a LGS should rest on the conclusions of the exercise to determine if it is worthy of designation and not a desire to prevent housing development.

1.24 An objection by local people to a planning application for residential development (the 'Ham Fields application' referenced in the LGS Paper is reference to the planning application for 97 homes on part of LGS2) is not, and cannot reasonably be equated to, evidence that a site is 'demonstrably special to the local community' for the purposes of being LGS. Objections to planning applications are quite simply that, and high levels of objection are received to every housing application for development on greenfield sites.

We note, for example that there are a high number of objections to the current residential application at Hassocks Golf Course, a site which is proposed as a housing allocation in the HNP (Site 15). Indeed, if the Parish Council's case was correct i.e. equating objection to housing development with evidence of a site being demonstrably special and therefore warranting LGS designation, then all greenfield sites on the edges of settlements would be in danger of such a designation.

This is clearly contrary both to logic and to the express statement in paragraph 76 of the NPPF that the

majority of green spaces will not warrant a LGS allocation and that LGS designations should be consistent with the local planning of sustainable development and complement (i.e. not be used to frustrate) investment in sufficient homes, jobs and other essential services.

1.25 Furthermore, it is notable also that even though residential development proposals for part of the LGS2 site were heard at a Public Inquiry in March 2015 (an Inquiry at which representatives of the Parish Council and the Protect Ham Fields group were heavily involved) none objected to the proposals on the grounds that the site was appropriate to be designated a LGS or had a demonstrable and particularly special value to the local community for any of the reasons identified by paragraph 77 of the NPPF.

1.26 As a result of a Freedom of Information Request made to the Parish Council, we have obtained from it the responses to the public consultation carried out between January and February 2016. From these we can see few if any references from any respondent suggesting that LGS2 had any special value (other than its generic value, like all undeveloped land around Hassocks, as countryside). Indeed, the allocation of the site as a LGS does not seem to have been proposed other than directly by the Parish Council Neighbourhood Plan Working Group ("NPWG"), taken forward following an Extraordinary General Meeting of the Parish Council in September 2015 prior to its inclusion in the Regulation 14 HNP published in January 2016. At this point the Parish Council had already determined which housing sites it proposed to allocate. It is hard, therefore, to conclude other than that the LGS2 allocation was brought forward by the NPWG not because the site was demonstrably special to the local community but instead, to preclude future development on this site – a site which it was aware was being actively promoted for residential development.

Does LGS2 hold a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife?

1.27 Paragraph 77 of the NPPF identifies a series of reasons for which a site might have a particular local significance and, therefore, be capable of LGS designation.

1.28 The LGS Paper 2016 assesses the merits of LGS2 on pages 6 and 7 and asserts that the site is demonstrably special to the local community due to its landscape character and views, heritage significance, wildlife significance and recreational value.

1.29 It can be noted firstly that the Parish Council seeks to suggest that the site has particular local significance for all of these reasons. This indicates either that the site is exceptional in terms of its particular local value or, as is actually the case, that the Parish Council is simply adopting a scatter-gun approach and hoping that one of the reasons identified will be sufficient to secure a LGS designation. Unfortunately for the credibility of this proposed allocation, the Parish Council and the HNP, even a cursory analysis of the available facts, and the Parish Council's own evidence (insofar as it exists), demonstrates that there is no evidence of particular local significance for any of these reasons (as summarised below) and it is in fact clear that proposed LGS2 is no different to any other piece of land in the area.

Particular Significance Because of its Beauty

1.30 The Parish Council does not assert that the site has any particular local significance for its beauty. However, the LGS Paper 2016 does refer to 'Landscape character and views', identifying that:

- i. there are views from the public footpath and from adjacent houses on London Road; and
- ii. there is a key viewpoint from the edge of the Hurst Wickham ridge which affords views south across the area and beyond to the downs.

1.31 Whilst these are not a case relating to the site's beauty (and accordingly this criterion cannot therefore be met), these are in any event simply statements to the effect that the site can be seen from two locations. In this way it is evident that proposed LGS2 is no different to any other piece of land in the area.

Particular Significance Because of its Historic significance

1.32 The LGS Paper 2016 notes with regard to LGS2, in terms of heritage significance, that:

- i. the area has a rich archaeological potential with evidence of prehistoric, Bronze Age and Roman remains;
- ii. A possible Roman cemetery and a Romano-British Settlement; and
- iii. The central section of an archaeological notification area as the route of the Roman Road from Ham Farm to New Close Farm in Hassocks.

1.33 While we do not dispute that the site has some limited archaeological potential and, indeed, this was noted specifically in the Heritage Assessment Report produced by CGMS on behalf of Gleeson Developments Ltd. In support of the planning application for 97 homes on part of this site, it is also a point of public record that West Sussex County Council Archaeology, as documented on pages 88 to 90 of the Officers Report to Committee dated May 2014 (Appendix 1), raised no objection to the development of the site on archaeological grounds.

As such it is clear that any remains that might exist do not warrant special protection and do not preclude development.

1.34 Notwithstanding the above, the LGS Paper 2016 in any event advances no evidence to justify the claim that the site has any particular local significance to the community it is alleged to serve for historic reasons. It simply records the limited archaeological potential as a matter of fact.

1.35 The LGS Paper 2016 states on page 21 that in objections submitted to the Regulation 14 HNP, we did not contest the heritage significance identified at that time in the LGS Paper. This is simply not correct and the Parish Council's LGS Paper 2016, on the very same page as the above statement, confirms that objections were made on the basis that the Parish Council had 'no clear reasoning for identification of heritage significance'. The objection cannot be clearer so we are at a loss as to why the Parish Council has taken comfort from this.

1.36 It is evident not only that the site has no particular value in heritage terms from a technical perspective, but also that there is no evidence that the site has any particular significance to the local community in terms of its historic significance and accordingly, is no different in this regard to any other field in the area.

Particular Significance Because of its Recreational value

1.37 The LGS Paper 2016 at page 7 states that the 'area is used by local people for informal recreation'. We assume that this refers to the site proposed as an LGS designation rather than the area more widely, although it is unclear. Again, however, no evidence is provided to demonstrate any particular local significance in this regard.

1.38 We advanced this case at Regulation 14 stage and the Parish Council's response is identified on page 20 of the LGS Paper, stating that the site 'is highly valued by local people as demonstrated by objections to housing on the site', and that there has been unchallenged informal access to much of the land for many years.

1.39 Firstly, as addressed previously, local objection to housing development does not, and cannot be, equated to evidence of particular local significance of recreational value sufficient to warrant LGS designation. This, of itself, is a fundamental flaw.

1.40 Secondly, the land is private and whilst it is not currently fenced off, and whilst its unauthorised use cannot therefore be stopped, there are no recreational rights afforded to local people. The LGS Paper 2016 identifies on page 7 that the public footpath that runs across the site 'links to a circular route which runs around the village.' The exact route

of this circular walk is not clarified although it is evident that there are a series of existing public rights of way around the village which could be utilised to walk around it. However, it is clearly not necessary (or appropriate) to propose to designate an LGS in order to facilitate part of a circular walk given that there is an existing public right of way crossing the site which already provides such a link. It is also important to note that the desire to maintain this ability to walk around the village has not resulted in the identification of proposed LGS designations on other land required to maintain this circular route.

1.41 As such not only is there no evidence provided to demonstrate particular local significance from a recreational perspective but the land, other than the public footpath, is not lawfully available for recreation purposes in any event. The circular walk around the village exists already via the public right of way network and would be retained without any LGS designation.

Particular Significance Because of its Tranquillity

1.42 The LGS Paper 2016 claims simply that the area is 'highly valued for its rural character and tranquillity'. No evidence is provided to substantiate this statement.

1.43 We made this objection at Regulation 14 stage and the Parish Council's response, as documented on page 20 of the LGS Paper, is that

'..in central parts of the site there is a good sense of tranquillity – limited urban intrusions in views, natural sounds e.g. birdsong predominate as opposed to traffic noise.'

1.44 Again, no evidence is advanced to justify this statement. However, it can be assumed from this statement that the Parish Council does not assert that the eastern part of LGS2 is tranquil. This must be right as it is immediately adjacent to London Road or runs immediately behind a single row of houses that front London Road, the main road heading south from Burgess Hill to Brighton, and road noise can clearly be heard.

1.45 The claimed tranquillity of the central part of LGS2 is, as referenced above, wholly unproved. Furthermore, it is simply not credible to claim that this part of the site is tranquil. Firstly, in terms of urban intrusions in to the view, development can clearly be seen both on London Road to the east and Hurst Road to the south. In terms of the view that natural sounds predominate over traffic, a visit to the site confirms clearly that whilst the central part of the site is quieter than the eastern part, it cannot reasonably be described as tranquil, as

traffic can clearly be heard. Furthermore, it is also clearly the case that the site is no more tranquil than any other field in the area, including those not proposed to be designated as an LGS.

Particular Significance Because of its Richness of wildlife

1.46 The LGS Paper 2016 claims on page 7 that there is wildlife value in the mature hedgerows, grazing land, hedgerows and mature trees, and that barn owls are often seen hunting in the fields.

1.47 Notwithstanding the duplicate reference to hedgerows, it is again the case that the ecological value asserted is wholly unremarkable.

1.48 Whilst it is true to state that insofar as there is any ecological value to the site this is focussed on the existing hedgerows and mature trees that exist on its edges, these do not have, and are not asserted to have, any particular local significance and certainly cannot be claimed to be 'rich'. Indeed, almost every site around Hassocks has hedgerows and trees on its boundaries and these are generally protected by other legislation.

1.49 This case was put to the Parish Council in our representations to the Regulation 14 HNP and this is noted on page 21 of the LGS Paper. However, the Parish Council's response is that whilst the individual features identified might not warrant designation as a LGS, they are of local significance and reflect local ecology and in combination reflect local character.

1.50 The NPPF paragraph 77 test in this regard is not whether a site reflects local character or local ecology but whether there is particular local significance in terms of a richness of wildlife. It is demonstrably the case that no such richness exists and the Parish Council does not assert that it does. All the Parish Council seems to be saying is that this site is like every other site around Hassocks and, therefore, reflects local ecology. This demonstrates a complete failure to understand the purpose of, and tests applicable to, a LGS and shows clearly that LGS2 has no particular local significance and is in fact the same as a multitude of other sites.

NPPF paragraph 77 bullet 3: Is the green area concerned 'local in character and not an extensive tract of land'?

1.51 The LGS Paper 2016 claims on page 3 that all of the proposed LGS's meet this criterion. Whilst it is not addressed with specific regard to LGS2, we do not dispute that LGS2 is not an extensive tract of land and that it is of a relatively enclosed nature. Importantly, however, satisfying this criterion is only one of the matters that must be successfully addressed in order to justify a LGS designation.

Basic Conditions / Change Sought

1.52 For the reasons set out above, LGS 2 demonstrably does not meet the NPPF paragraph 77 tests to justify an allocation as a LGS.

1.53 The LGS Paper 2016 identifies that of nine potential LGS designations which were considered on land around Hassocks, two were ultimately not designated (LGS4 and LGS9 which have in fact been allocated for housing). However, there is no evidence to demonstrate that these sites are less special than LGS2, or that LGS 2 is somehow more special. As such it is evident that the proposed designation of LGS2 is clearly a tool to obstruct housing delivery on a site which is subject to a planning application and which Mid Sussex District Council has concluded, in its HELAA, is suitable for housing.

1.54 There is a total lack of evidence to support this proposed LGS designation, and a total lack of any objective assessment. The designation clearly fails the basic conditions as it is not appropriate, having regard to national policy, to make the HNP. Given the issues raised there is no alternative but for the HNP to be discarded and the process started again.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20319	9	Mr A Ross	Nexus	Gleeson Developments Ltd	5	16-17	

Comments

Policy 5: South Downs National Park (SDNP)

1.1 We have no objection to Policy 5 and wholly support the statement that proposals for the development of land adjacent to the SDNP will be supported provided they have regard to its setting.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20319	10	Mr A Ross	Nexus	Gleeson Developments Ltd	7	19	

Comments

Policy 7: Air Quality Management

1.1 We support the aims of Policy 7 in terms of seeking to prevent unacceptable adverse impacts on air quality within the Stonepound Air Quality Management Area (AQMA). However, the supporting text at paragraph 4.30 seems, in the last line, to imply that development will not be allowed that would have any impact on AQ, and will not be allowed until AQ levels have fallen such that the AQMA is revoked. This is inappropriate and is not sustainable. A logical extension of this approach would be that there would be a moratorium on all development in all AQMA's in the UK.

1.2 The focus of the AQMA is on reducing AQ levels to acceptable levels below 40 microgrammes per cu. mtr. This is not a matter of direct responsibility for a local planning authority but for local authority environmental health. The local authority should, through application of its policies, ensure that new developments are consistent with the aims of any AQMA air quality action plans.

1.3 In general terms, developments which generate additional vehicles movements should be assessed in terms of appropriate guidance i.e. that produced by the Institute for Air Quality Management 2015. This provides a methodology for quantifying impact according to changes in pollutant levels from future year baseline levels, and in terms of how close cumulative levels of pollutant are predicted to be to the relevant Air Quality Objective e.g. 40 microgrammes per cu mtr for nitrogen dioxide. Where impacts can be shown to be negligible, even in an AQMA, and even if levels are predicted to rise slightly, then clearly a development is not likely to have a significant effect on health and air quality is not likely to be reason for refusal.

1.4 The focus of the Stonepound AQMA is on reducing air quality levels to acceptable levels below 40 microgrammes per cu mtr. If development can take place that would not breach this limit, then they should not be precluded even if they involve a slight increase in existing AQ levels, and even if the AQMA is still in place.

Suggested Change

1.5 Amend paragraph 4.30 to reflect the above.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20319	11	Mr A Ross	Nexus	Gleeson Developments Ltd	10	22	

Comments

Policy 10 Outdoor Playing Space

1.1 We support the thrust of Policy 10 but, as drafted, the policy is too prescriptive.

1.2 Requiring play space in every development of 15 units or more is not necessarily appropriate and the assessment of the contextual environment need to be assessed to determine need, is liaison with the Parish Council. This policy would / could potentially result in multiple play spaces being provided in close proximity to one another which are not necessary and not used. In such circumstances, appropriate financial contributions to improve or enhance an existing space may be more appropriate.

1.3 By way of example, as part of application discussions for housing development on Land at London Road, Hassocks, which is adjacent to existing recreational and play facilities, the Parish Council determined that it was most appropriate for financial contributions to be made to improve the existing facilities which were within the recommended Fields in Trust walking distance, rather than simply replicating the facilities.

Change Sought

1.4 Policy 10 should be amended to ensure that it is more flexible having regard to local context.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20319	12	Mr A Ross	Nexus	Gleeson Developments Ltd	13	27	

Comments

HNP Section 6 / Policy 13: Housing Overview

We object to Policy 13, and the Parish Council's approach to housing provision generally in the HNP on the basis that:

- i. Assessing housing need – the process by which the Parish Council has identified housing need for the purposes of the HNP is wholly arbitrary, is not based on robust or credible evidence, ignores the need for affordable housing and does not accord with national policy guidance as set out in the NPPG;
- ii. The approach to housing – the housing requirement identified in the HNP is presented as a cap on development, which is contrary to the requirements of paragraphs 14 and 184 of the NPPF given that the HNP is running ahead of the District Plan and, therefore, ahead of a tested and endorsed District-wide housing requirement;
- iii. The identification of constraints – the Parish Council's identification of constraints at Hassocks is flawed, which has in turn undermined the credibility of its assessment process;
- iv. The making of housing allocations – the allocation of specific sites is undermined by fundamental flaws in the Parish Housing Land Availability Assessment and Sustainability Appraisal. It is clear also that the allocation of sites was more of a popularity contest than a robust assessment of the genuine merits of the sites.

We address each issue in turn below.

1.0 HNP Section 6 / Policy 13 - Assessing Housing Need

1.1 The Mid Sussex Local Plan was adopted in 2004 and for the purposes of planning for housing, planned only until 2006. This was published prior to the publication of the NPPF and does not seek to identify, or meet, the objectively assessed need for market and affordable housing as required by paragraph 47 of the NPPF. On this basis, having regard to paragraph 215 of the NPPF, it is evident that the housing provisions of the adopted Local Plan are wholly inconsistent with the NPPF and accordingly, cannot be given material weight.

1.2 The emerging Mid Sussex District Plan, which was submitted for Examination on 24th August 2016, identifies a housing requirement figure for the District of 11,050 homes for the period 2014 – 2031, although this housing requirement figure is the subject of significant unresolved objection and has yet to be tested at an Examination. However, the District-wide housing figure advanced in the emerging District Plan is based upon the HEDNA Update produced by Mid Sussex District Council in November 2015. The HEDNA identifies at Table 24 that in

terms of apportioning this requirement, the 'starting point' for Hassocks Parish is the provision of 630 homes. This 'starting point' can be compared to the provision proposed in the emerging Hassocks Neighbourhood Plan which identifies provision for only 210 - 270 units in the period to 2031.

1.3 This is the strategic background against which we assess the Parish Council's approach to assessing housing need.

HNP Assessment of Housing Need

1.4 The Parish Council resolved, at an Extraordinary General Meeting on 22nd September 2015, to adopt a housing requirement figure for the HNP of 210 – 270 dwellings. As noted in the minutes of that meeting, this decision was made cognisant of, and wholly consistent with, the Neighbourhood Plan Working Group's recommendation in terms of housing need.

1.5 In terms of coming to this figure of 210 – 270 dwellings, the Parish Council's position is expressed in Section 6 of the HNP. Paragraph 6.5 identifies that a Parish Housing Need Assessment was produced in October 2014, and was most recently updated in June 2016. However, page 45 of the HNP, which lists the evidence base documents that have informed the HNP, refers to a 'Housing Need Document' dated August 2015. Clearly, however, the Parish Council's decision in this regard, that was made in September 2015, can only have been made based on the August 2015 document.

1.6 We are somewhat confused in this regard as the evidence base documents referenced on pages 44 to 46 of the HNP do not include reference to either the October 2014

document or a June 2016 document identified at paragraph 6.5 of the HNP. Furthermore, the document produced by the Parish Council in August 2015 is actually entitled 'Re-Estimation of Future Housing Needs in Hassocks' and not 'Housing Need Document'.

1.7 However, during the HNP Regulation 16 consultation period we sought clarification from Mid Sussex District Council on the above and were informed (in a letter dated 8th August 2016) that the June 2016 document had not originally been published but had now been made available. It was also confirmed that this June 2016 document acknowledges the latest November 2015 version of Mid Sussex District Council's HEDNA but 'does not change any of the numbers or conclusions'. On this basis our comments relate to the now published June 2016 document.

1.8 The Parish Council's evidence in the June 2016 document, like that in August 2015, extends to only three sides of A4 paper. It seems that, based on a Mid Sussex District Council produced 'Local Housing Assessment' document from October 2011, which identified that relevant considerations were household formation, demographic changes and economic changes, that the Parish Council has:

3

- i. looked at what reducing household sizes might generate in terms of a need for new houses in Hassocks;
- ii. then used the 2011 census to identify the scale of population change in the District (14.1%) and applied this to the population of Hassocks (together with a figure assuming that half of this growth took place (7.05%); and
- iii. then taken the number of jobs per annum identified by MSDC in its 'Local Housing Assessment' (249 jobs), on a pro rata basis applied this to Hassocks, and then applied an economic activity rate to identify job creation in Hassocks.

1.9 The conclusion of the Parish Council's work, identified on the third page of the June 2016 document, is that:

"Overall, it appears that the range of future housing requirement lies between 200 and 500, with only the full proportionate growth estimates being in excess of 400."

1.10 However, the Parish Council then amends this further, again on the third page of the document, advancing the case that:

"..the Burgess Hill Northern Arc will account for a significant proportion of the growth and therefor Hassocks requirement is more likely to lie in the range between 250 and 400 additional houses as opposed to the 630 additional houses... in the MSDC HEDNA".

1.11 The technical basis upon which the Parish Council has determined that the housing provision proposed at the (as yet) unconfirmed strategic allocation at Burgess Hill is wholly unclear from this evidence base document and indeed, the allocation or otherwise of development at Burgess Hill is irrelevant to the consideration of need at Hassocks. Instead it simply appears to be an attempt to reduce the housing needed at Hassocks to a level materially lower than the starting point identified in the Mid Sussex District Council's HEDNA Update 2015. Given

the lack of evidence on housing need produced by the Parish Council, and the fact that what little has been produced is wholly unclear, it is evident that this is not an appropriate evidence base upon which to base the HNP.

1.12 Even on the assumption that the Parish Council's work in this regard is robust (which it demonstrably is not), it can be noted that the conclusions of the Parish Council's own work identify an upper-end requirement for 400 homes – significantly higher than the 280 to 290 homes allocated in Policy 13. This in itself demonstrates that Policy 13 of the HNP does not accord with the Parish Council's own (limited and flawed) evidence base.

1.13 Secondly, and even more worryingly, it can be seen with reference to paragraph 6.9 of the HNP that the housing requirement identified in the HNP was something that the Parish Council resolved to adopt at an EGM in September 2015, concluding that the;
"..need for additional housing over the Plan period up to 2031 is 210-270 dwellings."

1.14 It is wholly unclear as to how this range of 210 – 270 homes was identified by the NPWG (before being endorsed by the Parish Council for inclusion in the HNP). Indeed, none of the scenarios modelled in the Parish Council's June 2016 housing needs paper (or that produced in August 2015) conclude with a figure of either 210 or 270 homes. As such the selection of the 210 – 270 home range is a wholly arbitrary selection at a point which is just within (although very much at the lower end) of the 200 – 500 home range identified by the Parish Council in its June 2016 housing paper.

1.15 The process adopted by the Parish Council in this regard is wholly arbitrary and is not based on robust or credible evidence. As fundamentally, however, it is a fundamental flaw for the Parish Council to consider, as stated overtly in the HNP itself, that the 'need' for housing is something that can be determined by resolution of the Parish Council at an EGM i.e. something that is not evidence based but which is instead something for the Parish Council to 'take a view on'.

1.16 The entire approach to the identification of housing needs in the HNP is fundamentally and fatally flawed.

1.17 The process to be adopted in identifying objectively assessed housing needs is clearly and specifically set out in the NPPG (ID 2a-001 to 2a-029). This starts with the most recent household projections, and then adjusts them having regard to job changes based on past trends / economic forecasts, and then again in terms of market signals and an uplift for affordable housing provision. The outcome of this process is the objectively assessed need for housing.

1.18 The NPPG (ID 2a-006) states that whilst the level of housing and economic development is likely to be a strategic policy i.e. something determined at a District level, Parish Council's preparing NP's can use the methodology identified in the NPPG to identify specific local needs. However, Hassocks Parish Council has wholly ignored this guidance / process and has instead used out of date evidence at District level (a Local Housing Assessment from October 2011) that not even MSDC at District level relies upon any more (relying instead on a HEDNA Update produced in November 2015) – a figure the Parish Council then reduces further. In addition, it is clear from the Parish Council's June 2016 housing paper that it has given no consideration to the issue of affordable housing need (see below).

Affordable Housing Need

1.19 Paragraph 47 of the NPPF requires that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed need for market and affordable housing in the housing market area.

1.20 Detailed guidance on how to fulfil this requirement is set out in ID 2a-014 to 2a-029 of the PPG. This clarifies that the starting point for assessing the need for housing is the household projections produce by the DCLG (ID 2a-015). Plan-makers should then make an assessment of the likely change in job numbers on past trends or economic forecasts and consider the issue of balancing housing supply and the supply of working age population that is economically active (ID 2a-018). They should then adjust the housing projections having regard to market signals (ID 2a019). Plan-makers should then estimate the number of households and projected households who lack their own housing and who cannot meet their needs in the market (ID 2a-022), with an objective to establish the unmet need for affordable housing based on past trends and recording current estimates (ID 2a-024). When the total need for affordable housing has been identified, plan-makers should consider it in the context of its likely delivery as a proportion of mixed market and affordable housing developments, increasing total housing provision where it could help deliver the required number of affordable homes (ID 2a-029).

1.21 Accordingly, it is evident that consideration of affordable housing need is a central element in considering the need for housing generally. However, the Parish Council's evidence, as set out most recently in its housing paper dated June 2016, considers only demographic and economic issues – wholly ignoring issues of affordability. As such although this evidence concludes that the housing requirement for Hassocks should be between 200 and 500 homes, this includes no consideration or uplift in terms of the need for affordable housing. This approach is fundamentally flawed and does not accord with the very clear guidance at paragraph 47 of the NPPF and ID 2a-014 to 2a-029 of the PPG and is not, therefore, an appropriate evidenced base for the HNP.

1.22 It is important to note that the District Council's HEDNA Update November 2015 does consider the issue of affordable housing. Whilst this document has not been tested at an Examination, and is the subject of significant unresolved objection on the basis that it underestimates the need for housing in the District, in concluding that the starting point for Hassocks in terms of housing provision should be 630 homes, it does include consideration of affordable housing need in addition to demographic and economic matters, and market signals.

1.23 For these reasons, Policy 13 does not identify housing needs for Hassocks in a NPPG compliant manner. The level of housing proposed in Policy 13 is simply the result of a resolution of the Parish Council rather than the conclusions of a robust and credible assessment process.

2.0 HNP Section 6 / Policy 13: Approach to Housing

2.1 The Parish Council's approach to the provision of housing is unclear from the HNP. Paragraphs 6.4 to 6.9 address the issue of need although as referenced elsewhere in our representations, this is fundamentally flawed.

2.2 Policy 13 then makes three allocations totalling 290 homes. The policy does not specifically state that this is a cap on housing numbers but given that it accords (to an extent) with the flawed need figure identified at paragraph 6.9, we assume that it is intended to meet what the Parish Council considers is its need and, therefore, would operate as a cap.

2.3 If this is the intention, then it is wholly inappropriate and unacceptable. If it is not the intention, then it should be made abundantly clear in the text of the Neighbourhood Plan.

2.4 The HNP is, by choice, running ahead of the emerging Mid Sussex District Plan. As such the objectively assessed need for housing in the District has not yet been tested, and a

housing requirement has not been set. The NPPF is clear at paragraph 184 that neighbourhood plans should not promote less development than set out in the Local Plan or undermine its strategic priorities, and paragraph 14 confirms that there is a presumption in favour of sustainable development. A cap on housing numbers would clearly not accord with these requirements

and would conflict with paragraph 184 of the NPPF which requires that neighbourhood plans should reflect strategic policies in an up to date Local Plan and ‘plan positively to support them’, and paragraph 16 (bullet 2) which required neighbourhood plans to ‘plan positively to support local development’.

2.5 Accordingly, even if it were based on robust evidence of local need (which it is not), the housing numbers expressed in the HNP cannot be a cap on development, as this would not allow for the flexibility that the NPPF seeks in responding to changing conditions. The same issue was raised with the Slaugham Neighbourhood Plan and the Examiner concluded similarly in January 2014 (Appendix 1).

3.0 HNP Section 6 / Policy 13: Approach to Housing - Constraints

3.1 The Parish Council identifies a range of environmental / constraints-based evidence on pages 44 to 46 of the HNP. The most easily referenced summary of this evidence is the ‘Hassocks Constraints and AQMA radius map’ (“the Map”) which identifies the potential development sites around the town and, inter alia, ecological, heritage, flooding and air quality constraints.

3.2 However, the Map identifies a number of flawed assumptions in terms of constraints, that have in turn informed its Sustainability Appraisal and Parish Housing Land Availability Assessment and, accordingly, affected its decisions in terms of housing allocations. We address the two primary errors below.

Local Gaps

3.3 On the western side of the town, the Map identifies a ‘Local Gap’ between Hassocks and Hurstpierpoint. Cross-reference with the Mid Sussex Local Plan 2004 confirms that the extent of this Local Gap is the same as that in the adopted Local Plan i.e. the Parish Council has taken the extent of this Local Gap as designated in 2004 as an absolute constraint to development.

3.4 As set out in further detail elsewhere in these representations, the policies for the supply of housing in the Local Plan 2004 are acknowledged by Mid Sussex District Council (and repeatedly by Inspectors at appeal) to be out of date. This includes Policy C3 which identifies a Local Gap between Hassocks and Hurstpierpoint.

3.5 Notably Policy DP11 of the emerging District Plan (which unlike the Local Plan has been produced after the production of, and there cognisant of, the NPPF) does not retain Local Gap designations. Whilst it allows neighbourhood plans to make gap designations, it requires that they must produce robust evidence to support it and demonstrate that the land is not suitably protected by existing national and local level policies (an approach which is compliant with the NPPF).

3.6 Accordingly, in order to justify a Local Gap policy in the HNP, the Parish Council must carry out two key pieces of work;

- i. consider whether a Local Gap is required at all given the provisions of Policy DP11 of the emerging District Plan which only allows development where it can be demonstrated that it would not result in coalescence of settlements and would not have an unacceptably urbanising effect on land between settlements; and
- ii. if a need is identified, examine what the boundaries of a Local Gap should be to meet the objectives of the HNP.

3.7 The Parish Council has not produced any evidence to justify either the need for, or the extent of, a Local Gap in this location. No evidence is available that confirms how the Local Gap boundary, as defined by Policy C3 of the adopted Local Plan, was defined and it is understood that it was simply a case of allocating all of the undeveloped land between the settlements of Hassocks and Hurstpierpoint (as defined in 2004). As such there is no evidence at a District-level upon which the Parish Council can rely in this regard.

3.8 Furthermore, there is no evidence produced by the Parish Council in support of the HNP to consider the need for / extent of the proposed Gap. At the recent public inquiry held to consider proposals for the residential development of land west of London Road, Hassocks Mr Mayhew, representing the Parish Council, initially sought to suggest that such evidence did exist with reference to the documents below:

- i. Hassocks Parish Landscape Character Assessment – this identifies and describes Character Area F (Ham Fields Greensand ridge) within which Site 2 is located but this includes no assessment of the need for or extent of the Gap;
- ii. HPNP Strategic Views – this document simply identifies 20 viewpoints around Hassocks – there is no assessment of the need for or extent of any Gaps;
- iii. Hassocks Constraints Map – as its name suggests, this is a plan identifying the purported constraints at and around the town – it is the output of work and is not any assessment of the need for a Gap;
- iv. Hassocks Townscape Appraisal – this document identifies a series of townscape character areas, which include ‘Stonepound’ and ‘London Road’ which are in close proximity

to Site 2. However, as the title of this document suggests, the document simply describes these areas in terms of their built form and does not provide any assessments relevant to Gaps.

3.9 However, for the reasons identified for each of the documents, which Mr Mayhew was taken through in cross-examination, he ultimately accepted that none constituted evidence of the need for, or extent of, a Gap between Hassocks and Hurstpierpoint.

3.10 By contrast, there is clear evidence, supported by MSDC, that development can be accommodated on Site 2 (Land at The Ham) without compromising the function of the Local Gap.

3.11 This simple 'rolling forward' of the Local Gap as identified in the out of date Local Plan 2004 is a fundamental flaw in the Parish Council's identification of constraints which has, in turn, influenced its decision to allocate (or not allocate) development sites.

Air Quality

3.12 The Map identifies the AQMA at the Stonepound Crossroads with a small blue dot. It then identifies a series of concentric circles working away from this at 250 metre intervals.

3.13 The only evidence, as identified on pages 44 to 46 of the HNP, relating to air quality are a letter to MSDC from the Parish Council, and a response to this letter. Notably, however, neither of these letters is available on either the District Council or Parish Council websites. As such it is not possible to understand the content or relevance of these letters, although the fact that they are letters between the Councils indicates that they are not part of a technical evidence base.

3.14 In any event, the relevance of these concentric circles is not clarified in the HNP and is wholly unjustified and irrelevant. The plotting of these concentric circles suggests, and some statements in the PHLAA back this up, is that the closer that a site is to the AQMA, the greater the impact of development on air quality within the AQMA.

3.15 This suggestion is clearly flawed and illogical. Proximity of a site to the AQMA has no direct relevance to the impact of development on air quality in that AQMA. Traffic from a site located within 250m of the AQMA, with an access on to London Road, will not generate any more traffic heading through the AQMA than a site 500m from the AQMA but also with an access on to London Road. The fact is that the proportion of traffic heading south on London Road, towards and through the AQMA, would be the same by virtue of the proportion of cars wanting to head south, not due to the proximity of the site.

3.16 Furthermore, it must also be the case that a site which is more than 1000m from the AQMA, but located on the eastern side of the village, might well send a similar or indeed higher level of traffic through the AQMA as cars would have to pass through the Stonepound Crossroads it to head south or west of the village.

3.17 Thus, the use of distance (away from an AQMA) as an indicator of air quality impact is illogical and likely to mislead. The magnitude of an air quality impact within an AQMA (or anywhere else for that matter) is determined by considering the change in pollutant levels from those in the future 'development' year (without the development, but including other committed development) to those cumulative levels arising in the 'development' year with the development in place. The magnitude is also determined by considering how close the 'development' year cumulative levels are to the levels set out in the Air Quality Objectives.

3.18 It must be clear therefore that since it is pollutant levels (both the change and absolute levels attained) which are key, the main factors affecting these are, a) how many 'new' additional development vehicles may pass through the AQMA and add pollutants, and, b) whether there are any significant commensurate highways improvement measures, which may alter the functioning of a road junction, offsetting any pollutant additions: distance is irrelevant.

3.19 This point is demonstrated by Site 2 (Land at the Ham) which is located approximately 250m from the AQMA. A planning application was submitted for the development of 97 homes and an Appeal has been heard at a Public Inquiry in August 2016. It is common ground between the appellant and MSDC that the impact of development on the AQMA will be negligible and, most importantly, that, absolute cumulative levels of nitrogen dioxide pollutant, will be significantly below the Air Quality Objective levels at the key relevant residential receptors.

This demonstrates that the Parish Council's application of concentric circles, and the suggestion that proximity to the AQMA is an indicator of air quality impact within the AQMA, is a fundamentally flawed approach with which to assess the merits of potential development sites.

Basic Conditions / Changes Sought

3.20 The Council's approach to the assessment of constraints is flawed and this has affected its decisions to allocate sites for development. These flaws mean that the HNP would not contribute to the achievement of sustainable development and as such, the HNP fails the basic conditions.

3.21 The Parish Council should start the HNP process again, and ensure that in considering the merits of potential sites for development, that it uses a robust assessment of constraints.

4.0 HNP Chapter 6 / Policy 13: Housing Allocations

4.1 Policy 13 of the HNP allocates three sites, one previously developed site and two greenfield sites, for a total of 290 dwellings to meet what the Parish Council purports to be its housing needs in the period to 2031. Site 2 (Land at The Ham) is not allocated for housing.

4.2 Paragraph 6.11 of the HNP states that the allocations selected are based upon the Parish Housing Land Availability Assessment (September 2015) (“PHLAA”). Despite this statement, we note that the Sustainability Appraisal (“SA”) also purports to assess the merits of the potential sites for housing in and around Hassocks and we assume, although not stated overtly in the HNP, that this was also used to inform the decisions made.

4.3 The Parish Council’s process in identifying sites for housing is fundamentally flawed as the assessments made in both the SA and PHLAA contain major factual errors which go to the heart of the assessment of sites and, in particular, there are clear and fundamental errors in terms of the scoring of Site 2 (Land at the Ham). Most notably:

- i. the Parish Council’s process of site selection was essentially a popularity contest rather than a robust assessment based on planning merit;
- ii. the Parish Council’s PHLAA demonstrates serious errors of fact in its assessment of Site 2, in both absolute and relative terms, and these errors directly influenced the housing allocations proposed in the HNP; and

the Parish Council’s SA demonstrates serious errors of fact in its assessment of Site 2, in both absolute and relative terms, and these errors influenced the housing allocations in the HNP.

4.4 For these reasons the housing allocations in the HNP do not achieve sustainable development and accordingly fail the basic conditions test as set out at Paragraph 8(2) (d) of Schedule 4B of the Town and Country Planning Act (as amended).

Site Selection as a Popularity Contest Rather than a Technical Assessment

4.5 As identified in the Parish Council’s Consultation Statement June 2016, two consultation exercises were carried out in January and July 2015 respectively. For the consultation in January 2015 the public was provided with some information relevant to the purported merits of potential housing sites and asked to complete a feedback form which principally sought views on whether they were for or against the allocation of each site. For the consultation in July 2015, the public was again provided with purported information relevant to the constraints and opportunities at Hassocks (albeit that this was fundamentally flawed information as it has the same errors and deficiencies as ultimately set out in the PHLAA published later in September 2015 – see elsewhere in our report) and then provided with a form entitled ‘Hassocks Parish Council Site Selection Preference Order Return Slip’. This identified the potential development sites, whether they were available for development, and the ranking for each site as identified from the public in the earlier January consultation. The public were then asked to identify a ranking for these sites with ‘1’ being most preferred.

4.6 As documented on page 1 of the Parish Council document entitled ‘Hassocks Neighbourhood Plan – Responses to January Consultation on Potential Housing Sites’, which summarised the responses to the January 2015 consultation:

“..there is a strong NIMBY effect, those on the West tend to be more in favour of sites on the East and vice versa”.

4.7 Sadly, in our experience, respondents favouring development locations furthest from where they themselves lived is a phenomenon that in our experience is not unusual

4.8 It is interesting to note that the document entitled ‘Hassocks Neighbourhood Plan – 3rd Consultation Event – Analysis of Preference Data’ confirms that the sites ultimately allocated by Policy 13 of the HNP scored as follows in terms of preference data from the July 2015 consultation:

- i. National Tyre Centre (Site 10 as originally identified - 1st order of preference
- ii. Hassocks Golf Club (Site 15 as originally identified) – 3rd preference
- iii. Land north of Clayton Mills (Site 4 as originally identified) – 7th order of preference

4.9 As such it can be seen that the allocations ultimately made in the HNP were generally those preferred by members of the public, based on clearly flawed technical information made available by the Parish Council (and in any event prior to the publication of the PHLAA) and notwithstanding the fact that the Parish Council itself recognises that the preference data, as one would expect, has a strong NIMBY effect.

4.10 Whilst the preferences of local residents are of some relevance, and consultation is of course an important part of any planning process, local preferences cannot be the central input as was demonstrably the case here. To do so results simply in the identification for development of the sites furthest from existing residents, as opposed to the most sustainable sites. It also tends to mean that those sites with a higher public profile at the time that preferences are sought are viewed more negatively relative to those with a lower profile, irrespective of their actual merits. This was undoubtedly the case for Site 2 which was, during 2015 (when the HNP allocations were formulated), the subject of a planning application for housing development and a subsequent high profile Public Inquiry.

Errors of Fact in the Parish Council's PHLAA

4.11 In addition to the material errors in the SA that informed the HNP, there are also errors in the PHLAA which was also used to inform decision in the HNP relevant to the allocation of sites for residential development (and resulted in the failure to allocate Site 2).

4.12 As with the SA, and unlike the majority of the other sites identified in the PHLAA, Site 2 was the subject of a planning application submitted prior to the production of the PHLAA and accordingly, the Parish Council had available to it detailed application documents and, importantly, consultation responses from statutory consultees. As such, it was able to draw upon this information in its assessment of Site 2.

4.13 However, inexplicably, the PHLAA appears to wholly ignore the application technical documentation and the relevant consultation responses, despite overtly recognising that the planning application had been submitted. The failure to have regard to this information has meant that the PHLAA makes judgments which are clearly and demonstrably contrary to the available evidence and which are, therefore, flawed. These flawed conclusions have then fed in to the allocation of land for housing. For clarity we identify some examples of these material errors below.

'Air Quality'

4.14 The PHLAA states that the development of Site 2 would have a 'high impact' on the Stonepound Crossroads AQMA. There is no evidence provided in support of the HNP to confirm how this conclusion has been reached. The PHLAA states simply that the proposals would be a 'substantial development very close to Stonepound Crossroads', which accords with the Parish Council's 'Hassocks Constraints and AQMA radius map' which incorrectly assumes that proximity to the AQMA equates to the level of impact.

4.15 By contrast, the promoters of Site 2 commissioned Alpha Acoustics to produce detailed air quality evidence to consider the impacts of development. This work concluded, in evidence submitted in 2015, that the impact of development on baseline NO₂ concentrations would be negligible, and that absolute concentrations of NO₂ would also be well below Air Quality Objective levels. The summary table shown in Appendix 2 illustrates the key residential receptors within the AQMA, taking into account the most up to date published guidance from

DEFRA. The table formed part of the suite of detailed air quality evidence (reports dated 23rd and 28th July 2016) produced by Alpha Acoustics and submitted to the recent Public Inquiry in August 2016 at which the development of Site 2 for residential development was considered.

4.16 The conclusion in the PHLAA is fundamentally at odds both the detailed evidence produced by Alpha Acoustic and the position confirmed by the District Council's Environmental Health Officer as reported to the District Planning Committee in January 2015 (Appendix 3) who notably concluded that:

- i. "... the scheme will not push pollutant levels above the Objective level" [Officers Report Appendix A page 15];
- ii. "The amount of change predicted by the model is up to 2.1%. Change of up to 2.1% would be classified as "small" by the Institute of Air Quality Management's (IAQM) table for quantifying the magnitude of change in pollutant concentration" [Officers Report Appendix A page 15]; and
- iii. "In this case the AQ impact from this development falls into the IAQM category of "negligible" [Officers Report Appendix A page 15].

4.17 As a consequence, the District Council did not advance impact on air quality as a reason for refusal at the Public Inquiry in March 2015 (and will not do so at the re-opened Inquiry due to take place in August 2016). As such it is evident that the development of Site 2 would demonstrably have a negligible impact on the Stonepound Crossroads AQMA, and not the 'high impact' referenced in the PHLAA.

'Vehicular Access Constraint'

4.18 The PHLAA concludes that Site 2 would have a 'high impact' in this regard as the site has access to London Road but is very close to the Stonepound Crossroads. No explanation is provided as to why the site's proximity to the Stonepound Crossroads is a negative in terms of access.

4.19 However, this conclusion is wholly unjustified given that the submitted planning application for the site, which sought detailed planning permission for vehicular access to London Road, demonstrated to the satisfaction of the Highway Authority and the District Council that safe and suitable access could be achieved. As documented at Appendix A page 9 of the Officers Report to Committee dated January 2015, the Highways Authority raise no objection to the proposals in terms of access (or any other issues) and MSDC similarly raises no objection on

any traffic or safety related grounds. As such, this conclusion in the PHLAA is clearly an error.

'Traffic Assessment'

4.20 The PHLAA states that development on Site 2 would have a 'high impact' in this regard, as it is a 'substantial' development close to village facilities but close to the

Stonepound Crossroads. It is unclear why proximity to the village's facilities is a negative given that its proximity allows easy access for pedestrians and cyclists and will result in lower levels of car use than for sites more remote from the village centre. It is also unclear why the site's proximity to the Stonepound Crossroads is a negative in this regard.

4.21 However, reference to the available planning application documentation / consultation responses, which were in the public domain when the PHLAA was written, confirm that there is no negative impact in this regard. Indeed, the consultation response from the Highways Authority as documented at Appendix A page 15 of the Officers Report to Committee dated January 2015 (Appendix 3) confirms that with the proposed mitigation measures at the Stonepound Crossroads:

"...in real terms the overall situation for traffic at the junction improves significantly" (our emphasis)

4.22 The Highways Authority, as a consequence, raised no objection to the application and did not submit any evidence against the application at the Inquiry in March 2015 (and is not proposing to do so when the Inquiry re-opens in August 2016). As such the PHLAA conclusion is in error.

'Mitigation'

4.23 The PHLAA states that adequate mitigation, to offset the impact of development on Site 2 is not possible. This conclusion is again not explained or evidenced.

4.24 Importantly, this conclusion also conflicts with the available facts and evidence which demonstrate, as proven by the submitted application for the site, that all technical issues had been addressed to the satisfaction of both the District and County Councils by March 2015, such that neither advanced evidence against the scheme (and neither proposes to do so when the Inquiry re-opens in August 2016). As such, by definition, adequate mitigation has been shown to be possible, contrary to the conclusions of the PHLAA.

Consistency with the Assessment of Other Sites

4.25 As identified above there are fundamental errors, in absolute terms, in the assessment of Site 2 in the PHLAA which go to the heart of how it was scored and, ultimately, the Parish Council's process in determining that it should not be allocated for housing. However, it is also notable that the PHLAA is flawed in relative terms. For the purposes of demonstration, we make reference to Site 15 (Land at Hassocks Golf Club) which is proposed by the Parish Council as a residential allocation in the HNP.

4.26 In terms of 'Vehicular Access Constraints', Site 15 is identified in the PHLAA as having 'low impact', with the PHLAA referring to the ability to achieve straightforward access on to London Road. However, as referenced previously, despite Site 2 benefitting from exactly the same straightforward access on to London Road, and indeed having demonstrated this through a planning application where access was considered in detail, it is somehow identified as having a 'high impact'. This conclusion is clearly flawed and unreasonably favours Site 15 over Site 2.

4.27 The same flaw can be noted in terms of 'Traffic Assessment'. Site 15 is identified as having 'high impact' as it is identified as a 'large development, distant from facilities'. However, despite its acknowledged proximity to facilities (a proximity which would reduce car journeys), Site 2 is similarly identified as having a 'high impact'. This conclusion has no regard to the acknowledged facts and cannot be reasonable.

Errors of Fact in the Parish Council's Sustainability Appraisal

4.28 Whilst Section 6 of the HNP makes no direct reference to it (referring only to the PHLAA) we assume, in accordance with relevant legislation, that the SA was also used by Parish Council to inform its housing site selection process. However, the SA includes material errors of fact that have directly influenced the assessment process and, ultimately, the allocation (or nonallocation) of land for development.

4.29 The HNP states at paragraph 1.14 that the SA has, in the Parish Council's view, enabled the most sustainable policy options to be identified and included within the HNP. As such the accuracy of this document is clearly essential to the production of the HNP. However, even a cursory review of the SA demonstrates that there are material errors of fact in relation to the assessment of Site 2 (Land at the Ham), in both absolute and relative terms.

4.30 The SA matrices relevant to each of the potential housing sites at Hassocks, including Site 2, are set out towards the rear of the submitted SA (although they are not page numbered). As is generally the case, the SA adopts a mixture of a traffic light system with a series of ticks and crosses, to identify the scale of any positive or negative impacts associated with the development of a site against the Parish Council's identified Sustainability Objectives. However, with specific regard to Site 2 (Land at the Ham), the scoring provided in relation to

some key Objectives in the SA is simply impossible to reconcile with the facts (even those presented by the Parish Council itself in this SA). We identify a number of Objectives below in this regard.

Site 2 Matrix - Objective 6 (highways safety and traffic congestion)

4.31 SA Objective 6 is entitled 'Improve highways safety and minimise the impact of traffic congestion'. We note that this is actually a much broader assessment than that identified earlier in the SA, where Objective 6 identified as relating only to matters of highway safety (see SA page 9).

4.32 Despite this confusion, it can be seen from the Site 2 matrix that it is identified as having a significant negative effect against Objective 6. However, the rationale for this conclusion is not only unclear but also appears to be wholly flawed.

4.33 Some text is provided underneath the matrix to elaborate to an extent on the assessment carried out. However, for Site 2 this text makes no reference at all to anything which would suggest that the development of Site 2 would be unsafe in highways terms.

4.34 Even on the basis of the widened Objective 6 referenced in the matrix, which also includes an assessment of the impact on traffic congestion, there is similarly no reference in this text to anything that would warrant Site 2 scoring negatively, let alone a significant negative. Indeed, to the contrary, the text acknowledges that Site 2 is 'in close proximity to the services and facilities of Hassocks village centre as well as non-car modes of transport'. This conclusion (which we agree is accurate) is something that would clearly mean that the impact of development on Site 2, in terms of traffic congestion, would be low both in absolute and relative terms.

4.35 Furthermore, the SA was of course produced by the Parish Council in the knowledge that a planning application had been submitted for residential development on Site 2. This meant not only that detailed technical work was available on a variety of technical matters, including highways, but also that consultation responses from key statutory consultees, including the Highways Authority, were available. As such, the impacts of development of Site 2 were much more easily confirmed than for other sites.

4.36 However, the SA appears to have had no regard to the technical information that informed the planning application or the relevant responses from statutory consultees. Reference to the Officers Report to Committee dated January 2015 (attached at Appendix 3) would quickly have confirmed that:

i. the Highways Authority agreed that with the proposed mitigation measures at the Stonepound Crossroad, "...in real terms the overall situation for traffic at the junction improves significantly" (our emphasis) [Officers Report Appendix A page 7]; and

ii. the Highways Authority raised no objection to the proposals having regard to the proposed mitigation measures (Officers Report page 3).

4.37 Accordingly, the scoring of Site 2 as a significant negative against Objective 6 is clearly and demonstrably contrary to the available evidence and, therefore, flawed. If scored having regard to the available evidence, it is clear that Site 2 should reasonably score a significant positive.

4.38 These errors are exacerbated by the fact that they apply not only in absolute terms but also, having regard to one of the larger greenfield sites that the Parish Council does propose to allocate in the HNP - Hassocks Golf Club, in relative terms.

4.39 Reference to the SA shows that for Objective 6 the Hassocks Golf Course site (Site 15) scores only a minor negative i.e. it scores better in relative terms than Site 2. No comment is provided in the SA in terms of highway safety but in terms of traffic congestion the SA rightly notes that the Golf Course site is 'relatively remote from the services and facilities of Hassocks village centre as well as non-car modes of transport'. On that basis it is not credible or reasonable for Site 15 to score better in relative terms than Site 2 when, at the Parish Council's own admission, the Golf Course site is remote from services and public transport which must, as a consequence, lead to higher car usage and, therefore, congestion when compared to Site 2 which is in close proximity to these services.

Site 2 Matrix – Objective 9 (Improve Non-Car Transport)

4.40 The matrix identifies that the development of Site 2 would have a possible positive impact the objective to improve non-car transport. Reference to page 23 of the SA shows that the key indicator in terms of meeting this objective is the number of households within a 10-minute walk (approximately 800 metres) of a train station or a bus stop with a frequency of more than 1 per hour during the working day.

4.41 As set out at paragraph 3.3 of the updated Transport Statement of Common Ground (TSOCG) agreed with West Sussex County Council (Appendix 4), the nearest bus stops to Site 2 are on the A273 and are approximately 325m and 500 from the centre of the site. As summarised at paragraph 3.1.1 of the TSOCG these services combine to provide four or five services per hour between the site and a number of key destinations including Burgess Hill and Brighton.

4.42 Furthermore, paragraph 3.1.2 of the TSOCG confirms that Hassocks rail station is situated approximately 750m from the centre of the site, providing regular services to a number of destinations including Brighton, Burgess Hill, Haywards Heath, Three Bridges, Gatwick Airport, Redhill, East Croydon and London stations.

4.43 It is, therefore, evident that development of Site 2 would wholly accord with the key indicator for Objective 9, with all proposed homes within approximately 800m of the station and only 325 / 500m from bus stops.

4.44 As one of the largest sites being considered for development as part of the HNP process, and given the above, it is evident that Site 2 should reasonably have scored a significant positive against this criterion.

Site 2 Matrix - Objective 11 (Maintain / enhance economic base)

4.45 The matrix identifies that the development of Site 2 for housing would have a neutral effect on the economic base. This cannot be right as housing development on Site 2 would clearly encourage economic development in a variety of ways:

- i. the delivery of additional housing on this site will provide homes that allow workers to live close to employers in Hassocks and the locality, making it easier for those employers to attract workers;
- ii. the construction of these houses will create 233 full time equivalent jobs either directly in construction or in the supply chain;
- iii. additional spend of £2.4m per annum will be generated by the residents of these new houses, which will benefit local businesses in Hassocks; and
- iv. the development would generate a total New Homes Bonus payment to the District and County Councils of approximately £1,000,000 (a local finance consideration that Section 70(2) of the Town and Country Planning Act 1990 (as amended) was specifically amended to require that a local planning authority must have regard to as far as it is material).

4.46 As such there is a clear and direct link between the provision of housing on Site 2 and improvements in the economic base of Hassocks. As Site 2 is one of the larger sites considered for development by the Parish Council it should logically score a significant positive in this regard (as opposed to the neutral score given in the SA).

Site 2 Matrix - Objective 13 (Retail)

4.47 The matrix identifies that the development of housing on Site 2 would have a neutral impact on retail in the town. This again must be an error as the delivery of houses on Site 2, in both the short and long term, will contribute directly to maintaining and potentially enhancing retail provision in the village.

4.48 In the short term, during the construction phase, construction workers will spend money in local shops. In the long term the residents of the new houses will spend a proportion of their income on retail services in Hassocks. The ONS Family Spending Report (2013) identifies that average household weekly expenditure was £489 per week in 2012. If Site 2 was to accommodate the 97 homes proposed by the developers, and assuming that the new households created conform to average weekly trends on various items, then total expenditure would be £47,433 per week (£2.4m per annum). Of this, £5,510 (£286,000 per annum) will be spent in total weekly on food and drink, including both top up and main food shopping. Furthermore, in Hassocks and the locality generally, there are a number of other small businesses that would also benefit from growth in the number of local households.

Average household expenditure on alcoholic drinks & tobacco, recreation & culture, restaurants & hotels, household goods & services and miscellaneous goods & services amounts to £181.50 per week per household which, would mean the Appeal Scheme would generate weekly spending of £17,606 on these items (£915,000 per annum).

4.49 This additional spend will help support the local long-term vitality and viability of Hassocks and the wider Mid Sussex economy.

4.50 As such there is clearly and demonstrably a link between the development of the Site 2 and Objective 13, and the SA should reasonably have recorded Site 2 as, one of the larger sites that was assessed, as having a significant positive impact.

Summary

4.51 As summarised above, there are clear and demonstrable errors in the Sustainability Appraisal produced by the Parish Council to support and inform the HNP. These errors are such that the relative scoring of options is fundamentally flawed. In particular, the scoring of Site 2 is such that it, unjustifiably and unreasonably, under-performed in the SA in both absolute and relative terms. As demonstrated in the tables on the next page, if this SA scoring is corrected it is materially different to that carried out by the Parish Council and is materially more favourable to Site 2. Accordingly, there is clearly potential for the Parish Council to have made a different decision.

5.0 HNP Section 6 / Policy 13: Conflict of Interest / Appearance of Bias

5.1 In addition to the issues raised previously in terms of the Parish Council's approach to housing in the HNP, the attached legal Opinion (Appendix 5) covers issues of the appearance of bias, and conflict of interest, relevant to both the decision-makers in this instance (the Parish Council) and its advisors (Dowsett Mayhew).

5.2 In short, this legal Opinion concludes that Mr Credland's role as Chairman of the Neighbourhood Plan Working Group (NPWG), Chairman of Save Ham Fields (the group established to oppose development at Site 2) and as a member of the Parish Council who voted on the HNP, gives rise to the appearance of bias on acknowledged prejudicial interests such that to make the HNP would be unlawful.

5.3 Secondly, the Opinion concludes that Mr Mayhew, as a professional town planner working for Dowsett Mayhew (advisors to the Parish Council), in opposing the

development of Site 2 and ostensibly providing “objective” assessments of development locations and related policies, also gives rise to the appearance of bias such that none of his advice, or the documents produced by Dowsett Mayhew, can safely be relied upon by the Parish Council, the District Council, the public or an Examiner.

5.4 Consequently, the Parish Council needs to cease progress of the HNP and start the process again, founded on fresh evidence produced by genuinely independent expert advice that is not infected with conflicts of interest and which is considered by the Parish Council to be similarly free from bias. Without such action the HNP, if made, is liable to legal challenge in the High Court.

6.0 Basic Conditions / Change Sought

6.1 Having regard to relevant national policy as set out in NPPF paragraph 47 and ID 2a-001 to 2a-029 of the NPPG, it is demonstrably not appropriate to make the HNP having regard to its fundamentally flawed approach to the identification of housing need. As such it fails the basic conditions tests.

6.2 Given the significance and extent of the failings in this regard (together with the legal issues associated with the appearance of bias and conflict of interest), the HNP should not be submitted for Examination. Instead, robust evidence of genuine housing need should be produced, in a manner compliant with national policy and guidance, and the HNP process started again in terms of identifying need, and then the identification of housing sites to meet this need (founded on fresh evidence produced by genuinely independent expert advice that is not infected with conflicts of interest and which is considered by the Parish Council to be similarly free from bias.)

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20319	13	Mr A Ross	Nexus	Gleeson Developments Ltd			

Comments

Sustainability Appraisal

1.1 The Parish Council has published a Sustainability Appraisal (“SA”) report, incorporating Strategic Environment Assessment dated June 2016. As the SA states at paragraph 1.10, its purpose is to assess whether the HNP may have effects on a range of sustainability topics and consider alternatives and mitigation to reduce any negative impacts.

1.2 Section 4 of the SA identifies the Sustainability Framework that has been used, identifying a series of Objectives based on the three strands of sustainability (environmental, social and economic) and for each Objective, the indicators chosen to quantify and measures the achievement of each Objective. Pages 22 to 24 of the SA identify the thirteen Objectives identified together with the indicators chosen for each.

1.3 As set out at paragraph 6.2 of the SA report, the information contained has been taken in to account by the Parish Council in preparing the HNP. As such it is evident that the accuracy of the SA is highly relevant to the decisions made and, therefore, to the credibility of the HNP as a whole.

1.4 We consider that the SA is flawed both in terms of the accuracy of its content and conclusions, and from a legal perspective in terms of some key process failings. On that basis we consider that the SA and the HNP are flawed and that the HNP should not be made. We set out our objections below

Failure to Identify Why Reasonable Alternatives Were Discounted

1.5 The SA report, at Appendix 2, assess each of the identified reasonable alternative sites for the provision of housing at Hassocks. Eighteen sites are identified in this regard. A matrix is included which summarises the scoring of each site against the identified Objectives.

1.6 However, having assessed the sites against these Objectives, nowhere in the SA report does it set out why fifteen of the eighteen reasonable alternative sites were discounted, and why the sites identified in Policy 13 of the HNP are selected. It is not, therefore, possible for any consultee to understand from the SA report what the reasons are for rejecting these alternative sites (and the coring of the sites is not hugely dissimilar). As set out in the case of Save Historic Newmarket vs Secretary of State and Forest Heath District Council (Appendix 1), this failure in the SA report is a breach of Article 5 of the Strategic Environmental Assessment Directive (Directive 2001/42/EC) and is, of itself, sufficient to render the SA report unlawful and preclude the making of the HNP.

Failure of SA Objective 7 to Accord with the Requirements of the NPPF

1.7 As set out at page 23 of the SA report, Objective 7 is entitled ‘Housing: to enable those with identified local housing needs to have the opportunity to live in an affordable home within the parish’. The identified indicators for assessing against this Objective are the number of new home completions, the number of affordable home completions, and the number of people on the Parish Council’s housing waiting list. It is against this Objective, and these indicators, that the merits of all of the options considered in the SA report, including the level of housing provided in the Parish, are considered.

1.8 However, Objective 7 refers only to enabling those with ‘identified local housing needs’ to have the opportunity to ‘live in an affordable home within the parish’. This is a very localised assessment which considers only the purported need for affordable housing as generated by the Parish itself, and provides no consideration of the contribution that the Parish should reasonably make to meeting the housing requirement for the District as a whole given its sustainability and position in the settlement hierarchy (it is of course below only the main

towns of Burgess Hill, East Grinstead and Haywards Heath in terms of its sustainability).

1.9 Paragraphs 14, 16 (1) and 16 (2), 17 (1) and 17(3), 47, 156 and 159 and 183 of the NPPF seek to ensure that local authorities neighbourhood forums plan positively and proactively, and specifically look to boost significantly the supply of housing and as part of this objective, ensure that local plans / neighbourhood plans meet the full objectively assessed needs for market and affordable housing in the housing market area. The Parish Council has chosen to progress the HNP ahead of the emerging Mid Sussex District Plan and accordingly, before the housing requirement for the District has been determined (albeit that Mid Sussex District Council’s HEDNA Update November 2015 identifies a ‘starting point’ housing figure for Hassocks of 630 homes). In this situation, as set out elsewhere in our representations, the HNP must ensure that it does not place a cap on housing provision. Furthermore, in the absence of a housing requirement figure for Hassocks in the emerging District Plan, the HNP

must consider what the appropriate level of housing is having regard to specific identified needs but also, the appropriate contribution to the provision of housing in the District

as part of a wider housing market area.

1.10 Objective 7 focuses only on the level of housing required for Hassocks itself, with a clear focus on affordable homes (although as referenced elsewhere in our representations, the HNP evidence base does not identify or consider what the need for affordable housing is in the Parish or how this should influence the housing requirement figure generally). This is contrary to the provisions on paragraph 47 of the NPPF. Importantly, this error then permeates the entire SA report as in assessing Policy 13, for example, the SA tests various options from 130 to 630 homes, concluding that 280-290 homes is the preferred option. However, the Parish Council has come to this conclusion based on a failure to consider the level of housing that it should provide, having regard to District-wide need, contrary to the relevant provisions of the NPPF. If it had had proper regard to these District-wide issues, the provision of 630 homes (the figure for Hassocks advanced by MSDC in its HEDNA Update November 2015) would / should have scored much more favourably against this key Objective.

Summary

1.11 The Parish Council's failure to properly assess, in accordance with the clear guidance in paragraph 47 of the NPPF, the merits of housing and affordable housing provision generally, and in the consideration of the merits of housing development on specific sites, is a fundamental flaw in the SA process. This, together with the other flaws identified elsewhere in our representations, are such that the SA Report that has been produced is so flawed that it cannot reasonably be described as an SA. As a consequence, the assessment of the HNP is similarly flawed.

Errors in Assessing Compatibility of HNP Objectives and SA Objectives (Figure 7)

1.12 Figure 7 of the SA report is a table which identifies the compatibility of the Strategic Objectives of the HNP and the Sustainability Objectives of the SA. We note that the HNP Strategic Objectives as identified in the table on page 24 of the SA report (and in Figure 7), of which there are seven, do not accord with the number of Objectives identified in the HNP itself (of which there are six). It seems in this regard that HNP Strategic Objective 1 has, for the purposes of Figure 7 of the SA report, been split in to two separate Objectives. They have also been re-ordered.

1.13 Notwithstanding this rather unhelpful confusion, there are some clear anomalies in Figure 7 which go the heart of the deficiencies of the SA process. We summarise some of these below.

Sustainability Objective 7 (Provide Housing) / HNP Objective 7 (Encourage Economic development)

1.14 Figure 7 shows no link between the provision of housing and encouraging economic development (showing a 0 in this regard). This cannot be right as increased levels of housing provision demonstrably encourage economic development in a variety of ways including:

- i. the delivery of additional housing on this site will provide homes that allow workers to live close to employers in Hassocks and the locality, making it easier for those employers to attract workers;
- ii. the construction of these houses will create 233 full time equivalent jobs either directly in construction or in the supply chain; and
- iii. additional spend of approximately £2.4m per annum will be generated by the residents of these new houses, which will benefit local businesses in Hassocks.

1.15 As such there is a clear and direct link between the provision of housing on Site 2 and improvements in the economic base of Hassocks. As Site 2 is one of the larger sites considered for development by the Parish Council it should logically score a significant positive in this regard.

Sustainability Objective 11 (Economy) / HNP Objective 6 (Provide housing)

1.16 Figure 7 shows no link between these two Objectives. For the reasons set out above in considering the errors made in relation to Sustainability Objective 7 and HNP Objective 7, the Parish Council has failed to identify the compatibility between housing and economic development and specifically, the benefits that housing delivery provides in this regard.

Sustainability Objective 13 (Maintain / enhance retail) / HNP Objective 6 (Provide housing)

1.17 Figure 7 identifies no link between the delivery of housing and maintaining and enhancing retail provision in Hassocks.

1.18 This is a significant error as the delivery of houses, in both the short and long term, contributes directly to maintaining and enhancing retail provision in Hassocks. In the short term, during the construction phase, construction workers will spend money in local shops. In the long term the residents of the new houses will spend a proportion of their income on retail services in Hassocks. The ONS Family Spending Report (2013) identifies that average household weekly expenditure was £489 per week in 2012. If Site 2 was to accommodate the 97 homes proposed by the developers, and assuming that the new households created conform to average weekly trends on various items, then total

expenditure would be £47,433 per week (£2.4m per annum). Of this, £5,510 will be spent in total weekly on food and drink, including both top up and main food shopping (£286,000 per annum). Furthermore, in Hassocks and the locality generally, there are a number of other small businesses that would also benefit from growth in the number of local households. Average household expenditure on alcoholic drinks & tobacco, recreation & culture, restaurants & hotels, household goods & services and miscellaneous goods & services amounts to £181.50 per week per household which, would mean that development of Site 2 would generate weekly spending of £17,606 on these items (£915,000 per annum).

1.19 This additional spend will help support the local long-term vitality and viability of Hassocks and the wider Mid Sussex economy. As such there is a clear and demonstrable link between these two Objectives.

1.20 As with economic development issues, the Parish Council's failure to recognise this link means that in assessing housing related issues, it has focussed inappropriately on the negatives and failed to recognise the benefits.

Errors in the Policy Assessment Matrices

1.21 In addition to the errors / omissions identified above, the SA report also contains a number of fundamental errors in its assessment of the options for specific HNP policies. We identify some of the most significant errors below.

Policy 2 Matrix – Ditchling & Hurstpierpoint Gap

1.22 This matrix assesses three options in relation to Policy 2 (Ditchling & Hurstpierpoint Gap):

- i. Option A: having a Gap policy but not defining a Gap;
- ii. Option B: having a Gap policy and identifying a Gap; and
- iii. Option C: having no policy or Gap designation and relying on the NPPF and Mid Sussex District Plan.

1.23 The SA report concludes that having a Local Gap policy, and identifying a Gap, is the preferred option (Option B). However, the scoring identified in the matrix, which led to this conclusion, is flawed.

1.24 It can be seen from the matrix that Option C scores a minor negative against Objective 1 (conserve and protect the countryside and landscape) and Objective 2 (protect / enhance biodiversity). The text below the matrix states that Option C would not "provide the policy framework to positively deliver sustainable protection of settlement identity".

1.25 Firstly, a Local Gap is a spatial planning designation and has relevance at all to issues of biodiversity. As such there is no reasonable basis to assume any relationship between a Local Gap and the protection / enhancement of biodiversity. Secondly, there is no evidence to support the assertion that relying on the policies of the NPPF and the strategic policies of the District Plan (Option C) would in any way be negative, or more negative in relative terms, than Options A or B. The NPPF and Policy DP11 of the emerging District Plan provide protection to valued landscapes generally, and Policy DP11 specifically precludes development that would result in coalescence. Proposals would simply be assessed on a case by case basis against this existing policy framework and unacceptable / unsustainable development would be refused. Accordingly, there is no basis for Option C to score negatively in this regard in either absolute or relative terms.

1.26 We note also that Option C scores a possible negative against Objective 5 (climate change), whereas Options A and B score a possible positive. The indicators against which Objective 5 is assessed are set out in the SA report on page 22, relating to green energy, Building Regulations, proximity to the train station, and air quality at Stonepound Crossroads. There is no basis for Option C to score a possible negative against this Objective or these indicators as a Local Gap issue has no bearing on this Objective.

Summary

1.27 Against this background it is evident that the SA scoring is flawed such that it cannot be considered to be a reasonable and robust assessment of the merits of the options considered. To demonstrate this, we have re-produced the Council's SA table on the next page, together with a version produced by Nexus Planning which addresses the anomalies identified in our representation and re-scores the options accordingly. As can be seen, the scoring is materially different and accordingly, that the Parish Council may well have made a different

decision had the SA been scored appropriately.

Policy 3 Matrix – Local Green Spaces

1.28 This matrix assesses two options:

- i. Option A: have a policy identifying Local Green Spaces; and
- ii. Option B: not having such a policy and relying on the NPPF and District Plan

1.29 Of fundamental importance, the identification and assessment of these two options highlights a key flaw in the Parish Council's understanding of and justification for, Local Green Space designations. As set out in detail in our representations to Policy 3, it is not a case of whether the Parish Council or its consultants consider that there are or are not merits in seeking to have Local Green Space allocations. It is, as set out at paragraphs 76 and 77 of the NPPF, whether an area(s) has the qualities to justify a LGS designation in terms of NPPF policy i.e.

whether land is demonstrably special to a local community and holds particular significance for one or more of the identified issues. This is something that can be brought forward if a local community so wishes and can evidence it suitably. It is not a case of whether the HNP should or should not have such a policy. This misconception fundamentally undermines the HNP and specifically the Parish Council's approach to the allocation of Local Green Space.

1.30 Notwithstanding this, Option B scores negatively against Objectives 1, 2 and 10. However it is impossible to understand why this should be the case. Objectives 1 and 2 seek to protect the countryside / landscape and biodiversity respectively. The NPPF and policies of the emerging District Plan provide protection to valued landscapes and biodiversity, ensuring that development which is unacceptable for either reason should be refused. There is no reason, as a matter of principle, that the absence of a Local Green Space designation would harm either Objective. In terms of Objective 10 (maintaining / enhancing community infrastructure)

there is no reason why the lack of a Local Green Space designation should be negative in terms of any impact on community infrastructure.

1.31 These errors mean that the merits of Option B have been under-scored relative to Option A, which is the Parish Council's preferred option. An appropriate and reasonable scoring of Option B would demonstrate that the need for Local Green Space designations is not preferable based on the Sustainability Objectives but is simply a case of whether the relevant tests at paragraph 77 of the NPPF can be met to warrant such designations. This will simply turn on the facts relevant to each Local Green Space.

Summary

1.32 Against this background it is evident that the SA scoring is flawed such that it cannot be considered to be a reasonable and robust assessment of the merits of the options considered. To demonstrate this, we have re-produced the Council's SA table on the following page, , together with a version produced by Nexus Planning which addresses the anomalies identified in our representation and re-scores the options accordingly. As can be seen, the scoring is materially different and accordingly, that the Parish Council may well have made a

different decision had the SA been scored appropriately.

Policy 13 Matrix – Housing Allocations

1.33 This matrix assesses four options, produced using different assessment methodologies, in terms of the provision of housing in Hassocks:

- i. Option A: 130 homes
- ii. Option B: 280-290 homes:
- iii. Option C: 474-500 homes; and
- iv. Option D: 630 homes

1.34 Option B is identified as the Parish Council's preferred option. However once again, the assessment of the options is flawed.

1.35 In terms of assessing these options against Objective 7 (Housing needs and Affordable Homes) the SA identifies a minor positive score for Option A, with all other options scoring a significant positive. Option B is ultimately identified as the Parish Council's preferred option. However once again, the assessment of the options is flawed.

1.36 As referenced elsewhere in our representations, the Parish Council's scoring of the options against this key objective fundamentally under-estimates the negative effects of failing to accord with the requirement of paragraph 47 of the NPPF in terms of meeting the full objectively assessed need for market and affordable housing. Options A – C all deliver less than the starting point for housing provision in Hassocks (630 dwellings) identified in the HEDNA Update 2015. As such, Options A-C should all score a significant negative. Option D,

the only option to accord with the requirements of the HEDNA Update, should score a significant positive.

1.37 Objective 2 relates to protecting / enhancing biodiversity. The Policy 13 matrix identifies increasingly negative scoring against this Objective as proposed housing numbers increase, with Options C and D scoring a significant negative.

1.38 The basis for this conclusion is wholly unclear but seems to be on the assumption that increased housing levels automatically result in negative impacts on biodiversity. This is clearly not the case as the significant majority of greenfield residential developments secure, through retention of key trees and hedgerows and the replacement of fields which lack biodiversity with increasingly diverse residential garden areas and managed open space, a biodiversity gain.

1.39 On that basis, the scoring of Options C and D is flawed. Again this error reflects the Parish Council's apparent determination to ignore the positives associated with housing development and an unjustified focus on purported negative impacts.

1.40 Similar flaws are evident in terms of the assessment of these Options against Objective 10: (Maintain / enhance community infrastructure). The matrix assumes that the impact of housing at any scale is neutral. This is clearly an error as new housing development will clearly help to either maintain existing community provision (with new residents making better use of facilities and potentially avoiding their closure) or, where appropriate, delivering improvements to or wholly new community infrastructure (one of the only realistic ways to fund such provision).

1.41 This is again a failure by the Parish Council to acknowledge the positives associated with housing development.

1.42 Finally, there are flaws also in the assessment of Policy 13 against Objective 11 (Maintain /enhance economic base). The matrix identifies a neutral impact for Option A, with all other Options having a possible minor positive impact. However, for the reasons expanded upon previously, the greater the level of housing delivery, the greater the short and long term economic benefits to Hassocks. As such logic would dictate that Options C and D, which propose materially high levels of housing than Option B, should score better against this Objective than Option B, yet the SA report scores them equally. This is despite the text below the matrix recognising that “..the higher growth option (in particular C and D) would be more likely to positively impact on the strategic objectives.”

1.43 As such it is evident that the authors of the SA agree with the logic of our point in this regard, yet the SA matrix scoring does not reflect it. This is clearly an error.

Summary

1.44 Against this background it is evident that the SA scoring is flawed such that it cannot be considered to be a reasonable and robust assessment of the merits of the options considered. To demonstrate this, we have re-produced the Council's SA table below, together with a version produced by Nexus Planning which addresses the anomalies identified in our representation and re-scores the options accordingly.

Errors in Site 2 Matrix

1.45 In addition to the errors identified above we have, in our representations to Policy 13 itself, identified a range of flaws in the SA assessment with specific regard to Site 2 (Land at the Ham). The scoring provided in relation to some key objectives in the SA is simply impossible to reconcile with the facts, even those presented by the Parish Council itself in this SA. As set out in more detailed in our representations to Policy 13 this includes, for example, the SA conclusions that development of the site would have a neutral impact on both retail (Objective 13), employment (Objective 11) and community infrastructure (Objective 10) when it would clearly and demonstrably have a positive, and potentially significantly positive impact on all three. Furthermore, the SA concludes that the proposals would have a negative impact on biodiversity (Objective 2) when this would at worst be neutral and in all likelihood be positive, and a significant negative impact on highway safety / traffic congestion (Objective 6) when the proposals would in fact reduce congestion at the Stonepound Crossroads and have been confirmed to be safe. For clarity we set include again, on the next page, the original SA scoring together with a revised SA table that corrects the identified errors. As can be seen, the revised scoring is materially different to the original, and is considerably more favourable to Site 2. As such it is evident that had this exercise been carried out correctly and robustly by the Parish Council, it is reasonable to assume that it might well have come to a different decision relevant to this site.

Basic Conditions / Suggested Change

1.46 Against this background it is evident that the SA is flawed both in terms of its content and the lawfulness of the process adopted. It fails the basic conditions in that it is clearly inappropriate to make the HNP having regard to national policies and advice which are clear that sustainability appraisal (and clearly accurate sustainability appraisal) is a key part of the planmaking process. The Sustainability Appraisal failures also mean that it fails the basic conditions tests as it is not compatible with EU obligations as set out in the Environmental Impact Assessment Directive 2011/92/EU (as clarified in the attached legal Opinion).

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20319	14	Mr A Ross	Nexus	Gleeson Developments Ltd		11	

Comments

HNP Chapter 3: Vision and Strategic Objectives

1.1 Section 3 of the HNP sets out the Parish Council's Vision and Strategic Objectives in the Plan period to 2031. This is wholly appropriate. However, we do object to some elements of the Vision and Strategic Objectives which go to the heart of more fundamental flaws in the Parish Council's production of the HNP (addressed in detail elsewhere in our representations) most notably, the importance of housing provision to the future of the Parish.

Vision

1.2 The Parish Council's Vision includes reference to the provision of access "for the whole community to local social, cultural, sporting and environmental amenities". However, it omits to make any reference to the key issue of providing sufficient homes having regard to needs in Hassocks and the appropriate contribution that the Parish / town should make to District-wide housing requirements, having regard to the requirements of paragraph 47 of the NPPF.

Strategic Objectives

1.3 The identification of a series of Strategic Objectives, which seek to implement the HNP Vision, and which feed in to the policies of the HNP, is wholly appropriate. However, we object to two of the Strategic Objectives which highlight crucial failings in the HNP process and, particularly, the approach to housing provision.

1.4 Strategic Objective 1 refers to "...maintaining Gaps to neighbouring town and villages". We do not object to the principle of maintain Gaps around the village. However, as set out elsewhere in our objections, in relation to the proposed Hassocks - Hurstpierpoint Gap allocated by Policy 2, this cannot be a simple rolling forward of the Local Gap as allocated by Policy C3 of the out of date Mid Sussex Local Plan 2004. Instead, based on the emerging District Plan, which has been produced following publication (and therefore cognisant of) the NPPF, it is noted that Policy DP11 does not allocate gaps but instead allows for the allocation Gaps in neighbourhood plans subject to there being robust evidence.

1.5 The evidence base for the HNP is listed on pages 44 and 46 of the Plan. However, there is no identified evidence to indicate that the need for a Gap in this location has been reviewed as a matter of principle or, even if it could be demonstrated that a Gap was required, any evidence to demonstrate that the extent of the Gap has been reviewed having regard to the well-established objective to ensure that no more land is identified than is necessary to fulfil this function. The Parish Council's representative at the recent Public Inquiry considering proposals for housing on the land west of London Road, Hassocks, ultimately agreed in cross-examination that there is no evidence supporting the HNP which considers the need for, or extent of, the Gap.

1.6 In the absence of such evidence, the Gap the provisions of Policy DP11 of the emerging District Plan have not been met and on this basis, the Gap designation must be deleted (although land in this location would of course still be protected by virtue of general countryside policies in the NPPF and emerging District Plan, and the provisions of Policy DP11 of the emerging District Plan which seeks to avoid coalescence).

Strategic Objective 3

1.7 Strategic Objective 3 seeks to "...provide the opportunity for appropriately sized, affordable and sustainable housing."

1.8 Importantly, Strategic Objective 3 makes no reference to provision of an appropriate number of houses. It is of course a significant boost in the supply i.e. number of houses that is the primary objective of the NPPF relevant to housing. Unfortunately, the failure to recognise the importance of delivering the right quantum of new housing, as opposed to a focus on the type and tenure, is something that has permeated, and undermined, the entire HNP process.

Basic Conditions / Changes Sought

1.9 It is not appropriate to make the HNP, having regard to relevant national policy and the Vision and Strategic Objectives identified above, as they are not consistent with paragraph 47 of the NPPF in terms of boosting significantly the supply i.e. number of new homes provided.

1.10 They are similarly not in general conformity with the strategic policies of the development plan as they simply roll forward a Local Gap from the out of date Local Plan 2004 and are contrary to the provisions of Policy DP11 of the emerging District Plan (which is cognisant of the NPPF) which does not allocate a Gap and whilst allowing neighbourhood plans to do so, requires robust evidence to be produced to show that sufficient protection is not provided by the NPPF and the District Plan.

1.11 As such the Vision and the identified Strategic Objectives (and the key elements of the HNP as a whole) do not comply with the basic conditions.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20516	1	Ms Charlotte Mayall	Southern Water		3	15	Object

Comments

Policy 3 (Local Green Spaces) states that proposals for any development that conflict with the purpose of local green space designation will be resisted in those areas. We consider that this is unduly restrictive, and does not meet the basic conditions necessary for a neighbourhood plan, namely; to be in general conformity with the strategic policies contained in the development plan for the area of the authority, to have regard to national policies and advice contained in guidance issued by the Secretary of State and contribute to the achievement of sustainable development. National Policies and Guidance Southern Water may have to provide additional water or wastewater infrastructure to serve new and existing customers or meet stricter environmental standards. It is likely that there would be limited options with regard to location, as the infrastructure would need to connect into existing networks. The National Planning Practice Guidance (NPPG) recognises this scenario and states that 'it will be important to recognise that water and wastewater infrastructure sometimes has locational needs (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered'. Therefore, utility infrastructure is considered to constitute the 'very special circumstances' envisaged by paragraph 76 of the National Planning Policy Framework (NPPF. This approach has been supported by both the Examiner of the Arundel NDP, who states that 'paragraph 76 of the NPPF recognises the provision of utility infrastructure can represent very special circumstances.', and on page 13 of the guidance on 'Writing planning policies' (A guide to writing planning policies which will address the issues that matter to your neighbourhood plan) written by Tony Burton and issued in September 2014.

Any proposed development that we would intend to undertake would be in connection with providing or operating our essential services. One of the core planning principles cited in the NPPF is that planning should 'proactively drive and support economic development to deliver the homes, business and industrial units, infrastructure and thriving local paces the country needs'. Paragraph 157 of the NPPF is clear about the importance of planning positively for infrastructure required to meet the objectives, principles and policies of the NPPF. We consider that development proposed to fulfil infrastructure requirements would constitute special circumstances and should be reflected in the proposed policy.

Strategic Policies

Mid Sussex's strategic policies recognise some development may be necessary in such locations, for example Policy B6 (Open Space in Built-Up Areas) of the Local Plan (2004) states that 'where such open space is to be lost to development, for whatever reason, appropriate alternative provision may be sought elsewhere'.

Southern Water 15 Policy 3

Signature: Date:

Proposed amendment

We consider Policy 3 (Local Green Spaces) of the Hassocks Neighbourhood Plan is unsound as it is not in line with the government's planning policies as outlined above. This would be addressed by the addition of the following wording: Development proposals which conflict with the purpose of this designation will be resisted in these areas, other than in very special circumstances, for example it is essential to meet specific utility infrastructure needs and no reasonable alternative sites are available.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20516	2	Ms Charlotte Mayall	Southern Water		9	22	Object

Comments

Southern Water understands Hassocks Parish Council's desire to protect areas of open space.

However, we can not support the current wording of this policy as it could create a barrier to statutory utility providers, such as Southern Water, from delivering their essential infrastructure required to serve existing and planned development. Policy 9 of the Hassocks Neighbourhood Development Plan (NDP) does not meet the basic conditions necessary for a NDP, namely to: be in general conformity with the strategic policies contained in the development plan for the area of the authority, to have regard to national policies and advice contained in guidance issued by the Secretary of State and contribute to the achievement of sustainable development.

National policies and guidance We note that existing 'open space of public value' (para 5.3, p21, Hassocks NP) to the community have not been clearly defined within Policy 9, or on any ancillary maps. Without clarity on such spaces, it will be difficult for decision makers to assess whether undeveloped land falls within this policy. Paragraph 17 of the National Planning Policy Framework requires that plans 'should provide a practical framework within which decisions can be made with a high degree of predictability and efficiency'. Southern Water may have to provide additional water or wastewater infrastructure to serve new and existing customers or meet stricter environmental standards. It is likely that there would be limited options with regard to location, as the infrastructure would need to connect into existing networks. The National Planning Practice Guidance (NPPG) recognises this scenario and states that 'it will be important to recognise that water and wastewater infrastructure sometimes has locational needs (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered'. Therefore, utility infrastructure is considered to constitute the 'very special circumstances' envisaged by paragraph 76 of the National Planning Policy Framework (NPPF). This approach has recently been supported by the Examiner of the Turners Hill NDP and page 13 of the guidance on 'Writing planning policies' (A guide to writing planning policies which will address the issues that matter to your neighbourhood plan) written by Tony Burton and issued in September 2014.

Proposed amendment

Accordingly, to meet the basic conditions necessary for a NDP, we propose the following amended wording to Policy 9: Development proposals which result in the loss of open space will not be supported, with the exception of proposals for essential utility infrastructure, where it can be demonstrated there are no reasonable alternative sites available

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20516	3	Ms Charlotte Mayall	Southern Water		14	28	

Comments

Policy 14: Hassocks Golf Course

The Neighbourhood Plan identifies that the above site could provide 130 residential units. Southern Water requested policy provision to require that the development connects to the sewerage system at the nearest point of adequate capacity. The HNP Consultation Statement considers 'that these matters are most appropriately addressed at a detailed design stage', however, Southern Water considers it prudent to include such provision within policy in order to be in line with National Planning Policy Framework and Guidelines as outlined below.

As indicated in our previous representations, Southern Water undertook a capacity assessment which indicated there is insufficient capacity in the sewerage network. This is not a constraint to development, provided a connection is made to the sewerage network at the nearest point of adequate capacity. If development is permitted to proceed where there is inadequate capacity in the sewerage network, then the system would become overloaded, leading to pollution of the environment. This situation would be contrary to paragraph 109 of

the NPPF, which requires the planning system to prevent both new and existing development from contributing to pollution. Furthermore, policies which allocate sites for development should recognise the need to

connect to the local sewerage network at the nearest point of adequate capacity, to be consistent with paragraph 157 of the National Planning Policy Framework (NPPF). That paragraph requires positive planning for the development and infrastructure required to deliver sustainable development. One of the core planning principles in the NPPF is to 'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs', whilst Planning Practice Guidance (Reference ID: 41-045-20140306) states 'Infrastructure is needed to support development and ensure that a neighbourhood can grow in a sustainable way'.

Our site assessment also revealed existing below-ground sewerage infrastructure at Hassocks Golf Course that needs to be taken into account when designing the proposed development.

An easement width of 6 metres would be required, which may affect the site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.

Proposed amendment To meet basic conditions and ensure consistency with the NPPF and National Planning

Practice Guidance, we propose the following additional text at the end of Policy 14 (new text underlined) as follows: · Have a financial fund to provide for the maintenance of the public open space [...];

- Provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by the service provider.
- Ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20516	4	Ms Charlotte Mayall	Southern Water		15	30	

Comments

Policy 15: Land to the North of Clayton Mills and Mackie Avenue

The Neighbourhood Plan identifies that the above site could provide 140 residential units. Southern Water requested policy provision to require that the development connects to the sewerage system at the nearest points of adequate capacity. The HNP Consultation Statement considers 'that these matters are most appropriately addressed at a detailed design stage', however, Southern Water considers it prudent to include such provision within policy in order to be in line with National Planning Policy Framework and Guidelines as outlined below. As indicated in our previous representations, Southern Water undertook a capacity assessment

which indicated there is insufficient capacity in the sewerage network. This is not a constraint to development, provided a connection is made to the sewerage network at the nearest point of adequate capacity. If development is permitted to proceed where there is inadequate capacity in the sewerage network, then the system would become overloaded, leading to pollution of the environment. This situation would be contrary to paragraph 109 of the NPPF, which requires the planning system to prevent both new and existing development from contributing to pollution. Furthermore, policies which allocate sites for development should recognise the need to connect to the local sewerage network at the nearest point of adequate capacity, to be consistent with

paragraph 157 of the National Planning Policy Framework (NPPF). That paragraph requires positive planning for the development and infrastructure required to deliver sustainable development. One of the core planning principles in the NPPF is to 'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs', whilst Planning Practice Guidance (Reference ID: 41-045-20140306) states 'Infrastructure is needed to support

development and ensure that a neighbourhood can grow in a sustainable way'. Proposed amendment

To meet the basic conditions and ensure consistency with the NPPF and National Planning

Practice Guidance as well as being supported by the examiner for the Hassocks Neighbourhood Development Plan, we propose the following additional text at the end of Policy 15 (new text underlined) as follows:

· Provide suitable access and parking arrangements; · Provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by the service provider.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20516	5	Ms Charlotte Mayall	Southern Water		16	31	

Comments

Policy 16: National Tyre Centre

The Neighbourhood Plan identifies that the above site could provide 20 residential units. Southern Water requested policy provision to require that the development connects to the sewerage system at the nearest points of adequate capacity. The HNP Consultation Statement considers 'that these matters are most appropriately addressed at a detailed design stage', however, Southern Water considers it prudent to include such provision within policy in order to be in line with National Planning Policy Framework and Guidelines as outlined below. As indicated in our previous representations, Southern Water undertook a capacity assessment which indicated there is insufficient capacity in the sewerage network. This is not a constraint to development, provided a connection is made to the sewerage network at the nearest point of adequate capacity. If development is permitted to proceed where there is inadequate capacity in the sewerage network, then the system would become overloaded, leading to pollution of the environment. This situation would be contrary to paragraph 109 of the NPPF, which requires the planning system to prevent both new and existing development from contributing to pollution.

Furthermore, policies which allocate sites for development should recognise the need to connect to the local sewerage network at the nearest point of adequate capacity, to be consistent with paragraph 157 of the National Planning Policy Framework (NPPF). That paragraph requires positive planning for the development and infrastructure required to deliver sustainable development. One of the core planning principles in the NPPF is to 'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs', whilst Planning Practice Guidance (Reference ID: 41-045-20140306) states 'Infrastructure is needed to support development and ensure that a neighbourhood can grow in a sustainable way'. Proposed amendment

To meet the basic conditions and ensure consistency with the NPPF and National Planning Practice Guidance as well as being supported by the examiner for the Hassocks Neighbourhood Development Plan, we propose the following additional text at the end of Policy 16 (new text underlined) as follows:

- Assess and mitigate flood risk [...];
- Provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by the service provider.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20518		Mr Robert Lloyd-Sweet	Historic England				

Comments

Thank you for consulting Historic England on the Submission version of the Hassocks Neighbourhood Plan. As the government's advisor on planning for the historic environment we have restricted our assessment of the plan to those areas that have potential to affect heritage assets and the character of the historic environment. We have previously commented on the plan at the Regulation 14 stage and are pleased to see that several of our recommended amendments have been incorporated. There are a number of policies that we feel are important to the successful implementation of the plan that we wish to support. We feel that Policies 14 and 15 require some amendment to identify the high archaeological potential of the sites and the need for early investigation to inform the design of proposals for development to avoid or minimise harm to heritage assets. We support Policy 6: Development in Conservation Areas and, specifically, the identification of key features of the area that should be respected by development proposals. This provides a locally specific interpretation of national and local planning policies based on the townscape analysis that has been prepared to support the plan's development. We support Policy 8: Character and Design and specifically the clear link to the Village Design Statement and Townscape Appraisal (bullet point 9) as documents that set out the community's appreciation of the character of their environment, including both features worthy of retention or emulation, as well as issues that require proactive measures to resolve.

Policy 14 Land at Hassocks Golf Course: Archaeological notification area DWS8607, following the line of the Roman road from Brighton to London, runs through the land at Hassocks Golf Course and could be affected by development. Whilst the site allocation policy makes reference to the need to protect heritage assets it should make specific reference to this known area of sensitivity within the site and the need for development proposals to seek to minimise or avoid harmful impacts where possible and to provide information both to inform the development of proposals and to allow their informed consideration. We recommend adding to the policy to make these requirements clear (Policy 14) with text such as:

"Development proposals must be informed by an archaeological investigation prepared according to a brief agreed with the Council's archaeological advisor. Proposals will be required to preserve important archaeological remains in-situ through the layout of development including placement of open space and to reveal their significance where practicable. Where preservation-in-situ of remains of less than national importance is not possible, it must be clearly demonstrated that the value of public benefits resulting from development that could not otherwise be delivered outweighs the loss to the archaeological record. In such circumstances a programme of archaeological recording will be required prior to or during development."

This addition is required to ensure the allocation of land has included measures to guide proposals to be developed with consideration of potential impacts on heritage assets, understanding of their significance and adoption of measures to avoid or minimise harm and, where possible, better reveal their significance. We note from the consultation report that the steering group considered this to be a matter that should be dealt with at the detailed design stage of any application. However, we consider that an allocation that doesn't provide a clear direction to inform such design would not promote sustainable development as defined within the NPPF, whilst the findings of such an investigation could, potential affect the number of units that could be delivered by the site's development. As such this is an issue that should be addressed at the outset of developing proposals for the site. The additional text is also required to put the broader, strategic policy B18 of the Local Plan into action at the neighbourhood scale as described within the National Planning Practice Guidance 'Conserving and Enhancing the Historic Environment' paragraph 007.

Policy 15 Land North of Clayton Mills: Part of Archaeological Notification Area DWS8608 lies partially within allocation site Land North of Clayton Mills and represents a dispersed multi-period landscape of Prehistoric and Roman period occupation and settlement. The extent of this type of site (in reality a number of overlapping sites of various dates) is difficult to define and suggests a high potential for remains to be present both within the area and in its immediate vicinity. We note the policy requires that development is limited within the northern part of the allocation site, which may help to preserve remains in situ, however, we would suggest that a similar policy wording is used to that suggest for Policy 14 (above) to draw attention to the archaeological potential of the land and to ensure appropriate investigation is undertaken to inform development proposals and decisions. This is required to ensure the plan promotes sustainable development by conserving archaeological remains in a manner appropriate to their significance and to implement the strategic policies of the NPPF and Local Plan at the neighbourhood level. In this instance the archaeological potential of part of the site has already been determined through investigation although it does not appear that this has covered the whole site and, as such, the extent and importance of remains is not

yet clearly defined. As such we suggest adding the following text to the policy:

“Development proposals must be informed by an archaeological investigation prepared according to a brief agreed with the Council’s archaeological advisor. Proposals will be required to preserve important archaeological remains in-situ through the layout of development including placement of open space and to reveal their significance where practicable. Where preservation-in-situ of remains of less than national importance is not possible, it must be clearly demonstrated that the value of public benefits resulting from development that could not otherwise be delivered outweighs the loss to the archaeological record. In such circumstances a programme of archaeological recording will be required prior to or during development.”

With regard to the Strategic Environmental Assessment of the Plan we note that the assessment of Policy 14 ‘Housing Allocation’ identifies negative impacts to heritage assets from all options but has not identified any potential mitigation measures to offset these impacts. The assessment of the Housing allocation options assesses Option A (essentially policies 14 and 15) as having a positive impact on heritage (Objective 3), whereas we would suggest the potential loss of archaeological remains and landscape character would result in a negative impact without our suggested amendments to Policies 14 and 15. Furthermore at Page 69 and 80 within the individual site assessments the potential impacts to archaeological remains of development of Land at Land North of Clayton Mills and Mackie Avenue (Site 4) and at Hassocks Golf Club (Site 16) does not appear to have taken into account the potential impact on archaeological remains, in spite of the two Areas of Archaeological Potential recorded on the West Sussex Historic Environment Record and our earlier recommendation for the environmental report to consider impacts on non-designated heritage assets including archaeological remains. As such, the former site is recorded as having a neutral impact on the objective to protect/enhance heritage assets and the latter would have an uncertain impact, where we would suggest that without mitigation both options would have a negative impact.

We hope these comments are of assistance to the examiner but would be pleased to answer any queries relating to them or to provide further information that may be necessary.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20642	1	Mr Ben McCully					Neutral

Comments

I have just had a very quick read through the recently published Hassock Neighbourhood Plan. As a resident of Woodland Rd I would like to make a few comments about the proposal for the land to be developed to the North of Mackie Avenue/Clayton Mills.

- With regard to the compensatory green space suggested to the North of the development - the proposed site was already supposed to be allocated open space for the use of the residents of the existing Clayton Mills development, and indeed was already subjected to legal action between Hassocks Parish Council and Barratt Homes because the developer had not fulfilled their obligations in landscaping this area. How can you grant development on an area that is already supposed to be allocated open space? How can we be sure that any compensatory open space will be provided?
- As part of this, the proposal suggests 'It is recommended suitable access to the site is to be gained via Ockley Lane and/or from the south.' Exactly where from the South would the suggested access be? I would want to seek assurances that this will not be from Woodland Road - we already carry a lot of traffic on this road, and the access on the road is already problematic due to the huge amount of commuter traffic and parking. The road narrows at the top end and it is not possible to widen further due to the housing. There are a large number of small children living on the street, any further increase in traffic volume would be dangerous. Can you suggest where this southern access to the new development might be, and whether Woodland Rd has been considered or discounted?
- The plan suggests that no requirement for additional healthcare facilities has been identified - how so? It already takes nearly a week to get an appointment, and with an additional ~270 dwellings the village population will increase by around 1000 people. Surely we will need to extend the healthcare provision, or see further diminishing service?
- The plan suggests an additional 2-form entry school is required, but that no site has been identified. Isn't it more important that this site is identified first before the residential housing sites are defined? It will surely be easier to fit residential development around a school, than to try to shoehorn a school into pre-existing housing developments, or site the school remote from these developments?
- It is good to see that the Plan highlights all the problems we have with commuter parking and supports the provision of better car parks for commuters. However there is no clear vision on how this will be achieved. This is a significant problem, and we are one of the only stations in the area who do not have controlled parking close to the station. Can you give any timeframe for when proposals for better commuter parking will be developed? This is a huge problem within the village.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20643	1	Mr T Surridge					

Comments

In so far as many residents chose to live here because of its status as a village with reasonable transport access to a variety of places including London, Gatwick airport and Brighton it could be assumed that most residents value what it provides. However it has grown in recent years and is now creaking at the seams with particular problems with education capacity, air pollution, public transport reliability, parking close to the station and affordability for new young families. The Parish council are to be commended for the proposals which reflect the fact that they consulted and listened but of course they cannot build a new school, build a car park near to the station, or solve the problem of housing costs where even modest housing is beyond the reach of many. Other local plans will face similar challenges and it is essential therefore that central government and county councils support the investment required if this process is not to be seen as another government project which fails residents because of a lack of funding

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20644	1	Laura Spicer					Support

Comments

I would like to register my support for the Hassocks Neighbourhood plan

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20645	1	Ms A Trott					Support

Comments

As a Hassocks resident, I wish to express my full support for the Hassocks Neighbourhood Plan?

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20646	1	Mr J Taylor					Support

Comments

As a Hassocks resident I endorse the draft plan and agree with its proposals

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20647	1	Mr R Hearle					Object

Comments

I have previously written to the council on this matter and so far have not received a response. My concerns are as follows:

1. My understanding is that the land north of Clayton Mills should be protected for open space for the existing housing development. Why is this now being proposed for development?
2. It is stated in the Plan that the land to the north of the proposal site will be protected (Burgess Hill Gap). (1) Will this be for public access? and (2) How do we know this will not be developed in the future?
3. I am very concerned that further development in this area will exacerbate the already unacceptable situation where vehicles are accessing the Clayton Mills development illegally along the private access road to 'The Kennels' at the northern end of Woodsland Road - this is a designated footpath. In doing so an increasing number of vehicles are using Woodsland Road. This is not sustainable and has been acknowledged by the West Sussex County Council Ranger and Highways officer as an oversight. It is also an issue that the council has unsuccessfully attempted to address. Therefore, I consider that further developments in this area will only exacerbate this already unacceptable outcome from the previous development.
4. I am concerned that access to the site will not be possible from Ockley Lane due to issues regarding visibility. If this is true, How will the site be accessed from the south as stated in the Plan? Surely without an detailed access strategy the site is potentially redundant for the provision of housing. I look forward to considered response to my concerns.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20648	1	Mr M Alder					Support

Comments

Having read and studied the Hassocks Neighbourhood Plan I wish to make known my agreement (in entirety) of the contents of the plan. It is a document of great worth, not only for the fact that much trouble was taken to include the views of the entire community, but that it is beyond doubt a document of sound and clear thinking that will allow Hassocks to evolve positively and fruitfully in the future.

The Hassocks Neighbourhood Plan is a model NP that other Parishes may choose to look to for guidance and should be adopted in full, without delay

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20649	1	Mr S Jameson					Support

Comments

I am writing to show my full support to this plan. After attending various meetings regarding this plan I feel it has been handled as democratically as could be expected and considering the number of new houses Hassocks is obliged to allow for, this resulting plan seems the best result that the majority of residents have agreed upon. As a resident of Shepherds Walk I am particularly pleased that the area of the Friars Oak Fields, designated as LGS1 on the map, are proposed to remain as local green spac

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20650		Mr N Allen					Support

Comments

Please note my support for the Hassocks neighbourhood plan as submitted by the parish council

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20651		Mr & Mrs J & F Vousden					

Comments

I have lived adjacent to the above fields, without the risk of flooding, for thirty years.

I am concerned that if the latest proposed development for 130 homes gains approval, the risk of flooding to my property will be greatly increased.

Although, there are proposals by the developer regarding the building of a bridge - I believe that it may increase the risk of flooding and not diminish the risk to our home.

I would ask that you take my concerns into consideration. I would like the fields to remain the green space enjoyed by locals, visitors and wildlife and not just another estate that makes us an extension of Burgess Hill. I would therefore, like to support the local plan for the Friars Oak Fields to remain a local 'green space'

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20652		Mrs S Smith					Object

Comments

I have been walking thr Friars Oak Fields for 6 years now, I use them to walk my dog as it's a lovely local area to do so and safe.

I object to the plans to use this site for development purposes for three reasons really. The first which is a major concern to me is the volumn of traffic and hazard it will cause to the drivers on the London Road, it's a busy enough and development here would I'm sure cause more accidents. The second is flooding, I've seen how the stream rises and the flooding all the way along from the pub up to Little Copse road. The residents back gardens are affected and fear that this will only push the problem elsewhere.

The last reason is that there is becoming less green space for people to walk, run, learn and enjoy the wildlife and nature that live in these fields and fear that eventually Hassocks will loose it's charm and village appeal which will have an affect on us all.

Small developments yes, but not Friars Oak Fields.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20653		Mr D Creaton			14	31	

Comments

Not sure how the proposal to develop land on Hassocks Golf course will tie in with the Plan's Air Quality policy (policy 7). A development here will clearly increase the traffic at Stonepound Crossroads causing an increase in the pollution levels which the Plan acknowledges are already too high. The Air Quality policy stresses that any development must not increase pollution levels at Stonepound Crossroads and this is clearly not compatible with a development off hte already very busy A273.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20654		Mrs R Parker					

Comments

I refer to the Plan as a whole and wish to comment that I trust you will take on board all the comments of the Parish Council, which were drawn from the local residents' comments, regarding the area as a whole, together with specific environs - especially to prospective areas for house building. My concerns are that houses will be built where it is patently unsuitable i.e. Friars Oak Fields, which is subject to flooding at any time of the year and to build on this area would cause an increased risk of flooding to current housing.

Building at the Ham would cause additional pollution to Stonepound Crossroads which is currently subject to poor pollutions levels and this would only increase with the additional vehicles using London Road from either of the proposed building areas. We, as Hassocks residents, have chosen sites which would do the least amount of damage, either to current properties or to the status of the village itself. It is essential that we retain our village status as that is why many of us live here but understand that we must accept increased housing stock but we should be consulted on where this stock will be built and our comments taken notice of.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20655		Mr D Cross					
Comments							
I have taken time to read the proposed plan. In particular, it is good to see proposal of better bridgeway links between Hassocks and the downs, as well as surrounding areas. As a cyclist and walker, these will get regular use by myself. However, I am still concerned how all of these new houses will affect Stonepound Crossroads. More should be done to route traffic away from this area and on to the A23. Increased population equals increased traffic on our already overcrowded roads. Wouldn't the plan do well to propose new roads to ease traffic away from bottle neck areas ?							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20656	1	Mrs D Woods					Support
Comments							
I have attended the local meetings to help prepare the Hassocks Neighbourhood Plan and have read and reviewed the proposed plan at every stage. I would therefore like to give my full support to the Hassocks N P and would like to see it completed and put in force. I thoroughly support all the future housing choices preferring to see small-scale development to keep Hassocks a village and not turn it into a sprawling town. I fully support the protection of the strategic gap and open green spaces for the community to enjoy.							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20656	2	Mrs D Woods					Support
Comments							
I have read & studied the Hassocks Neighbourhood Plan and wholly agree with its contents. I support the provision of a public green space for everyone to enjoy. Also the protection of the strategic gap.							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20657		Mrs S Saunders					Object
Comments							
I am very against the Friars oak field being built on the fields they flood a lot you are going to take away the wild life homes from them . you are putting more people at risk when they will use the railway line to cross for a short cut to get to the village and school. There is not a bigger another health centre or schools to take any more children and they family's people who have live in the village all there life's who have children and little ones can't get in to the school they are sent to a different areas in West Sussex if you have a child at the school then your other children want to go to the same school they can't get in that means they have to get someone else to take them as they can't be in two place at once . I do hope you re think this as you are also bridge the gap between Hassocks and burgess hill WE are a Village not a town keep Hassocks a village please.							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20658	1	Ms E Handford					Support

Comments

I agree with the above plan and the Friars Oak fields will be designated as green space and protected from development.

I would like to support the Hassocks Neighbourhood Plan. With particular reference to the Regulation 16 submission, policy 3, I strongly agree that the land north of Shepherds Walk(LGS1) be given local green space designation. I have walked these two fields over many years with my children and my grandchildren. This is such a valuable experience - the freedom of being in a natural environment, so close to our local community, is a rare privilege in this day and age.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20659	1	Mr G Smitherman			3	15	Support

Comments

I strongly support the creation of a Local Green Space north of Shepherds Walk (LGS1). My family has used those fields for walking our dog, general exercise and as a safe, enclosed area for our children to play in since we moved here nine years ago. It is in constant use by many others too, and we seldom go there without seeing other walkers. According to our neighbours and the people from whom we bought our house it has been used in this way for many years before that. It is a wildlife haven and the only part of the Burgess Hill gap that is accessible by footpath from the Hassocks side. In addition, if it were used for housing the village would be extended north west in such a way that the residents would have to use cars to reach the village centre, or make it more likely they would go to Burgess Hill, thereby depriving local shops and business of of any benefit. There would also be the obvious extra pressure on Stonepound crossroads and more traffic on the A273, which is already extremely busy - especially if the golf course development opposite goes ahead.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20660	1	Mr T Green					Support

Comments

I would like to express my support for the Hassocks Neighbourhood Plan as published.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20661	1	Mrs V Weston Green					Support

Comments

I should like it to be known that the published Hassocks Neighbourhood Plan has my full support.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20663	1	Ms R Griffin					Support

Comments

I support the Friars Oak Fields to be designated as Local Green Space to continue the important rural hinterland gap between Hassocks and Burgess Hill.

The area of Stonepound crossroads is already heavily congested and more houses in this area will make the pollution levels too high for all residents living around this area.

The schools in Hassocks have all are in the process of multiple extensions to accommodate the already over populated numbers for all schools and more houses in the Friars Oak Fields will add more presurre for the local schools.

the Medical practice in the village is also under pressure with time slots for people wanting to see the doctors and once again with the Friars Oak Fields this will increase the pressure on the local infrastructure.

Parking in Hassocks is very limited and once again put more pressure on the small village.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20664		Ms Katy Weir					Support

Comments

I am strongly in favour of the proposed Hassocks Neighbourhood Plan and wish to support it

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20665		Ms I Griffin-Morrison					Support

Comments

I support the Friars Oak Fields to be designated as Local Green Space to continue the important rural hinterland gap between Hassocks and Burgess Hill.

The area of Stonepound crossroads is already heavily congested and more houses in this area will make the pollution levels too high for all residents living around this area.

The schools in Hassocks have all are in the process of multiple extensions to accommodate the already over populated numbers for all schools, more houses in the Friars Oak Fields will add more presurre for the local schools.

the Medical practice in the village is also under pressure with time slots for people wanting to see the doctors and once again with the Friars Oak Fields this will increase the pressure on the local infrastructure.

Parking in Hassocks is limited and once again put more pressure on the small village.

kind regards

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20666		Mr O Griffin-Morrison					Support
Comments							
I support the Friars Oak Fields to be designated as Local Green Space to continue the important rural hinterland gap between Hassocks and Burgess Hill.							
Stonepound crossroads is already heavily congested and more houses in this area will make the pollution levels too high for all residents living around this area.							
Schools in Hassocks have all are in the process of multiple extensions to accommodate the already over populated numbers for all schools, more houses in the Friars Oak Fields will add more presurre for the local schools.							
the Medical practice in the village is also under pressure with time slots for people wanting to see the doctors and once again with the Friars Oak Fields this will increase the pressure on the local infrastructure.							
Parking in Hassocks is limited and once again put more pressure on the small village.							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20667		Dr S McGuire					
Comments							
I am fully supportive of the aims set out in the neighbourhood plan.							
I am fully supportive of the proposed green spaces.							
I am fully supportive of the policies and suggested areas for development with the exception of the golf course (policy 14)							
I have some reservations about whether development of the golf course would negatively impact on air quality at the stonepound crossroads. It will be some distance from the village amenities which would encourage car use and most people would travel through the stonepound area if they wanted to get either into the village or commute into Brighton. This seems a direct contraindication to policy 7. 130 extra residential properties would probably attract at least as many cars to this AQMA.							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20668		Mt T Ormesher	National Farmers' Union				Object

Comments

Hassocks Neighbourhood Plan – Publication Stage Consultation

This submission is broadly similar to our comments made during the Regulation 14 pre-submission consultation, specifically in response to Policy 3 “Local Green Spaces”. Our submission to the previous consultation contained an error as we referred to the incorrect LGS reference name and number. This was due to the fact that we were referring to an online map and report published (and still present) on the Parish Council website¹, which contains now superseded numbering of the proposed LGS sites.

For the avoidance of doubt both our current and previous submission are concerned with LGS 4 “Land to the east of Ockley Lane” which we believe should be removed as a candidate LGS site.

There appears to have been no attempt to change the LGS designations since the last consultation, this is despite the landowner and other interested parties submitting robust objections on this particular site.

Landowner Consultation

We are concerned that in preparing this plan the Parish have not made sufficient attempts to engage or negotiate with affected landowners. In the case of LGS4 the landowners received a single letter dated 4 September 2015 advising that the site had been proposed for designation.

In our understanding there has been no further attempt to hold a meeting or any further negotiation or dialogue on this subject, despite the issue having considerable concern for the affected landowners. We have also not received any advice that the plan is now open for further consultation. We believe this is an inappropriate way to conduct a consultation where it has a direct impact on a specific business interest.

Blanket Designation

We note that the seven proposed sites are distributed in a manner that links up with other protected green spaces such as woods and playing fields around the built area boundary. In places this will have the effect of creating a continuous corridor that may function in much the same way as a green belt around the village. In our view this is an incorrect application of LGS policy as the relevant planning practice guidance² states:

“...blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.”

¹ See <http://hassockspc.net/wp-content/uploads/2014/07/LGS-Candidates-4.pdf>, which refers to now superseded and incorrect LGS reference numbers.

² Paragraph: 016 Reference ID: 37-016-20140306

You will be aware that Paragraph 77 of the National Planning Policy Framework (NPPF) specifies that “The Local Green Space designation will not be appropriate for most green areas or open space”, which implies that the proposals should only concern exceptional isolated locations. We are concerned that the extensive suite of proposed sites exceeds this guidance as nearly every part of the built area boundary will be subject to some form of designation.

Extensive Tract of Open Countryside

NPPF 77 goes on to state that the designation should only be used “where the green area concerned is local in character and is not an extensive tract of land”.

At 10 hectares, the proposed LGS4 is a large site spanning a continuous area between the built up boundary and the parish boundary, which makes it as much of an extensive tract as it is possible to achieve within the limits of the Parish.

In comparing LGS4 with the wider surrounding fields, LGS4 has the feel of open countryside, consistent in character with the extensive rural landscape beyond the village. The draft Mid-Sussex District Plan identifies the site as DP10 “Countryside Area of Development Restraint”, which categorises ‘countryside’ in terms of having a general consistency of ‘rural and landscape character’. As the site is identified as part of the wider open countryside within the Mid-Sussex Plan, we suggest this is not consistent with a site “local in character” but rather by definition forms part of an extensive tract. We suggest that LGS4 does not satisfy the requirement for a site local in character as it is defined by the local authority as a constituent part of the wider countryside.

Indeed we note within Policy 2 that the same area is designated as part of the “Local Gap” to prevent coalescence between settlements. We dispute that the same area should

be designated twice as both local gap and local greenspace. Local Gaps are essentially blanket designations, mutually exclusive from the intention of LGS policy to designate areas that are “demonstrably special”.

Location within South Downs National Park

The land is situated within the South Downs National Park and in accordance with NPPF 116: “Planning permission should be refused for major developments in... [National Parks]... except in exceptional circumstances and where it can be demonstrated they are in the public interest.” This is a very substantial level of protection where the National Park as Local Planning Authority would have the power to refuse planning permission unless it is demonstrably in the public interest.

By comparison the protection afforded by an LGS designation is lower in that “local communities will be able to rule out new development other than in very special circumstances” (NPPF 77). This does not automatically confer powers on local communities to act as a planning authority and refuse permission in any circumstances, but rather would be a guiding principle in any decision made by the LPA and as such is weaker than the National Park powers of refusal. Furthermore the test of “very special circumstances” is likely to be less robust than the National Park test, as the latter must demonstrate public interest.

The LGS designation would not provide any additional protection to the site compared to the protection already available via the National Park designation and as such is entirely unnecessary.

The relevant planning practice guidance³ states:

“If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.”

In terms of development control, for the reasons outlined above we suggest that the designation would not provide any additional benefit.

In terms of public access, as you are aware, designation would not confer any additional rights of public access over that which exists at present. It is our view that in establishing an LGS designation this could

3 Paragraph: 012 Reference ID: 37-012-20140306

act as a perceived green light for residents who may mistakenly think that they now have additional rights. The site is already subject to trespass by dog walkers who do not follow the designated right of way. If this situation were to deteriorate as a consequence of the LGS designation, the landowner may have no other choice than to fence the line of the footpath to protect his farming operations. In this context we suggest that there would be a substantial risk that the existing access enjoyed by local residents could be restricted as a direct result of the designation.

We are concerned that the LGS designation may be a retrograde step leading to less local benefit compared to the current situation and as a consequence we suggest that it should be abandoned.

Local Significance

As you are aware each LGS must “hold a particular local significance” in relation to the headings set out in NPPF 77. These have been considered these briefly within the PC’s ‘Proposed Local Greenspaces’ documents⁴. In response to the assessment made on “Land to the east of Ockley Lane”, we have the following comments:

Public Access

We note that there is reference to the eastern field, where there is “an informal path around the perimeter of the field popular with local dog walkers”. For the avoidance of doubt, this informal path is matter of trespass and could be enforceable in a civil court. The point is not made frivolously, if the Neighbourhood Plan seeks to encourage activities which are illegal, could these be potential grounds for the entire plan to be found unsound? We do not think that this is an appropriate basis on which to make the case that an LGS holds particular local significance.

Whilst the public right of way may be of value to local dog walkers, this is simply a single right of way across two privately owned fields and there is no scope to increase the right of access available. The presence of a single footpath should not be considered sufficient grounds of “particular local significance” otherwise every well used footpath may be eligible for designation; an outcome which is evidently not intended by the policy.

Beauty

We suggest that the views looking into the site are relatively typical of an arable field and improved grassland field in this part of West Sussex. From an intrinsic point of view we see little evidence to demonstrate the site has beauty or particular local significance; and it therefore does not meet this criterion.

We recognise that the site offers outward views towards the South Downs and a nearby windmill; however these views are also obtainable throughout most parts of the village. There has been no reasoned assessment to demonstrate that the views from within LGS⁴ are significant in comparison to any other views obtained elsewhere within the village.

The submission documents have therefore provided insufficient information to demonstrate these views hold particular local significance.

It is our opinion that all of the views both looking into and out of the site are relatively typical of the surrounding area, and would therefore fail to meet the level of significance required to meet NPPF 77.

Historic Significance

We have seen no evidence based assessment, such as a search of historic records and historic maps, to give any credence to the claims of heritage significance outlined in the submission document. There is a reference to a roman road, but this is of questionable relevance given that the road is not located within the proposed LGS boundary.

Whilst we see no reason to doubt that the field structure has its origins in a historic land parcel arrangement, this is not a sufficient reason to designate the site, given that the same would be true for nearly every other field in the surrounding area. On this basis the Plan does not present any evidence to

4 <http://hassockspc.net/wp-content/uploads/2014/07/Proposed-Local-Green-Spaces.pdf>

suggest that these fields (as opposed to any others) have particular local historic significance. This logic is also consistent with reference to any archaeological “potential” where:

a. There is unlikely to be a single square metre within the Hassocks Parish boundary that does not have the same or similar archaeological “potential” unless it can be shown otherwise; and

b. There is no documentary evidence provided to support the claim that the field has greater or lesser archaeological potential than the surrounding area and cannot therefore be said to hold local significance.

The submission documents do not provide sufficient information to demonstrate that there is historic significance to the LGS4 site. Consequently ‘Historic significance’ should not continue to be put forward as a valid criterion for designating the site.

Recreational value (including as a playing field)

LGS4 does not hold any value as a playing field as this activity is not permitted by the landowner. There are existing public rights of way however these are already protected by other forms of legislation so the LGS designation would add no extra benefit to the right of way. The justifications provided under ‘Recreational Value’ in the ‘Proposed Local Greenspaces’ document are largely related to the landscape and visual amenity, which we have commented on above.

In our view there are no reasons why this site should be considered for designation due to recreational value.

Tranquillity

The site is situated adjacent to the relatively well used Ockley Road and several large housing estates. Both fields are actively farmed, which involves the movement of livestock and heavy farm machinery. We are glad to see that the Parish have not included tranquillity as a reason for designation, particularly due to the presence of much more extensive areas of tranquil open space available close by within the National Park.

Wildlife

Whilst it is recognised that mature ash, oak and hornbeam are likely to provide a variety of wildlife habitat; we see no evidence to demonstrate that this specific site holds particular significance compared to other locations around the village. Trees, hedges bats and nesting birds already enjoy statutory and non-statutory protection however it has not been demonstrated that LGS designation will add any additional benefit to these potential receptors, or that these receptors are of specific interest to the LGS4 site compared to any other.

We have seen no reference within the consultation documents that any baseline ecology surveys have been undertaken. Such surveys might give evidence to determine whether this site holds more value for wildlife in comparison to other locations. Without any evidence to the contrary, given the fairly typical array of habitats available, we see no justification that this site holds particular local significance for wildlife.

In summary, we believe that the Neighbourhood Plan submission fails to provide sufficient evidence to demonstrate that LGS4 holds any “particular local significance” with reference to subject headings provided in NPPF 77.

The affected NFU member is extremely concerned that the designation will encourage a much greater level of unwanted and illegal access on his land. The ongoing problem with unsolicited public access causes disruption for the livestock farming activities, which are an integral part of our member’s business. The LGS designation could increase the disruption that is caused by the public and their dogs, such that the field may increasingly become less viable to support productive agriculture. We would encourage Hassocks Parish Council to enter into a genuine dialogue with the affected landowner, or to simply remove LGS4 as a candidate site from the list.

The NFU seeks to ensure that our members are able to continue their business operations in a fair regulatory environment, which at times can involve supporting our members

with costs towards legal fees. We do this by operating a Legal Assistance Scheme, which is a discretionary funding mechanism towards professional costs incurred in relation to legal disputes. Our member in this case has been a subscriber to the NFU Legal Assistance Scheme for 15 years. We are often most concerned over cases that might set a national precedent. In this case I am extremely concerned that this LGS designation presents significant risks to the industry in setting the evidence requirement for designation at such a low level. We will therefore follow the development of this Plan with interest.

We would be grateful if you could keep us informed on further progress with the plan and any further public examination by the planning inspectorate. We would rather than the LGS is deleted before it reaches the examination but will be prepared to give evidence at the hearing if it is necessary to do so.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20671	1	Mrs F Gilbert					

Comments

Keymer tyres in Hassocks is likely to be demolished and an application for 20 houses to be built there

Surely these properties should only be two storey high so that they are similar in height to Dale Terrace which is beside the present national tyres

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20672	1	Mrs A Halliwell					Support

Comments

I agree with the comments detailed in the Hassocks Neighbourhood Plan relating to the fields North of Shepherds Walk and Ham Fields. Both areas should be designated Green Spaces and not developed

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20673	1	Mr A Chapman			4	14	Support

Comments

I wanted to stress that I fully support the village plans proposals to designate the area to the North of Shepherds Walk as Local Green Space (LGS1). This is a beautiful area full of wildlife there is a healthy population Green Woodpeckers, I regularly see deer on this land and there are numerous birds of prey. This land would be unsuitable for development because it regularly floods in the winter (see picture of flooded stream from January this year), also it is close to a very dangerous crossing over the main London to Brighton railway, which would provide a very dangerous but short route to the local services for any potential residents. This would also exacerbate traffic at the already busy and polluted Stonepound crossroads.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20674	1	Mrs L Chapman				14	Support

Comments

I support the Hassocks Village Plans proposals to designate the area to the North of Shepherds Walk as Local Green Space (LGS1). This is a beautiful area full of wildlife there are Buzzards, Green Woodpeckers, I regularly see deer on this land and there are numerous birds of prey. This land would be unsuitable for development because it regularly floods in the winter, also it is close to a very dangerous crossing over the main London to Brighton railway, which would provide a very dangerous but short route to the local services for any potential residents. This would also exacerbate traffic at the already busy and polluted Stonepound crossroads. I highly value this green space and regularly walk my dog on it. Also I have looked at the village plan and believe it has selected the sites that will best serve for the future development of the village whilst protecting areas that are valued by the residents of which I am one.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20675	1	Mrs L Creaton					Support

Comments

I support the Hassocks Neighbourhood Plan

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20676	1	Mr R Alexander					Support

Comments

This is to confirm my support for the proposition that the land north of the Shepherds Walk estate should indeed be designated a protected green space, it being part of the strategic gap between Hassocks and Burgess Hill.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20677	1	Dr D Rea					Support

Comments

I am writing to you to express my full support for the Hassocks Neighbourhood Plan.

In particular, I support

Policy 1 Hassocks - Burgess Hill Gap
Policy 3 Local Green Spaces

I feel very reassured by the fact that this plan has arrived at the publication stage by a village-wide democratic consultation process. I would be extremely upset if the plan is subverted or circumvented by outside interests who do not have the same stake in the development of the village as local residents.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20678	1	Mrs M Rea					Support

Comments

I took part in all the stages leading up to the Hassocks Neighbourhood plan and gave my input at each stage of the democratic process after due consideration and discussion. I think that the Neighbourhood plan is a very good reflection of the thoughts and ideas of the whole community and it has my full support. Having spent a good deal of time discussing the plan with many other people who live here I would be very angry if the plan was allowed to be ignored by those whose interests are not those of the village. For instance, there is a need for extra housing, but this needs to be kept in line with the Neighbourhood plan - other suggestions for development around the village can be driven by the financial benefits to large developers without any local consideration. The points in the plan about the gaps between Hassocks and the surrounding villages, the need for green space, keeping traffic and pollution at reasonable levels and the avoiding of building on areas liable to flood are all ones which I am most in agreement with.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20679	1	Mrs F Vousden					

Comments

I would like to endorse the proposal to make the Friars Oak Fields a Public Green Space. Many thanks.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20680	1	Mr D Price					Support

Comments

I would like to register my full support for the Hassocks Neighbourhood Plan.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20681	1	Mr A Coop					Support

Comments

As a Resident of Hassocks, I am writing to comment on the Hassocks Neighbourhood Plan.

I consider that the preparation, analysis and consultation on the draft Plan has been thorough. The Parish Council has provided ample opportunity for input from the Community and for residents to vote on emerging proposals. I believe that the Plan is balanced and provides sound solutions to address the various pressures on the Parish over the coming years.

I fully support the aims and objectives of the Plan, which would enable the Parish to develop and evolve whilst maintaining, and enhancing where possible, the characteristics of Hassocks. I am particularly concerned that the strategic gaps are maintained between Hassocks and Ditchling, Hurstpierpoint and Burgess Hill.

I hope that the Hassocks Neighbourhood Plan can proceed as soon as possible.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20682	1	Mrs J Coop					Support

Comments

I am writing to support the Hassocks Neighbourhood Plan.

The Plan has been prepared after thorough analysis and consultation and I am very satisfied with the opportunities provided by the Parish Council for residents to input to the draft Plan. The Plan is balanced and provides clear solutions to meet the pressures on the Parish over the coming years.

I fully support the aims and objectives of the Plan, which will enable the Parish to develop and evolve whilst maintaining, and enhancing where possible, the characteristics of Hassocks. To this end, it is vital that the strategic gaps are maintained between Hassocks and Ditchling, Hurstpierpoint, Burgess Hill.

I hope that the Hassocks Neighbourhood Plan can proceed as soon as possible.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20683	1	Mr R Glaister					Support

Comments

I have now had a chance to read through the Hassocks Neighbourhood Plan and I can confirm that I am supportive of the proposals contained within said plan; I am particularly impressed with the strong focus of retaining the unique and wonderful character of Hassocks and the commitment to preservation of the local environment and our cherished local green spaces particularly in this context the preservation of the green gap that separates Hassocks from the much larger urban conurbation of Burgess Hill; the reasons to reserve this green space have been perfectly laid out in the plan document and I have nothing further to add except that these points receive my full and up-most support. The other section of the plan that I would like to discuss is in regards to housing need. I believe the proposals discussed in the plan demonstrate both a commitment to providing for local housing need whilst listening to and respecting the views and opinions of local people and, protecting both the character of the village and our local green spaces/environment.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20684	1	Mr K Headicar					Support

Comments

I confirm that I have read through Hassocks Neighbour Plans and fully support all the points raised in that well prepared document

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20685		Mr M Hanna					Support

Comments

I write with reference to the above Neighbourhood Plan.

I have been in to the Council Offices in Hassocks to look at the plan and write to confirm my support for the plan as it stands.

I look forward to confirmation that it has been adopted.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20686		Mrs S Hanna					Support

Comments

I write with reference to the above Neighbourhood Plan.

I have been in to the Council Offices in Hassocks to look at the plan and write to confirm my support for the plan as it stands.

I look forward to confirmation that it has been adopted.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20688	1	Mr R Brewer					Support

Comments

Formal Comments - Hassocks Parish Council's Neighbourhood Plan Regulation 16 Submission Version - June 2016.

Dear Sir,

Having read the Hassocks Parish Council's Neighbourhood Plan Regulation 16 Submission Version - June 2016.

I submit the plan has comprehensively demonstrated "sound" compliance to the National Planning Policy Framework (NPPF) "examination" criteria including the four defined in paragraph 182 by clearly demonstrating the quality and effectiveness of the consultation that established the Neighbourhood Plan submission:

"The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound."

"A local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework."

The Parish Council's Regulation 16 submission demonstrates compliance to the National Planning Policy Framework (NPPF) by reporting supporting evidence, stake holder involvement, wide range of candidate development sites and defining policies to deliver and demonstrate the sustainability of the Hassocks Neighbourhood Plan for Hassocks, Keymer and Clayton. See paragraphs 183, 184 and 185.

"Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need. Parishes and neighbourhood forums can use neighbourhood planning to:

- Set planning policies through neighbourhood plans to determine decisions on planning applications; and
- Grant planning permission through Neighbourhood Development Orders and Community Right to Build Orders for specific development which complies with the order."

"Neighbourhood planning provides a powerful set of tools for local people

to ensure that they get the right types of development for their community. The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies."

"Outside these strategic elements, neighbourhood plans will be able to shape and direct sustainable development in their area. Once a neighbourhood plan has demonstrated its general conformity with the strategic policies of the Local Plan and is brought into force, the policies it contains take precedence over existing non-strategic policies in the Local Plan for that neighbourhood, where they are in conflict. Local planning authorities should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation."

Hassocks Parish Council has persued the task in a very professional way and delivered a comprehensive Neighbourhood Plan for the community of Hassocks, Keymer and Clayton. I believe decision makers can give weight to this comprehensive emerging plan where the LPA is currently unable to demonstrate 5-year housing land supply as the Hassocks NP progresses through the next stages.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20689	1	Mrs J Headicard					Support
Comments							
I confirm that I have read the Hassocks Neighbourhood Plan, publication stage consultation, and support all the points raised therein.							
Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20690	1	Mrs L West					Support
Comments							
Having read the plan, I feel it is very fair representation of my personal views. We do need new homes, but not at the loss of precious green belt. Please keep this intact as far as possible, both for the identity of the village, and of the flora and fauna which make up this beautiful part of Sussex							
Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20691	1	Mr A Rogers					Object
Comments							
I have found the process engaged in by Hassocks Parish council to have been flawed. They have refused to engage with the residents committee for Clayton Mills as they do not believe them to be stakeholders. How can we not be stakeholders when sections of the land outlined for development don't just border with where we live but we also currently pay to maintain the land.							
Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20692	1	Mrs L Robb					Support
Comments							
I APPROVE THE WHOLE PLAN							
Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20693	1	Mr M Keen					Support
Comments							
I support the neighbourhood plan for hassocks. In particular the policies regarding local gaps, air quality and most important, community facilities. Houses have steadily crept in all over hassocks, not just clayton mills but Reed Close, at the tennis club and on the football pitch by Stafford house, for example. No provision has been made to the health or education facilities for these houses.							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20694	1	Ms J Durkota					Object

Comments

I wholeheartedly object to the Hassocks NP as it's authorship is fundamentally flawed. There is a significant conflict of interest between the consultants who have drafted the document and their representation on other groups (namely to "Save Ham Fields"). The document has not been drafted objectively and therefore should not be progressed further.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20695		Mr S Halliwell					

Comments

I agree with the plan at this stage

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20696	1	Mrs S Goodsell					Support

Comments

Have read and agree to the proposals that have been presented with regard to new housing. But please no more building and keep the green space behind Shepherds Walk as an area for recreation and a sanctuary in this busy area.

My garden backs on to the London Road from the Stonepound Cross roads which already has been proved by the AQMA in 2012 to be very polluted with nitrogen oxide from the exhaust fumes from the cars on this very, very busy stretch of road. This side of the railway line is already so congested and traffic uses Priory Road as a rat run in the busy periods, so pollution both sides of our property. We cannot cope with anymore building in this area.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20697		S Marsden-King					Support

Comments

Thank you for all your efforts putting this together. It looks great!

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20698	1	Mrs S Miller					Support

Comments

I support the opportunity for residents to influence the future of Hassocks via the plan.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20699	1	Mr K Woods					Support
Comments							
<p>I wanted to send a message of support for this plan.</p> <p>It is very detailed - outlines the best possible solutions to the clear need for new housing while ensuring Hassocks retains its rural settings.</p> <p>Only the areas for development that have been listed in the document should be considered in relation to planning applications as the team behind this document have done a huge amount of research to provide a sustainable offering and plan.</p> <p>Fully support this document</p>							
Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20700	1	Mrs L Daly					
Comments							
<p>Policy 12 - regarding education provision. I support the policy of needing a new 2 form entry primary school. I would like to comment that the language in the plan needs to be more definite regarding the proposed locations. The language feels like this is something that may be needed in the future, whereas in reality it is something that is needed immediately.</p> <p>There is mention of the school's having been increased to 3 form entry. This needs to be amended as the intake for 2016 at Hassocks Infants school is 4 form this year. And the intake of 2015 was 4 over capacity, meaning that every reception class exceeded the maximum capacity of 30 children. This is an urgent issue that needs to be addressed as a matter of urgency. There are children who are going to be schooled in the staff room this year. The school is over full and this cannot be allowed to happen anymore. Can any more urgent and up to date information be included in the NP please? Policy 13 - the numbers of houses being proposed are quite low. I know there is a concern about too many houses, but when developers build larger developments they are required to provide a school.</p> <p>Would increasing the number of houses built not fulfil the need for a school? Can this number be increased if the benefit to the community would be as far reaching as a school? The needs of the very young are just as important as the desires of the older part of the population - which according to the percentages on population are very evenly balanced.</p>							
Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20701	1	Mrs J Doyle					Support
Comments							
<p>I am in agreement with the neighbourhood plan, but note the immediate need for a new primary school in the village</p>							
Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20702	1	Mrs K Weller					Support
Comments							
<p>I support the plan and wish for Hassocks to remain a rural village</p>							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20703	1	Mrs J Hayward					Support

Comments

I live just moments from Hassocks golf club and walk there each day with my daughter, I am sad that it will be lost. However I understand that there is a great need for housing and the golf course has been deemed an appropriate site.
 I am therefore writing to support the neighbourhood plan.
 I am also pleading that it will be adhered to by the council. I am aware of a building application of 200 hundred homes on Friars oak fields and 97 on Ham fields. If these are too granted along with those on the neighbourhood plan I am gravely concerned for Hassocks. There just isn't the infrastructure to support this many homes and people.
 My house will have no longer be on the border of Hassocks but in the centre of it and very sadly I will no longer be able to access the green space that my family enjoy so much.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20704		Claire Tanner					

Comments

Dear Nicholas
 I have emailed the council but they did not reply many months ago.
 I am concerned regarding the development at Clayton mills. When I purchased my house in 2009, I could not get a school place for my son, could not get a dentist and to this date, we still are not registered with a dentist as the waiting lists are so long.
 Any new development would continue to over stretch the facilities in Hassocks.
 The roads are getting very busy and dangerous. Ockley lane is dangerous to exit onto and the new planned development would make this even more dangerous.
 Flooding was terrible last year and I believe the new development would be detrimental to this and the environment. The forest/land has a wealth if wild Life that should be preserved.
 Also, in the contract, it said that there would Not be any more houses build on this area so any construction would be a breach of contract for which residence should be compensated

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20705	1	Mr C Bond					

Comments

It is obvious that a lot of time and effort has gone into the production of this excellent report.
 I feel it is imperative to retain he Gap between Hassocks, Burgess Hill, Hurstpierpoint and Ditchling.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20706	1	Mr J Raftery					Support

Comments

I wish to express my support for this very detailed document which I think clearly sets out proposals which will sustain the identity of Hassocks going forward

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20707	1	Mrs P Raftery					Support

Comments

I wish to support this Plan which I feel sets out proposals that will hopefully satisfy housing needs whilst at the same time protecting the character of the Village

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20708	1	Sarah Allred					Support

Comments

I wish to fully support the Hassocks Neighbourhood Plan. I have attended many meetings regarding local planning applications and the Neighbourhood plan since the autumn of 2014. I particularly agree with Hassocks Neighbourhood Plan Regulation 16 Submission, Policy 3 with respect to the Land north of Shepherds Walk (LGS1) being given local green space designation. Local residents applied for Local Green Space designation for these fields in November 2014. The submission included in-depth information about the local flora and fauna collated over a two year period and clearly showed how demonstrably special this site is to the local community. This submission was accompanied by approximately 150 evidence forms completed by Hassocks residents. This document was submitted before any planning applications on the site.

I feel that it is very important to have the Hassocks Neighbourhood plan in place before any further planning applications or appeals are considered as, whilst I fully understand the need for more housing, any developments need to be sited carefully in accordance with the wishes of the majority of the existing village residents. I thought that this was the whole point of having a neighbourhood plan.

Many thanks for taking account of my views.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20709	1	Mrs K Sexton					Support
Comments							
<p>I support the policies and proposals of the Hassocks Neighbourhood Plan Regulation 16 Submission. However, I feel the following supporting document in respect of Local Green Space designation for the land north of Shepherds Walk needs some clarification.</p> <p>Please see amendments (in red) beneath the original statements -these seek to clarify the Regulation 14 Pre-Consultation Plan, Proposed Local Green Space Sites NPWG Response Paper June 2016 in respect of LGS 1.</p> <p>Individual Site Descriptions and Local Significance – Discussion LGS1 (HA Site 9) – Policy 3 designated as LGS1 Site and Location This is an area of two fields to the north of Shepherds Walk and an adjoining area of public open space to the west of Shepherds Walk. The open space is an informal area adjacent to the Herring Stream. Local residents have put forward a written case for designation of the fields as local green space. There is a planning application pending for housing on part of this site.</p> <p>This is an area of two fields to the north of Shepherds Walk. Local residents put forward a written case for designation of the fields as local green space in November 2014. There is evidence of strong public support lodged with Hassocks Parish Council. There has since been a planning application submitted for housing on part of this site.</p> <p>Public Access A public footpath crosses the area from west to east and the fields have been used by local residents as informal access for many years. It is recognised that apart from the public right of way across the area the current open access is at the discretion of the landowner.</p> <p>There are three access points to the fields. A public footpath crosses the area from west to east and gives access to a circular route around the village and a longer distance route between Ditchling and Hurstpierpoint. There is also access to the fields from the south via a stile. The fields have been used by local residents as informal access for many years. It is recognised that apart from the public right of way across the area the current open access is at the discretion of the landowner.</p> <p>Criteria for designation as LGS Reasonable Proximity to a local Community The land lies on the northern edge of Hassocks and adjoins an area of housing to the south. There is access to the land via a footpath. It is, therefore, considered to be in reasonable proximity to a local community.</p> <p>The land lies on the northern edge of Hassocks, immediately adjoining an area of housing to the south. There is access to the land via a west to east public footpath. An adjoining area of public open space to the south of the fields and west of the Shepherds Walk estate (managed by MSDC) allows direct access to the fields via a stile. It is, therefore, considered to be in close proximity to a local community.</p> <p>An Extensive Tract of Land The site comprises two medium sized fields linked by a public right of way. The site is enclosed by a hedgerow to the north, the railway to the east, housing to the south and</p>							

London Road to the west, creating a defined landscape parcel. It is, therefore, not considered to be an extensive tract of land.

Landscape character and views

There are views across the area from the public footpath and from the adjacent houses. The area has an unspoilt rural character. The winding channel of the Herring Stream forms the western boundary of the area. The fast flowing Herring is in a deep channel and is a focal point of the area. Mature trees along the stream channel, willows and alders, enhance the visual and landscape value of the stream.

There are views across the area from the public footpath and from the adjacent houses. There are far reaching views to the Downs and Jack and Jill windmills from many points in the fields. The area has an unspoilt rural character. The winding channel of the Herring Stream forms the western boundary of the area. The fast flowing Herring is in a deep channel and is a focal point of the area. Mature trees along the stream channel, willows and alders, enhance the visual and landscape value of the stream.

Heritage significance

The mature trees and hedgerows which define the field boundaries in this area suggest this is an historic landscape.

The mature trees and hedgerows which define the field boundaries in this area suggest this is an historic landscape. Local maps reference evidence that a roman road continues across this site.

Wildlife significance

The ancient hedges and mature oak trees are a potential habitat for a diverse range of species. The woodland on the railway embankment and the Herring Stream which form the boundaries to the area are also rich in wildlife. The wet meadows in the flood plain of the stream are a valued habitat.

The ancient hedges and mature oak trees are a habitat for a diverse range of species. The woodland on the railway embankment and the Herring Stream which form the boundaries to the area are also rich in wildlife. Over a period of two years, 50 varieties of birds including barn owls have been noted at the site. The wet meadows in the flood plain of the stream are a valued habitat.

Recreational value

The area is used by local people for informal recreation and is highly valued for its rural character and tranquillity. The public footpath is part of a longer distance route between Ditchling and Hurstpierpoint and is part of a circular route around the village.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20710	1	Miss C Tindall					Support

Comments

I support the policies and proposals of the Hassocks Neighbourhood Plan Regulation 16 Submission. However, I feel the following supporting document in respect of Local Green Space designation for the land north of Shepherds Walk needs some clarification. Please see amendments (in red) beneath the original statements -these seek to clarify the Regulation 14 Pre-Consultation Plan, Proposed Local Green Space Sites NPWG Response Paper June 2016 in respect of LGS 1.

Individual Site Descriptions and Local Significance – Discussion
LGS1 (HA Site 9) – Policy 3 designated as LGS1
Site and Location
This is an area of two fields to the north of Shepherds Walk and an adjoining area of public open space to the west of Shepherds Walk. The open space is an informal area adjacent to the Herring Stream. Local residents have put forward a written case for designation of the fields as local green space. There is a planning application pending for housing on part of this site.

This is an area of two fields to the north of Shepherds Walk. Local residents put forward a written case for designation of the fields as local green space in November 2014. There is evidence of strong public support lodged with Hassocks Parish Council. There has since been a planning application submitted for housing on part of this site.

Public Access
A public footpath crosses the area from west to east and the fields have been used by local residents as informal access for many years. It is recognised that apart from the public right of way across the area the current open access is at the discretion of the landowner.

There are three access points to the fields. A public footpath crosses the area from west to east and gives access to a circular route around the village and a longer distance route between Ditchling and Hurstpierpoint. There is also access to the fields from the south via a stile. The fields have been used by local residents as informal access for many years. It is recognised that apart from the public right of way across the area the current open access is at the discretion of the landowner.

Criteria for designation as LGS
Reasonable Proximity to a local Community
The land lies on the northern edge of Hassocks and adjoins an area of housing to the south. There is access to the land via a footpath. It is, therefore, considered to be in reasonable proximity to a local community.

The land lies on the northern edge of Hassocks, immediately adjoining an area of housing to the south. There is access to the land via a west to east public footpath. An adjoining area of public open space to the south of the fields and west of the Shepherds Walk estate (managed by MSDC) allows direct access to the fields via a stile. It is, therefore, considered to be in close proximity to a local community.

An Extensive Tract of Land
The site comprises two medium sized fields linked by a public right of way. The site is enclosed by a hedgerow to the north, the railway to the east, housing to the south and London Road to the west, creating a defined landscape parcel. It is, therefore, not considered to be an extensive tract of land.

Landscape character and views
There are views across the area from the public footpath and from the adjacent houses. The area has an unspoilt rural character. The winding channel of the Herring Stream forms the western boundary of the area. The fast flowing Herring is in a deep channel and is a focal point of the area. Mature trees along the stream channel, willows and alders, enhance the visual and landscape value of the stream.

There are views across the area from the public footpath and from the adjacent houses. There are far reaching views to the Downs and Jack and Jill windmills from many points in the fields. The area has an unspoilt rural character. The winding channel of the Herring Stream forms the western boundary of the area. The fast flowing Herring is in a deep channel and is a focal point of the area. Mature trees along the stream channel, willows and alders, enhance the visual and landscape value of the stream.

Heritage significance

The mature trees and hedgerows which define the field boundaries in this area suggest this is an historic landscape.

The mature trees and hedgerows which define the field boundaries in this area suggest this is an historic landscape.

Local maps reference evidence that a roman road continues across this site.

Wildlife significance

The ancient hedges and mature oak trees are a potential habitat for a diverse range of species. The woodland on the railway embankment and the Herring Stream which form the boundaries to the area are also rich in wildlife. The wet meadows in the flood plain of the stream are a valued habitat.

The ancient hedges and mature oak trees are a habitat for a diverse range of species. The woodland on the railway embankment and the Herring Stream which form the boundaries to the area are also rich in wildlife. Over a period of two years, 50 varieties of birds including barn owls have been noted at the site. The wet meadows in the flood plain of the stream are a valued habitat.

Recreational value

The area is used by local people for informal recreation and is highly valued for its rural character and tranquillity. The public footpath is part of a longer distance route between Ditchling and Hurstpierpoint and is part of a circular route around the village.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20711	1	Mr & Mrs P & S Catford					Support

Comments

We support the Hassocks Neighbourhood plan regulation 16 submission document.

Policy 3 - the local green space designation - we want to register our support for the land north of Shepherds Walk (LGS1).

These fields have been very much a part of our family life for three generations, they are of great recreational value to us and many other local families. There is such a wide variety of wildlife which is so important to our whole community, especially in this day and age, where many local youngsters can have the opportunity to see and experience the natural diversity of these fields. We are so lucky to have this unique area right on our doorstep. We feel very strongly that these fields must be secured for future generations. Further evidence of the importance of these fields to us and our village as a whole can be found in the document that was submitted, by local residents, to the Parish Council in November 2014.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20712	1	Faye Hopkins					

Comments

I would like to submit some comments regarding the Hassocks neighbourhood plan.

Traffic, illegal parking and speeding is a genuine concern of mine in the village at school start and end times. 3 schools within a very small and busy area all finish and start their days within 15 minutes of each other. Crazy. There is just not enough road or pavement space for this many Cars, bikes, pedestrians and buses. Further, the schools are increasing their numbers this year too!! There is no pelican crossing at the start of dale avenue and nothing to slow cars down. An imposed 20mph limit is not enough. Speed bumps would help as would concrete posts on the footpaths to stop cars almost knocking over children on the footpath. Not enough is being done to keep our children safe and it's going to get worse.

The keymer road/ grand avenue junction also needs some consideration. It is becoming dangerous especially as cars park illegally outside mcolls.

I think it makes sense for the hassocks golf club to be developed next as that is not taking away any already used green space from the residents of Hassocks. The north of the village, its open space and walks and the pressure of traffic on Grand Avenue needs a break.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20713	1	Ms C Hughes					Support

Comments

I support the plan. I would however like to have more detail on how the policies outlined will be implemented, over what timeframe and which are the priorities. Some of the plans are already urgent eg. The provision of an additional school. But the plan covers a 15 year period. The community needs to be reassured that urgent problems will be addressed as a matter of priority and that the required funding is actively being sought.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20714	1	Geoff Sear					Support

Comments

I am fully in agreement wityh the new plan for Hassocks

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
------	------	------------	--------------	-----------	--------	------	------

20715	1	Mr & Mrs A & J Rosewell					
-------	---	-------------------------	--	--	--	--	--

Comments

Policy 1:Hassocks-Burgess Hill Gap (Burgess Hill Gap), Page 11

Item 10, Proposals Map which shows the development limits, conflicts with the Mid Sussex Local Plan, February 2008, Inset 29. The latter shows the land to the north of Mackie Avenue as part of the strategic gap whereas the former shows housing development on some of it. It should also be noted that Inset 12a of Mid Sussex District Plan, August 2016, shows this land as Protection and Enhancement of Countryside.

We believe that building development should not be allowed to encroach into the strategic gap which should be maintained as Protection and Enhancement of Countryside.

Policy 11:Education Provision, Page 13

The issue of where to locate a new school is dodged. This should be settled and housing planned around the location rather than the reverse of initially considering housing alone in the hope that a school can be fitted in later.

In the Hassocks Neighbourhood Plan 3n1 Consultation Event documentation, the Golf Club (Site 15) entry mentioned land being gifted for the provision of a two form entry primary school. This has not been mentioned in the current Plan which seems strange since it is particularly relevant to the education issue.

At present all schools are to the east of the railway and in order to reduce air pollution at Stonepound Crossroads the new (two form entry) primary school should be to the west. This is important and needs to be settled before fixing the housing locations in isolation.

Item 8:Transport, Page 36 (Aim 8 Page 38)

We note that within an answer to Neighbourhood Plan previous FAQ 6 (on Parish Council website January 2016), concerning the air quality at Stonepound Crossroads, it was stated that "the latest position is that the Local Planning Authority, in discussion with the County Council, believe the impact on the crossroads from that [large housing planning application close to this junction] development on air quality is likely to be acceptable".

However, the Neighbourhood Plan has been skewed by the Stonepound Crossroads air pollution issue. This seems to have been the reason to rule out a number of sites to the west of the railway which must be questionable.

Either the County Council statement is correct in which case air pollution is not a major consideration with respect to site selection; or it is incorrect (see dowsettmaybew Sustainability Appraisal 6.61 to 6.64) in which case, if taken to its logical conclusion, would mean that all development which increases traffic flow would become impossible if target air quality levels are to be achieved.

Neighbourhood Plan FAQ 7 on the current Parish Council website states: "The Highway Authority for the area are West Sussex County Council. They are responsible for providing advice on the ability of local roads and junctions to safely cope with further development. They will be consulted as the Plan moves forward. This will include, in particular, the ability of the Stonepound Crossroads to cope with further traffic, particularly at peak periods."

It is probable that any development in Hassocks will contribute to some increase in air pollution. This being the case it is important that the issue is not put to one side which seems to be the present approach. If air pollution is indeed a significant factor then more radical solutions such as a roundabout (with possible housing demolition), tree felling to open up the area or a bypass road must be considered further at County Council level and a scheme developed prior to allowing further housing with the consequent increase in traffic.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20716	1	Mr & Mrs J & J Hizzey				10	

Comments

Public Transport - Buses

The existing village rider bus 167 and 168 only serve the east side of Hassocks, Keymer Road and Grand Avenue. The service is not frequent, possibly only two or three return journeys per day. More important the bus does not go to the railway station or Stonepound Cross Roads to link with other bus or train services.

What is required is a early morning and evening bus service linking the adjacent villages, say to the west, Albourne and possibly Henfield via Hurstpierpoint to Hassocks railway station. This would require several small buses running a shuttle service to and from the railway station to aid commuters and reduce traffic in the centre of Hassocks and ease parking in adjacent side streets.

The timing of the buses to coincide with train times during the day the buses could assist with the school runs and support local shopping in Hassocks and Hurstpierpoint.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20716	2	Mr & Mrs J & J Hizzey				7	

Comments

Tunnel Clayton Mills to Shepherds Walk under the railway line - footpath

This tunnel should be made big enough to have a single lane road with footpath and cycleway.

This tunnel would connect east and west sides of northern Hassocks and if connected to the London Road A273 and Ockley Lane or even Common Lane B2122 north of Ditchling would make a relief road around the centre of Hassocks if Keymer Road was blocked by an accident or road works.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20716	3	Mr & Mrs J & J Hizzey			7	21	

Comments

Traffic pollution Stone Pound Cross Roads and Keymer Road.

The pollution from the traffic in the crossroads area and into the village up to the railway station could be reduced by some redesign of the crossroads to encourage filtering traffic and the cutting down and removing many of the trees. The canopy restricts the wind blowing away the various traffic gasses - others will say that the trees absorb some of the gasses - but many of the trees are old and could be dangerous in high winds with branches leaning over the road. Also the trees block out the recently installed street lights. Many of the trees are self sown and possibly have not been recently surveyed. I believe the problem with a survey of the trees (for insurance purposes) is that the owner of the trees or land is unknown. The existing canopy does give a very dark and dismal entrance to the village.

Also the old trees in Woodsland Road should be cut down the stumps removed and the road reinstated. This would extra car parking spaces.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20716	4	Mr & Mrs J & J Hizzey			16	30	

Comments

Village Centre National Tyre Centre.

This is a key site in the middle of the village which needs careful design and not just a site to build 20 houses. It should be a large paved open area designed like a piazza with shops/restaurants/cafes around the edges. An underground car park should be built underneath to give parking space for the houses built above the shops etc.

This should be an area where the village market and other village functions like fetes and events like light up Hassocks and remembrance services (parades) could be held with provision for flag poles and memorials etc.

A further addition would be for the Library, the Parish Council Help Point/Tourist Office to be located there. Pedestrian access should be from at least two sides.

As Age UK Age Concern are wanting to upgrade/rebuild their property, this could create a chance to link with the Doctors Surgery to give them chance to expand to provide facilities for the extra population. The 4 houses in Dale Avenue backing on to this site should also be rebuilt into this complex.

We should also give the National Tyre Centre a site on the outside of the village to move to as this is a service to the village.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20716	5	Mr & Mrs J & J Hizzey				37	
Comments							
Aim 6 page 37 Aim 4.							
The Neighbourhood Plan is missing one major design fault. The proposal for extra housing will bring more people into the centre of Hassocks to use the railway station and more cars for local shopping and the school run.							
We have just had the result of a survey and report from West Sussex County Council Highways about parking in Hassocks. The majority of their solutions just result in moving the problem further up the side road, hoping the problem will go away. Any development like this is a waste of money. We already have some roads which it would be difficult for emergency vehicles to go along - Parklands Road, Chancellors Park (North end) etc.							
The problem starts with parking at the Railway Station which this plan has just ignored.							
Now is the time for a major development using money from Section 106. Mid Sussex and Hassocks Parish Council should start urgent discussions with British Railway etc or who ever owns the old Hassocks Goods Yard, where Parkers Builders Yard is. This is the only empty site in the middle of the village with existing road access, and pedestrian access across or along side the existing bridge over the road into the railway station. All very similar to what is being built at Haywards Heath Station ie a multi storey car park with direct access to the station.							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20717	1	Mr R Rathbone					
Comments							
The plans to develop Hassocks does not meet the need of local residents & will fall short of the village's identity turning it into yet another unimpressive town without any suitable facilities & infrastructure.							
There has been no plan to put the required infrastructure or the need for a new/larger school in place, even at this moment in time the village is grid locked at peak times & getting very dangerous for the children going to & from school. With the added development to the village this would only add to the already dangers. Also the Doctors surgery is at bursting point, so the need for a new surgery would be required. This could be at the National tyre centre site.							
It seems to be that Ham field's site 2 was very favourable BUT now it doesn't even Favier in the running, it seems it is all going to be put to site 4 & 13. I thought that if a councillor's house was adjacent to a site that he could not be involved as he has a conflict of interest & it is against the law.							
If site 4 & 13 was to go ahead then where would it be accessed from as there is no possible way that a road could be taken from Ockley Lane to these sites as there would have to be a very dangerous junction not to mention the environmental impact on the area? Do you think people are going to drive northwards towards Burgess Hill rather than go to the local stores in the village to do their daily shopping thus meaning more traffic congestion & pollution in the village centre? Site 2 would not impact on the traffic through the village as much as it is a through road to Brighton or Burgess Hill.							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20718	1	Miss L Baker					
Comments							
<p>The following comments relate to the Hassocks Neighbourhood Plan and the Sustainability Appraisal.</p> <p>The Hassocks Neighbourhood Plan (NP) does not meet the objectives of the government's National Planning Policy Framework in terms of creating a high quality built environment or in protecting and enhancing the natural environment. The NP, by proposing the concentration of development in two areas to the north of the village, (apart from a small brown field development in the village centre, which may or may not be deliverable) one of which, site 13, is adjacent to a recent high density development, Clayton Mills, will not create balanced development in the village and will damage the natural environment.</p>							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20718	2	Miss L Baker					

Comments

1. Constitution and impartiality of the Hassocks Neighbourhood Plan Working Group (NPWG).

The NPWG has not been demonstrably balanced and neutral in its consideration of sites for development in Hassocks, and the development of the NP could be viewed partly as an exercise to ensure that development does not take place on site 2, Ham Fields, therefore prejudicing the evaluation of other sites in the village.

- The chair of the NPWG, Cllr Credland, has been very actively involved in, if not an instigator of Protect Ham Fields, the local pressure group set up to stop development on Ham Fields, and his property is adjacent to the site. This would indicate a prejudicial interest in this site. Other members of the NPWG also have a prejudicial interest in some of the sites under consideration.

(Note - The Parish Council had clear advice from the MSDC Monitoring Officer and Solicitor that if a parish member lives so close to a potential site that the development is likely to affect the value of that property then they have a prejudicial interest and they cannot be involved in any part of the housing site selection. Dispensations are possible if the application of this rule would exclude more than 50% of the parish membership from the process. The Parish Council, at its meeting on 10 March 2015, considered this clear advice, and at the time, of the 13 members of the NPWG, only 3 councillors and 3 co-opted members had declared an interest, so the 50% rule would not have applied, and sufficient councillors without a prejudicial interest would have been able to be involved in the preparation of the plan. The council was however persuaded to set aside the advice and agree that all members with a prejudicial interest could claim a dispensation, and take part in the site selection.)

- The NPWG Chairman was closely involved in drawing up the list of sites for consideration, contacting site owners to put their sites forward, and in drawing up the criteria by which the sites were judged, and making the individual site assessments.

- According to the minutes of the NPWG meeting on 10

September 2015, Cllr Credland recommended the sites to be included in the NP, site 15 and sites 13 & 4 combined, together with site 10. These sites were agreed by the NPWG for putting forward to the full council, which endorsed these sites for inclusion in the NP to fulfil the housing requirement.

In summary, Cllr Credland chaired the NPWG, helped draw up the site list, was intimately involved in the site selection and evaluation, and proposed the final sites which are included in the NP. He has demonstrated a prejudicial interest in site 2, and has campaigned to prevent development on site 2. This therefore leaves an impression that there may have been a bias to exclude site 2 from selection for development in the NP.

On this basis, it could be concluded that the NP has not been drawn up in a completely unbiased and impartial way, in the best interests of the village as a whole, and to produce the best, sustainable long term development for the village.

(A number of local residents have raised this point during the public consultation phase, but the parish council's response to suggestions that there might have been bias is that all members declared their interests and

abstained from voting on matters relating to their sites. However in the case of site 2, the assessments were done by the NPWG and the site was given a negative rating for development, so the site was effectively removed from consideration before voting took place at the parish council meeting, enabling anyone with a prejudicial interest to vote in favour of other sites, further ensuring site 2 would not be developed.)

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20718	3	Miss L Baker					

Comments

2. Site Assessments

Because of the possible bias, as above, the criteria, assessments and way in which the plan is framed could be questioned. The outcome was that site 2 was not included in the short list of sites suitable for development, and it might appear that the site was not judged on the same basis as the other sites.

Looking at the site assessments in the Sustainability Appraisal, Appendix 2, and comparing site 2 to sites 4 and 13 for example,

- Objective 1 - sites 4 and 13 are given a rating of negative, while site 2 is given a rating of significant negative. This is a purely subjective assessment, and there is no evidence that site 2 is of any more importance than sites 4 or 13, or other green field sites in the village.
- Objective 2, again site 2 has been given a rating of negative, while site 13 only rates possible negative. There is no evidence to support this subjective judgement, and indeed site 2 has been significantly degraded over recent years.
- Objective 5, site 2 has been given a possibly positive rating, while sites 4 and 13 have been given a negative rating, presumably on the basis of the AQMA issue at Stonepound, but this is not backed up with any evidence, and is arguably not the case (see objective 6 below)
- Objective 6 - refers to air-quality, site 2 has been rated as significant negative, while sites 4 and 13 have been rated as no impact. This hinges on the air quality issue at Stonepound, which has been made much of in the NP and also in the campaign to prevent development at Ham Fields. The reality is that while air quality is a very serious issue, development anywhere in Hassocks, (or indeed in Hurst and Burgess Hill where developments have already contributed significantly to the local increase in traffic volumes) or any of the surrounding area, will impact on Stonepound as this is the main east-west, north-south junction in the village. The development at Clayton Mills has increased traffic through the village considerably, and there are frequently long queues from station approach east to Stonepound, reaching back into the high street. The parish council has not carried out a traffic survey and has no evidence to support the assertion that development on site 2 would have a greater impact on air quality at Stonepound than development anywhere else in the village, and in fact development on the east side of the village could make congestion and pollution worse as traffic through the village would increase as well as increasing traffic queueing at Stonepound. The junction of Grand Avenue and Keymer Road is a particular problem which has not been addressed.
- Objective 9, refers to improvement in the levels of non-car transport, sites 4 and 13 are rated as negative, while site 2 is rated possible positive. This again is a subjective judgement, not supported by evidence. Residents currently walk to the station and the village services from the existing Clayton Mills development, and the public access via Woodland Road is well used. It takes no longer to walk to the centre of the village from Ham Fields than it does from Clayton Mills.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
------	------	------------	--------------	-----------	--------	------	------

20718	4	Miss L Baker					
-------	---	--------------	--	--	--	--	--

Comments

3. The Strategic Gap

It is stated in the site assessment for Site 2 that the site is within the defined Strategic and Local Gap, and that development would reduce the openness of the gap and harm the setting of the village. In reality, there is no observable gap between Hassocks and Hurstpierpoint as there is housing all along the Hurst Road, and in the gap in Belmont Lane etc. Travelling north from Stonepound, there is housing all along the eastern edge of site 2, so development on site 2 would not be visible from the London Road, and not impact on the street scene.

There is still a visible green gap to the north of the village between Hassocks and Burgess Hill, along the western side of Ockley Lane, so development on site 13 would have a very significant impact on the setting of the village, particularly if a new road entrance were to be created onto Ockley Lane. There is also a footpath running across site 13. The harm development in this gap would do to the village setting and erosion of the gap has not been acknowledged in the NP. There is also no mention of the fact that a bund was created at the north of the Clayton Mills development specifically to prevent further development as the land to the north was designated as informal recreational space, and was intended to be passed to the district or parish council to prevent further development of this area.

In summary, the cumulative effect of the above subjective assessments is that site 2 is overall rated red, least suitable or sustainable for development, while sites 4 and 13 are rated amber, together with sites 9, 15 and 20.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20718	5	Miss L Baker					

Comments

4. Issues which have not been considered in the preparation of the NP.

- No transport survey has been carried out to assess the likely traffic impact of the sites under consideration. The development of sites 13 and 4 may not be feasible as the current single Clayton Mills access onto Mackie Avenue serves 250 dwellings already, and an entrance into Ockley Lane near a bend may not be acceptable to the Highway Authority.
 - The parish council has chosen to leave the question of the siting of a new school to WSCC, but this will have a major impact on traffic, and should have been dealt with in the context of the availability of a site, the willingness of developers to provide land or part funding, and the relationship of a new school to existing and planned housing in the village.
 - The issue of the impact of two large developments to the north of the village as against spreading development in smaller pockets around the village has not been considered. The development of Clayton Mills, a large site concentrated in the north east of the village, has had a considerable impact on the village and the site has not yet been fully absorbed, and yet the proposal is for a large proportion of future housing need to be met by another large, dense development in the same area, rather than a spread of development in smaller parcels. It is also likely that all the development will take place in earlier years if concentrated on two developers, and not be spread throughout the plan period.
 - The outcome of the planning appeal on site 2, is not yet known, but, if successful, would add additional housing over and above that proposed in the NP.
 - There is very little evidence of developer contributions to provide additional facilities or enhancements to the village to offset the loss of green field sites.
-

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20719	1	Miss J Rand					
Comments							
<p>The Hassocks Neighbourhood Plan proposes development which does not meet the needs of local residents and will irreversibly harm the town's ethos, turning it into more of a suburb than a town with its own identity.</p> <p>Although the Parish Council has recommend only a few of the sites put forward for development, it feels inevitable that, having opened up many options, all sites will be eventually developed, leaving Hassocks surrounded by new estates. This would turn Hassocks into a featureless town with intrinsic social, environmental and traffic problems.</p> <p>This first point relates to the plan as a whole.</p> <p>I do not accept the sites chosen by the council for the following reasons:</p> <p>1/ There is no evidence that the needed infrastructure will be put in place:</p> <ul style="list-style-type: none"> • The local schools are full to bursting point and the volume of traffic at peak school hours is causing serious and dangerous problems in the centre of Hassocks. There is no mention of building any new schools. • The doctor's surgery is small and out-of-date so it does not meet local needs. This needs addressing before building a significant number of additional houses • If the development abutting the Clayton Mills estate were to go ahead then a new road would need to be built to take the traffic into and out of the estate. This could only come out in Ockley Lane which is not suitable for high volumes of traffic, and it has a dangerous stretch of road plus a sharp bend. • Much has been made of the problem of traffic pollution at Stonepound crossroads but I submit that it is already a problem in the centre of Hassocks so any addition development to the East of the town will cause a serious deterioration throughout Hassocks. 							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20719	2	Miss J Rand					
Comments							
<p>This second point refers to site 10 on the Neighbourhood Plan</p> <p>2/ The recommendation to build on the National Tyre Centre site is misguided.</p> <ul style="list-style-type: none"> • It contributes little to the numbers of houses needed, but has a high impact on the town centre. There are other sites which have been rejected and which would provide a higher number of houses with less impact on the town centre. This site would be better used as an open space within the town, perhaps with additional shops (for instance, a nice new town square). It could actually provide improvements for the benefit of all residents. 							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20719	3	Miss J Rand					

Comments

This third point relates to sites 13 & 4 on the neighbourhood plan.

3/ The recommendation to build an additional 140 houses on the fields behind Clayton Mills will lead to serious problems for the town as a whole.

- Hassocks has been developed over a long period of time from market gardens, orchards and fields. This has led to the town having a tree-lined footprint, which when viewed from the top of the Downs gives an impression that the town and the surrounding woods and meadows merge with soft lines. The Clayton Mills development damaged that because the concrete and tiled roofs stand-out with few trees to alleviate its bareness. By doubling the number of houses this will be worse.
- There are increasing social problems in Hassocks, and by adding housing at the same density as the current estate will lead to escalating problems. This is because the current estate has insufficient green space and insufficient parking. It is naive to think that by limiting parking it limits the number of cars that people want to keep.
- As already mentioned there are serious problems in the centre of Hassocks with traffic (I witnessed a near miss involving school children and a car at the pedestrian lights, which was caused by the volume of traffic, buses and people at a peak time).
- By building additional houses and opening up a road into Ockley Lane then the strategic gap between Hassocks and Burgess Hill will be eroded. Inevitably this will bring additional pressure to build even more houses alongside the new road and will severely damage the environment. Hassocks and Burgess Hill will merge.
- It is a misconception that if the traffic from the new estate goes out into Ockley Lane it will not then come back through Hassocks. The people in the estate are more likely to want to go to either the schools, the railway station, the shops, Brighton or the doctor's surgery- so will not automatically go up to Burgess Hill.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20719	4	Miss J Rand					

Comments

This fourth point relates to site number 15 on the neighbourhood plan.

41 The recommendation to build on the site at Hassocks Golf Club has its merits.

- This development seems to be the most sensitive as it combines green spaces, is well planned out, and if this includes a new school it could serve the residents of Hassocks well.
- There is already access onto the road both through to Brighton and alternatively to Burgess Hill.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20719	5	Miss J Rand					

Comments

This fifth point relates to site number 2 on the neighbourhood plan.

51 The recommendation not to build on the land behind London Road. I have to ask why the plans which go behind the existing house line alongside the London Road were turned down.

- I do not hold that any air quality problems are worse in that part of Hassocks than elsewhere.
- The strategic gap argument is spurious as there is no strategic gap- there is already housing from Stonepound through to Hurstpierpoint and from Stonepound all the way up to the Golf Club. In fact the one last gap between Hassocks and Hurst (at the Ham) now has planning permission to be built on.
- The land for building is low lying and is poor quality agricultural land. The houses will not impact the town's footprint.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20720	1	Mr M Jackson	Terence O'Rourke Ltd	Gleeson Developments Ltd			

Comments

On behalf of our clients, Gleeson Developments Limited (Gleeson), we are pleased to enclose representations to the Hassocks Neighbourhood Plan as part of the Regulation 16 Consultation in regard to the site 'Land to the north of Clayton Mills and Mackie Avenue' and the promotion of this site for residential development.

This representation should be read in conjunction with the previous representation made in relation to the Hassocks Neighbourhood Plan Regulation 14 Pre-Submission Consultation made on the 16 February 2016.

Introduction

By way of background, Gleeson has a number of land interests within Hassocks Parish. However these comments relate specifically to land to the north of Hassocks, which is subject to the housing allocation set out in draft Policy 15 (Land to the north of Clayton Mills and Mackie Avenue), referred to hereon as the Policy 15 site.

Gleeson consider there to be a number issues with the overall housing requirement and with Policy 15 that need to be examined with reference to the basic conditions. These are set out below.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20720	2	Mr M Jackson	Terence O'Rourke Ltd	Gleeson Developments Ltd			

Comments

Housing Requirements

In advance of the adoption of strategic policies, to be set by the District Council in the local plan, the evidence base of the NP fails to give sufficient confidence that regard has been had to the NPPF and that it is appropriate to make the NP in that context, further that the plan will contribute to sustainable development. Meeting the objectively assessed housing need is clearly an important

period is 210 – 270 dwellings appears arbitrary and is inappropriate with regard to the evidence base, NPPF and the requirements of sustainable development – it does not meet the basic conditions. The need is much higher and in advance of a strategic distribution of housing being confirmed in the local plan, the Neighbourhood Plan must address the higher need and should be termed as 'minimal' requirements to provide flexibility. This would assist in ensuring that the NP provides the right types of development for the local community, with reference to NPPF paragraph 184.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20720	3	Mr M Jackson	Terence O'Rourke Ltd	Gleeson Developments Ltd			

Comments

Strategic Gaps

Policy 1 designates land to the north of Hassocks as the 'Burgess Hill Gap'. The designation on the proposals map differs from the designation of local gaps. The justification, at paragraph 4.4, refers to the out of date Mid Sussex Local Plan and the designation of the area in that plan as 'strategic gap'. The emerging local plan does not bring forward the strategic gap designation and whilst it facilitates the identification of local gaps within a neighbourhood plan it does not facilitate bringing forward strategic gaps from the extant local plan, or the designation of strategic gaps.

By its nature, any strategic gap between Hassocks and Burgess Hill will need to operate across areas outside the NP designated area in order to be effective. There is no indication that this is to be the case, in the area between the eastern part of Hassocks and Burgess Hill. The made Burgess Hill Neighbourhood plan (October 2015) does not include gap policy. This could place additional development pressure on the southern edge of Burgess Hill, where policies are less restrictive than on the northern edge of Hassocks, where the gap policy would operate.

As a matter of principle this gap should be deleted as it does not meet the basic conditions.

Land to the north of Clayton Mills and Mackie Avenue

Policy 15 allocates the land to the north of Clayton Mills and Mackie Avenue for up to 140 residential units. The policy sets out that residential development on the site will be supported where proposals:

- Do not extend residential development into the Burgess Hill Gap (Policy 1as identified on the Proposals Map;
- Provide a significant landscape buffer to the northern edge of the site;
- Protect the existing woodland along the western edge
;
- Provide compensatory formal/informal open space to meet the needs of existing occupants of Clayton Mills and the needs generated by the occupiers of the development;
- Protect the amenity of existing residential properties bordering the sit
- Provide a suitable mix of dwelling type and sizes to meet the needs of current and future households;
- Protect the amenity of existing Public Rights of Way through and adjacent to the site; and
- Provide suitable access and parking arrangements.

Gleeson welcome and support the draft allocation in principle. They consider that the site is not constrained in either technical or physical terms and offers the opportunity for sustainable development, lending itself well to a natural extension of the settlement and without a detrimental impact on the strategic gap between Hassocks and Burgess Hill. It is deliverable, with reference to NPPF footnote 11, and would make a positive contribution to local housing needs and needs within the wider Housing Market Area. However there are elements within the draft allocation that need to be addressed, as we set out below:

‘Residential development on Land to the north of Clayton Mills and Mackie Avenue (as identified on the Proposals Map) for up to 140 units...’

In light of the concern that the proposed housing allocation target of 280 – 290 new homes over the plan period (Policy 13) is insufficient, the allocation for Policy 15 should not be worded to limit the number of homes to 140. This is an important site for which detailed masterplanning/capacity testing has yet to be undertaken. Whilst such detailed work is not necessary at this stage, to support the allocation, capping the capacity of the site, without further testing, fails to represent a positive approach and fails to meet the objectives and requirements of sustainable development.

The allocation should be for ‘at least 140 dwellings’ in order to encourage the efficient use of the site, with the upper range determined as a result of detailed design work and an appropriate response to the context and site constraints.

‘Do not extend residential development into the Burgess Hill Gap (Policy 1) as identified on the Proposals Map;’

Firstly, the above comments with respect to this gap should be taken into account.

Second, it should be acknowledged that the proposed site allocation boundary for Policy 15 does not fall within the proposed Burgess Hill Gap. It would therefore not be possible for the housing to extend into the proposed Burgess Hill Gap without deviating from the site allocation. Therefore, Gleeson question the need for this requirement within the allocation, if the site boundaries remain as submitted.

Third, and notwithstanding this position, the boundaries of the Burgess Hill Strategic Gap were set within a very different policy context – including against housing requirements identified within the Mid Sussex District Plan 2004 (extending up to 2006). Given the current overall housing need, and need to promote sustainable development, the opportunities to extend the allocation into the area currently designated, without detrimentally effecting the integrity of the gap, should be fully considered and evidenced.

The NP plan process has failed to consider this opportunities, which could result in a greater site capacity and a greater contribution to meeting housing needs (market and affordable) within the terms of sustainable development. The approach and evidence base in this respect fails to meet the basic conditions.

‘Provide compensatory formal/informal open space to meet the needs of existing occupants of Clayton Mills and the needs generated by the occupiers of the development;’

As currently worded, the sub-text to the policy (paragraphs 6.22 and 6.23) sets out that the southern part of the site (comprising the area of open space associated with the Clayton Mills development) should be the location for housing, whilst the northern part of the site (comprising the arable field above Mackie Avenue) should be used for open space.

Currently Gleeson is in the process of undertaking design feasibility work and technical studies to determine the likely appropriate development strategy for the site. This will enable broad parameters to be established for the progression of a masterplan in terms of the most appropriate land configuration addressing housing, open space, access and infrastructure.

As was suggested at the Neighbourhood Planning Working Group meeting on the 4 February 2016, the exact location and form of the open space, housing and access to be provided on the site will need to be explored in detail and should involve discussions with key local stakeholders. A number of options could be identified and explored.

Such exploration will need to include consideration of a wide range of matters including but not limited to landscape and visual impact, impact upon the settlement boundary, the need for the provision of sufficient play and recreation space, impact upon the residents of Clayton Mills and Mackie Avenue, biodiversity and the provision of safe and satisfactory access. In addition, there remains the possibility that an allowance may need to be given for the provision of other essential community infrastructure to be delivered on the site.

Until this work is complete it would be inappropriate for the policy to be restrictive in the way that it is; paragraphs 6.22 and 6.23 are overly prescriptive. It would be prudent for there to be sufficient flexibility in the wording of the policy to facilitate positive and comprehensive masterplanning and facilitate the delivery of community infrastructure, should the need arise.

Whilst we appreciate that paragraphs 6.22 and 6.23 are sub-text and not the wording of the actual policy, the sub-text is inevitably important in understanding how the policy should be interpreted and implemented. We therefore suggest changes to the wording (underlined for clarity) as follows:

6.22. 'The site is considered suitable for residential development to deliver up to some at least 140 dwellings. These should be located through a comprehensive masterplanning process within the southern part of the site, whilst so as to protecting the residential amenity of existing properties and protecting and preserve ing the existing woodland along its western edge. It is recommended suitable access to the site is to be gained via Ockley Lane and/or from the south.'

6.23. 'The northern part of the site, principally comprising the existing arable field, should be used to provide both compensatory open space for existing should assist to reinforce the settlement edge and protect the Burgess Hill Gap, the boundaries of which will be informed by landscape evidence and the comprehensive masterplanning process.'

This will allow Gleeson, in consultation with key stakeholders, to work up the most appropriate and sustainable design solution for the site and the village without the risk of potentially deviating from the wording of the policy sub-text. This approach would contribute to the achievement of sustainable development (as required by the basic conditions).

'Protect the amenity of existing Public Rights of Way through and adjacent to the site'

There is one public right of way through the site and others around the site, including along the northern edge of the allocated area. In developing a scheme for the site, Gleeson will endeavour to maintain these public rights of way. However it is inevitable that the visual amenity from some of the rights of way will change to some degree. Any application would be accompanied by a landscape and visual impact assessment which would consider views from public vantage points and identify mitigation where possible. Although a scheme will be mindful of this, the policy should acknowledge the possibility of change. Our suggested changing to the wording (underlined for clarity) is set out below:

'Protect Have regard to the amenity of existing Public Rights of Way through and adjacent to the site'

Conclusion

Gleeson welcomes the site allocation, for the residential development of land to the north of Clayton Mills and Mackie Avenue. However, there are key concerns with the evidence base and policy requirements, which indicate that the NP does not meet the basic conditions. These matters need to be examined and major modifications made.

We would like to take this opportunity to thank you for consulting us on the neighbourhood plan.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20721	1	Mr M Sharp					

Comments

As a resident of Mackie Avenue I would like to make two points in my representation regarding Policy 15 in the neighbourhood plan. The first is about the merging of sites 13 and 4. The second is about the proposal of an access road from Ockley Lane.

Land Allocation

The 140 proposed dwellings can fit into the land north of Clayton Mills (site 13). By including the land north of Mackie Avenue, there is a clear excess of land. This is against Policy DP10 of the Pre Submission District Plan (page 42 - 2nd paragraph), "The primary objective of the District Plan with respect to the countryside is to secure its protection by minimising the amount of land taken for development..."

The evidence for the above can be seen by comparing the land allocation for the existing Clayton Mills development with the amount of land proposed for development in the Neighbourhood Plan. "Clayton Mills is a community of 250 properties in the Sussex village of Hassocks built by Barratt Homes between 2007 and 2012." – source <http://www.claytonmillshassocks.co.uk>. The allocation of 140 homes can easily be built in the area (site 13) in the following photograph as it is roughly the same area as Clayton Mills.

I would support this area for development (site 13) provided the access was from the south. This area is logical for consideration for development as it fits Hassocks Neighbourhood Plan Conditions Statement (C1, page 16), "The policy seeks to firmly resist development beyond existing built-up area boundaries." The land north of Clayton Mills is within the existing built-up area boundary between Shepherds Walk to the west and Mackie Avenue to the east, the land north of Mackie Avenue is beyond the existing built-up boundary and so should not be developed according to the Conditions Statement.

The Neighbourhood Plan Policy 13 (page 27) gives the allocation of housing north of Clayton Mills. It does not mention north of Mackie Avenue. I support policy 13 but not north of Mackie Avenue as in policy 15.

By creating an excess amount of land available for development begs the question, 'Has there been a further assessment of need for housing?' as the amount of land allocated is clearly too big for the projected need for 280-290 homes in the Neighbourhood Plan. Why make more land available than necessary to meet the projected need up to 2030? If the allocation is too large for the likely need, the suggestion of using Ockley Lane as an access is much more inappropriate.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
------	------	------------	--------------	-----------	--------	------	------

20721	2	Mr M Sharp					
-------	---	------------	--	--	--	--	--

Comments

Proposed Access to Ockley Lane

The statement in Policy 15 Paragraph 6.22 (Neighbourhood Plan page 29) says, "It is recommended suitable access to the site is to be gained via Ockley Lane and/or from the south." I am against the construction of a new access road via Ockley Lane for the following reasons.

Hassocks Neighbourhood Plan Conditions Statement (R7, page 25) says that, "Development that would result in a reduction of existing recreation facilities in the countryside, including public rights of way and other recreational routes, will not be permitted." There is an existing right of way along the north of the land (that joins Ockley Lane) that is regularly used recreationally, an access road there would considerably reduce the recreational facility to the community. There are great views across the countryside, an ancient hedgerow, spring, wetland and stream – evidence is from the Parish Council's own document <http://hassockspc.net/wp-content/uploads/2014/07/LGS-Paper-Combined-Final-June-2016.pdf>. The route is currently used regularly for several activities including:

1. Cycling: The existing right of way route is used by Hassocks Bike 'n' Fun encouraging local people to cycle – they have used the right of way for the past seven years. https://www.facebook.com/HassocksBikenFun/about?tab=page_info. <http://www.visithassocks.co.uk/resources/Bike-n-Fun.pdf>
Many local people including myself have used the route to teach young children to cycle as it is safe from traffic.
The route takes people to Ockley Lane near the turn off for Ockley Windmill.

2. Walking – the route has good views and is in publicised routes including on HPC website - <http://has-sockspc.net/wp-content/uploads/2013/03/A-CIRCULAR-WALK-FROM-HASSOCKS.doc>

3. There are regular joggers who run off road. 'Map my run' has lots of examples of the routes joggers have taken. The route is used by 'We Run Hassocks' a local community group.

4. Dog Walking - many people use the road to walk their dogs off lead as there is no traffic and lovely views.

Hassocks Neighbourhood Plan Conditions Statement (DP11, page 33) says that, "Development will be permitted if it does not result in the coalescence of settlements which harms the separate identity and amenity of settlements, such as visually or by an increase in activity which has an urbanising effect on the area between settlements..." A new road or development in the Hassocks Burgess Hill gap will affect visual and auditory amenity and will have an urbanising effect due to increased traffic and the risk to increased development north of any proposed access road. The gap to Burgess Hill from Hassocks is smallest at Mackie Avenue and Greenlands Road is currently visible so the visual gap is at greatest risk here.

Hassocks Neighbourhood Plan Conditions Statement (C2, page 16) says that, "Development will not be permitted unless it: (c) would not compromise individually or cumulatively the objective and fundamental integrity of the gap." Putting an access road into the gap will give compromise its integrity as it 'opens the door' to future development to close the gap further. A road would create a new physical barrier that would be likely to see the further expansion of Hassocks northwards, which would be contrary to protecting the gap with Burgess Hill.

The inclusion of land north of Mackie Avenue may be to provide closer access to Ockley Lane, however access can be made via several routes via the south e.g. via Clayton Mills

or the purchase of the private road to Woodside Grange from Woodlands Road. As the plan takes development in Hassocks up to 2030, then these access options are attainable.

Site 4 does not go all the way to Ockley Lane, this throws some doubt on exactly how deliverable site 4 is as there will be difficulties with access due to blind double bend at this point on Ockley Lane. If the access was further north there will be additional problems with the viability of the building projects and it would be even more contrary to protecting the gap with Burgess Hill.

Building a road would also make the scheme less viable and thus less deliverable (if the developer has to build a road that for a greater proportion of its length won't serve any houses and therefore the cost of the road will be have to be spread across fewer houses) or alternatively create additional pressure for the land north of the road being released for housing without there being a proper assessment of need.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20721	3	Mr M Sharp					

Comments

Conclusion

I believe I have shown that site 4 does not need to be allocated as housing and the proposed access to Ockley Lane breaks the Conditions Statement in several ways and there are questions about its deliverability and viability.

If the land north of Mackie Avenue is not needed for housing then I would support its allocation as open space/recreation land rather than having that further to the north of the proposed housing allocation and therefore more integrated into the fabric of Hassocks rather than north of site 13 as suggested in the NP. If the open space is in part compensation for that open space not provided as part of the Clayton Mills development there needs to be something in the NP to suggest the open space is provided sooner rather than later and if the site access is to be through Clayton Mills, work on the open space/recreation use can be undertaken at the same time as the housing and won't have to be left until the housing is built.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20722	1		PlanningSphere Ltd	Hassocks Golf Club			

Comments

1.0 Introduction

1.1 PlanningSphere has been instructed to make representations concerning the emerging Hassocks Neighbourhood Plan on behalf of the owners of Hassocks Golf Club (HGC), who are proposing the redevelopment of the Club (Application Ref: DM/16/1775). This representation is submitted to Hassocks Parish Council in accordance with the consultation timetable and builds upon our previous comments made in respect of the Regulation 14 pre-submission consultation.

1.2 As stated previously, we broadly support the proposals in the emerging Neighbourhood Plan on meeting the identified housing and infrastructure needs for Hassocks over the Plan period including the allocation of land at Hassocks Golf Course for housing under draft Policy 14. We consider that the emerging Neighbourhood Plan presents an exciting opportunity to allow the village to stay in control of its future growth with the provision of a significant package of community benefits in tandem with new housing provision, as stated in our Regulation 14 consultation submission.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20722	2		PlanningSphere Ltd	Hassocks Golf Club			

Comments

Comments on Specific Neighbourhood Plan Polices:

Policy 1 Hassocks-Burgess Hill Gap:

2.0 We broadly support the over-arching objective of Policy 1 in preventing coalescence between Burgess Hill and Keymer/Hassocks but we remain concerned that the policy wording is overly restrictive and would not permit the redevelopment of Hassocks Golf Club in a manner that would best reflect local character and amenity. The whole of the current Golf Club is in the Strategic Gap as set out in the Mid Sussex Local Plan (2004). We therefore suggest changes to Policy 14 and the Proposals Map to better reflect our planning application proposals. Please also refer to our previous comments on the Regulation 14 consultation.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20722	3		PlanningSphere Ltd	Hassocks Golf Club			

Comments

Policy 14 Hassocks Golf Course:

2.1 We strongly support the identification of the Golf Course as the location for housing and broadly welcome Policy 14.

2.2 As stated above in respect of Policy 1, we consider that proposals for the site should better reflect our application proposals.

2.3 We maintain our concerns outlined in our previous representation to the Regulation 14 consultation as the current delineation of the site on the Proposals Map would still not allow sufficient flexibility to provide the optimum design solution to deliver the required 130 houses whilst maintaining the balanced between these important visual considerations. We again suggest that the criteria of the policy (1st bullet point) should be reworded as follows:

Does not extend residential development into the Burgess Hill Gap (Policy 1) as identified on the Proposals Map unless forming part of a comprehensive masterplan for the whole Golf Club site.

2.4 Similarly, the Policy criterion specifying the provision of land to the west of Belmont Recreation Ground for formal/informal open space would only be acceptable in the event that the 2.3ha site, as annotated on the enclosed Parameters Plan, is not developed as a primary school. We therefore again suggest that the policy (9th bullet point) is reworded to cater for this scenario as follows:

Provide land to the west of Belmont Recreation Ground for formal/informal open space in the event that the 2.3ha site is not needed or developed as a primary school.

2.5 As referred to in our previous Regulation 14 representation, the supporting text to Policy 14, at paragraph 6.14, should be amended to refer to 5.5ha not 5.1ha as stated. The 5.5ha housing allocation area is clearly annotated on the enclosed Parameters Plan (Drg. Ref: 93.PA.02 RevA).

2.6 Similarly, the supporting text to Policy 14, at paragraph 6.15 should refer to 3.5 ha of public open space not 5.5ha as stated. The 3.5 ha public open space area is clearly annotated on the Parameters Plan submitted as part of our Regulation 14 representation and is at a quantum that is more than adequate to meet the needs of 130 households.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20722	4		PlanningSphere Ltd	Hassocks Golf Club			

Comments

Proposals Map

2.7 Again, we suggest that the Neighbourhood Plan should reflect the latest iteration of the Parameters Plan which has been amended to create a more 'serpentine' shape to the housing allocation area as it interfaces with the proposed public open space, as recommended by Mid Sussex DC's urban design officer as part of the pre-application negotiations. The Neighbourhood Plan should be amended so that the housing allocation aligns precisely with the 5.5ha housing site as annotated on the Parameters Plan (Drg No. 93.PA.02). We will be able to supply the Neighbourhood Plan Working Group with a plan in AutoCAD should this be required.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20722	5		PlanningSphere Ltd	Hassocks Golf Club			

Comments

Conclusion

2.8 We consider that, apart from the minor suggested amendments to the policy and supporting text wording highlighted above, the Hassocks Neighbourhood Plan offers a deliverable and sustainable strategy for future development in the Parish, and is strongly supported by Hassocks Golf Club.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20723	1	Mr M Williams					

Comments

Please rename the land noted as 'LGS2: Land at the Ham' - this land has nothing to do with any of the properties at the old Ham Farm and leads to confusion as people assume that the development proposals by Gleesons have something to do with us.
The land should be referred to as either 'Land to the West of London Road opposite PDH Garage' or just 'Land to the West of London Road'
I have attached the extract from the Planning Portal noting Gleeson application which notes is as 'Land Parcel at London Road, Hassocks'

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20724	1		Batcheller Monkhouse	Mr & Mrs Gorringe			

Comments

We act for Mr and Mrs Gorringe who own the eastern part of the proposed Local Green Spaces Candidate No.4.

Before dealing with the site in detail we should draw the District Council's notice to the deplorable lack of consultation on this matter. Our clients were only made aware of the proposals by a letter dated 4th September 2015 which invited "feedback" by 10th September. We responded in detail on 9th September and asked to be kept informed of future deadlines. By chance we checked the website in time to comply with the Hassocks Neighbourhood Pre- Submission Consultation. In our letter of 8th February 2016 we offered, as our clients have done before, to meet to discuss the basis of the recommendations and the impact of the designation on their farming business, an offer which has been ignored. The Acting Assistant Parish Clerk acknowledged receipt of our letter of 8th February and kindly confirmed that she "had added our email address to our [Hassocks Parish Council] mailing list for Neighbourhood Plan updates and information". We have received nothing since.

We do not consider that the Neighbourhood Plan Working Group have upheld the "Principles of Stakeholder Engagement" as set out in their Consultation Statement dated June 2016. The National Planning Practice Guidance states at paragraph 019 that the "Local Planning Authority.... or the qualifying body (in the case of Neighbourhood Plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Apart from the last minute letter of 4th September there has been no engagement.

We attach our earlier responses dated 9th September 2015 and 8th February 2016. We would ask that these letters are taken as part of our Publication Stage Consultation along with this letter. We can see no attempt to answer the comments raised in these two letters and we stand by our original remarks. We would make however the following observations:

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20724	2		Batcheller Monkhouse	Mr & Mrs Gorringe			

Comments

1. Paragraph 77 of the National Planning Policy Framework (NPPF) confirms that designation "will not be appropriate for most green areas or open space". It is therefore for the promoters of the neighbourhood plan to demonstrate why this land is worthy of designation and what distinguishes it from land for the north and east and indeed the generality of farmland in this area of the Low Weald, with traditional hedgerow patterns and views of the South Downs and surrounding topography.

Ref# Cmt# Respondent

20724 3

Organisation

Batcheller Monkhouse

Behalf Of

Mr & Mrs Gorringe

Policy

Page

Type

Comments

2. Paragraph 77 requires the land to be demonstrably special and hold a particular local significance. The Neighbourhood Plan Working Group (NPWG) in the Regulation 14 Pre-Consultation Plan identified four reasons as criteria for designation of this site, namely:

i) Landscape character and views:

Apparently it is of "high landscape value as it is within the boundary of the South Downs National Park". With respect that is hardly evidence in itself but what it does demonstrate is that the land is already protected by its status as part of the National Park. Paragraph 011 of the National Planning Practice Guidelines states that designation is unnecessary unless it gives "additional local benefit.....". The NPWG goes on to say that there are views of the neighbourhood as indeed there are from adjoining land, and we see no special significance to the views from the land.

ii) Heritage significance

The NPWG claim the footpath as a historic route between the villages. The public footpath is protected as a public path. Paragraph 17 of the NPPG confirms that designation does not confer any additional rights and it is difficult to see that designation will be relevant to the status of the path historic or not. The NPWG confirms that the Roman Road runs "just to the south of this area" (under Damien Way and Newlands Close presumably). If the Roman Road is under this site designation will give it no additional protection.

iii) Wildlife Significance

As previously stated the heavy use of the footpath by dog walkers will preclude the abundance of ground nesting birds and wildlife. Like the surrounding landscape there are boundary trees and hedgerows but nothing of "local significance" and nothing that will be enhanced by designation.

iv) Recreational Value

The only recreational value is provided by the public footpath which is already protected. Designation will not alter the fact that there is no access to the land other than by the public footpath as shown on the map deposited with WSCC by Mr and Mrs Gorringe.

Paragraph 18 of the NPPG confirms "there is no need to designate linear corridors.....s. imply to protect rights of way which are already protected".

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20724	4		Batcheller Monkhouse	Mr & Mrs Gorringe			

Comments

3. The NPWG state that they do not consider the site to be "An Extensive Tract of Land". Unfortunately there seems to be no guidance as to what constitutes "extensive" in this context. We note however that this is amongst the larger, if not the largest, site being proposed.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20724	5		Batcheller Monkhouse	Mr & Mrs Gorringe			

Comments

4. We draw your attention to paragraph 15 of the NPPG which states "in particular designation should not be proposed as a 'back door' way to achieve what would amount to a new area of Green Belt by another name". A casual glance at the maps showing the sites of the other proposed Local Green Space sites coupled with other features preventing development and the National Park would suggest otherwise.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20724	6		Batcheller Monkhouse	Mr & Mrs Gorringe			

Comments

In conclusion:

- We do not feel that the NPWG has fulfilled its obligations to properly consult with the landowners involved.
- Moreover it has not complied with its own Consultation Statement or with paragraph 19 of the NPPG.
- Furthermore it has failed to pay proper regard to the relevant National Planning Policy Framework and the National Planning Practice Guidance and has not shown that the land is "demonstrably special to [the] local community and holds a particular local significance".

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20725	1	Mr N Clayton					Support

Comments

I fully agree with and support the Hassocks Neighbourhood Plan.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20726	1	Mr S Sexton					Support
Comments							
I would like to support the Regulation 16 approval for the Hassocks Neighbourhood plan. An effort has been made to maintain the character and identity of the village.							
My comments focus on the following policies within the Hassocks Neighbourhood Plan regulation 16 Submission Document:							
Policy 1: The Hassocks/ Burgess Hill gap as defined should be accepted in order to avoid coalescence between these two settlements.							
Policy 3: Local Green Spaces LGS 1 - Land north of Shepherds Walk: I particularly support designation of these two fields as local green space. It is a remarkable area, rich in wildlife and demonstrably very special to the village. Hassocks residents applied for LGS designation in November 2014 and this application along with supporting documentation from the local community is lodged with Hassocks Parish Council.							
Policy 13: Housing Allocations: The future housing requirements of the Mid Sussex District Council have been analysed and a very credible housing allocation fulfilling the requirements has been submitted within the plan.							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20727	1	Miss L Keenan					Support
Comments							
I support Hassocks neighbourhood plan As we all sent our letters in 2014 to hassocks parish council for friars oak fields to be given local green space designation, I desperately hope that this lovely area will be protected. I'm 11 and it is my favourite place to walk my dog and look at the windmills on the Downs.							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20728	1	Miss L Keenan					Support
Comments							
I support Hassocks neighbourhood plan As we all sent our letters in 2014 to hassocks parish council for friars oak fields to be given local green space designation, I desperately hope that this lovely area will be protected. I'm 11 and it is my favourite place to walk my dog and look at the windmills on the Downs							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20729	1	Mr A Keenan					Support

Comments

I support Hassocks neighbourhood plan

I am really pleased that friars oak fields has come first in the village vote for local green space designation because this area is really loved and used by so many people. I am 13 years old and I have spent all my childhood enjoying the fields with my family and friends. I've seen loads of wildlife including deer and owls.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20730	1	Mr & Mrs G & R Hayhurst					Object

Comments

We would like to comment on the merging of sites 4 and 13 and the proposed accessing of these sites via Ockley Lane.

As residents of Oaley Lane we would like to state that we do not support the proposal in the neighbourhood plan, Policy 15 para 6.22, which recommends accessing sites 13 & 4 via Ockley Lane which is a narrow 'C' road.

Site 4 does not include the land directly fronting Ockley Lane nearest Ockley Manor where there are difficulties caused by a bling bend at this site, indicating that there will be an expectation to push the only access road to sites 4/13 further north, an excessively long road running towards the north and Burgess Hill.

In our view this would be inappropriate because:

- It jeopardises the strategic gap between Hassocks and Burgess Hill, once a road is built there is always pressure to 'back fill' with further housing.
- It would split Ockley Manor Hamlet, the small line development historically associated with Ockley Manor Farm, in two. It also shows little respect for the proximity of the grade II* listed building, Ockley Manor, and its historical environment in marked contrast to the care the Hassocks NP has taken in mentioning and protecting the surrounds of Oadlands Mill and Friars Oak Farm.
- It encourages the use of vehicles to access Hassocks village centre, schools, health centres, etc by coming out further north and thus not addressing and indeed conflicting with sustainability issues.
- It would run alongside the current footpath destroying unique, open views across the low Weald to the north and Clayton and Wolstonbury Hills to the south. This is well used for leisure pursuits by the villagers of Hassocks and Keymer, and visitors, and would further downgrade & urbanise this facility as has already happened to this footpath between Woodlands Road and the northern border of Clayton Mills estate.
- Any street lights pushing further into the countryside at a site near the southdowns national park would conflict with recently initiated 'dark skies' policies.
- It would increase street use and traffic noise in a rural environment.
- In effect this proposal goes against the NP conditions statement DP11 where development should not result in 'coalescence of settlements which harms the separate identity and amenity of settlements, such by visual or an increase of activity which has an urbanising effect on the area between settlements.' Also C2, where development 'should not compromise individually or cumulatively the objective and fundamental integrity of the gap.'
- We would also NOT support the inclusion of site 4 behind Mackie Avenue for building as site 13 is similar in area to that of the current Clayton Mills estate which consists of 250 houses, and should be large enough for the proposed 140 houses in the neighbourhood plan. The NP itself, policy 13, gives the allocation of housing north of Clayton Mills, not mentioning north of Mackie Avenue. Therefore including site 4 for building would be excessive and should be the designated green buffer between site 13 and the strategic gap lying north of the footpath running across the north of site 4 and 13.

- In addition site 13 is within the built up area of Sheperds Walk to the west and Mackie Ave to the East, site 4 is not and should not be built on. (policy DP10, pre submission district plan, The primary objective..."with respect to the countryside is to secure it's protection by minimising the amount of land taken for development."

To conclude, we support the proposal to build on site 13 with access south, towards Hassocks Village, not via Ockley Lane. There is no need shown in the NHP to build on site 4, land north of Mackie Avenue and this should be a green buffer between Hassocks and the strategic gap.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20731	1	Mrs P Heath					Support

Comments

I am writing in support of the Hassocks Neighbourhood Plan. The sites identified for development are evenly spread across the village and help to protect the strategic gaps between Hassocks, Burgess Hill, Hurstpierpoint and Ditchling. Likewise the sites for local green spaces will help preserve these gaps and keep the local green spaces for the local population who have used these for many years.

I support the Parish Council's proposals to reduce nitrogen dioxide levels at Stonepound Crossroads and the possibility of the rerouting of HGV away from the north/south route of the A273. I also support the maintaining and improving of footpaths and the possible linking of them to provide a circular route around Hassocks. Bus transport could be improved as it is not possible at present to get a bus from the west side of the railway line to the village centre nor to take a bus from the centre along the London Road to the Leisure centre at the Triangle in Burgess Hill to use the swimming baths another facilities on offer there.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20732		Mrs A Gladding					Support

Comments

Policy 1 - I wish to support the Hassocks neighbourhood plan regulation 16 document. I have recently moved from Hassocks to Burgess Hill and am aware of how large this town now is and the fact it is rapidly growing. I realise how important it is to keep the identity and amenity of these two very individual settlements by keeping a defined gap to the north of Hassocks. I believe that the neighbourhood plan has managed to achieve this aim.

Policy 3 - Local Green Space designation (LGS1) I support this proposed LGS designation for the two fields north of Shepherds Walk. This popular area meets all the criteria for an LGS and would be of great benefit to the residents of Hassocks

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20733	1	Mrs G Worthington					Support
Comments							
<p>I would like to give my support for the Hassocks Neighbourhood Plan. Having read the Hassocks Neighbourhood Plan Regulation 16 Submission: Policy 1 pages 12/13 in respect of the Hassocks / Burgess Hill gap I feel I must make the following comments:</p> <p>Burgess Hill is a large town that is expanding exponentially and Hassocks is a large village. In planning for green space it is vital to protect the rural setting of our village and the surrounding countryside from development. There is a clear boundary (an historic, well used public footpath) that runs from east to west from Ockley Lane to the London Road. I believe that the neighbourhood plan has sought to maintain this boundary to the benefit of both the residents of Hassocks and Burgess Hill. Policy 3, p15, has regard to the Local Green Spaces and I would like to register my support for LGS1 - Land north of Shepherds Walk. This LGS was applied for in November 2014, the fields fulfill all the criteria and I believe that this is a good example of localism in action as this was applied for by the community and supported by a great many Hassocks residents. Having lived in this village for thirty years I believe that the Neighbourhood Plan shows a clear route forward for the village and that the LGS (as above) will serve its purpose well.</p>							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20734	1	Mrs L Heywood					
Comments							
<p>What I support most about the planned development sites is the definite attempt to maintain the strategic gap between Hassocks and Burgess Hill and the designation of the local green spaces which includes the Friar's Oak Fields to the north of Shepherds Walk. It is of utmost importance in order to retain the rural character of our village that these spaces remain 'green', and preferably 'wild'. Too often green spaces are lost to agriculture or are allowed to become 'manicured' in some way. This is not fitting to our countryside setting.</p> <p>While I realise that housing is required, I am concerned that developments along London Road will exacerbate the air pollution problems caused by the queuing traffic, so minimising these should be given top priority.</p> <p>And finally, it is a worry to me that there may not be sufficient places in the village schools for the increasing numbers of school-age children, but the plan indicates that this will not be an issue, so hopefully my worrying is unnecessary.</p> <p>Forwarded for your information and necessary action.</p>							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20735	1	Mr C Heywood					Support
Comments							
I support the planned development sites and the need to maintain the strategic gap. I very much support the local green spaces especially LGS1 north of shepherds walk							
Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20736	1	Mrs C Hindle					Support
Comments							
I email to provide my support to the Hassocks Neighbourhood Plan.							
Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20737	1	Mrs S Owens					Support
Comments							
I support the Hassocks neighbourhood plan in its entirety.							
Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20738	1	Mrs G Pinchbeck					
Comments							
<p>I have lived in Hassocks for forty years and have been closely involved with the community in a variety of ways. Having read the Neighbourhood Plan I would like to refer to the Regulation 16 Submission Version to stress the importance of localism. My specific comments relate to Policy 3, pages 14 / 15 with respect to LGS1 – Land to the north of Shepherds Walk:</p> <p>Local residents applied for Local Green Space designation for these fields in November 2014. At this time, many people completed evidence forms that supported this submission. I strongly feel that this is an important resource for Hassocks residents of all ages who have the opportunity to enjoy this natural green space. This area is in very close proximity to the local community and is easily accessed via a stile and public footpaths. In the past I ran a playgroup in the local church hall and regularly took the children on nature walks across the fields. The children I taught then now take their own children to benefit from this wonderful resource.</p>							
Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20739	1	Miss C Tankard					Support
Comments							
I am happy with the proposed Hassocks Neighbourhood plan June 2016 it is good to see that local green spaces have been designated , community, health and education facilities have been taken into account and that safe guarding the Ditchling, Burgess Hill and Hurstpierpoint gaps has been taken into account							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20740		Mr W Tankard					

Comments

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20740	1	Mr W Tankard					Support

Comments

I am happy with the proposed Hassocks Neighbourhood Plan June 2016. It is good to see that local green spaces have been designated, community, health and education facilities have been taken into account and that the safe guarding of the Ditchling, Hurstpierpoint and Burgess Hill gaps have been taken into account

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20741	1	Mrs S Tankard					Support

Comments

I am happy with the proposed Hassocks Neighbourhood plan June 2016 it is good to see that local green spaces have been designated , community, health and education facilities have been taken into account and that safe guarding the Ditchling, Burgess Hill and Hurstpierpoint gaps has been taken into account

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20742	1	Mrs J Trevitt					

Comments

I have lived in Hassocks for 14 years and would support the aim of keeping this a Sussex village with rural principles.

In recent months we have had quite a bit of traffic hold up's due to road works in one form or another. The pollution of car fumes has been considerable & we are all aware of the unacceptable levels of air pollution at the stone pound crossroad area. It has also meant that Priory Road has become a complete 'rat run' for traffic going at unacceptable speeds, causing residents in the road to have concerns for their children, pets and being able to even turn into their driveways. Our roads are becoming crowded from commuters parking in the area- additional housing with over crowded population will result in grid lock.

I will support a properly thought out Neighbourhood Plan that takes into consideration that we protect our green spaces for families in the area - let's have a village that does not become a town!!! Also we should keep our boundaries which means not adjoining Burgess Hill.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20743	1	Mrs F Tanous					Support

Comments

I support the Hassocks Neighbourhood Plan in its entirety.

I would especially draw attention to the importance of :

1. Friars Oak Fields being designated a 'Local Green Space' : this will (a) allow residents, bird-watchers, visitors and dog walkers to enjoy the outdoors locally and maintain a healthy existence and good well-being; (b) be in line with the recommendations of the Natural Capital Committee advising the government in developing its 25 year Environment Plan. Its third report The state of natural capital : protecting and improving natural capital for prosperity and wellbeing to achieve the government's vision "to be the first generation to leave the natural environment in a better state that it inherited" sets out these recommendations.
2. Hassocks retaining its rural village character.
3. Sustainability and efforts to reduce climate change and flooding.
4. Efforts to support young people in the Neighbourhood Plan.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20744	1	Mrs C Doyle					Support

Comments

I support the Hassocks Neighbourhood Plan

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20745	1	Mr G Hollebon		Mackie Avenue Residents Management Company			

Comments

1. Background

1.1. Clayton Mills is a 250 home development in Hassocks village built by Barratts between 2007 and 2012.

1.2. Residents pay a service charge to maintain their own roads, footpaths, street lighting, play areas etc.

1.3. A Management Company was established in 2008, the Mackie Avenue Residents Management Company Limited (MARMC), to represent the interests of residents and to manage the development and its accompanying land.

1.4. It is important to note that MARMC is not a simply a residents association, it is a Limited Company (Co. Number 06470322), all private residents are Members and it has obligations set out in its Memorandum and Articles of Association to manage and maintain amenity land that makes up the Clayton Mills development.

1.5. The remit of this Company extends to the amenity land to the north of Clayton Mills known in the Neighbourhood Plan as Site 13. Residents pay a proportion of their service charge specifically to maintain and manage this amenity land via MARMC which has a legal obligation to so do.

1.6. MARMC appointed its first resident Directors in January 2014 and, since then, the company has been highly active and visible in the community publishing newsletters, using social media and engaging with the wider Hassocks community including the Hassocks Parish Council Neighbourhood Plan (NP) process.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20745	2	Mr G Hollebon		Mackie Avenue Residents Management Company			

Comments

2. The NP Process and Recommendations

2.1. MARMC has engaged with its members on a regular basis during the NP process and, on behalf of them, remains opposed to the recommendations made in the latest draft of the Neighbourhood Plan.

2.2. It is important to stress that we are not NIMBYS opposed to all new house building. On the contrary we believe that new housing injects welcome economic and social impetus into the village. We do though believe it is essential that the process by which recommendations are made as to where new housing is built is transparent and objective. We believe that the 2 NP process in Hassocks fails on both of these measures.

2.3. Our objections to the draft plan fall into 3 broad areas:

2.3.1. Failure to consult (see Section 3)

2.3.2. Planning process issues (see Section 4)

2.3.3. Failure of governance (see Section 5)

2.4. We will be repeating a number of points first raised in our response to the Regulation 14 consultation as we have seen no evidence that these have been properly considered as well as raising additional issues.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20745	3	Mr G Hollebon		Mackie Avenue Residents Management Company			

Comments

3. Failure to Consult

3.1. It is quite staggering that the Neighbourhood Plan Working Group (NPWG) and Hassocks Parish Council (HPC) have repeatedly failed to properly consult and engage with MARMC. Despite the best efforts of the Directors, repeated attempts to open a two way dialogue have been rebuffed and the only face to face meeting, in December 2015, was characterised by a bullying approach from the Chair of the NPWG, Ian Credland, to those who attended. Crucial comments made by Ian Credland, at this meeting have been withheld from the minutes despite repeated requests to the Parish Clerk for this to be rectified. A request that HPC Members were told of this omission in the minutes was not actioned. Correspondence from the Chair of MARMC to the Chair of the NPWG (email of 4th Jan 2016) has received no response.

3.2. The NPWG ignored requests for all relevant information about Site 13 to be included in the site assessments and made available to the public i.e. that the Site was already designated as open space, that MSDC were pursuing Barratts for breach of planning given their failure to landscape the area.

3.3. After the village consultation process was completed the NPWG made material changes to the proposals for Site 13 including combining it with Site 4, effectively creating a "super site" which was not presented for consultation to the community. It appears that this is the only solution to ensuring road access to an otherwise land locked site but this should have been dealt with before the consultation to allow residents the opportunity to comment on a much larger and more intrusive site.

3.4. In February 2016, the NPWG met with a developer who wishes to build on Site 13. MARMC were not advised of this meeting and, during the meeting, the Chair and NPWG failed to properly identify MARMC as having an interest in the site when the issue was raised. We also understand that the Chair of the NPWG suggested to Gleeson that they should focus their attention on site 13 which makes a mockery of the public consultation process.

3.5. We also note the quite extraordinary statement by the Parish Clerk in an email to Parish Councillor Peter Gibbons in January 2016 giving the following as a reason for not consulting with MARMC,
 "... the first residents meeting was not held until 19th November 2015 so when the Neighbourhood Plan Working Group started its consultation the residents group had not been formed in such a way as to be listed as consultees."

3.6. Whether by design or incompetence, the NPWG has, by its own admission, failed to properly engage and consult with MARMC despite knowing that there was a representative body with a legal, practical and financial interest in land being considered as a part of the NP.

3.7. Whatever the reason, it is unacceptable that residents and their representatives could be so roundly ignored by the NPWG when those residents:

3.7.1. upon purchasing their homes in the very recent past, would have been aware that the adjacent amenity land was set aside as open space as a condition of the planning which enabled their property to be built in the first place, and,

3.7.2. have diligently paid a service charge (currently £256.92 per annum per property) to maintain and manage that land on behalf of the entire community.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20745	4	Mr G Hollebon		Mackie Avenue Residents Management Company			

Comments

4. Planning Process

4.1. Our review and analysis of the NPWG process (we have quoted from the relevant policy documents and minutes) has highlighted a number of issues which we have outlined below and for which a response to each is required.

Policy 15: Land to the north of Clayton Mills and Mackie Avenue

MARMC Comments / Questions:

4.2. Item 6.19 of the policy confirms that Hassocks Parish Council and the NPWG were all aware of the previous planning requirement to provide a significant landscape buffer to the north of the existing development. This item should have been included in the emerging Neighbourhood Plan as a priority for those residents who are still waiting for this provision.

4.3. Clarification is required from the NPWG as to why this has not been raised as part of a recognised LGS?

4.4. Policy 15 is in direct contradiction to the current Mid Sussex District Plan Policies B3/C2/G3/T4/KH2/KH4 and BH15 which all show this area as being retained as part of the Burgess Hill strategic gap and also highlight the intended use of this area of land as a community recreational area for cycling and walking outside of any proposed development.

4.5. If the newly emerging Mid Sussex District Plan Policies were used then policy DP11 could loosely be interpreted as covering the use of this site however this single policy is outweighed by policies DP10/DP18/DP19/DP22 which highlight an issue with the use of this area of land as a development site.

4.6. Confirmation is therefore required as to why these policies were all ignored during the selection of this site?

Policy 1 Burgess Hill Gap

MARMC Comments / Questions:

4.7. Clarification is required as to why the provision of the initial open space should now be moved away from the Clayton Mills boundary and into the Burgess Hill strategic gap?

4.8. The NPWG had the opportunity through NPPF to designate this area of land as LGS confirmation is required as to why was this not done?

Policy 3: Local Green Spaces

The Neighbourhood Plan designates the following locations as Local Green Spaces (as shown on the Proposals Map);

☑ Land to the north of Shepherds Walk (LGS1)

☑ Land at the Ham (LGS2)

☑ Undeveloped land south of Clayton Mills (LGS3)

☑ Land to the east of Ockley Lane (LGS4)

☑ Land at South of Downlands (LGS5)

☑ Land to the west of the railway line (LGS6)

☑ Land at Pheasant field (LGS7)

MARMC Comments / Questions:

4.9. This policy highlights the provision of six Local Green Spaces none of which protect the strategic gap between Clayton Mills and Burgess Hill. Given that at the meeting of the NPWG on 30th July 2015 minutes reflect Planning Consultant Dale Mayhew “inquired whether land North of Mackie Avenue should be designated as Green Space as technically it was already supposed to be. IC and the group agreed that it should.”

4.10. Clarification is required as to why this resolution was over turned and the basis on how this decision was arrived at?

Policy 6: Development in Conservation Areas

MARMC Comments / Questions:

4.11. Development at Site 13/4 will have a direct impact on the siting of a listed building this goes against Policy 6 and paragraphs 4.23 and 4.24.

4.12. Clarification is therefore required as to how this impact will be mitigated?

Policy 8: Character and Design

MARMC Comments / Questions:

4.13. Clarification is required as to how the provision of Site 13/4 for development is in line with this policy and specifically:

Respects the character and scale of the surrounding buildings and landscape;

Protects open spaces and gardens that contribute to the character of the area;

Does not cause significant harm to the amenities of existing nearby residents and future occupants of new dwellings, including taking into account of the impact on privacy, outlook, daylight, sunlight and security

Creates safe, accessible and well connected environments;

Protects existing landscape features and contributes to the village’s Green Infrastructure network.

Access & Traffic

4.14. Site 13/4 is poorly served by public transport and its location, distant from major access routes, will cause an increase in traffic through Hassocks village centre as well as in Keymer and Burgess Hill.

4.15. All traffic heading north from Site 13/4 will need to use the narrow Ockley Lane and will enter Burgess Hill at the already over utilised Folders Lane roundabout.

4.16. Traffic heading for the main A23 / M23 will have to travel either via Burgess Hill town centre or Hassocks village High Street adding to the already high levels of congestion. By contrast access to the A23/M23 from sites on the London Road Hassocks (Ham Fields and Friars Oak Fields) can travel on the A273, bypassing Burgess Hill and with no need to pass through the congested centre of Hassocks village.

4.17. Traffic heading south from Site 13/4 will have to pass through either Keymer or Hassocks village centres with the consequential issue of congestion. Traffic will inevitably cut through the residential Grand Avenue which is unsuitable for an increase in traffic given existing parking, visibility and speed issues (including a very serious child vs car accident earlier this year). Traffic entering and exiting this site will also be detrimental to the Listed building on Ockley Lane.

4.18. Access from Site 13/4 will also require the incursion of development into the strategic gap between Hassocks and Burgess Hill.

4.19. By contrast traffic heading south from sites on the London Road Hassocks (Ham Fields and Friars Oak Fields) will be able to join the A23 at Pyecombe via the A273 without needing to pass through any village centres.

4.20. Development of site 13/4 will also lead to further abuse by vehicles of the public footpath access to Woodside Grange from Woodland Road. This is a very dangerous route that should, in theory, only be used by a small number of authorised vehicles but which is regularly used as shortcut to avoid Grand Avenue. Current restrictions are regularly flouted with vehicles passing, often at speed, along a narrow public footpath that is heavily used by walkers and which passes directly by a playground.

4.21. Site 13/4 is not served by any bus routes and Ockley Lane is unsuitable for bus stops. It is a 20 minute walk from Hassocks Railway Station. Ham Fields is well served by bus routes given its location close to the London Road and is a reasonable 6 minute walk to the railway station. Even Friars Oak Fields is no more than a 12 minute walk to the station and, thanks to its proximity to the London Road is also on existing bus routes.

4.22. The east side of the village has been the focus of virtually all housing development over the last 10 years, including 250 properties at Clayton Mills. This has had a material impact on congestion in the village centre. Development to the west of the railway line spreads the impact of new housing and allows the creation of a second village hub with the potential for a new school and other facilities to support a location currently poorly served.

4.23. By their own admission, HPC are concerned at house building adjacent to the London to Brighton railway line. With reference to a development of 130 homes planned for land immediately adjacent to Site 13/4 but on the eastern side of the railway line they have said: "The proposal would create an increase in the number of people, mainly children, using the uncontrolled crossing over the London to Brighton Railway. This would create a high risk of injury or death to those using the crossing and permission should be refused for this reason." Quoted in <http://bit.ly/2cbMRIE>

4.24. Clearly then it would be reasonable to expect HPC to oppose development on both sides of the railway line but, in an email to MARMC from the Parish Clerk dated 7th June 2016, they have refused to do so. The only conclusion that can be drawn is that the protection of some sites and the development of others has been pre-determined and HPC will defend their decisions even when their own statements defy all reasonable logic.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20745	5	Mr G Hollebon		Mackie Avenue Residents Management Company			

Comments

5. Failure of Governance

5.1. The NP process in Hassocks fails to meet any reasonable standard of integrity and has been run primarily in order to avoid development of one particular site, Ham Fields.

5.2. We note the following in the Minutes of the NPWG meeting held on 26 February 2015 at 7.30 pm

“Item 7. Housing Site Assessments and Housing Workstream. Protocols for Councillors and NPWG Volunteers Involved in Site Selection.

Advice had been received from the MSDC Monitoring Officer and Solicitor that councillor and non-councillor members of the NPWG with a prejudicial interest should not take part in the site selection process to avoid any conflict of interest and to ensure that the council maintains proper standards of conduct. In discussion it was suggested by some members that providing the interest was disclosed and minuted, the process would be transparent, and it was also suggested that all members if they lived in the village would have some form of pecuniary interest wherever development took place. It was therefore suggested that members with a pecuniary interest should be involved in the site selection process, and that a blanket dispensation could be issued.

The majority view of the committee was to recommend to full council that a dispensation should be granted and the mechanism for doing this should be investigated. The Clerk would take further advice from the MSDC Monitoring Officer and a recommendation would be made to the parish council based on his advice. Dale Mayhew commented that, in his opinion the site selection process had not yet started since the activities so far had been the factual gathering of data rather than evaluation. He also commented that given that full council would make the final site selection decisions, this created a distance from the selection activity in the NPWG offering independent scrutiny and evaluation of the selection recommendations, particularly if members with a prejudicial interest remained involved”

5.3. The advice given by MSDC was very clear. The response as recorded in the minutes makes it clear that some Councillors / Members who had interests in the outcome of the process did not wish to be excluded from making decisions about which sites to promote and were prepared to ignore legal advice in order to do so. The dispensation in question is normally used when the Council will be unable to function without being Quorate which is not the case in this matter.

5.4. We believe that Members who have engagement with or membership of Groups which oppose development on sites which may be selected for the NP should not have been involved at this point of the site selection process.

5.5. Councillor Ian Credland, Chair of the NPWG, owns a property at REDACTED ADDRESS Hassocks which directly backs onto the land known as Ham Fields, a site “in play” in the NP process. Ian Credland has also been a founder and Chair of the “Protect Ham Fields” group which exists to stop development of this site. This is a clear conflict of interest.

5.6. Further we understand that other members of the NPWG have written personal letters objecting to the development of Ham Fields which clearly undermines any pretence at their objectivity.

5.7. NPWG members, Councillors Owens and Standfast have personal interests in the outcome of the NP process with regards to Ham Fields.

5.8. Councillor Foot, has owned property adjacent to Ham Fields and, quite incredibly, remains a member of the NPWG despite no longer living in the Parish.

5.9. It is quite extraordinary that HPC can allow the NPWG to function and make recommendations on sites for development when the Chair of the NPWG has a clear personal,

and almost certainly financial interest, in the outcome of those deliberations and has a track record of favouring the protection of this particular site. This runs counter to the documented advice of MSDC and to all common sense as to how conflicts of interest should be managed in order to avoid any suggestion of impropriety in public life.

5.10. There is a further and highly material conflict of interest which results from Mr Dale Mayhew of the planning consultants Dowsett Mayhew acting on behalf of the NPWG and HPC to advise on site selection having previously represented the Protect Ham Fields group at a planning inquiry (letter dated 29th January 2015 and, we understand, on other dates). This conflict of interest was known to the current Chair of HPC, Ian Weir, who in an email dated 20th January 2015 to other Councillors wrote: "...Dowsett Mayhew are to make the submission on behalf of the Ham Fields Group at the appeal hearing. As they are an integral part of the Neighbourhood Plan development I feel we need an assurance from DM that there is no danger of developers citing this as a conflict of interest when our NP goes for consultation / submission."

5.11. There are two startling conclusions that can be drawn from this email a) that when MARMC brought the conflict of interest to the attention of HPC in April 2016, Ian Weir, contrary to the response he gave at the meeting, did in fact know of this issue and b) that his concern was not the conflict of interest per se but rather whether it would undermine the NP.

5.12. Since then, HPC have appointed the same individual to act on their behalf at the August 2016 planning enquiry into Ham Fields.

5.13. Taken together, the above represent a shocking catalogue of conflicts of interests within and around the NPWG which have been allowed to continue unchallenged by HPC, apparently either "asleep at the wheel" or unable to rein in the behaviour of the Chair of the NPWG.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20745	6	Mr G Hollebon		Mackie Avenue Residents Management Company			

Comments

6. Summary

6.1. We continue to take no pleasure from highlighting the deficiencies of the NP process in Hassocks. The village deserves a robust and objective plan which addresses the development needs of the community.

6.2. It is our opinion that the Hassocks NP process has primarily been designed to serve the interests of the Chair of the NPWG, some other members of the NPWG and the Protect Ham Fields group.

6.3. There is clear evidence of multiple conflicts of interest and a consistent failure of HPC to properly challenge and provide robust oversight.

6.4. We have also experienced first hand, and had confirmed by others, a culture of bullying, aggressive behaviour and an unwillingness to accept challenge by the Chair of the NPWG, Ian Credland. This is thoroughly inconsistent with the critical purpose of this role.

6.5. Finally, but most importantly, the planning justification for development of Site 13/4 is weak when compared to other sites, and those at Ham Fields and Friars Oak Fields in particular.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20746	1	Ms V Cavagnoli					Support
Comments							
<p>I believe the plan accurately outlines the importance of maintaining the character of Hassocks as a desirable place to live, by seeking to preserve the green areas, and ensure development happens in a way that is sympathetic to the village, and not changing the village drastically.</p> <p>It mentions the detrimental effects that the construction of vast numbers of houses will have to the village, which considering the oversubscription of the schools alone is surely common sense.</p> <p>Most importantly it will ensure that the residents of Hassocks have a part in deciding the future of the village, instead of external parties who have differing interests at heart. This seems a more democratic and fairer system.</p>							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20747	1	Mrs C Webbon					Support
Comments							
<p>I very strongly agree that the land north of Shepherds Walk should be named as a local green space (LGS1). To reiterate the reasons I have emailed about in the past: building on this land would increase the flooding risk; the 'rat run' of Priory Road would become much worse at peak times, and pose a risk to local residents; the pollution levels at Stonepound crossroads would increase; traffic on London Road would increase, and the access to and from this land is not sufficient to support a housing development.</p> <p>I thank all involved for the hard work and dedication it has obviously taken to produce this local plan, and I give it my full support</p>							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20748	1	Mr B Heath					Support
Comments							
<p>I am writing in support of the Hassocks Neighbourhood Plan. The sites identified for development are evenly spread across the village and will help to protect the strategic gaps between Hassocks, Burgess Hill, Hurstpierpoint and Ditching. Developing the National Tyre Centre site will greatly improve the appearance of that part of the village. Likewise the sites for local green spaces will help to preserve this gaps and keep these areas for the local population who have used them for many years.</p> <p>I support the Parish Council's proposals to reduce nitrogen dioxide levels at Stonepound Crossroads and the possibility of rerouting HGV away from the north/south route of the A273.</p> <p>I also support the maintaining and improving of footpaths and the possible linking of them to provide a circular route around Hassocks.</p> <p>Bus transport could be improved as it is not possible at present to get a bus from the west side of the railway line to the village centre or to take a bus from the centre along the London Road to the leisure centre at the Triangle in Burgess Hill to use the swimming baths and other facilities on offer there.</p>							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20749	1	Mr D Doyle					Support
Comments							
<p>I support the Hassocks Neighbourhood Plan</p>							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20751	1	Mr V Palladino					
Comments							
<p>I have read the Hassocks Neighbourhood plan prepared by Hassocks Parish Council for the period 2014- 2031 and believe that it has been influenced by the input of local people and fully reflects the wishes of the whole parish including Keymer and Clayton.</p> <p>We fully agree with the Vision and Strategic Objectives of Hassocks Parish Council's Neighbourhood Plan, their emphasis on the need for a Hassocks-Burgess Hill Gap and particularly the designation of local green spaces.</p> <p>It is one of the green spaces in particular I would like to focus on, Land to the North of Shepherds Walk (LGS1), although I recognise that all the others are of equal importance. This land not only provides an important green gap between Hassocks and Burgess Hill, it is extensively used for recreational purposes by people on this side of the village. It is used by walkers, dog walkers, families with children and for people of our age group it provides easy access to the countryside and all the health benefits that entails. It also contributes to wild life, providing hedges, plants including some very old trees, woodlands and a stream. Some of the wild life in these fields are becoming increasingly rare.</p> <p>I hope that Mid-Sussex County Council will carefully consider all the objectives contained in the Hassocks Neighbourhood Plan and that we will continue to live in a village environment.</p>							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20752	1	Mrs S Goodsell					Support
Comments							
<p>I support the Hassocks Neighbourhood Plan and would like to refer to the Regulation 16 Submission Version: Policy 3 pages 14 / 15 - I give my full support for land north of Shepherds Walk(LGS1) as a local green space. However, when reading the underlying document - Proposed Local Green Space Sites NPWG Response Paper June 2016 I noticed that Figure 1 (page 4) Proposed Local Green Spaces and Enhanced Footpaths (ref. LGS1) includes a small area of inaccessible land, west of the public open space, between the stream and the London Road. This area is not part of the LGS1 designation which states that the area is two fields to the north of Shepherds Walk. Please see if a slight amendment to Figure 1 is necessary.</p>							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20753	1	Ms H Trevelyan					
Comments							
<p>I would like Friars oak fields to be designated local green space.</p>							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20754	1	Mr M Langridge					
Comments							
<p>The final draft of the Hassocks neighbourhood plan has sort to combine sites 13 and 4 (stating these sites were now under one ownership) and ignoring the fact that site 4 is wholly within the strategic gap with Burgess Hill and at this point north of Mackie Ave the gap is at its narrowest with the southern outskirts of Burgess Hill clearly visible. If Hassocks is to retain any semblance of a rural community then there should be no encroachment into the gap at this point</p>							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20755	1	Mrs E Pizzey					
Comments							
<p>I have been a resident of Hassocks for thirty years and also owned and run a business in Hassocks.</p> <p>Policy 3 of the Regulation 16 submission document:</p> <p>I would like to give my full support to Local Green Space Designation being given to the land north of Shepherds Walk. This LGS was applied for by the residents of Hassocks in 2014 and I know that a great deal of written support for this application is with Hassocks Parish Council. These two fields are immediately behind the Shepherds Walk estate they are a well-defined, enclosed area that is very special to all residents of Hassocks. Although I live on the other side of Hassocks I have enjoyed walking in these fields with my friends and family for many years.</p> <p>Proposed local green space sites – NPWG Response Paper June 2016</p> <p>There appears to be a slight anomaly regarding the extent of LGS1 between the text and the map, (Fig 1 Proposed local green spaces and footpaths). The map (fig 1) appears to include land west of the public open space, between the stream and the London Road. However, as the LGS 1 description indicates, this site comprises two medium sized fields linked by a public right of way</p>							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20756	1	Mrs G McPeake					Support
Comments							
<p>I have read all of the above publication and have found it to reflect my personal views for this Parish in which I live .</p> <p>I have attended all of the meetings that have been held in the preparation of this final plan and do hope that it is passed by Mid Sussex District Council.</p> <p>The proposal for all Local Green Spaces is especially important to maintain the quality of life for residents.</p>							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20757	1	Ms M Bryant					Support
Comments							
<p>I would like to support the Hassocks Neighbourhood Plan's proposal for a Local Green Space on the land north of Shepherd's Walk as this is an area already used daily by local residents for activities such as dog walking, bird watching and family walks. It is within close proximity to the houses of those that use the area and is and has been for many years considered a special amenity to local people who are anxious not to lose it. The area is of significance to people as for many, going there, is part of their daily life helping to keep them fit and maintain their mental wellbeing. If these fields were no longer available residents would have to go much further away to find an open space which would probably mean they would use their cars therefore causing more traffic congestion on the already overloaded A273. The land meets the requirements for Local Green Spaces as set out in Paragraph 76 of the National Planning Policy Framework</p>							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20758	1	Mr R Marsden-King					Support
Comments							
<p>Please be advised that I support the designation of Friars Oak Field as Local Green Space as detailed in the completed Hassocks Neighbourhood Plan.</p>							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20759	1	Mr E Sexton					Support

Comments

I support the policies and proposals of the Hassocks Neighbourhood Plan Regulation 16 Submission. I agree with the Visions and Strategic Objectives as stated on page 11 and the Environment and Heritage objectives p12.

Policy 3, Local Green Spaces, pages 14/15 -I fully support the LGS 1 designation for the land north of Shepherds Walk. Please note that these two fields are easily accessed either directly from the public open space via a stile or by the east / west footpath and are in very close proximity to the local community

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20760	1	Mr D Rowan					

Comments

A little while ago I wrote to you concerning a proposal to build houses on fields behind the Friar's Oak Inn, Hassocks. As a frequent visitor, I know the area well and entirely sympathise with residents who object to any such plan. My own views in support of their position are detailed in the letter to which I have referred, and which you will have noted.

I understand that the 'Hassocks Neighbourhood Plan' has reached the public consultation process, which will include consideration of the Green Space' designation of the Friar's Oak fields. Should this designation be changed in any way that allows for development of this land, the consequences for the natural environment of the area would be highly regrettable and the loss irrevocable.

Development of this site would destroy the rich variety of wildlife that presently flourishes in the fields and hedgerows and along the stream. It is an oasis of nature that is, in my view, most worthy of preservation in the interests of wildlife and the well-being of the people, both of Hassocks and neighbouring Burgess Hill.

A building development on this 'green field' site would inevitably result in further erosion of the 'village' character of Hassocks. It would be a shame if one more Sussex village were to be lost to inappropriate urban development. I urge Mid-Sussex District Council to confirm the "Green Space" designation of the Friar's Oak fields in the interests of preserving the village and rural aspect of Hassocks and the surrounding area, which provides a such a pleasant approach to the South Downs National Park.

Though not, myself, a resident of Hassocks, my views are offered in the spirit of genuine regard for a very attractive part of Sussex and the English countryside.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20761	1	Mr W Sexton					Support
Comments							
I support the Hassocks Neighbourhood Plan Regulation 16 Submission. Policy 3, Local Green Spaces, pages 14/15 I would like to register my strong support for (LGS 1) land north of Shepherds Walk – the fields are a very popular recreational area, the site is well defined and is easily accessible to the community.							
Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20762	1	Mr A Leonard					Support
Comments							
I am in complete agreement with the council regards to this plan							
Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20763	1	Mr S Hill					Support
Comments							
I feel that the proposed neighbourhood plan sets out sustainable development for our town for the next 17 years and i fully support the proposals included within the document.							
Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20764	1	Mr T Hill					Support
Comments							
We are fully in support of the neighbourhood plan							
Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20765	1	Mrs H Hill					Support
Comments							
We are very happy with the neighbourhood plan for Hassocks and support it entirely. We are very grateful for the significant and through work that has been done to complete this document. We hope that this will be implemented and respected by planning officials in due course							

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20766	1	Mrs L Johnson					Support

Comments

I fully support the Hassocks Neighbourhood Plan Regulation 16 Submission. With regard to Policy 3 Local Green Spaces - Land north of Shepherds Walk (LGS1) Having read the underlying document, proposed LGS sites NPWG response statement June 2016 (LGS1) pages 4 and 5, I think it I also useful to note that many local people who access the fields do so without having to cross a main road - all ages can walk across the public open space and use the stile to safely get immediate access to the area

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20767			Terence O'Rourke Ltd	Gleeson Developments Ltd			

Comments

Land to the north of Clayton Mills and Mackie Avenue.

On behalf of our clients, Gleeson Developments Limited (Gleeson), we are pleased to enclose representations to the Hassocks Neighbourhood Plan as part of the Regulation 16 Consultation in regard to the site 'Land to the north of Clayton Mills and Mackie Avenue' and the promotion of this site for residential development.

This representation should be read in conjunction with the previous representation made in relation to the Hassocks Neighbourhood Plan Regulation 14 Pre-Submission Consultation made on the 16 February 2016.

Introduction

By way of background, Gleeson has a number of land interests within Hassocks Parish. However these comments relate specifically to land to the north of Hassocks, which is subject to the housing allocation set out in draft Policy 15 (Land to the north of Clayton Mills and Mackie Avenue), referred to hereon as the Policy 15 site.

Gleeson consider there to be a number issues with the overall housing requirement and with Policy 15 that need to be examined with reference to the basic conditions. These are set out below.

Housing Requirements

In advance of the adoption of strategic policies, to be set by the District Council in the local plan, the evidence base of the NP fails to give sufficient confidence that regard has been had to the NPPF and that it is appropriate to make the NP in that context, further that the plan will contribute to sustainable development. Meeting the objectively assessed housing need is clearly an important consideration, yet this is not reflected in the strategic objectives or in the policy. The Parish Council's resolution that the need for additional housing over the plan period is 210 – 270 dwellings appears arbitrary and is inappropriate with regard to the evidence base, NPPF and the requirements of sustainable development – it does not meet the basic conditions. The need is much higher and in advance of a strategic distribution of housing being confirmed in the local plan, the Neighbourhood Plan must address the higher need and should be termed as 'minimal' requirements to provide flexibility. This would assist in ensuring that the NP provides the right types of development for the local community, with reference to NPPF paragraph 184.

Strategic Gaps

Policy 1 designates land to the north of Hassocks as the 'Burgess Hill Gap'. The designation on the proposals map differs from the designation of local gaps. The justification, at paragraph 4.4, refers to the out of date Mid Sussex Local Plan and the designation of the area in that plan as 'strategic gap'. The emerging local plan does not bring forward the strategic gap designation and whilst it facilitates the identification of local gaps within a neighbourhood plan it does not facilitate bringing forward strategic gaps from the extant local plan, or the designation of strategic gaps.

By its nature, any strategic gap between Hassocks and Burgess Hill will need to operate across areas outside the NP designated area in order to be effective. There is no indication that this is to be the case, in the area between the eastern part of Hassocks and Burgess Hill. The made Burgess Hill Neighbourhood plan (October 2015) does not

include gap policy. This could place additional development pressure on the southern edge of Burgess Hill, where policies are less restrictive than on the northern edge of Hassocks, where the gap policy would operate.

As a matter of principle this gap should be deleted as it does not meet the basic conditions

Land to the north of Clayton Mills and Mackie Avenue

Policy 15 allocates the land to the north of Clayton Mills and Mackie Avenue for up to 140 residential units. The policy sets out that residential development on the site will be supported where proposals:

- Do not extend residential development into the Burgess Hill Gap (Policy 1) as identified on the Proposals Map;
- Provide a significant landscape buffer to the northern edge of the site;
- Protect the existing woodland along the western edge;
- Provide compensatory formal/informal open space to meet the needs of existing occupants of Clayton Mills and the needs generated by the occupiers of the development;
- Protect the amenity of existing residential properties bordering the site
- Provide a suitable mix of dwelling type and sizes to meet the needs of current and future households;
- Protect the amenity of existing Public Rights of Way through and adjacent to the site; and
- Provide suitable access and parking arrangements

Gleeson welcome and support the draft allocation in principle. They consider that the site is not constrained in either technical or physical terms and offers the opportunity for sustainable development, lending itself well to a natural extension of the settlement and without a detrimental impact on the strategic gap between Hassocks and Burgess Hill. It is deliverable, with reference to NPPF footnote 11, and would make a positive contribution to local housing needs and needs within the wider Housing Market Area. However there are elements within the draft allocation that need to be addressed, as we set out below:

‘Residential development on Land to the north of Clayton Mills and Mackie Avenue (as identified on the Proposals Map) for up to 140 units...’

In light of the concern that the proposed housing allocation target of 280 – 290 new homes over the plan period (Policy 13) is insufficient, the allocation for Policy 15 should not be worded to limit the number of homes to 140. This is an important site for which detailed masterplanning/capacity testing has yet to be undertaken. Whilst such detailed work is not necessary at this stage, to support the allocation, capping the capacity of the site, without further testing, fails to represent a positive approach and fails to meet the objectives and requirements of sustainable development.

The allocation should be for ‘at least 140 dwellings’ in order to encourage the efficient use of the site, with the upper range determined as a result of detailed design work and an appropriate response to the context and site constraints.

‘Do not extend residential development into the Burgess Hill Gap (Policy 1) as identified on the Proposals Map;’

Firstly, the above comments with respect to this gap should be taken into account.

Second, it should be acknowledged that the proposed site allocation boundary for Policy 15 does not fall within the proposed Burgess Hill Gap. It would therefore not be possible for the housing to extend into the proposed Burgess Hill Gap without deviating from the site allocation. Therefore, Gleeson question the need for this requirement within the

allocation, if the site boundaries remain as submitted.

Third, and notwithstanding this position, the boundaries of the Burgess Hill Strategic Gap were set within a very different policy context – including against housing requirements identified within the Mid Sussex District Plan 2004 (extending up to 2006). Given the current overall housing need, and need to promote sustainable development, the opportunities to extend the allocation into the area currently designated, without detrimentally effecting the integrity of the gap, should be fully considered and evidenced.

The NP plan process has failed to consider this opportunities, which could result in a greater site capacity and a greater contribution to meeting housing needs (market and affordable) within the terms of sustainable development. The approach and evidence base in this respect fails to meet the basic conditions.

‘Provide compensatory formal/informal open space to meet the needs of existing occupants of Clayton Mills and the needs generated by the occupiers of the development;’

As currently worded, the sub-text to the policy (paragraphs 6.22 and 6.23) sets out that the southern part of the site (comprising the area of open space associated with the Clayton Mills development) should be the location for housing, whilst the northern part of the site (comprising the arable field above Mackie Avenue) should be used for open space.

Currently Gleeson is in the process of undertaking design feasibility work and technical studies to determine the likely appropriate development strategy for the site. This will enable broad parameters to be established for the progression of a masterplan in terms of the most appropriate land configuration addressing housing, open space, access and infrastructure.

As was suggested at the Neighbourhood Planning Working Group meeting on the 4 February 2016, the exact location and form of the open space, housing and access to be provided on the site will need to be explored in detail and should involve discussions with key local stakeholders. A number of options could be identified and explored.

Such exploration will need to include consideration of a wide range of matters including but not limited to landscape and visual impact, impact upon the settlement boundary, the need for the provision of sufficient play and recreation space, impact upon the residents of Clayton Mills and Mackie Avenue, biodiversity and the provision of safe and satisfactory access. In addition, there remains the possibility that an allowance may need to be given for the provision of other essential community infrastructure to be delivered on the site.

Until this work is complete it would be inappropriate for the policy to be restrictive in the way that it is; paragraphs 6.22 and 6.23 are overly prescriptive. It would be prudent for there to be sufficient flexibility in the wording of the policy to facilitate positive and comprehensive masterplanning and facilitate the delivery of community infrastructure, should the need arise.

Whilst we appreciate that paragraphs 6.22 and 6.23 are sub-text and not the wording of the actual policy, the sub-text is inevitably important in understanding how the policy should be interpreted and implemented. We therefore suggest changes to the wording (underlined for clarity) as follows:

6.22. ‘The site is considered suitable for residential development to deliver up to some at least 140 dwellings. These should be located through a comprehensive masterplanning process within the southern part of the site, whilst so as to protecting the residential amenity of existing properties and protecting and preserve ing the existing woodland along its western edge. It is recommended suitable access to the site is to be gained via Ockley Lane and/or from the south.’

6.23. ‘The northern part of the site, principally comprising the existing arable field, should be used to provide both compensatory open space for existing residents as well as future residents and a significant landscape buffer. The latter should assist to reinforce the settlement edge and protect the Burgess Hill Gap,

the boundaries of which will be informed by landscape evidence and the comprehensive masterplanning process.'

This will allow Gleeson, in consultation with key stakeholders, to work up the most appropriate and sustainable design solution for the site and the village without the risk of potentially deviating from the wording of the policy sub-text. This approach would contribute to the achievement of sustainable development (as required by the basic conditions).

'Protect the amenity of existing Public Rights of Way through and adjacent to the site'

There is one public right of way through the site and others around the site, including along the northern edge of the allocated area. In developing a scheme for the site, Gleeson will endeavour to maintain these public rights of way. However it is inevitable that the visual amenity from some of the rights of way will change to some degree. Any application would be accompanied by a landscape and visual impact assessment which would consider views from public vantage points and identify mitigation where possible.

Although a scheme will be mindful

of this, the policy should acknowledge the possibility of change. Our suggested changing to the wording (underlined for clarity) is set out below:

'Protect Have regard to the amenity of existing Public Rights of Way through and adjacent to the site'

Conclusion

Gleeson welcomes the site allocation, for the residential development of land to the north of Clayton Mills and Mackie Avenue. However, there are key concerns with the evidence base and policy requirements, which indicate that the NP does not meet the basic conditions. These matters need to be examined and major modifications made.

We would like to take this opportunity to thank you for consulting us on the neighbourhood plan.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
------	------	------------	--------------	-----------	--------	------	------

20768		Mr J Orchard					
-------	--	--------------	--	--	--	--	--

Comments

My Comments

I am writing to submit comments relating to the "Hassocks Neighbourhood Plan" Submission Version 16.

Introduction

I would start by offering my congratulations to Councillor Ian Credland the Chairman of the Neighbourhood Plan Working Group and his team who all deserve great credit, having got the Neighbourhood Plan this far to the publication consultation stage. I am supportive of the principles of the Neighbourhood Plan and the adoption of the Draft Plan and I accept that new housing has to be accommodated within the Hassocks Parish Council area

I also accept that broadly the communities on the East and the West sides of the railway line that bisects Hassocks must be treated equally as far as possible with regard to the apportionment of new housing.

Aims

The aims of the Plan are stated as being to:

- Provide a framework for future development in the plan area,
- Protect and enhance existing open spaces, and,
- Establish aims for facilitating future infrastructure needs.

The Hassocks Neighbourhood Plan is a vision for 17 years from 2014 - 2031. It is comprised of policies and aims to meet the Vision and Objectives.

Response

However I consider that the Plan as issued, which identifies large scale developments, constitutes potential over-development on a massive scale with a significant loss of amenity as a result. I refer in particular to the scheme for developing the Hassocks Golf Club. My particular concern is that an attractively landscaped area that constitutes a pleasurable green space is identified for development in the Plan. Whilst it appears to be a failing venture in its current form, this should not in itself be a reason for developing housing on one area of the course. Particularly so as this will impact adversely on the designated 'Strategic Gap' between Hassocks and Burgess Hill.

This Strategic Gap as well as that between Hassocks and Hurstpierpoint should be maintained and not built on with the open space protected and enhanced. This cannot be achieved by building a large number of houses.

Pockets of controlled smaller infill development (such as Reed Close) that rejuvenate land rather than destroy it and implemented systematically in a controlled manner over a period of years would be far more appropriate and beneficial to Hassocks. It would also allow the infrastructure to be upgraded to support this.

Smaller, phased developments over a period of years would enable the housing requirement to be met and would limit the impacts on amongst other areas:

Pollution - more houses= more vehicles = more pollution

Parking - more houses=more vehicles=more parking

Schools - more houses=more children=more school capacity

Healthcare - more houses = more people=increased healthcare requirement

Transport - more houses = more commuters=more parking=more train capacity

It is clear that Hassocks village is currently at full stretch. Further large scale development would further exacerbate the problems of growth and squeeze the current capacity.

In terms of the Hassocks Golf Course (Policy 14) the golf club, clearly anticipating approval have jumped on the back of the Plan to submit an 'outline' planning application, meaning that if it is approved, the actual housing estate could actually contain many more homes than the 130 proposed. (ref: Planning Application Case Number: DM/16/1775 Hassocks Golf Club, London Road, Hassocks, West Sussex dated 29th April 2016). This raises the question as to whether advanced discussions have taken place between the owner of the golf club and the Parish Council and whether development of the golf course is actually a 'done deal' subject to planning.

I would also comment on the press campaign by the Hassocks Golf Club (reference the article in the Mid Sussex Times on 27th April 2016) which coincided with the submission of this planning application. This appears to direct pressure on the planning authorities to grant permission for their development. The threat that the owner will withdraw his subsidy for the club and that it will be lost as a result is nothing short of an attempt at blatant coercion, which is concerning.

Funding

The purpose of the Neighbourhood Plan is to focus on community development and to provide the framework to deliver benefits for residents, businesses and visitors. Funding for new community facilities and improvements are likely to come from new housing. The Parish's housing needs are contained within the strategic sites identified in Plan. However I do have concerns that the Plan as it stands, is aspirational and raises more questions than answers particularly in relation to the provision of infrastructure, and the timing of its development in relation to the volume of housing. Neither the question of funding nor the plans for infrastructure improvements is adequately addressed in the Plan although reference is made to the District's Infrastructure Delivery Plan (IDP)..

Conclusion

As stated previously I am supportive of the principles of the Neighbourhood Plan and the adoption of the Draft Plan and accept that new housing has to be accommodated within the Hassocks Parish Council area. I therefore support the Hassocks Neighbourhood Plan but not in its current form. Whilst it is stated to be a framework for future development, the Plan needs to be deliverable and I don't believe that it is in its current form.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20769	1		Agri-Matters	Mrs H Widdicombe			

Comments

I write on behalf of my client, Mrs H Widdicombe concerning the Hassocks Neighbourhood plan.

My client has a land owning and development interest in Site 8 / LGS4. I write further to my previous correspondence to Hassocks Parish Council of 22 September 2015 and 16th February 2016 regarding the same.

These previous representations set out in some detail why we feel that the plan as prepared does not meet the Basic Conditions, and that as such, may risk failing at examination. Principally we are concerned that:

- a) Allocation of LGS 4 as Local Green Space under policy 3 does not meet criteria required under paragraphs 77-78 of the NPPF, and is therefore inconsistent with the Basic Condition set out in Schedule 4B, 8(2)a (to have regard to national policies and advice contained in guidance issued by the Secretary of State).
- b) Allocation of LGS 4 as Local Green Space under policy 3 does not provide sufficient flexibility for sustainable plan making and that is therefore inconsistent with the Basic Condition set out in Schedule 4B, 8(2)d (to contribute to the achievement of sustainable development).

Furthermore we are concerned that the Neighbourhood Plan Consultation Statement does not adequately convey or acknowledge the concerns that we have raised, nor does it indicate how these concerns have been addressed in the Neighbourhood Plan. I expand on this further at Paragraph 3 'Comments on Consultation Statement'.

Under the provisions set out at paragraph 057 of the Planning Practice Guidance we request an oral hearing at which we can set out full details of our concerns as well as our proposals to the Examiner as well as the wider community.

1) Background to the development proposals for Site 8/LGS4

For the avoidance of doubt, I set out the proposals for my clients's site as follows:

- Included within the proposed scheme will be a purpose built two year intake primary school facility for the district, the building of which to be fully funded by the developer as part of the proposed development scheme.
- A mixed development of approximately 50-60 homes to include a mix of house types with a range of affordability and tenure at a build density of approximately 20-30 dph.
- Subject to constructive dialogue with the Parish Council on the precise requirements of the parish, it is considered that the school development could incorporate the provision of multi-use community facilities which we note has been identified as a requirement within the Neighbourhood Planning process.

These proposals are in line with discussions that took place at a meeting between the landowner, and her development partner and the Parish Council at the council's offices on 15 April 2015. A record of this meeting, as summarised by the Clerk to the council dated the same is enclosed for reference.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20769	2		Agri-Matters	Mrs H Widdicombe	12		

Comments

2) Policy 12: Education Provision

The Neighbourhood Plan correctly identifies the requirement for an additional 2 form entry primary school in the parish over the plan period. This is confirmed by the Local Education Authority, West Sussex County Council, in their letter of 30/9/15 to HPC (See Consultation Statement - June 2016, Appendix 17). The Neighbourhood plan stops short of identifying and allocating a specific site for the school however, in the absence of detailed feasibility study of potential sites to be carried out by the local educational authority (WSCC).

Despite the discussions that have taken place between WSCC and HPC with regards the potential suitability of my client's site for the provision of such a school facility, the Neighbour Plan includes proposals to allocate the site as Local Green Space under Policy 3. This introduces further impediment to the delivery of a school facility for which there is a demonstrable requirement, where there are already recognised constraints.

MSDC have themselves commented on the difficulty of delivering Policy 12 - Education provision in their response to the (Regulation 14) consultation. In this they acknowledge that "The second criterion of the policy seems difficult to overcome as the only options [for a school site] will be within the National Park or in one of the gaps. There is no scope for a site to come forward for school provision outside of one of these designations". (Ref Hassocks Neighbourhood Plan Consultation Statement – Appendix 18 - Page 2).

Given this context we would argue that the designation of a site with potential for a school as Local Green Space is inconsistent with the Basic Condition to plan for sustainable development and to accord with National Policy guidance.

Paragraph 007 of the National Planning Practice guidance says "Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and Local Green Space designation should not be used in a way that undermines this aim of plan making".

Whilst we acknowledge that the Neighbourhood Plan defers to WSCC for a detailed feasibility study on site suitability to be done, we are concerned that a) no time scales are proposed or specified, and b) sites that have been identified as potentially available for a school site as part of the Neighbourhood planning process are not specifically referenced or `reserved` with Policy 12 – Education provision.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
20769	3		Agri-Matters	Mrs H Widdicombe			

Comments

3) Comments on Consultation Statement - June 2016

3.1 Representations received by HPC as part of the Consultation on the pre-submission plan (regulation 14) have been summarised thematically at Section 7 in the 'Hassocks Neighbourhood Plan Consultation Statement' (June 2016).

Looking at this document I note that the representations made in my letter of 16/2/16 have been economically summarised simply as "Objection to LGS4 - LGS not suitable as LGS regard to NPPF" (Ref Hassocks Neighbourhood Plan Consultation Statement' (June 2016) - Policy 3 - LGS in table at paragraph 7.9, p 33).

I note that my comments relating to the relevance of the LGS4 allocation to the impact on potential sites for schools and the importance of ensuring that the Neighbourhood Plan meets the basic conditions in terms of sustainable plan making have not been reported, under either theme; 'Policy 3 - local Green Space' or 'Policy 12 - Education Provision'.

Section 8 of the Consultation Statement includes a summary of how comments received by HPC have been considered and, where relevant, addressed in the Neighbourhood plan.

I note that the comments section in this summary contains no counter arguments to the assertion in my representation that the allocation of my clients's site as LGS4 does not comply with the NPPF guidelines and the remains silent on how the working group have been addressed these concerns within the plan (Stakeholder reference 183 p61-62). No consideration has been given to my comments regarding the premature allocation of a potential school site as Local Green Space at the summary of comments on 'Policy 12 - Education provision' – (Stakeholder reference 183, Page 72).

3.2 Appendix 20 Hassocks Neighbourhood Plan - Proposed Local Green Space sites. Regulation 14 Pre consultation Plan NPWG Response Paper, June 2016. The document references a letter from Agri-Matters dated 21st March 2016. For the avoidance of doubt, no letter with this date has been sent by me. The summary of the comments would appear to relate to my letter of 16th February 2016.

3.3 Stakeholder References / representations omitted

I am aware that Batcheller Monkhouse have made representations on behalf of Mr & Mrs Gorrings who own the eastern part of the proposed Local Green space LGS4, which adjoins my client's land. Despite having a land owning interest in the land, and having submitted representation at the Regulation 14 Consultation stage, these comments do not appear to have been acknowledged in Section 7 or 8 of the Neighbourhood Plan Consultation Statement and neither Batcheller Monkhouse nor Mr & Mrs Gorrings are referenced within the Stakeholder

Reference list at Appendix 19.

3.4 Concerns regarding some aspects of the public consultation exercise.

My letter of 16/2/16 raised concerns regarding the fact that participants at the public consultation event in July which had an objective of assessing the community's preferences in terms of potential development sites were asked to "disregard the proposals for the inclusion of a schools site within the development". (Ref Agri-Matters letter 16/2/16, Paragraph No 6). I can find no acknowledgement or counter argument to this point in the consultation summary in Section 7 or 8 of the Neighbourhood Plan Consultation Statement.

Summary

In view of the above I append my original correspondence of 22/9/15 and 16/2/16 in full order MSDC can review the comments made in their entirety and give them due consideration. Under the provisions set out at paragraph 057 of the Planning Practice Guidance we also request an oral hearing at which we can set out full details of our concerns and our proposals to the Examiner and the wider community. Whilst we acknowledge the six week period of public consultation on the Neighbourhood Plan expires on 8th September 2016, we reserve the right to come back to MSDC once the proposed refinements to the NPPF are known following the DCLG consultation in December 2015.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type
------	------	------------	--------------	-----------	--------	------	------

20770	1	Mr P Bareham					
-------	---	--------------	--	--	--	--	--

Comments

As requested on Hassocks Parish Council flyers, I forward the following comments on the above, as a resident of Hassocks for about 50 years with an office in Hurstpierpoint for about 30 years.

The Plan fails to address the fact that Hassocks is the traffic hub of a linear town stretching from Ditchling to Albourne, all interlinked- if I need to see the doctor I am offered an appointment in Ditchling, Hassocks or Hurstpierpoint for example. Likewise membership of clubs, etc, unites the various areas of the town at various venues. Hurstpierpoint secondary school children travel to the Downsland School in Hassocks. Examples of integration are numerous, even in my opinion to shops.

At a recent meeting on parking problems, total surprise was expressed by the attending WSCC officials about the catchment area of commuters to Hassocks Railway Station traffic hub and its parking. At the time of the Hassocks Village Design Statement research, and experience since, showed that commuters travelled to Hassocks from Henfield in the west and beyond Ditchling in the east. In my road we have two commuters who travel from Worthing for free on road parking, cheaper season ticket and a guaranteed seat on the train! How can one thus have a Hassocks Neighbourhood Plan without detailed consideration of the adjacent areas, travel, infrastructure, etc. Rather than three Neighbourhood Plans there should be a comprehensive master plan for our linear town.

It is interesting to note the words on housing in regards to the provision of schools in Hassocks, in the light of the planning permission given to Bovis Homes for 140 houses to the east of Hurstpierpoint, which will greatly affect Hassocks in many ways, alongside other housing proposals. When Hassocks residents were invited to inspect the proposed Infants School extension we questioned the adequacy of the proposals in the light of house building in the area. Patricia Flint of WSCC informed us that this was not taken into account! The figures for school spaces "are from the Child Health Trust and the Primary Care Trust and relate to actual birth figures and extrapolation of the figures of migration into the area on a four year time scale". An approach now proven to be totally wrong with the current proposal for a three classroom shed on the school carpark within such a very short time of the school extension being built.

When the Village Design Statement was being prepared, proposals were offered to help balance the housing problems by suggesting elderly housing in central areas, to reduce car ownership, traffic movement, sustainability in all its aspects- including the survival of the shopping area, (it is with concern one notes the number of shops empty or on the market) the freeing up of family houses (an approach now actively being adopted by some London Boroughs) etc. We were told it could not be included as "it would inhibit developers"! In the light of the words in the Plan can we believe that this will now not be so, bearing in mind that it is volume builders who build- for profit and shareholders- not politicians. One notes with despair the minimum dwelling sizes offered by the volume builders in the name of "affordability"- marginally bigger than a kennel for humans and requiring virtually immediate extensions.

As an architect/landscape designer I have deep concerns, but offer no comment, on design, having contributed to the subject in the Hassocks Village Design Statement, the forthcoming "Building of England: West Sussex" and a publication in the spirit of Owen Hatherley's "A guide to the new ruins of Great Britain".