

# HASSOCKS PARISH COUNCIL

Parish Centre, Adastra Park Keymer Road, Hassocks, BN6 8QH Telephone: 01273 842714 email: info@hassocks-pc.gov.uk www.hassockspc.net

06 July 2017

EMAIL ONLY

Jonathan Bore MRTPI C/O Pauline Butcher Programme Officer

Idfprogrammeofficer@tiscali.co.uk

Dear Mr. Bore

#### Hassocks Parish Council representations on Mid Sussex District Plan Examination

Hassocks Parish Council object to the proposed amendments to Policy DP6 as detailed in MSDC8c. In particular, the Parish Council object to the proposed requirement, set out in the supporting MSDC8c: Appendix 1 that Hassocks' residual provision to find figure is 334 dwellings. This is to contribute to the minimum residential figure of 1116 dwellings in Category 2 settlements as detailed in the Spatial Distribution of Housing Requirement Table in policy DP6.

The proposed spatial distribution has been determined according to a wholly desk-based exercise, largely predicated on census household data. There has been no consideration or analysis of the capability and capacity of a settlement to be able to provide additional housing; no assessment of planning policy constraints that affect settlements and their hinterland, with the exception of whether they are wholly within the High Weald AONB; and no site visits to test and verify the conclusions that have been reached.

Hassocks is a highly constrained settlement, with limited capacity to provide land for more housing. The constraints of the Parish are detailed in the Hassock Neighbourhood Plan Constraints Map attached at Appendix 5.

The built-up area is bordered to the south and east by land that falls within the South Downs National Park (SDNP). Not only is this a constraint to housing in planning policy terms, it also means that any housing provided within this area, would not contribute to MSDC housing numbers. Instead it would contribute to housing need within the South Downs National Park Authority (SDNPA).

The built-up area is bordered to the north, east and west by 'gaps' within the adopted development plan. These are narrow and vulnerable to erosion with consequential harm that may be caused to the identity and character of individual settlements. A previous appeal on land on the eastern edge the adjoining settlement of Hurstpierpoint was refused by the SoS in 2014 due to the harm to the gap between Hurstpierpoint and Hassocks <sup>1</sup>. Whilst a subsequent appeal was allowed in the same gap earlier this year<sup>2</sup>, that decision was, in part, based on the ability to provide mitigatory open space on the outer edge of the development to provide a rural buffer to the settlement edge within the gap.<sup>3</sup>

<sup>&</sup>lt;sup>1</sup> see decision APP/D3830/V/14/2211499

<sup>&</sup>lt;sup>2</sup> in relation to 13/03818/OUT

<sup>&</sup>lt;sup>3</sup> see for example paragraph 207 of Inspectors Report - APP/D3830/W/14/2226987

Within the gap area along the northern edge of the settlement (separating Hassocks from Burgess Hill), 2 large housing allocations are proposed in the neighbourhood plan<sup>4</sup>, with a further scheme awaiting determination at appeal. This reflects that the emerging Neighbourhood Plan seeks to allocate future growth within the least vulnerable gap areas, that are unconstrained by other planning policies.<sup>5</sup>

These physical and planning policy constraints have not been considered by MSDC in preparing MSDDC8c<sup>6</sup>.

Instead, consideration has been given to providing a discount for housing requirements for settlements within the AONB, although without reference to capacity consideration of the settlements. No discount has been applied to Hassocks, despite the SDNP bordering 2 sides of its built-up area. HPC consider that the physical and planning policy constraints that affect Hassocks should be given due consideration in the spatial distribution strategy in Policy DP6. These include, its relationship to the SDNP, and its close proximity to surrounding settlements (Burgess Hill, Hurstpierpoint and Ditchling) which render its rural hinterland important to be retained as defined 'gaps'.

Furthermore, there are 3 parishes that adjoin the built-up area of Burgess Hill. Two of these are proposed to be the subject of a significant discount of further housing requirements <sup>7</sup> as detailed in the Table at 'Stage 3' of MSDC8c: Appendix 1. The third parish, Hassocks, is proposed to have no discount. This is notwithstanding the comparable geographic proximity of Hassocks to Burgess Hill in relation to the other 'discounted' settlements. HPC consider that the parish's proximity to Burgess Hill should be given equal consideration and discount.

HPC consider that the parish will not be capable of providing for the additional 334 dwellings set out in MSDC8c. Whilst it is noted that this number requirement is set out in an Appendix to the policy, it is clear that this is part of the evidence base that underpins the proposed requirement of 1116 dwellings within Category 2 settlements as set out in policy DP6.

Neighbourhood Plans must be in general conformity with the strategic policies of the local plan and not promote less development than set out in the local plan or undermine its objectives. HPC are concerned that the emerging Hassocks Neighbourhood Plan (HNP) would not be capable of being in conformity with emerging policy DP6. This has significant implications for the ability to progress the HNP. This would conflict with the Government's clear commitment to neighbourhood planning.

It is submitted that emerging Policy DP6 should not proceed unless and until an adequate assessment has been undertaken of the settlements proposed for housing growth. This is required to ensure that the District Plan is prepared on a robust and credible evidence base.

Through such an assessment, it is submitted that the proposed housing growth figure for Hassocks should be significantly reduced.

The Parish Council trust that the above submissions will be given due consideration in the further assessment of the emerging Mid Sussex District Plan. Full details relating to the background of this representation is attached in Appendix 1 along with associated appendices.

Should you require anything further, in respect of these submissions, please do not hesitate to contact the Parish Clerk.

Yours sincerely Ian Weir Chairman Hassocks Parish Council

<sup>&</sup>lt;sup>4</sup> at Hassocks Golf Club and North of Clayton Mills

<sup>&</sup>lt;sup>5</sup> such as the flood risk that affects land north of Friars Oak

<sup>&</sup>lt;sup>6</sup> acknowledged by officers of MSDC at a meeting with representatives of the Parish Council on 15th June 2017

<sup>&</sup>lt;sup>7</sup> Hurstpierpoint and Sayers Common Parish; and Ansty and Staplefield Parish



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EMAIL ONLY

Jonathan Bore MRTPI C/O Pauline Butcher Programme Officer

Idfprogrammeofficer@tiscali.co.uk

Dear Mr. Bore

#### Hassocks Parish Council representations on Mid Sussex District Plan Examination

These submissions comprise representations by Hassocks Parish Council (HPC) to the Examination of the Mid Sussex District Plan (MSDP). These representations relate to the Addendum Document MSDC8c (and associated appendix) published by Mid Sussex District Council (MSDC) with regard to the matter of the proposed policy DP5: Settlement Hierarchy and DP6: Housing.

The Parish Council object to the proposed revisions to Policy DP6, and in particular the proposed Spatial Distribution of Housing Requirement. It is submitted that this is based on a flawed methodology, that fails to take account of settlement constraints and capacity, in particular with respect to the settlement of Hassocks.

#### Background

It is noted that MSDC8c has been prepared in response to your letter of 20th February 2017, which sets out interim conclusions on the housing requirement for Mid Sussex over the period 2014-2031.

In providing guidance 'on the way forward' you set out that "the spatial strategy should be clarified by establishing the approximate numbers of dwellings expected in each settlement or groups of settlements. The District Plan is a strategic plan and should contain this information. As submitted it is not sound because it provides inadequate guidance to neighbourhood plans and to the future Site Allocations Plan on the amounts of housing development they should aim to accommodate."

Document MSDC8c sets out a proposed spatial distribution of housing based on a requirement of 15942 homes over the plan period<sup>1</sup> and by reference to a settlement hierarchy. Hassocks and Keymer<sup>2</sup> is identified as a Category 2 settlement, which should provide a share 2847 dwellings over the plan period with 1116 dwellings still be provided for from 2017 onwards.<sup>3</sup>

MSDC8c notes that taking the District Plan requirement for the first 8 years up to 31st March 2022, the required minimum provision for Hassocks is identified as 322 dwellings. Having regard to existing

<sup>&</sup>lt;sup>1</sup> based on a 'stepped trajectory' of 876dpa until 2023/4 and 1026dpa thereafter until 2031

<sup>&</sup>lt;sup>2</sup> which comprises a single settlement

<sup>&</sup>lt;sup>3</sup> see Spatial Distribution of Housing Requirement Table within DP6: Housing

completions and commitments, the table produced by the District Council and attached at Appendix 2 confirms that existing completions and commitments within Hassocks is currently 317 dwellings.

MSDC8c: Appendix 1 sets out a 'summary methodology' for the proposed parish OAN Distribution. This sets out that the approach is predicated on the proportionate number of households in each settlement relative to the district as a whole.<sup>4</sup> 'Policy Adjustments' are then made to the figures.<sup>5</sup> This includes taking account of emerging District Plan allocations at Burgess Hill and Pease Pottage; settlements within the High Weald AONB; and completions and commitments. This results in a residual amount 'to find' figure distributed by settlement category and then individual settlement.<sup>6</sup> For Hassocks, the residual provision to find figure is 334 dwellings over the remainder of the plan period.

#### **Hassocks Parish**

Hassocks Parish is located some 1.5km south of Burgess Hill. Abutting the eastern and southern edges of the built up area of village of Hassocks and Keymer is the designated South Downs National Park (SDNP)<sup>7</sup>. The main built up area is separated from Hurstpierpoint (to the west) and Ditchling (to the east) by narrow, but important rural hinterland 'gaps' of generally undeveloped land.

In total, the parish extends to some 10.88sqkms (4.2sqm) and at the last Census had a total population of 7667 persons living within 3342 households.

Within the adopted Mid Sussex Local Plan, land to the north, east and west of the settlement is defined as a 'Strategic Gap'; whilst land to the east and west are separately also defined as Local Gaps. Within these areas land is to be safeguarded with the objectives of preventing coalescence and retaining the separate identity and amenity of settlements.<sup>8</sup> The extent of these are detailed on the District Plan Proposals Inset Map attached at Appendix 3.

## Hassocks Neighbourhood Plan

HPC was designated for the purposes of preparing a Neighbourhood Plan in July 2012 by both MSDC and the South Downs National Park Authority (SDNPA).

Following extensive evidence base gathering and stakeholder engagement, the Pre-Submission Neighbourhood Plan was published in January 2016. Following, consideration of feedback, the Submission Version Plan<sup>9</sup> was published for its statutory 6-week consultation in July 2016.

The Hassocks Neighbourhood Plan (eHNP) seeks to positively meet housing need whilst protecting the high quality character and setting of both the main built-up area and its hinterland. The Plan

<sup>&</sup>lt;sup>4</sup> referred to as Stage 1 - 'policy-off'

<sup>&</sup>lt;sup>5</sup> referred to as Stage 2

<sup>&</sup>lt;sup>6</sup> referred to as Stage 3

<sup>&</sup>lt;sup>7</sup> and so the southern and eastern parts of the parish fall within the South Downs National Park Authority

<sup>8</sup> see Policies C2 and C3 of the Mid Sussex Local Plan

<sup>&</sup>lt;sup>9</sup> supported by the associated Sustainability Appraisal, Consultation Statement and Basic Conditions Statement

identifies 3 housing allocation sites which would collectively deliver some 280-290 dwellings. These are sites at Hassocks Golf Club; north of Clayton Mills, and National Tyre Centre.<sup>10</sup>

In addition the plan supports windfall housing development within the defined built-up area.<sup>11</sup> This has delivered a strong historic and recent supply of housing, which is expected to continue over the plan period. It is estimated this might deliver circa 10 dwellings per annum over the plan period.<sup>12</sup>

Following the end of the public consultation period, the Parish Council have been seeking for the Plan to progress to independent Examination. MSDC have more recently confirmed they do not support progress of the Neighbourhood Plan until the District Plan is further advanced, as detailed in the letter attached at Appendix 4.

#### **Interim Housing Applications**

In parallel to progress of the Neighbourhood Plan, there have been a number of planning applications for large scale housing development within the Parish. These are:

Land to the west of London Road - application for 97 dwellings and associated infrastructure on land to the west of London Road<sup>13</sup>. MSDC Planning Committee considered the application in May 2014 where it was resolved the application be refused on 3 grounds relating to: the absence of a completed S106 Agreement; the severe traffic impact on the Stonepound Crossroads; and the adverse impact on air quality at Stonepound Crossroads.

The decision was the subject of an appeal, which was subsequently recovered for the Secretary of State's (SoS) determination. Notwithstanding MSDC's withdrawal of their objections, the SoS refused planning permission and dismissed the appeal in the decision letter dated 31 March 2015, in part due impact on the 'gap'. This was successfully challenged in the High Court and the decision was quashed.

On re-determination, the SoS allowed the appeal and granted planning permission in March 2017<sup>14</sup>.

Land at Hassocks Golf Course - application for up to 130 dwellings and associated infrastructure<sup>15</sup>. MSDC Planning Committee resolved to approve the scheme in December 2016. HPC supported the application as it was in accordance with Policy 14 of the eHNP.

Land North of Friars Oak - application for 130 dwellings <sup>16</sup>. MSDC Planning Committee resolved to approve the scheme in October 2016. The application was subsequently "called-in" by the Secretary of State. HPC made representations to the Public Inquiry in June 2017, as a Rule 6 party. Representations on behalf of HPC included matters in relation to impact on the Strategic Gap and the

- <sup>15</sup> LPA Reference DM/16/1775
- <sup>16</sup> LPA Reference DM/15/0626

<sup>&</sup>lt;sup>10</sup> see policies 13-16 of the eHNP

<sup>&</sup>lt;sup>11</sup> see policy 17 of the eHNP

<sup>&</sup>lt;sup>12</sup> see para 6.34 of the eHNP and completions within the Table at Appendix 1

<sup>&</sup>lt;sup>13</sup> LPA Reference 13/03818/OUT

<sup>14</sup> APP/D3830/W/14/2226987

absence of a Sequential Test given the site's part designation within a Flood Zone 2 and 3. The Decision is awaited.

### National Planning Guidance on Neighbourhood Planning

Paragraph 184 of the NPPF states that neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. It notes that the ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. It notes that neighbourhood plans must be in general conformity with the strategic policies of the local plan.<sup>17</sup> Neighbourhood plans should not promote less development than set out in the Local Plan or undermine its strategic policies.

This is supported by guidance in the online NPPG. This states that although a draft neighbourhood plan is not tested against the policies in an emerging Local Plan the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.<sup>18</sup>

#### Submissions

Against this background, Hassocks Parish Council object to the proposed amendments to Policy DP6 as detailed in MSDC8c. In particular, the Parish Council object to the proposed requirement, set out in the supporting MSDC8c: Appendix 1 that Hassocks' residual provision to find figure is 334 dwellings. This is to contribute to the minimum residential figure of 1116 dwellings in Category 2 settlements as detailed in the Spatial Distribution of Housing Requirement Table in policy DP6.

The proposed spatial distribution has been determined according to a wholly desk-based exercise, largely predicated on census household data. There has been no consideration or analysis of the capability and capacity of a settlement to be able to provide additional housing; no assessment of planning policy constraints that affect settlements and their hinterland, with the exception of whether they are wholly within the High Weald AONB; and no site visits to test and verify the conclusions that have been reached.

Hassocks is a highly constrained settlement, with limited capacity to provide land for more housing. The constraints of the Parish are detailed in the Hassock Neighbourhood Plan Constraints Map attached at Appendix 5.

The built-up area is bordered to the south and east by land that falls within the SDNP. Not only is this a constraint to housing in planning policy terms, it also means that any housing provided within this area, would not contribute to MSDC housing numbers. Instead it would contribute to housing need within the SDNPA.

The built-up area is bordered to the north, east and west by 'gaps' within the adopted development plan. These are narrow and vulnerable to erosion with consequential harm that may be caused to the identity and character of individual settlements. A previous appeal on land on the eastern edge the adjoining settlement of Hurstpierpoint was refused by the SoS in 2014 due to the harm to the gap

<sup>&</sup>lt;sup>17</sup> this is one of the basic conditions that the Neighbourhood Plan must be tested against

<sup>&</sup>lt;sup>18</sup> see paragraph reference 41-009-20160211

between Hurstpierpoint and Hassocks<sup>19</sup>. Whilst a subsequent appeal was allowed in the same gap earlier this year<sup>20</sup>, that decision was, in part, based on the ability to provide mitigatory open space on the outer edge of the development to provide a rural buffer to the settlement edge within the gap.<sup>21</sup>

Within the gap area along the northern edge of the settlement (separating Hassocks from Burgess Hill), 2 large housing allocations are proposed in the neighbourhood plan<sup>22</sup>, with a further scheme awaiting determination at appeal. This reflects that the emerging Neighbourhood Plan seeks to allocate future growth within the least vulnerable gap areas, that are unconstrained by other planning policies.<sup>23</sup>

These physical and planning policy constraints have not been considered by MSDC in preparing MSDDC8c<sup>24</sup>.

Instead, consideration has been given to providing a discount for housing requirements for settlements within the AONB, although without reference to capacity consideration of the settlements. No discount has been applied to Hassocks, despite the SDNP bordering 2 sides of its built-up area. HPC consider that the physical and planning policy constraints that affect Hassocks should be given due consideration in the spatial distribution strategy in Policy DP6. These include, its relationship to the SDNP, and its close proximity to surrounding settlements (Burgess Hill, Hurstpierpoint and Ditchling) which render its rural hinterland important to be retained as defined 'gaps'.

Furthermore, there are 3 parishes that adjoin the built-up area of Burgess Hill. Two of these are proposed to be the subject of a significant discount of further housing requirements<sup>25</sup> as detailed in the Table at 'Stage 3' of MSDC8c: Appendix 1. The third parish, Hassocks, is proposed to have no discount. This is notwithstanding the comparable geographic proximity of Hassocks to Burgess Hill in relation to the other 'discounted' settlements. HPC consider that the parish's proximity to Burgess Hill should be given equal consideration and discount.

HPC consider that the parish will not be capable of providing for the additional 334 dwellings set out in MSDC8c. Whilst it is noted that this number requirement is set out in an Appendix to the policy, it is clear that this is part of the evidence base that underpins the proposed requirement of 1116 dwellings within Category 2 settlements as set out in policy DP6.

As detailed above, Neighbourhood Plans must be in general conformity with the strategic policies of the local plan and not promote less development than set out in the local plan or undermine its objectives. HPC are concerned that the emerging Neighbourhood Plan would not be capable of being in conformity with emerging policy DP6. This has significant implications for the ability to progress the HNP. This would conflict with the Government's clear commitment to neighbourhood planning.

<sup>&</sup>lt;sup>19</sup> see decision APP/D3830/V/14/2211499

<sup>&</sup>lt;sup>20</sup> in relation to 13/03818/OUT

<sup>&</sup>lt;sup>21</sup> see for example paragraph 207 of Inspectors Report - APP/D3830/W/14/2226987

<sup>&</sup>lt;sup>22</sup> at Hassocks Golf Club and North of Clayton Mills

<sup>&</sup>lt;sup>23</sup> such as the flood risk that affects land north of Friars Oak

<sup>&</sup>lt;sup>24</sup> acknowledged by officers of MSDC at a meeting with representatives of the Parish Council on 15th June 2017

<sup>&</sup>lt;sup>25</sup> Hurstpierpoint and Sayers Common Parish; and Ansty and Staplefield Parish

### **The Way Forward**

HPC object to MSDC8c, and in particular the implications for further housing growth at Hassocks as detailed in policy DP6 and supported through the associated MSDC8C: Appendix 1.

The policy changes have been prepared on a wholly desk based basis. Furthermore, it has not included a detailed policy constraint analysis and/ or settlement capacity analysis. As a result, and in particular for Hassocks, proposed housing numbers do not reflect the ability of the settlement to contribute the proposed additional housing numbers.

This failure, has significant implications for both the District Plan and the emerging Neighbourhood Plan.

It is submitted that emerging Policy DP6 should not proceed unless and until an adequate assessment has been undertaken of the settlements proposed for housing growth. This is required to ensure that the District Plan is prepared on a robust and credible evidence base.

Through such an assessment, it is submitted that the proposed housing growth figure for Hassocks should be significantly reduced.

The Parish Council trust that the above submissions will be given due consideration in the further assessment of the emerging Mid Sussex District Plan. Should you require anything further, in respect of these submissions, please do not hesitate to contact the Parish Clerk.

Yours sincerely

Ian Weir Chairman Hassocks Parish Council

| Hassocks  | Completions     |               |                 |             |
|---|-----------------|---------------|-----------------|-------------|
| Completions   | 2014/15-2016/17 |               |                 |             |
| Land south of Ockley Lane, Hassocks                     | 1               |               |                 |             |
| IL/B Muddles Wood Brighton Road, Hassocks               | 1               |               |                 |             |
| Beacon Centre, Ocley Lane, Hassocks                     | 4               |               |                 |             |
| The Oaks, southern Farm, Lodge Lane, Hassocks           | 1               |               |                 |             |
| 18a Keymer Road, Hassocks                               | 1               |               |                 |             |
| 31 Keymer Road, Hassocks                                | 2               |               |                 |             |
| 6 Kemps, Hassocks                                       | 1               |               |                 |             |
| Royston Nursing Home, Brighton Road, Hassocks           | 6               |               |                 |             |
| Sandbrook, Parklands, Hassocks                          | 8               |               |                 |             |
| Land rear of Stafford House, Ockley Lane                | 17              |               |                 |             |
| 9 Station Cottages, Station Approach                    | 2               |               |                 |             |
| Sandy Lane, Brighton Road, Hassocks                     | 3               |               |                 |             |
| 62 Dale Avenue, Hassocks                                | 1               |               |                 |             |
| 22-24 Keymer Road, Hassocks                             | 4               |               |                 |             |
| L/A Lodge Lane, Hassocks                                | 1               |               |                 |             |
| 21 The Crescent, Hassocks                               | 3               |               |                 |             |
| L/R Faeerie Glen, Brighton Road, Hassocks               | 2               |               |                 |             |
| Total   | 58              |               |                 |             |
|   |                 | Commitments   | Commitments     | Commitments |
| Commitments   |                 | 2017/18-21/22 | 2021/22-2026/27 | 2027/28+    |
| Stafford House, Keymer Road, Hassocks                   | Permission      | 14            |                 |             |
| Station Goods Yard Hassocks                             | Allocation      |               |                 | 70          |
| Hassocks Golf Club, London Road Hassocks                | Permission      | 130           |                 |             |
| Land at The Ham, London Road, Hassocks                  | Permission      | 97            |                 |             |
| Byanda, Brighton Road, Hassocks                         | Permission      | 3             |                 |             |
| Land west of Byanda, Brighton Road, Hassocks            | Permission      | 2             |                 |             |
| Adj 32 Woodsland Road, Hassocks                         | Permission      | 1             |                 |             |
| Crossways, Belmont Lane, Hassocks                       | Permission      | 1             |                 |             |
| Beacon Centre, Ocley Lane, Hassocks                     | Permission      | 4             |                 |             |
| Land rear of 52 -58 Keymer Road, Hassocks               | Permission      | 3             |                 |             |
| 20 Brook Avenue, Hassocks                               | Permission      | 1             |                 |             |
| 24 Hurst Road, Hassocks                                 | Permission      | 1             |                 |             |
| Land to north of Millway Cottage, Ockley Lane, Hassocks | Permission      | 1             |                 |             |
| 58 Parklands Road, Hassocks                             | Permission      | 1             |                 |             |
| Total   |                 | 259           | 0               | 70          |
| Completions   |                 | 58            |                 |             |
| Comitments  |                 | 259           | 0               | 70          |
| Cummulative commitments and completions                 |                 | 317           | 317             | 387         |
|   |                 |               |                 |             |



# KEY

District Boundary

Countryside Area of Development Restraint

Built up Area Boundary

Area of Townscape Character

- Landscape Area
- Burial Ground
- Business Development
- Countryside Gap

Civic, Cultural and Other Recreational Uses

Ardingly Reservoir

- SSSI Site of Special Scientific Interest
- SNCI Site of Nature Conservation Importance
- Strategic Gap

Shopping Policy Area

- Car Parking
- Residential Gypsy Site
- Ancient Monuments
- Sports Facilities
- Local Nature Reserve
- Informal Open Space
- Specific Policy Area



New School Site

Arts, Leisure and Entertainment

Park or Garden of Historic Interest

Residential Allocation (Local Plan 2004)

- Small Scale Housing DPD 2008 Allocations (SSH)
- Conservation Area
- Area of Outstanding Natural Beauty High Weald
- Area of Outstanding Natural Beauty Sussex Downs
  - Recreation Area
  - Town Centre Shopping Policy Boundary
  - Community Facilities
  - Bluebell Railway (New Station Site)
- HILE Bluebell Railway Extension
- Cycleway
  - Haywards Heath Relief Road
- Haywards Heath Relief Road Internal Collector Road
- Footpath
- Primary Shopping Frontage
- Secondary Shopping Frontage
- Linear Open Space (Worth Way)
- Kickabout Area
- Childrens Play Area
- New Link Road
- Access Restriction
- **XX** Floodplains



Mid Sussex Local Development Framework Proposals Map - February 2008



Informal Recreation Area and Nature Conservation Area

(forms part of 'SSH11 - Land at GravelyeLane / Lyoth Lane' allocation)



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Contact: Judy Holmes 01444 477015, Fax: 01444 477507 E-Mail: judy.holmes@midsussex.gov.uk Your Ref: Our Ref: JH/LM Date: 19<sup>th</sup> April 2017

Hassocks Parish Clerk

By Email

**Dear Parish Clerk** 

I refer to our recent meeting regarding the progress of the Hassocks Neighbourhood Plan. At that meeting we discussed the District Council's concerns about the risks of taking your plan forward in advance of the District Plan.

As discussed the Council is working towards the agreement of an overall housing requirement with the Inspector. The Inspector has also requested that the Council produces a more robust spatial framework for neighbourhood plans, including potential growth requirements.

The risk to your neighbourhood plan if you press ahead now is that it gets superseded by events on the District Plans, notably in terms of the housing requirement We would hope that the outstanding issues regularly the District Plan will be resolved in the near future.

Advice regarding emerging local plans in the NPPG is as follows:

"...the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, <u>up-to-date housing needs evidence</u> is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development"....

This means that the Examiner's view must be taken on the basis of the up to date housing needs evidence and given significant weight.

We are also aware there are substantive objections relating to housing supply from a number of developers in regard to your Plan. Their position is also likely to be that your Neighbourhood Plan should reflect the position in the District Plan.

Any change in your housing requirements may also trigger the need for additional work such as an updated Sustainability Appraisal.

On reflection we do not think a review clause in your plan is a workable solution given that the Inspectors conclusions are likely to emerge during the finalisation of your plan, which would prevent its adoption, or shortly thereafter which would give your plan a very short effective life.

We would be pleased to keep you informed of progress with the District Plan and indeed we are running a session for Neighbourhood Plans this week where we can update you on the currents assumptions on the growth requirements that will be in the District Plan.

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Overall this means that whilst I realise you have put significant work into the plan, our view is that it should not proceed to examination at the current time. We suggest that you should wait for the Council to arrive at agreed figures for the overall requirement and for individual neighbourhood plan areas.

I therefore advise that on balance it is better to delay the finalisation of the plan than risk a plan that may fail at examination or is challenged or, even if it progresses to referendum and is made, cannot be adopted, or has to be changed almost immediately.

As always I am happy to discuss. I look forward to seeing you at the Neighbourhood Planning meeting this week.

Yours sincerely

M Whenes

Judy Holmes Assistant Chief Executive

