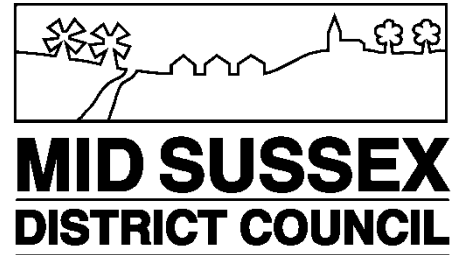


Mid Sussex District Council



District Plan Pre-Submission Consultation

12th June – 24th July 2015

Consultation Responses – Summary Reports

Pre-Submission District Plan: Consultation Responses

Consultation on the Pre-Submission District Plan was held between 12th June and 24th July 2015. In total, 299 representations were received, generating around 1,200 separate comments from individuals and organisations.

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

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

Code	Comment
1a	Support District Plan – General
1b	Object to District Plan – General
1c	Factual Corrections / Typos
1d	Process / Compliance with Legislation
1e	Compliance with other plans/policies (including DtCO)
1f	New policy area should be included
1g	Maps/Diagrams including general Policies Map comments
1h	Evidence Base
1i	Consultation
1j	Saved policies
2a	Context / General
2b	Vision (para 2.10) – Specific Comments
2c	Challenges (para 2.9) – Specific Comments
3a	Support – overall (paras 3.1 - 3.38)
3b	Object – overall (paras 3.1 - 3.38).
3c	General principle of development at Burgess Hill
3d	Location of development
3e	Delivery of strategic sites
3f	Alternative location suggested for development
3g	Neighbourhood Plans – principle of approach, etc
3h	Economic Growth
3i	Infrastructure
3j	Nature and Quality of Development
3k	Monitoring
3l	Gatwick Airport
HRA – a	Support HRA – overall
HRA – b	Object to HRA - overall
HRA – c	Methodology
SA – a	Support Sustainability Appraisal - overall
SA – b	Object to Sustainability Appraisal - overall

Policy	Title
DP1	Sustainable Development in Mid Sussex
DP2	Sustainable Economic Development
DP3	Town Centre Development
DP4	Village and Neighbourhood Centre Development
DP5	Housing
DP6	Settlement Hierarchy
DP7	General Principles for Strategic Development at Burgess Hill
DP8	Strategic Allocation to the east of Burgess Hill at Kings Way
DP9	Strategic Allocation to the north and north-west of Burgess Hill
DP10	Protection and Enhancement of Countryside

DP11	Preventing Coalescence
DP12	Sustainable Rural Development and the Rural Economy
DP13	New Homes in the Countryside
DP14	High Weald Area of Outstanding Natural Beauty
DP15	Ashdown Forest Special Protection Area and Special Area of Conservation
DP16	Setting of the South Downs National Park
DP17	Sustainable Tourism
DP18	Securing Infrastructure
DP19	Transport
DP20	Rights of Way and other Recreational Routes
DP21	Communication Infrastructure
DP22	Leisure and Cultural Facilities and Activities
DP23	Community Facilities and Local Services
DP24	Character and Design
DP25	Dwelling Space Standards
DP26	Accessibility
DP27	Noise, Air and Light Pollution
DP28	Housing Mix
DP29	Affordable Housing
DP30	Rural Exception Sites
DP31	Gypsies, Travellers and Travelling Showpeople
DP32	Listed Buildings and Other Buildings of Merit
DP33	Conservation Areas
DP34	Historic Parks and Gardens
DP35	Archaeological Sites
DP36	Trees, Woodland and Hedgerows
DP37	Biodiversity
DP38	Green Infrastructure
DP39	Sustainable Design and Construction
DP40	Renewable Energy Schemes
DP41	Flood Risk and Drainage
DP42	Water Infrastructure and the Water Environment

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

Code	Form
Lindfield	Lindfield Preservation Society letter ¹
PRC	East Grinstead Post Referendum Campaign (PRC) Form

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

¹ Whilst a number of separate letters were received from individuals, they have been coded as a 'Standard Form' as all made the same comment. These related to the misapprehension that the District Plan was allocating a number of sites in Lindfield (in fact, the comments were related to the SHLAA).

Submission District Plan 2015 - Consultation Responses: Individuals

Ref# Comment# Respondent:

5

1

Mr R Bates

Code: 3i

Policy:

Sustainability Appraisal?

I would like to question the statement that Gatwick Airport predict 45 million passengers by 2021 when the District Plan covers a period up to 2031 Passengers figures have been published that are higher than 45 million and the plan needs to be tested on figures up to 2031 There must be implications to Mid Sussex in respect to infrastructure, housing, transport and employment on higher Passenger figures by 2031

Ref# Comment# Respondent:

412

1

Mr C Phillips

Code:

Policy: DP5

Object

Sustainability Appraisal?

Disappointed that such a large number (1,515) of the housing allocation is left to local plans and that more have not been allocated to the other towns of Haywards Heath and East Grinstead. We appreciate that the desire is for neighbourhood plans to come up with a housing allocation for each area, but given the large percentage of land in the Mid Sussex District that is not appropriate for new building because of the constraints on it, we as a parish consider ourselves vulnerable to a disproportionate share of the remaining housing allocation due to us not having any areas subject to major constraints.

Ref# Comment# Respondent:

412

2

Mr C Phillips

Code:

Policy: DP6

Object

Sustainability Appraisal?

The plan refers to expansion beyond existing boundaries. Our Parish has supported the development of a Rural Exception Site outside the existing village boundary on the understanding that this did not set a precedent for building outside the village boundary. We are concerned that the precedent has been set for the village boundary to creep into the neighbouring countryside.

Ref# Comment# Respondent:

6948

1

Mr A Brooks

Code: 1i

Policy:

Sustainability Appraisal?

Is not in accordance with legal and procedural requirements including the need for informed front-loaded consultation at the earliest stage.

o The District Council has not consulted on this plan according to the law or fairly, and

o has largely ignored representations made to the East Grinstead Area Action Plan, Core Strategy, the withdrawn draft District Plan and the East Grinstead Neighbourhood Plan by residents of East Grinstead and the surrounding villages.

o There has been:

minimal publicity in the local paper

no local displays

no information sent to households

Ref# Comment# Respondent:

6948

2

Mr A Brooks

Code: 1b

Policy:

Sustainability Appraisal?

Does not provide a spatial plan that sets out “where, when, how and why” development is planned

Fails to take account of the major constraints at East Grinstead and prospective isolation of communities such as Crawley Down from employment sites due to traffic congestion.

Is incomplete in that

o It excludes South Downs National Park.

o It references a Site Allocations Development Plan Document without defining associated strategy/philosophy to be adopted in the event that additional housing is required over and above that proposed in Neighbourhood Plans.

Fails to Include relevant policies to take account of the major constraints on development allowed at East Grinstead, which also impact on the surrounding area.

Fails to Address known loopholes and deficiencies in the current Local Plan and associated planning system.

In support, as a minimum, the plan needs to define methodologies and philosophies for

- Assessment of Sustainability
- Assessment of Viability and non-Viability
- Objectively Assessing Housing Needs
- Producing a “housing allocations document for the District”
- Producing a “Site Allocations Development Plan Document”
- Assessing the viability of proposed drainage solutions.
- Securing infrastructure.
- Remedying infrastructure deficiencies.

In Summary, the pre-submission plan

- Has not been properly consulted upon
- Is not based on robust evidence
- Is not coherent,
- Is not sustainable,
- Is incomplete
- Has not adequately considered alternatives
- Is ambiguous, and,
- Fails to address fundamental infrastructure deficits.

Ref# **Comment#** **Respondent:**

6948

3

Mr A Brooks

Code:

Policy:

DP5

Object

Sustainability Appraisal?

Fails to set out the distribution of housing and employment development either for the District or for East Grinstead and the surrounding villages – it is not a coherent spatial plan, neither does it reference one. It does not set out “where, when, how and why” development will take place.

Para 3.29 states that “The Plan recognises that if insufficient development is being delivered through Neighbourhood Plans, then the District Council will be required to produce its own housing allocations document for the District.” However, the Plan conveniently ignores the process by which this policy would be produced. Without an accompanying policy, and spatial plan, this statement is unacceptable and the housing policy incomplete.

Ref# **Comment#** **Respondent:**

6948

4

Mr A Brooks

Code:

1c

Policy:

Sustainability Appraisal?

Include definitions, methodologies and applicable philosophies throughout, to remove the current inherent ambiguities and ensure repeatability/integrity of assessments.

Ref# **Comment#** **Respondent:**

6948

5

Mr A Brooks

Code:

3i

Policy:

Sustainability Appraisal?

Fails to set out clear development principles to provide essential infrastructure to support any further development in the North of the District in a timescale appropriate to any proposed development. Address infrastructure deficiencies resulting from the current planning process and lack of appropriate strategy.

Whilst addressing future developments, the proposed Plan does nothing to address infrastructure deficiencies resulting from previous developments. How does MSDC propose to address the significant infrastructure deficiencies directly caused by their inappropriate planning permissions prior to adoption of any District Plan?

It is vital that the District Plan include measures to ensure that infrastructure requirements are included and funded within any planning application/permission, such that timely infrastructure is fully addressed as a fundamental element of planning. Grampian conditions and the like, which seek to evade difficult decisions need to be outlawed. This aspect has been recognised in the Commons report on Neighbourhood Planning.

Ref# **Comment#** **Respondent:**

6948

6

Mr A Brooks

Code:

Policy:

DP6

Object

Sustainability Appraisal?

Fails to Address the consequences of failed strategy in the 2004 Plan. Namely, that of building on sustainable communities whilst largely ignoring marginal or non-viable communities. That policy has directly overstrained previously sustainable communities and left marginal communities to fail. Policy should be to support marginal communities. DP6 implicitly continues this flawed strategy and consequently continues to fail both marginal communities and previously sustainable communities.

Ref# **Comment#** **Respondent:**

6948

7

Mr A Brooks

Code: 3l

Policy:

Sustainability Appraisal?

Fails to Fully recognise the issues that a second runway at Gatwick could bring. Address and plan mitigation for the potentially catastrophic implications of a second runway at Gatwick Airport.

Fully address the potential implications of a second runway at Gatwick and put mitigation in place pending a decision.

The Plan fails to identify key infrastructure improvements which will be required to be largely funded by County/District if the Second Runway proposals are adopted and the proposed funding mechanism.

No mention has been made of the vast economic impact that such a development would imply – housing, transport, population and economic. Although Gatwick Airport Ltd have widely advertised potential positive economic aspects, the adverse aspects have been totally ignored. The proposed expansion would require housing provision well outside the currently identified capacity of the District. This would be to house a largely lower paid workforce who could not afford to buy their own housing, so would be reliant on already strained road and transport infrastructure. Requirements for staff would be at the expense of many local employers who would be forced to move or increase their wage bill in order to compete for labour

I would also have expected a statement on risk mitigation regarding possible development restrictions until such time as the decision has been made and an MSDC statement re their stance on airport expansion.

Ref# **Comment#** **Respondent:**

6948

8

Mr A Brooks

Code: HRA-b

Policy:

Sustainability Appraisal?

The accompanying Habitats Regulations Assessment is flawed. It does not take account of the full quantum of development planned in Mid Sussex and within the 7km buffer zone around Ashdown Forest. It does not have robust deliverable policies to ensure that there is no damage to the SPA and SAC sites. There is no proposed methodology by which the cumulative effect of any development may be reliably assessed and appropriate mitigation proposed.

Ref# **Comment#** **Respondent:**

6948

9

Mr A Brooks

Code: 1h

Policy:

Sustainability Appraisal?

MSDC has failed to provide proper evidence for its proposed development options. In particular the 2014 Capacity Study is a desktop rehash of previous studies which presents an incomplete and flawed picture of the District and was plainly generated to try and defend against the charge of non-cooperation with neighbouring authorities. In releasing such a flawed document without consultation MSDC have opened the door even wider to inappropriate, unjustified, unsustainable and unwanted developments.

Ref# **Comment#** **Respondent:**

6948

10

Mr A Brooks

Code: 1d

Policy:

Sustainability Appraisal?

It is not in conformity with national legislation, the National Planning Policy Framework guidance or the EU Habitats Directive.

Ref# **Comment#** **Respondent:**

6948

11

Mr A Brooks

Code:

Policy:

DP1

Object

Sustainability Appraisal?

It adopts the Government's Presumption in Favour of Sustainable Development, without defining a measure of sustainability, which means that development will be allowed automatically unless there are policies that restrain it. Further it fails to recognise that social and environmental factors should carry equal weight to economic factors when assessing sustainability

Good words, but completely meaningless without a practical definition of "Sustainable" and associated assessment methodology which recognises that sustainability must be assessed in a local context applied to local environmental, social and economic factors.

The Mid Sussex Partnership's Sustainable Communities Strategy (2008-2018) is also flawed. It attempts to build on sustainable communities without addressing the needs of marginal communities which could become more sustainable with help.

Delete reference to Policy DP6 (Settlement Hierarchy) as the policy is not adequately supported by evidence and should be deleted. Define a methodology by which "sustainability" may be assessed, Add reference to the implicit need to ensure that all necessary infrastructure (including school places) is provided before development is occupied.

Ref# **Comment#** **Respondent:**

6948

12

Mr A Brooks

Code:

1j

Policy:

Sustainability Appraisal?

In removing all current policies setting out the well-established major constraints on development at East Grinstead and surrounding villages, the draft plan opens up the significant probability of over-development that would be unsustainable and would damage the social, economic and environment balance.

Ref# **Comment#** **Respondent:**

6948

13

Mr A Brooks

Code:

SA-b

Policy:

Sustainability Appraisal?

Sustainable/sustainability

The Brundtland definition is not practical. The plan definition must emphasise that social and environmental factors have equal weight to economic factors when evaluating sustainability.

The definition needs to have specified qualitative and quantitative parameters for economic, social and environmental factors which, if not fully satisfied, make the subject definitively and unarguably unsustainable.

Ref# **Comment#** **Respondent:**

6948

14

Mr A Brooks

Code:

1f

Policy:

Sustainability Appraisal?

Add an additional policy specifically to reflect the major infrastructure and environmental constraints and deficiencies at East Grinstead and the North of the District, already established through earlier plans, examinations and new evidence.

Ref# **Comment#** **Respondent:**

6948

15

Mr A Brooks

Code:

Policy:

DP18

Object

Sustainability Appraisal?

Strengthen and modify DP18 to mandate proof of funded/planned infrastructure and an associated management plan (where appropriate) as a planning condition. To include restriction of development until such deficiencies have been supplied/remedied and abolish the use of Grampian conditions in planning permissions. Such provision need not be entirely funded by developer contributions – the requirement is to demonstrate that it will happen.

Ref# Comment# Respondent:

6948

16

Mr A Brooks

Code:

Policy:

DP14

Object

Sustainability Appraisal?

Policy DP 14 Ashdown Forest needs to be significantly strengthened to protect the 'SAC' (Special Area of Conservation) from increased atmospheric pollution.

i. Further environmental studies to establish what levels of air pollution would result from proposed development within 7km of Ashdown Forest and MSDC's proposed mitigation measures are needed. MSDC should work jointly with Wealden District Council on this.

ii. The current Mid Sussex Transport Study only appears to assess 159 additional houses, grossly underestimating the cumulative number proposed within the 7km buffer zone under the Mid Sussex Local Development Framework

iii. Define a methodology for assessing the cumulative impact of any development and the appropriate level of mitigation required.

Ref# Comment# Respondent:

6948

17

Mr A Brooks

Code:

3f

Policy:

Sustainability Appraisal?

Contingency. The District Plan needs an additional policy to identify 'contingency' sites in the event of failing to deliver sufficient housing at Burgess Hill or through the Neighbourhood Plans.

(This principle was accepted by the Council in its abandoned Core Strategy which allocated Crabbet Park as a contingency)

Ref# Comment# Respondent:

6948

18

Mr A Brooks

Code:

Policy:

DP19

Object

Sustainability Appraisal?

DCLG have recognised the issue and recommended that parking provision be increased beyond the WSCC parking calculation. This recommendation should be implemented within the plan and apply to both new build and extensions which remove garage/parking spaces and/or add bedrooms. It is not sufficient to allow Neighbourhood Plans to mandate an increased parking provision without defining the justification required by MSDC.

Ref# Comment# Respondent:

6948

19

Mr A Brooks

Code:

3b

Policy:

Sustainability Appraisal?

The Plan also needs to address a failed and failing strategy of the 2004 Plan. Namely, that of building on sustainable communities whilst largely ignoring marginal or non-viable communities. That policy has directly overstrained previously sustainable communities and left marginal communities to fail. Policy should be to support marginal communities.

Para 3.24 states that "The identification in the District Plan of where new homes will be delivered (and the subsequent detailed allocations and policies in Neighbourhood Plans) is essential to demonstrate delivery of the new homes that Mid Sussex requires for its communities to become more sustainable and meet their needs." That implicitly contradicts the earlier statement that a Bottom Up approach is being followed. It states that the District Plan will allocate where housing is to be delivered, without any apparent economic, social or environmental evaluation then assumes that the Neighbourhood Plans would deliver those, apparently without any regard to local constraints.

Ref# Comment# Respondent:

6948

20

Mr A Brooks

Code:

Policy:

DP2

Object

Sustainability Appraisal?

Define the factors required for economic development to be Sustainable.

Where is the Spatial Planning aspect required to justify the proposals? Where is the proposed policy/strategy to support production of a "Site Allocations Development Plan Document"?

Without an appropriate strategy this policy is incomplete

Ref# **Comment#** **Respondent:**

6948

21

Mr A Brooks

Code:

Policy:

DP3

Neutral

Sustainability Appraisal?

Whilst supporting the general aims of the policy, I would note that it does not address key infrastructure issues which, in themselves are making Town centre development unfeasible. In the case of East Grinstead traffic issues are threatening to strangle any further development and the effect has spread to outlying villages. Restriction of permitted development rights should also be considered in order to prevent an unviable retail mix.

Ref# **Comment#** **Respondent:**

6948

22

Mr A Brooks

Code:

Policy:

DP4

Neutral

Sustainability Appraisal?

I note comment referring to Crawley Down and support the stated aim. However, as per DP4, some restriction of permitted development rights should also be considered in order to prevent an unviable retail mix. Also to protect Public Houses, which are important community assets currently at threat throughout the District.

Ref# **Comment#** **Respondent:**

6948

23

Mr A Brooks

Code:

Policy:

DP6

Object

Sustainability Appraisal?

This is totally unacceptable and represents a demonstrably flawed strategy based on flimsy “evidence”. The policy would encourage over-development of previously sustainable communities and fail to support marginal communities.

The Settlement Sustainability Review “does not examine in detail existing constraints to development; potential future constraints to development such as infrastructure or transport; or the availability of suitable sites for development” (para 1.7 of the May 2015 version). As such it explicitly ignores sustainability constraints and is therefore unfit for purpose.

Whilst I would agree that the defined distance threshold for assessing sharing services should equate to a 5-minute car journey, that is not a road distance of 5km as assumed in the Settlement survey! An average of 40mph is probably only achievable in the dead of night. Google average journeys in the Crawley Down/East Grinstead area and you will find 20mph to be more likely.

Crawley Down fails to meet the stated criteria for Local Service Centre and is currently without a public house so does not even meet the criteria for a Limited Local Service Centre. Therefore should not be classed as a Category 2 settlement.

Request that this policy either be deleted or comprehensively re-drafted. Any re-draft should include a further rural site requirement that it not be remote from the settlement centre, where “remote” is defined as being more than a 15 minute walk at 0.9m.s

Ref# **Comment#** **Respondent:**

6948

24

Mr A Brooks

Code:

Policy:

DP10

Object

Sustainability Appraisal?

The Mid Sussex Capacity Study (May 2014) is of disputed value as noted above. As such it does not in itself form a valid evidence base for spatial planning.

Policy should read “Built-up area boundaries are subject to review by Neighbourhood Plans or through a Site Allocations Development Plan Document where a Neighbourhood Plan does not exist”. By definition an adopted Neighbourhood plan must take precedence over a later District policy change, the philosophy and methodology of which is not available for consultation at this stage.

Ref# **Comment#** **Respondent:**

6948

25

Mr A Brooks

Code:

Policy: DP11 Object

Sustainability Appraisal?

Pleased to see that this policy has been strengthened since the 2013 release. However, The Mid Sussex Capacity Study (May 2014) is of disputed value as evidence. The policy wording needs to be changed to emphasise that it is not just coalescence, but also the perception of coalescence which needs to be prevented. To that end ribbon developments and infill outside the BUAB should be resisted except in exceptional circumstances.

Likewise, preservation of settlement setting is an important factor to address when preventing perception of coalescence.

Ref# **Comment#** **Respondent:**

6948

26

Mr A Brooks

Code:

Policy: DP12 Object

Sustainability Appraisal?

Define "sustainable" in quantifiable terms with an associated methodology. Without that the policy is largely meaningless, or, worse still is wide open to re-interpretation by a clever barrister acting on behalf of a developer.

Ref# **Comment#** **Respondent:**

6948

27

Mr A Brooks

Code: Policy: DP13 Sustainability Appraisal?

Should ONLY be permitted in exceptional circumstances as per para 55 of the NPPF.

Change of Use or removal of occupancy conditions should be subject to a viability test and any permission given be subject to time period which limits further changes within a reasonable time and thus restricts the rolling change of use which has seen many agricultural buildings lost to inappropriate residential developments.

Applications for Re-use and adaptation of rural buildings for residential use should require an associated viability test.

Ref# **Comment#** **Respondent:**

6948

28

Mr A Brooks

Code:

Policy: DP14 Neutral

Sustainability Appraisal?

Policy needs to clarify that it specifically applies to areas outside existing settlement boundaries and not necessarily to the communities within the AONB.

Ref# **Comment#** **Respondent:**

6948

29

Mr A Brooks

Code:

Policy: DP15 Object

Sustainability Appraisal?

Does not appear to comply with EU legislation which requires assessment of the cumulative effects. Likewise the effects of Gatwick second runway would need to be assessed in this context. I understand that Natural England have confirmed damage to Ashdown Forest from aircraft, but have not quantified it.

Provision 2) should be expanded to include a mandatory full cumulative assessment for all developments of more than 6 dwellings within or immediately adjacent to the 7km zone of influence. The reference to adjacent being due to developments which may technically be outside the 7km zone, but which would share transport routes to Ashdown Forest and be equally likely to use it as dwellings immediately adjacent inside the zone.

No quantitative method or associated threshold/weighting of assessing cumulative effect, no associated methodology for assessing level of SANG or other appropriate mitigation required, no identified costings for maintenance etc.

Ref# **Comment#** **Respondent:**

6948

30

Mr A Brooks

Code:

Policy:

DP18

Object

Sustainability Appraisal?



Pleased to see this policy, but it does not go far enough, does not address existing deficiencies and still allows the use of negative planning conditions such as Grampian conditions rather than positive requirements and pre-conditions for development.

Policy needs to be extended to cover provision of utilities, school places, health, transport infrastructure. Proof of feasible funded and planned infrastructure provision together should be mandated as a pre-condition of planning consent. That does not mean that the developer should pay for all requirements, but does require that the developer liaise with the community and infrastructure suppliers to ensure that the required infrastructure will be in place in a timely manner and provide proof of that. All necessary infrastructure must be mandated with an agreed schedule, identified budget line and associated penalties for failure to deliver an adequate solution. There has been far too much development permitted without appropriate infrastructure addressed. That needs to be addressed as well as prevention of the situation getting worse.

Ref# **Comment#** **Respondent:**

6948

31

Mr A Brooks

Code:

Policy:

DP19

Object

Sustainability Appraisal?



This policy is generally welcomed but it must address the failings of the past with a baseline assessment for each area as part of the evidence base, being updated on an application by application basis to form a cumulative assessment.

We must never again be in the situation whereby the planning department takes a blinkered view and only assesses each individual proposal instead of viewing that proposal in overall context. A full assessment including survey, as appropriate, must be mandated until such time as that overall picture has been compiled. Piecemeal planning applications which just creep under planning thresholds must be re-assessed as part of the application process.

Ref# **Comment#** **Respondent:**

6948

32

Mr A Brooks

Code:

Policy:

DP20

Neutral

Sustainability Appraisal?



Policy welcomed, but needs to be extended to protect the landscape setting of PROWs and the secondary use as wildlife corridors.

Ref# **Comment#** **Respondent:**

6948

33

Mr A Brooks

Code:

Policy:

DP21

Neutral

Sustainability Appraisal?



Policy endorsed, but also needs to address mobile phone coverage which is patchy across the District and within villages and encourage communications providers to upgrade cable systems within villages. There are a number of villages and estates where the use of aluminium cable etc fundamentally restrict achievable bandwidth.

Ref# **Comment#** **Respondent:**

6948

34

Mr A Brooks

Code:

Policy:

DP22

Support

Sustainability Appraisal?



Policy supported.

Ref# **Comment#** **Respondent:**

6948

35

Mr A Brooks

Code:

Policy:

DP23

Sustainability Appraisal?



Needs to be extended to specifically cover ACVs. Requires definition of viability.

Ref# Comment# Respondent:

6948

36

Mr A Brooks

Code:

Policy: DP27 Object

Sustainability Appraisal?

Although Noise and other pollution can be isolated/mitigated by building construction there is nothing that can be done about noise outside the building except not put the building there! Sites under the flight paths, near motorways and other major roads etc should not be regarded as viable sites and assessed as such under the MSDC Housing site methodology. Until, such time as the Gatwick/Heathrow decision is made any sites likely to be affected should be protected from development.

Ref# Comment# Respondent:

6948

37

Mr A Brooks

Code:

Policy: DP28 Object

Sustainability Appraisal?

Crawley Down and Copthorne Neighbourhood Plans confirm the over-supply of larger houses and need for smaller homes as starter and downsizing homes. The supply of social housing is at risk of becoming unsustainable.
The Neighbourhood Plan and assessment of local needs should take precedence.

Ref# Comment# Respondent:

6948

38

Mr A Brooks

Code:

Policy: DP29 Neutral

Sustainability Appraisal?

Suggest that the requirement for 30% affordable could be waived in return for rectification of local shortages in the housing mix.

Ref# Comment# Respondent:

6948

39

Mr A Brooks

Code:

Policy: DP31 Neutral

Sustainability Appraisal?

Any allocated site needs to be sustainable – ie availability of local school places, capacity in health centres, transport infrastructure in place etc.

Ref# Comment# Respondent:

6948

40

Mr A Brooks

Code:

Policy: DP33 Neutral

Sustainability Appraisal?

Add areas of townscape character.

Ref# Comment# Respondent:

6948

41

Mr A Brooks

Code:

Policy: DP36 Support

Sustainability Appraisal?

Policy supported. However, it is common practice amongst landowners to clear “inconvenient trees” before making a planning application. An Arboricultural survey should be mandated as part of a development application to 1) identify and protect all trees of merit and 2) identify trees obviously “lost” prior to the survey.

A positive tree replacement policy should be mandated and root protection appropriate to the size of a mature tree applied to the development design. The rule of thumb of 15m is not adequate. The protection zone needs to extend beyond the spread of the canopy of a mature tree. Drainage swales and other forms of SuDs should not be located within the buffer zone.

Although the Forestry Commission Standing Advice on Ancient Woodland (2004) is still appropriate, more detailed guidelines are given in Sussex Wildlife Trust paper on Landscape Buffer Strips (originally published Oct 2005) and “Impacts of nearby development on the Ecology of Ancient Woodland” (+Addendum) Corney, Smithers et al 2008. These papers should be referenced within the policy.

Ref# **Comment#** **Respondent:**

6948

42

Mr A Brooks

Code:

Policy: DP37 Object

Sustainability Appraisal?

Buffer zones need to be established around Ancient Woodland with particular attention paid to maintenance of the existing water table and associated aquifers. As per comments on Policy DP36, the Forestry Commission Standing Advice on Ancient Woodland (2004) is still appropriate, more detailed guidelines are given in Sussex Wildlife Trust paper on Landscape Buffer Strips (originally published Oct 2005) and "Impacts of nearby development on the Ecology of Ancient Woodland" (+Addendum) Corney, Smithers et al 2008. These papers should be referenced within the policy.

Ref# **Comment#** **Respondent:**

6948

43

Mr A Brooks

Code:

Policy: DP38 Support

Sustainability Appraisal?

Policy welcomed and supported. Add a requirement for development to ensure preservation of rural setting where appropriate.

Ref# **Comment#** **Respondent:**

6948

44

Mr A Brooks

Code:

Policy: DP39 Neutral

Sustainability Appraisal?

Policy needs to make reference to the Gatwick Airport (and possibly Biggin) airport safeguarding requirements which potentially preclude large arrays of solar panels, wind turbines and the like which may contribute to aircraft hazards.

Ref# **Comment#** **Respondent:**

6948

45

Mr A Brooks

Code:

Policy: DP41 Object

Sustainability Appraisal?

The policy does not fully accord with recent guidance on SuDs, notably:

" .. in considering planning applications, local planning authorities should consult the relevant lead local flood authority on the management of surface water; satisfy themselves that the proposed minimum standards of operation are appropriate and ensure through the use of planning conditions or planning obligations that there are clear arrangements in place for ongoing maintenance over the lifetime of the development. The sustainable drainage system should be designed to ensure that the maintenance and operation requirements are economically proportionate."

<https://www.gov.uk/government/speeches/sustainable-drainage-systems>"

SuDs should be mandated as the first option with alternatives only if SuDs is proven to be unviable.

There should be a clear policy objective that surface run-off and other effects of any development be contained within that site. To that end SuDs should be mandated and the extended use of external aquifers be unacceptable. Use of retentive lagoons would also be unacceptable.

Satisfactory drainage solutions (with identified management and funding) should be a pre-condition for all development. To that end, Grampian conditions and similar should be avoided as not addressing the requirement for evidence. Planning permission should be accompanied by a drainage remediation period appropriate to the development whereby developers would be responsible for correcting any shortfall in drainage performance for that period. A 10 year period would seem to be appropriate for housing, in line with guarantees on the housing fabric.

Ref# **Comment#** **Respondent:**

6948

46

Mr A Brooks

Code:

Policy: DP42 Neutral

Sustainability Appraisal?

Welcome the policy, but this should be extended to require developers to liaise directly with suppliers pre-application and prove that a feasible funded solution exists and would be provided within the development timescale.

Planning should be positive with Grampian and similar negative planning conditions avoided. Management structure and polices should be required together with associated remediation periods.

Ref# **Comment#** **Respondent:**

6948

47

Mr A Brooks

Code: 1h

Policy:

Sustainability Appraisal?

Withdraw the 2014 Capacity Study and not re-issue unless and until the fundamental flaws and omissions have been addressed. Para 3.5 – Capacity Study. This comprises a desktop rehash of existing poorly validated information. I would strongly dispute the assertion that the study addressed the fundamental aim of providing “a detailed and robust assessment of the constraints to development in the District”. In particular, the study did not fully address constraints such as the viability of existing services, the ability of communities to sustain additional housing, the additional infrastructure required, investment required to make them viable or the sustainability of any resultant development. In particular the potentially devastating effects of Gatwick second runway on development in the North of the District have been ignored. I would also challenge the implicit assumption that any development within the AONB would be unacceptable. Sympathetic small/medium developments should be encouraged, otherwise those communities could easily become unsustainable. The study also ignores the implications of Strategic Objectives 2, 5 and 13 of the District Plan. As such it should be rejected until the shortcomings are fully addressed.

Ref# **Comment#** **Respondent:**

6948

48

Mr A Brooks

Code: 1h

Policy:

Sustainability Appraisal?

In addition, the District Plan fails to provide for the infrastructure and traffic relief already identified by MSDC as essential to support any additional development at East Grinstead and surrounding villages. According to the Mid Sussex Transport Study there are only some 200 additional jobs planned in East Grinstead. That figure tends to gibe with the housing numbers and requirement for sustainability. Where do MSDC assume that the additional residents are going to work if not commuting? The A264 from East Grinstead to Crawley, especially at the Duke’s Head roundabout, the Copthorne Hotel roundabout and at Junction 10 of M23, is already ‘at capacity’ and cannot absorb additional car traffic. An unsustainable development of 450 homes plus industrial units has received outline planning permission adjacent to the M23 Jn10 link road. Access to the development is only via that overloaded link road. The evidence base provided for the draft District Plan does not include and fails to take account of the recent traffic studies carried out in and around East Grinstead by consultants Peter Brett Associates, MTRU, Atkins or the recently published JUBB report (December 2014). These show that there are very limited possibilities for offsetting additional traffic caused by new homes in East Grinstead – especially when most new residents will need to commute by car. Commuters will be forced to rat run down the village lanes around Crawley Down, Turners Hill, Snow Hill and Copthorne. These roads are unsuitable for such traffic and are already under strain. Recent roadworks at the Imberhorne Lane/London Rd junction have led to 1.5 mile tailbacks from the Dukes Head roundabout along the B2028 - a threefold increase.

Ref# Comment# Respondent:

8930

1

Mr F Berry

Code: 3i

Policy: Sustainability Appraisal?

I support the statement that local people are given more ownership and control over the planning of their area. However, it states that development can help communities maintain a high quality of life, increase economic prosperity and protect the environment to meet current needs and of the needs of future generations. These objectives will only be achieved if there is suitable, improved or new infrastructure completed prior to the completion of the development.

The Draft Plan states that East Grinstead "in particular has acknowledged congestion problems". Any large scale development will have a serious impact on traffic flows, with pinch - points at various locations on the outskirts of the Town. As I have stated previously, No development should be allowed before infrastructure improvements are made, and this includes major improvements to road junctions, roads etc.

Ref# Comment# Respondent:

8930

2

Mr F Berry

Code: 2a

Policy: Sustainability Appraisal?

I believe this section needs to be strengthened to say that no development will be allowed, or be allowed to continue without the necessary infrastructure improvements being in place. without such a 'safeguard', Developers will continue to build up to the limit of planning approval, and once occupied, the local community and infrastructure will be adversely affected i.e. improvements in infrastructure should not be allowed to 'catch up'; it needs to be integral to the planning permission and strictly enforced. Developers may have to pay the Levy, but they have no interest in the local community (despite what they may say),and no interest in how the money will be spent and when.

Ref# Comment# Respondent:

8930

3

Mr F Berry

Code:

Policy: DP18 Neutral

Sustainability Appraisal?

Does say that the timing of developments "partly in the hands of the specific developers themselves and will depend on the timely delivery of infrastructure". See my comments above. The 650 homes is an average over the 17 years of the Plan - there needs to be an emphasis on the control of the size and phasing of the development to completion i.e. a maximum of homes built in any given location in any given year. If houses are built within say one year and schools, doctors surgeries are not expanded or built at the same time, this will impose a strain on existing facilities and services and even on any on - site facilities.

:Policies DP18 Securing Infrastructure and DP19 Transport should, therefore, be strengthened to ensure the above points are included

Ref# Comment# Respondent:

8930

4

Mr F Berry

Code:

Policy: DP19 Neutral

Sustainability Appraisal?

Does say that the timing of developments "partly in the hands of the specific developers themselves and will depend on the timely delivery of infrastructure". See my comments above. The 650 homes is an average over the 17 years of the Plan - there needs to be an emphasis on the control of the size and phasing of the development to completion i.e. a maximum of homes built in any given location in any given year. If houses are built within say one year and schools, doctors surgeries are not expanded or built at the same time, this will impose a strain on existing facilities and services and even on any on - site facilities.

:Policies DP18 Securing Infrastructure and DP19 Transport should, therefore, be strengthened to ensure the above points are included

Ref# **Comment#** **Respondent:**

9286

1

The Rt Hon Sir N Soames MP

Code: 1a

Policy: Sustainability Appraisal?

Based on our experience, detailed knowledge of the District and the feedback from constituents, we believe that the Plan achieves the right balance between deliverable levels of housing and employment land and protecting the special environmental characteristics of the District.

The plan has been positively developed with our neighbours and with active support for Neighbourhood Planning which has enabled a wider group of Mid Sussex residents to become directly involved in the Plan making process.

Ref# **Comment#** **Respondent:**

9376

1

Mr P Brooks

Code: 3i

Policy: Sustainability Appraisal?

The policies on housing expect East Grinstead, as one of the main towns, to take it's share of new houses (although the number is unspecified) - however there are no policies to make the necessary infrastructure improvements to the roads to mitigate the comment in 2.9. This means that the plan as a whole is unsound in it's policy towards East Grinstead. There must be included in the plan specific policies to address the chronic traffic congestion in East Grinstead and failure to do this should mean no significant housing should be allowed in the town until this is addressed.

Ref# **Comment#** **Respondent:**

14361

1

Mr P Tucker

Code: HRA-b

Policy: Sustainability Appraisal?

bespoke Ashdown Forest guidance developed by Liley of Footprint Ecology for neighbouring Wealden through extensive research by Footprint Ecology demonstrates explicitly that the 8ha standard per 1000 population formula, used in the Thames Basin Heath area, is wholly inappropriate for the purpose of assessing capacity SANGS to mitigate recreational pressure at Ashdown Forest.

“Furthermore, the 8ha per 1000 population standard is not relevant to the amount of SANGS that should be provided in Wealden as there is no logical evidence to substantiate the use of the standard in the context of Ashdown Forest.”

The Wealden guidelines are bespoke and were developed by D Liley of Footprint Ecology specifically for the Ashdown Forest SPA/SAC and using the Ashdown Forest Visitor Studies and the visitor analysis commissioned by Natural England. These rely on a different and more relevant stringent capacity formula of ‘1 person per hectare per hour’

Certainly the capacity calculations undertaken by MSDC are inconsistent and have grossly underestimated the number of dwellings that need to be assessed against the proposed SANGS.

Ref# **Comment#** **Respondent:**

14361 2 Mr P Tucker

Code:

Policy: DP15 Object

Sustainability Appraisal?

Using this capacity formula (developed specifically in relation to Ashdown Forest) and applying this to the existing visitor numbers for Ashplats Wood, provided in the Ecology Solutions study for a developer that MSDC rely on, having done no study themselves, and there is no demonstrable spare capacity as far back as May 2013. Therefore the proposed Ashplats SANGS cannot be deemed effective in attracting additional visitors away from the Ashdown Forest.

With the Ashplats Wood part of the proposed SANG site covering an area of 28ha, available SANGS area is ancient woodland. Apart from the narrow pathways, the dense understory makes this area impenetrable to visitors for the majority of the time.

+When this is taken into account and the capacity assessment adjusted accordingly there would be very little or no unused capacity for additional visitors.

85% of the proposed Ashplats SANGS is heavily wooded. So for most of the walking routes, the paths are narrow and bordered on both sides by tall trees and dense scrub. While the narrow winding pathways may be desirable for some walkers, others may well feel unsafe and prefer the much more open character of the Ashdown Forest, running counter to the primary SANGS objective.

The Footprint Ecology study by Liley makes it clear that much of the attractiveness to visitors of Ashdown Forest is the feeling of open space and being in the wild, with far reaching vistas. It is clear that Ashplats Wood is an entirely different environment.

Looking back at earlier iterations of the MSDC Habitats Regulations Assessment other locations for a SANGS were considered such as Imberhorne Farm on the western side of East Grinstead. However it appears that MSDC have chosen Ashplats Wood not because it offers the best or even an average site for a SANGS but because they were able to negotiate a very cheap 125 year lease at a nominal rent of just £1 per annum. This is undoubtedly a very good price but this is immaterial if the site is not suitable, as we find with Ashplats Wood.

Ref# **Comment#** **Respondent:**

14791 1 Mr W P Field

Code:

Policy: DP19 Neutral

Sustainability Appraisal?

DP19 as does the referenced Mid Sussex Transport Study gives only passing mention to rail travel. Much of the District's prosperity stems from the connectivity provided by the London to Brighton line. The service is however under ever increasing pressure. The location of Mid Sussex within the system renders it particularly vulnerable to capacity constraints at peak times which could threaten the sustainability of future development. The need for inclusion of rail in DP19 Transport Assessments (which will need to be on a regional basis taking into account of developments in other Districts) should be emphasised.

Ref# **Comment#** **Respondent:**

14791 2 Mr W P Field

Code: 3c

Policy: Sustainability Appraisal?

It would be useful to provide an overall view of the potential sites considered and the reasoning behind the Burgess Hill choice and rejection of other sites by expanding 3.18 to include the Strategic Options maps in the SA and the summary of appraisal text.

Ref# **Comment#** **Respondent:**

14791 3 Mr W P Field

Code:

Policy: DP5 Neutral

Sustainability Appraisal?

A list giving the breakdown of figures in DP5 between each town and village would be most informative.

Ref# Comment# Respondent:

14791 4 Mr W P Field

Code: 1e

Policy: Sustainability Appraisal?

Contiguous development. The District Plan emphasises cooperation with other Authorities. There is need for a statement clarifying MSDC policy with regard to development of contiguous land under the control of those authorities - eg land adjacent to Greenhill Way at the southern edge of Haywards Heath designated for development by LDC in their core plan.

Ref# Comment# Respondent:

14791 5 Mr W P Field

Code: 1g

Policy: Sustainability Appraisal?

The maps of the overall District in the District Plan are diagrammatic only. Fold out OS coverage of the District at a scale of 1:50000 showing built-up-areas of each town/village would be helpful.

Local Plan map scales vary widely. This is unhelpful particularly with contiguous built up areas such as Cuckfield/Haywards Heath/Lindfield. Maps should include development designations of contiguous land under the control of adjacent districts. Countryside area of Development Restraint as colour coded are not always labelled eg south of Haywards Heath. There are a number of gaps in the built-up area e.g. in the vicinity of HH11. It is important that the planned future extent of such areas is fully defined.

Ref# Comment# Respondent:

14791 6 Mr W P Field

Code: 1c

Policy: Sustainability Appraisal?

The list of contents makes no mention of the initial three chapters nor of the Local Plans, which will be presumably published as appendices. Without local plans the document is largely a list of guidelines rather than a plan.

Ref# Comment# Respondent:

15308 1 Mr N Kerslake

Code: 1h

Policy: Sustainability Appraisal?

There is no evidence in the HEDNA Update to support the assertion about the 5 year supply problems or the difficulties of the deliverability of the SHLAA figure of 723 homes per annum. HEDNA provides words, rhetoric and opinion only but no robust evidence about the 5 year supply issues or of providing housing need figures close to the SHLAA figure of 723 homes per annum.

The HEDNA Update wrongly implies/concludes that anything other than a large uplift in housing supply, in response to market signals (based on the Reading study) is pointless in terms of improving affordability of housing under the NPPG.

The HEDNA update shows that 249 jobs would result from 627/650/656 homes. One would expect an increase in the number of homes per annum would produce an increase in the number of jobs per annum. In the February 2015 HEDNA MSDC stated that 650 homes per annum would produce 278 jobs per annum; and paragraph 6.1 shows 645 homes per annum would produce 272 jobs.

Ref# Comment# Respondent:

15308 2 Mr N Kerslake

Code:

Policy: DP5 Object

Sustainability Appraisal?

MSDC provides no evidence of its willingness to manage the allocation of sites in the SHLAA to avoid problems it perceives or to consider increasing the SHLAA number by a small amount to provide greater headroom for a higher housing number than the 650 homes per annum.

Ref# Comment# Respondent:

15308

3

Mr N Kerslake

Code: 1e

Policy:

Sustainability Appraisal?

The HEDNA update of June 2015 refuses to provide any uplift in the housing plan number to provide towards helping to meet the unmet housing need of local neighbouring authorities.

Ref# Comment# Respondent:

15308

4

Mr N Kerslake

Code:

Policy: DP29 Object

Sustainability Appraisal?

There was a reduction in the housing register number over the period April 2014 and August 2014. The current NPPG calculation of affordable housing need is entirely different, and much lower, than the affordable housing need would have been in the months immediately before MSDC changed its criteria for continued inclusion of people on its housing register.

The vast majority of those removed from the list still require affordable/social housing. It is reasonable to suppose that some removed will, over the 17 year plan period, re apply having met the new criteria. It is not credible to assume those removed from the housing can be ignored in the calculations. Some estimate must be made of those likely to return.

- Based on 20% returning to the list, this adds 600 to the register. This would equate to a need for 258 affordable homes per annum. This would mean a housing requirement of 860dpa based on meeting 100% of the affordable need, and 688 based on meeting 80% of the affordable need.
- Based on 20% returning to the list, and assuming meeting 80% of the affordable housing need, this would require a housing requirement of 688dpa.
- Based on 33% returning to the list, this adds 990 to the register. This would equate to a need for 281 affordable homes per annum. This would mean a housing requirement of 937dpa based on meeting 100% of the affordable need, and 749 based on meeting 80% of the affordable need.
- Based on 50% returning to the list, this adds 1500 to the register. This would equate to a need for 311 affordable homes per annum. This would mean a housing requirement of 1037dpa based on meeting 100% of the affordable need, and 829 based on meeting 80% of the affordable need. [full methodology and calculations are set out in Annex A, Paper 2 of the representation]

Ref# Comment# Respondent:

15308

5

Mr N Kerslake

Code: 3h

Policy:

Sustainability Appraisal?

MSDC has changed its position on new jobs required in the District in a fundamental way and in conflict with the clear and determined strategic aim for jobs set out in the failed District Plan submitted 2013. There is no reference to the strategy for 380 jobs per annum established only 2 years ago in the 2013 plan, or why the jobs number of 278 is now seen as sufficient. There is such a sudden change in the new jobs growth target in the 2015 plan compared to the 2013 plan which requires explanation in the 2015 plan. [Local Housing Assessment, 2011 (MSDC) appended]

278 jobs per annum is a number generated by POPGROUP modelling software and bears no relation to any economic growth target. There is no analysis or justification to suggest this number is sufficient to meet economic and jobs needs.

Of the view that the 278 jobs number is too low and should be in the range 332-380 jobs per annum producing an average housing requirement of 700dpa (not 650dpa). [full methodology and calculations set out in Paper 3 of the response].

The NPPF makes clear there should be a quantitative target, aim or identified increase in economic activity resulting from the policies and plans in the Local Plan. No such target, aim or economic output resulting from the Plan is discernible in the plan.

The Pre-submission District Plan has chosen to deliberately omit any reference to economic growth in assessing its jobs need which is in direct contradiction to the NPPG requirement on page 8 of the NPPG.

Ref# Comment# Respondent:

15308

6

Mr N Kerslake

Code:

Policy: DP2 Object

Sustainability Appraisal?

The policy does not mention the word offices which accounts for 30% of the total existing commercial floorspace in the District. There is no specific economic plan for offices in the District, including how much employment land should be allocated for offices and in which of the three main towns the Plan sees offices being the main office centre of the District.

There is an implied economic policy of making Burgess Hill a growing centre for industrial activity. That policy is not stated explicitly and there is nothing in policy DP2 relating to industrial development in East Grinstead or Haywards Heath. There should be a clear policy for employment land in the three main towns and say where further employment land should be provided.

There is no strategy and vision for the component parts of business (offices, industry/factories, distribution/warehousing) and no strategy or vision for which of the three main towns in Mid Sussex will be the main growth areas. There is nothing (save for the Hub and Science Park, both in Burgess Hill) which shows cohesive plans for the provision of employment land and employment floor space over the plan period, as required by the NPPF para 161.

Ref# **Comment#** **Respondent:**

15308 7 Mr N Kerslake

Code: 1h

Policy:

Sustainability Appraisal?

In deciding which sites to include in the SHLAA on the basis of sustainability, it is the case that some sites are very sustainable, some are sustainable and some are only just barely sustainable. There is a graduation in the sustainability measure which is based on an element of judgement. If MSDC increases the housing number to 710 homes it could revisit the sites that missed being included in the current SHLAA to increase housing provision to say 740 homes per annum. The concept of graduation in sustainability must already be in the SHLAA numbers and the concept of least worst options is a normal planning concept.

Ref# **Comment#** **Respondent:**

15308 8 Mr N Kerslake

Code:

Policy: DP5 Object

Sustainability Appraisal?

In terms of affordable housing need - the housing need register has been amended (reduced) to take into account new eligibility criteria, meaning the affordable housing need over the plan period may be understated. You have to account for the possibility that people who were removed from the list may return on to it once they meet the criteria. Based on 20% returning to the list, and assuming meeting 80% of the affordable housing need, this would require a total housing requirement of 688dpa. [full methodology and calculations are set out in Annex A, Paper 2 of the representation]

Ref# **Comment#** **Respondent:**

15308 9 Mr N Kerslake

Code:

Policy: DP5 Object

Sustainability Appraisal?

It matters not how large the total unmet housing need figure is in local neighbouring authorities; it is unacceptable to do nothing and say the figure [unmet need] is too large. A small addition to the unmet need would at least make a small indent in the total unmet need figure.

Ref# **Comment#** **Respondent:**

15308 10 Mr N Kerslake

Code:

Policy: DP5 Object

Sustainability Appraisal?

The HEDNA implies that a housing figure of 700 or below would be sustainable. There is no discussion in the HEDNA as to whether a figure above 650 and below 700 could be used. My papers 2 and 3 suggest the District Plan housing numbers should be providing around 710-720 homes per annum. This could be achieved by uplifting OAN by 3-5% for market signals and allowing a small addition to meet the unmet needs of local authorities. An increase should be applied for market signals and it matters not that a modest uplift in housing numbers only produces a modest/small reduction in house prices.

Ref# **Comment#** **Respondent:**

15308 11 Mr N Kerslake

Code:

Policy: DP5 Object

Sustainability Appraisal?

MSDC should have calculated the OAN and then added a percentage for market signals then considered making a small attempt to help with adjacent local authorities unmet need. This is what they did when calculating a housing figure of 650dpa in the Pre-Submission District Plan (March 2015) approved by full council. MSDC has not calculated the housing need figure but has applied constraints to the provision of a housing number by arguing, at the outset, that market signals cannot and should not be applied and neither should provision for unmet need. MSDC complied with the NPPG in the Pre-submission plan (March 2015) in concluding that market signals applied and added a small (23 dpa) increase for neighbouring unmet needs. When the DCLG OAN came out after this, the 650dpa has not changed even though the DCLG figure increased.

Ref# Comment# Respondent:

16176 1 Mr and Mrs P and J Roberts

Code: 3i

Policy: Sustainability Appraisal?

Main concern in paragraph 1.8 "the plan has been prepared on the principle that further housing development must be accompanied by suitable and timely infrastructure." The gap between the increase in the population and the lack of services is particularly worrying and has not received enough emphasis

Recent building in the town has added more traffic to roads already at capacity. These developments have been allowed with no supporting infrastructure in place and would advocate an embargo on further housing until this is rectified.

Increase in population will put more strain on health services, particularly as higher than average number of retired people in district, who make greater use of these services.

Ref# Comment# Respondent:

16176 2 Mr and Mrs P and J Roberts

Code: 2c

Policy: Sustainability Appraisal?

Consider protection of green infrastructure important, especially as two thirds of woodlands classed as ancient, happy to see it highlighted in strategic objectives;

Ref# Comment# Respondent:

16176 3 Mr and Mrs P and J Roberts

Code:

Policy: DP38 Object

Sustainability Appraisal?

Maintenance of green spaces in towns, playgrounds, allotments, green corridors for wildlife and public open spaces for recreation and enjoyment are essential to ensure quality of life for residents. Infrastructure deficits in open spaces and sport provision need to be addressed.

Ref# Comment# Respondent:

16176 4 Mr and Mrs P and J Roberts

Code:

Policy: DP15 Object

Sustainability Appraisal?

Designation of Ashplats Wood and East Court as a SANG is not appropriate to counteract the polluting effects of new development, as it is not a new open space, just a re-designation of an existing green area. Important Habitats Regulations Assessment is enforced and genuine SANGS found in East Grinstead. This has not been addressed in this plan.

Ref# Comment# Respondent:

16176 5 Mr and Mrs P and J Roberts

Code: 3l

Policy: Sustainability Appraisal?

The proposal of a third runway at Gatwick and the generation of jobs this would engender, further illustrates the stress which would be placed in the demand for housing for airport workers and for transport in the area. Without further infrastructure improvements considerable problems would be caused.

Ref# Comment# Respondent:

16412 1 Dr I Gibson

Code: 1b

Policy: Sustainability Appraisal?

There is a clear and urgent need for MSDC to have a District Plan. Developers have targeted the District in the past 3 years and many of the over 5,000 'committed' new homes have been justified on the basis of the lack of a five year land supply rather than housing mix and location. The impact on the District of these developments is largely unknown but many of them are being added to communities whose infrastructure and services are already over-stretched. Against this background, what is needed is a plan that solves existing and emerging problems. Regrettably, the draft Plan fails to provide this.

Ref# Comment# Respondent:

16412 2 Dr I Gibson

Code: 2a Policy: Sustainability Appraisal?

In setting out the economic and environmental context the draft Plan correctly identifies that the character of the District is comprised of a small number of large settlements (towns) and a network of small settlements (villages) set in largely wooded countryside. The protection of this character is identified as a key objective, but the strategy for development set out in the draft plan will prejudice rather than protect both the village communities and the countryside that they are set in.

Ref# Comment# Respondent:

16412 3 Dr I Gibson

Code: Policy: DP29 ObjectSustainability Appraisal?

Clearly, villages need to provide new housing to match their local needs, but the evidence suggests that this should be focused on affordable starter homes and homes that enable 'last-time buyers' to downsize while remaining in their communities. A housing survey for the Crawley Down Neighbour Plan identified that a significant number of 3 and 4 bed homes would be released for new families to move into the village if 2 bed bungalows were available for the present incumbents to move to. This approach equates to a strategy of making better use of the existing housing stock. It is not sustainable to have couples and single person households living in 3 and 4 bed houses. The District Plan has failed to recognise the benefits that such a strategy could deliver.

The term 'affordable housing' is being generally mis-used by being linked with 'social housing'. There is need for both in communities and they need to be distinct. Linking them is primarily to the detriment of affordable housing, which should be reserved for properties that are affordable by local people. Developers should be encouraged to deliver schemes that are priced at a set % of the local market rate in perpetuity. All social housing (meaning for rent at a set % of the commercial rate) in villages should be reserved for local people, as it cannot be considered to be sustainable to move households between village communities.

Ref# Comment# Respondent:

16412 4 Dr I Gibson

Code: 3f Policy: Sustainability Appraisal?

There is a suitable site at Crabbit Park, adjacent to the M23, whose development would relieve the need for economic development pressure on the villages. It would also meet some the need for new housing in Crawley that is currently not being addressed.

Ref# Comment# Respondent:

16412 5 Dr I Gibson

Code: Policy: DP30 ObjectSustainability Appraisal?

This policy should be revised to include a test to confirm that the chosen site is the most appropriate. This is a repeat of a comment submitted on the previous (2013) Plan.

Ref# Comment# Respondent:

16427 1 Mr E Fielding

Code: 1i Policy: Sustainability Appraisal?

How have MSDC summarised comments received on the previous draft District Plan iterations that were out for consultation in 2014 and 2015? I do not believe that the summarised output is useable or true reflection of comments received since the comments cannot be aligned to particular pages, paragraphs, policies, targets or strategic objectives contained within the Draft District plan or the documents contained in the evidence base. This summarised document dumbs down the original comments and is not a correct representation of comments either I or others have made. This makes the draft district plan not sound since it has not been able to evidence that it has correctly made amendments in respect of upheld consultation comments.

Ref# **Comment#** **Respondent:**

16427

2

Mr E Fielding

Code: 3g

Policy:

Sustainability Appraisal?

I do not agree that this draft district plan is sound because it makes reference to using the Neighbourhood plans as part of its evidence base, yet only 3 neighbourhood plans have been put to the inspector for examination and only 4 have passed referendum at the time of this draft.

Page 4 Paragraph 2.2 How are the characteristics and aspirations of parishes shown – since all but 3 neighbourhood plans have been put forwards for examination which may or may not pass examination and only 4 neighbourhood plans have succeeded at referendum (page 18, paragraph 3.22), making a total of 7 out of the 20 neighbourhood plans to have even be drafted at this point? This claim demonstrates MSDC’s inability to draw from Neighbourhood plans since the majority of these neighbourhood plans have yet to be drafted and so this Draft District plan is not sound.

Page 19 paragraph 3.29 Localism requires a “bottom up approach” as detailed on page 17 paragraph 3.20 of the draft district plan and if MSDC will then tell Parishes and communities what it will be getting when Neighbourhood plans do not deliver the required number of houses to match the Objectively assessed needs this is not in accord with Localism hence the proposed District Plan is not sound.

Page 19 paragraph 3.29 the draft district plan is not sound because each Neighbourhood plan to date has claimed it will use houses from the strategic development (The Northern Arc) to deliver the unmet portion of its housing requirement. Even though many neighbourhood plans are counting the houses in the strategic development of the Northern Arc there is no monitoring by MSDC that there is sufficient houses to avoid double-counting .

Ref# **Comment#** **Respondent:**

16427

3

Mr E Fielding

Code:

Policy: DP18 Object

Sustainability Appraisal?

What happens to the planned income from the Community Infrastructure Levy Charging whilst MSDC does not have an approved and published schedule in place? Calculations to deliver the required infrastructure are based on the full number of new houses and this is greatly reduced due to the fewer houses that will be charged CIL and the lesser income from S106 agreements. Income will not match the required budget and so the proposed District Plan is not sound.

Page 20 paragraph 3.33 “the Community Infrastructure Levy collected from developers by the District council will normally be spent on infrastructure needs in the locality of the scheme that generated it” why is it only normally not always spent on the infrastructure needs in the locality of the scheme that generated it? Where are the definitions of normally? Again this lack of clarity lead me to conclude that the draft District plan is not sound.

Ref# **Comment#** **Respondent:**

16427 4 Mr E Fielding

Code: 1h

Policy:

Sustainability Appraisal?

Page 7 Paragraph 2.12 – the Sustainable Communities Strategy is not in the evidence base and so the Draft District plan is not sound since it is using strategies that MSDC do not consider to part of its formal evidence base.

Page 9 paragraph 2.17 – when will MSDC publish the “local strategic statement” be reviewed “to improve the clarity of the strategic priorities for growth and investment in the Diamond”? Without this review the priorities will not be established and hence the proposed District Plan is not sound or deliverable from the start. There is a lack of up to date base data and an un-reviewed local strategic statement is unacceptable, a review date of two years is ludicrous and this planning strategy that will be key to the District hence without it in place the proposed District Plan is not sound or deliverable.

Ref# **Comment#** **Respondent:**

16427 5 Mr E Fielding

Code:

Policy: DP15 Object

Sustainability Appraisal?

Page 10 paragraph 2.23 –When will the further work re the “potential mitigation measures have been identified and further work is taking place to assess the impact of this plan” be concluded? Without recommendations from this review it will be impossible to state if this Draft District Plan will protect the Ashdown Forest Special Protection Area and Special Area of Conservation (European Designations) and so this draft District plan is not sound.

Ref# **Comment#** **Respondent:**

16427 6 Mr E Fielding

Code: 1g

Policy:

Sustainability Appraisal?

Pages 12 and 13 why are the maps still missing a number of villages – this goes against the response to previous consultation when MSDC agreed to include all villages on all maps

Page 13 figure 5 – why are built up area boundaries shown when the Neighbourhood Plans will dictate where these are to be as per MSDC responses?

Page 41 Figure 7 shows that the built up area for Burgess Hill has been changed within this iteration of the Pre submission District Plan 2014-2031 to include a chunk of Ansty and Staplefield Parish and Hurstpierpoint and Sayers Common Parish – without a formal boundary review or consultation having been undertaken with any of the three parish/towns councils (Ansty and Staplefield Parish and Hurstpierpoint and Sayers Common Parish and Burgess Hill Town Council).

Ref# **Comment#** **Respondent:**

16427 7 Mr E Fielding

Code: 1d

Policy:

Sustainability Appraisal?

Page 14 Paragraph 3.2 does not adhere to the Localism Act and so the Draft District plan is not sound, I state this since MSDC have determined that “The District Plan provides clarity to communities, developers and other interested parties on what, where, when and how development should take place in Mid Sussex until 2031.” If this reflected the Localism Act it would state that the neighbourhood plans would determine where development would take place not MSDC. If MSDC are making these decisions why are parishes etc. going to the expense and trouble of drafting neighbourhood plans?

Ref# **Comment#** **Respondent:**

16427 8 Mr E Fielding

Code:

Policy: DP5 Object

Sustainability Appraisal?

The Draft District Plan is not sound because the lack of uplift on the OAN is not correct and cannot be substantiated an uplift does not have to be 10% the only figure tested when other percentages may work and deliver much needed new housing.

Ref# **Comment#** **Respondent:**

16427 9 Mr E Fielding

Code: 1e Policy:

Sustainability Appraisal?

Page 16 paragraph 3.13 – the draft District plan is not sound because there is no evidence provided of cross boundary agreements or outputs from Duty to Cooperate e.g. Memorandums of Understanding. Since there is no evidence provided one can only assume there are none.

Page 16 paragraph 3.14 – the draft District plan is not sound because there is no evidence that the proposed numbers within the plan have been increased to deliver any requirements from neighbouring authorities to assist in meeting unmet employment floorspace requirements as identified by six of the eight neighbouring authorities.

Page 16 paragraph 3.15 – SHLAA, the draft district plan is not sound because it is based on out of date reports. In addition many of these now out of date report were not written for MSDC use but for West Sussex County Council use, and MSDC do not have clarity re when some of these reports were produced. The position is further confused when you look on the WSCC website and find that the West Sussex Structure Plan 2001-2016 February 2005 is very much current on West Sussex County Council’s Strategies, Plans and Policies and was last updated on 20 February 2015.

Page 17 paragraph 3.17: The draft district Plan is not sound since MSDC claims it could not contribute towards meeting neighbouring authorities housing needs as per paragraph 182 of the NPPF, yet the correct position its it can, if the SHLAA is correctly conducted in accordance with the NPPF guidance of a minimum of five or more sites rather than the six required by MSDC.

Ref# **Comment#** **Respondent:**

16427 10 Mr E Fielding

Code: 1c Policy:

Sustainability Appraisal?

Page 18 paragraph 3.25 – the draft district plan is not sound because the approximation of 5,500 new homes is contradicted on page 30 the number of houses shown as commitments was 5,405. The difference between these two numbers is not acceptable and indicates that MSDC is not confident of the true number of commitments to date. The use of such differing number and inconsistent use of data throughout the draft plan is not acceptable and make the draft district plan not sound.

Page 20 paragraph 3.33 what is the definition of locality? I have asked numerous times including in previous consultation yet there is still no definition. A term that cannot be defined has no place in a District Plan and leads me to believe that any Community Infrastructure Levy (although the amount has yet to be agreed) has already been earmarked for large District Projects not those in the villages or parish what I would consider to be the Locality.

Page 30-31 DP5 – the draft District Plan is not sound because the 3,500 new homes that are shown to be planned for delivery through the strategic development is not the only number shown for this development on page 19 paragraph 3.27 it is stated that “The Plan assumes the strategic developments proposed for around Burgess Hill will yield 3,980 homes over the lifetime of the plan” on page 17 paragraph 3.19 the figure proposed is 3,500 – 4,000 - so which number is correct 3,500, 3,980 or 4,000? MSDC have acknowledged that the 3,500 may be hopeful and the true number is likely to be less.

Page 35 DP7 –the Draft District Plan is not sound because foot note 6 as marked in the text has no details provide in the foot notes.

Ref# **Comment#** **Respondent:**

16427 11 Mr E Fielding

Code: 3b

Policy: Sustainability Appraisal?

Page 19 paragraph 3.26 – how and when will “the District Council continue to work with the landowners, developers and statutory agencies to try to remove these barriers...”? I am a landowner and have had no evidence of this work. Since I have experienced no approach of working together with the council even though I submitted numerous options in a rural village that has been classified as sustainable and offered to enter dialogue more than once, I can only conclude that this is empty words with no substance written to mislead residents and ultimately the inspector hence the proposed District Plan is not sound.

Ref# **Comment#** **Respondent:**

16427 12 Mr E Fielding

Code:

Policy: DP4 Object

Sustainability Appraisal?

Page 29 DP 4 - the village of Handcross has been missed out – why? It has a wealth of shops and facilities including a primary school and health centre that also has a dentist and holds clinics for the Princess Royal Hospital and ante natal clinics etc. I have previously informed MSDC but they have chosen to continue to present an incomplete suite of data that is knowingly not correct. This makes the draft District plan not sound. Page 29 DP 4 - the village of Staplefield has been missed out – why?

Ref# **Comment#** **Respondent:**

16427 13 Mr E Fielding

Code:

Policy: DP6 Object

Sustainability Appraisal?

Page 33 DP 6 – the plan is not sound because it has wrongly categorised Staplefield as a Category 4 settlement. Staplefield has more services than Albourne, Pease Pottage, Sayers Common, since it has two churches – St Mark’s Church (Cof E) and Our Lady of Fatima (Roman Catholic) , two public houses - The Victory and The Jolly Tanners , a shop catering for basic needs, a primary school - St Mark’s School and a special needs school - Brantridge School, this caters for children with Autism), a pavilion, sporting facilities, business and retail facilities, a village hall with meeting rooms, all of which provide “...essential services for the needs of their own residents and immediate surrounding communities. Whilst more limited, these can include key services such as primary schools, shops, recreation and community facilities, often shared with neighbouring settlement”.

In addition Mid Sussex District has not recognised if a village has more than one facility of the same type and so it is incorrect e.g a village with one church is scored the same as on with two etc. This does not provide a full picture of sustainability and does not show the vitality and vibrancy of the villages to their true extent nor the number of settlements these services within each village deliver.

Pages 31-33 DP6 – The Draft District Plan is not sound since it relies solely on the settlement having a built up area boundary to determine if it is sustainable. An example is shown in comment 65 above of the village of Staplefield which has numerous key services and several of the same type e.g. 2 x churches, 2 x schools, 2 x public houses etc. This status has been carried over blindly with no formal review for more than 23 years and is not in compliance with the NPPF guidance whose golden thread is the presumption in favour of sustainable development.

Pages 31-33 DP6 – Handcross wrongly categorised as a category 3 village and accordingly the draft district plan is not sound. The number of key services, facilities and employment opportunities to exceed those of Copthorne, Crawley Down, Cuckfield, Hassocks, Keymer and Hurstpierpoint.

Ref# Comment# Respondent:

16427 14 Mr E Fielding

Code:

Policy: DP7 Object

Sustainability Appraisal?

Page 34 DP7 – how can the developers provide new and improved educational facilities when these fall to the county council who will dictate the need and location of such new facilities. What age ranges will these educational facilities cover, primary, secondary or both? What about adult education and further education, are these included too. This is too vague and required definition, without this clarity the Draft District Plan is not sound.

Page 34 DP7 – how can the strategic development influence the range of shops available? This does not make any sense and so the Draft District Plan is not sound due to its poor phraseology the fact that MSDC have desires and aspirations above their true influence.

Page 34 DP7 – how can the strategic development provide the necessary transport improvements when they are controlled by private companies? This does not make any sense and so the Draft District Plan is not sound due to its poor phraseology the fact that MSDC have desires and aspirations above their true influence.

Page 34 DP7 –in support of previous comments from a number of respondents to prior consultation, the Draft District Plan is not sound because it does not consider the need for any churches or for the provision of facilities to practice faiths.

Ref# Comment# Respondent:

16427 15 Mr E Fielding

Code:

Policy: DP8 Object

Sustainability Appraisal?

Pages 35-36 DP8 – How did MSDC determine this as a Strategic site when it has the following issues that go against MSDC policy:

- It adjoins the Ditchling Common Site of Special Scientific Interest in East Sussex
- Is next to the railway running through Burgess Hill - and so will have noise issues
- Has flood issues
- Having been a former industrial site is likely to suffer from contamination problems,
- How can the provision of 480 new homes on this poor choice of sites, that also builds a neighbourhood centre claim to have measure to mitigate against its impact?

This policy is not sustainable, environmentally sensitive, it goes against MSDC policies DP1 on environmental grounds, DP5, hence the Draft District Plan not sound.

Ref# Comment# Respondent:

16427 16 Mr E Fielding

Code:

Policy: DP9 Object

Sustainability Appraisal?

Pages 38-40 DP9 this policy is not sound and so the Draft District plan is not sound. It is not sound because DP9 is in conflict with the following Mid Sussex Policies:

- The site contains ancient woodland which is not in accordance with page 74 PD37.
- The site has considerable flood risk – page 39 “on-site flood plains” .
- No additional sporting provision since the Triangle is to be replaced not added too with more facilities.
- Is adjacent to Goddards Green Waste Water Treatment Works – hence odour issues have to be overcome.
- MSDC have no control over the multiple agents and landowners who are required to bring these collection of sites together.
- The reliance on Wivelsfield station – a single platform station with no parking and limited expansion opportunities is not going to provide the service required for these 3,500 new dwellings.
- The remoteness of the Science Park from the train stations can only increase the reliance on the car.

Ref# **Comment#** **Respondent:**

16427

17

Mr E Fielding

Code:

Policy:

DP10

Object

Sustainability Appraisal?

Pages 42-44 DP10 – the draft district plan is not sound because it is using out of date data as shown on page 42 DP10: “The Council has worked with West Sussex County Council to produce evidence, guidance and landscape strategy documents that will be referred to when implementing this policy. The Landscape Character Assessment for Mid Sussex (2005) provides a comprehensive account of the landscape character of Mid Sussex. This shows data that is more than 10 years out of date, this is not sound or acceptable for the next 16 years when it will be over 25 years out of date.

Page 42-44 DP10 - The draft District Plan is not sound because reference is made to “data held by West Sussex County Council” which is not included in the evidence base for this draft District plan.

Page 42-44 DP10 - The draft District Plan is not sound because what does “The Assessment states that change needs to be managed so that important landscape characteristics are not lost and that opportunities to create new landscapes are maximised (paragraph 2.81)” actually mean in plain English – if one cannot understand the text how can the Draft District plan be considered sound?

The draft District plan is not sound because MSDC has yet to review Built up Area Boundaries and has blindly carried over historical decisions with no regards for change

Page 43 DP10 – the draft district plan is not sound because the built up area boundaries can be determined through the Site Allocation Development Plan Document which is derived from the SHLAA, yet sites without a built up area boundary are excluded from the SHLAA assessment process and so can't be allocated.

Page 43 DP 10 – how and when will MSDC consult and publish any further work in conjunction with West Sussex County Council re minerals and possible extractions? It is unacceptable that the Draft District Plan is pushed through when these discussions have yet to take place, the locations and nature of mineral extraction make this a very sensitive issue for this district, yet residents are given no say in what should go ahead. Due to this bullish and frankly uninformed approach the draft district plan is not sound.

Ref# **Comment#** **Respondent:**

16427

18

Mr E Fielding

Code:

Policy:

DP12

Object

Sustainability Appraisal?

By proposing this policy MSDC cannot deliver strategic objective 8 “to provide opportunities for people to live and work within their communities reducing the need to commute” when read with Policy DP13 page 46 “...Where accommodation is essential to enable agricultural, forestry and certain other full time rural workers to live at, or in the immediate vicinity of, their place of work...”. The Draft District Plan is not sound since it discriminates against those trying to live in rural communities and work from home unless they are in the 5% of all businesses in Mid Sussex that are agricultural in nature.

Page 45 DP12 The draft district plan is not sound because it ignores the high percentage of home workers in the District especially in the rural villages as detailed by MSDC and ONS which will only increase with improved Broadband services. Home offices should be encouraged to enable Strategic objectives 7, 8 and 10. The provision of more home offices will in turn boost local economies and enable Mid Sussex’s rural communities (as significant in number as the towns when added together) to live and work in their communities.

Ref# Comment# Respondent:

16427 19 Mr E Fielding

Code:

Policy: DP13 Object

Sustainability Appraisal?

The draft district plan is not sound because Page 47 DP13 – the classification of new ‘granny annexes’ as new homes will restrict families from providing support to those in their family who need additional care, for example elderly relatives or less able grown up children.

Ref# Comment# Respondent:

16427 20 Mr E Fielding

Code:

Policy: DP17 Object

Sustainability Appraisal?

Page 50-51 DP17 - The draft district plan is not sound because there is no comprehensive list of tourist attractions or details of sustainable tourism within the plan e.g. by using National Cycle Route 20 a tourist could visit St Mark’s Church and view the famous Kempe Wall paintings whilst travelling through the district either to or from Brighton and visit many more en-route.

Ref# Comment# Respondent:

16427 21 Mr E Fielding

Code:

Policy: DP18 Object

Sustainability Appraisal?

Page 52 DP18 – how has the priorities for additional provision be reached? I do not agree with these priorities and ask what about other sports such as swimming, diving, gymnastics, dancing, cycling, golf, shooting, archery, tennis, badminton, modern pentathlon, equestrian sports, polo, water polo, sailing, stall ball and athletics both track and field as just a few sports that have no additional provision prioritised.

Page 52 DP18 – how much money will be set aside for sporting facilities from the community infrastructure levy (CIL)? If the CIL is being used to pay for transport networks, on-site infrastructure and affordable housing, regeneration of town centres etc will there be any left? The draft District Plan is not sound because it cannot deliver strategic objective 6 and has already missed out on much required resources from those permissions already granted in the years that there has not been any cover from a District plan and developers have the scope to negotiate out of paying S106 since CIL has yet to be agreed. Even when CIL is in place developers can off-set payment against on-site infrastructure costs.

Page 52 DP18 – where do I find the Community Infrastructure Levy Charging Schedule? Without this key document the Draft District Plan cannot be considered as sound since it will not be able to achieve its objectives.

Page 53 DP18 – please define “normally” without this key definition (note this is not my first time of asking for this definition and I am not alone in my request for a definition) the draft district plan is not sound.

Ref# Comment# Respondent:

16427 22 Mr E Fielding

Code:

Policy: DP19 Object

Sustainability Appraisal?

Page 54 DP19 – this draft district plan is not sound because MSDC cannot claim to have the authority to tell private companies such as train or bus companies what service they have to provide or where they should have stations. Even if MSDC were to enter dialogue with these private providers the changes required would be most unlikely to take effect during the life of this District plan.

Ref# Comment# Respondent:

16427 23 Mr E Fielding

Code:

Policy: DP21 Object

Sustainability Appraisal?

Page 56 DP21 – This draft district plan is not sound because it is using an out of date evidence base, some of these documents are already 10 years old before the draft district plan is adopted, how can they be considered current for over 26 years?

Ref# Comment# Respondent:

16427 24 Mr E Fielding

Code:

Policy: DP23 Object

Sustainability Appraisal?

Page 58 DP23 where do I find the Supplementary Planning Document MSDC refer to within this policy? Without this document the draft district plan is incomplete and so is not sound.

Ref# Comment# Respondent:

16427 25 Mr E Fielding

Code:

Policy: DP24 Object

Sustainability Appraisal?

Page 59 DP24 “does not cause significant harm to the amenities of existing nearby residents and future occupants of new dwellings, including taking account of the impact on privacy, outlook, daylight and sunlight;” what is the definition of outlook? How far does an outlook extend? Who arbitrates if one party believe development improves outlook and another does not? Without clear definitions this draft district plan is not sound since this policy is subjective and has no clear guidelines or parameters, after all the planning department are often heard telling people they “don’t own a view unless they own the land the view is over”.

Ref# Comment# Respondent:

16427 26 Mr E Fielding

Code:

Policy: DP26 Object

Sustainability Appraisal?

Page 60-62 DP26 – what studies as indicated on page 61 - has MSDC considered and where do I find them and the output from them? References to studies and documents that are not included in the evidence base does not enable a sound or comprehensive plan to be drafted. Due to the incomplete nature of the evidence base the draft district plan is not sound.

Page 62 DP26 the draft district plan is not sound or legal because exception 1 does not comply with Homes for Life Standards and so the standards being aimed within this policy strive for a far lesser quality that discriminates against the known ageing population and those with mobility needs. This policy may fall foul of the disability discrimination act by not providing amenities or housing that fit for purpose and reasonable adjustments have not been considered.

Ref# Comment# Respondent:

16427 27 Mr E Fielding

Code:

Policy: DP28 Object

Sustainability Appraisal?

Page 64 DP28 – without a clear and agreed Traveller Site Allocation Document this draft district plan is not sound, emerging is not good enough or in the public view.

Ref# **Comment#** **Respondent:**

16427

28

Mr E Fielding

Code:

Policy:

DP29

Object

Sustainability Appraisal?

Page 65 DP29 – The draft district plan is not sound because MSDC has not profiled the requirement for new affordable houses for the whole duration of the plan. Current need will not be linear over the forthcoming years since the ageing population has been recognised but the need may get less since many of these people own their own properties which then removes the burden on affordable housing, especially when coupled with changes to the pension rules re annuities and the amount of pensioners who will draw down on a lump sum.

Page 65 DP29 - The range give of between 116 and 223 homes per year is not specific enough to show a true need has been established and hence the draft district plan is not sound.

Page 65 DP29 – how many affordable houses will the large developments bring and when? I ask because MSDC could make these developers do the socially responsible act of building these houses at the required minimum or above level of 30% affordable whilst it builds its other houses or make this land available as their first act on site thereby alleviating the pressure to house these people who are in great need. If large scale developments do not generate a minimum of 30% affordable housing then this plan will not be sound since without this provision the need of all residents as per Strategic objective 13 cannot be met.

Page 65 DP29 – how is MSDC ensuring that affordable housing will be pepper potted on developments and not all put in a group or ghetto corner of the sites? Without details of where the affordable housing will be located being detailed this draft district plan is not sound.

Page 66 DP29 – where is the “Free serviced land” going to come from? How has this been consulted upon in the Neighbourhood plan process? Without this detail being determined and provided this draft district plan is not realistic or sound.

Ref# **Comment#** **Respondent:**

16427

29

Mr E Fielding

Code:

Policy:

DP30

Object

Sustainability Appraisal?

Page 66 DP30 – will rural exception sites be sought where mixed developments cater for the expressed need for affordable housing in a parish? If Rural exception sites are only to be located where it is adjacent or in close proximity to a rural settlement containing local services why does it need to be an exception site? If the settlement has local services it is surely considered sustainable and then it is acceptable to have sustainable development and then a mixed site could be built which generated both affordable housing and market housing and the much required CIL to fund community infrastructure requirements. As this policy stand it will not fulfil strategic objective 13 since it does not provide the housing required by all sectors only affordable sector and with this in mind this draft district plan is not sound.

Page 66 DP30 without a definition Local then the draft district plan is not sound since the required “genuine local need” could not be accurately gauged.

Page 67 DP31 – some of the sites listed as being safeguarded for Gypsy and Traveller use have already been granted planning permission to have new dwellings and these do not have any conditions attached to ensure they remain for Gypsy or Traveller use – e.g. Highfields, near Warninglid. I have already informed you of this error and it has not been corrected With the use of knowingly incorrect data I can only conclude that MSDC are trying to mislead the residents, councillors and inspector and accordingly this plan is not sound.

Ref# **Comment#** **Respondent:**

16427 30 Mr E Fielding

Code:

Policy: DP31 Object

Sustainability Appraisal?

Page 67 DP31 how will the Gypsy, traveller and travelling showpeople need be updated during the life of this plan? If there are no plans to review or amend this policy then this draft district plan is not sound, by the very nature of these people they do not have fixed requirements and do not require to be stuck in one location for the foreseeable future with no option to move or travel. Travelling Showpeople may not show a need at the moment but how will this be captured and met in future years?

Ref# **Comment#** **Respondent:**

16427 31 Mr E Fielding

Code:

Policy: DP33 Object

Sustainability Appraisal?

Page 70 DP33 – the draft district plan is not sound because MSDC has yet to draft conservation Area Character appraisals or management plans for most of the Conservation Areas it has designated as such. This leads one to conclude the designations are questionable and not based on up-to date fact.

Ref# **Comment#** **Respondent:**

16427 32 Mr E Fielding

Code:

Policy: DP36 Object

Sustainability Appraisal?

Page 72-73 DP36 – Will MSDC be listing or protecting any of the trees or hedgerows on its own land that are considered of merit? If MSDC do not follow the same rules as those who live and work in the District then this draft district plan is not sound.

Page 72-73 DP36 – what monitoring does MSDC do/plan to do to ensure that replanting occurs when it is required? If there is no agreed monitoring regime the trees will not be replanted and this policy will fail to meet Strategic Objectives 3, 4 and 5 and hence this draft district plan is not sound.

Ref# **Comment#** **Respondent:**

16427 33 Mr E Fielding

Code: 3k

Policy: Sustainability Appraisal?

The Objective and targets set in Pages 84 to 92 need to be SMART. Smart stands for: Specific, Measurable, Attainable, Relevant and Time-bound, further details are shown below to help MSDC revise its objectives and targets accordingly since I have provided feedback on these items numerous times in previous consultation

[detailed proposals for monitoring indicators provided for every policy]

The targets are largely not SMART or stretching, MSDC will not be able to judge success of many policies and will not be able to see where policies may be failing or achieving great success. Without clear targets the plan and individual policies will potentially not deliver the changes required in the District of Mid Sussex over the life of the plan or even be able to highlight where review and interim modifications could be beneficial, this will mean that both MSDC Officers and Councillors will not be able to make informed decisions that benefit the District. Targets need to be time driven e.g. of an increase of x by yy year or an increase of x each year of the plan's life. As it stands many of the target render the draft District Plan not Sound since success cannot be measured, reported or recognised and will so an end point/success will never be achieved. If you do not know what you are looking for you will not find it.

Ref# Comment# Respondent:

16427

34

Mr E Fielding

Code: 1h

Policy:

Sustainability Appraisal?

It is worthy of note that in addition to the minimum criteria shown to enable a settlement to be classified as a Limited Local Service Centre, Staplefield has far more services, as shown in Table 6 – Settlement services page Vii of the MSDC Settlement Sustainability Review May 2015. Staplefield actually has two public houses, two churches – one C of E and the other RC, two schools – St Mark’s and Brantridge School, a village Hall and a Pavilion and Cricket pitch etc etc. The draft District plan is not sound because it does not follow the NPPF SHLAA guidance. This guidance should be read in conjunction with the NPPF 2012 which details the presumption in favour of sustainable development. MSDC have knowingly reduced the number of potentially sustainable and suitable sites for new houses to meet its known need and contribute towards meeting the unmet needs of neighbouring authorities. Staplefield meets all the criteria of a Limited Local Service Centre – ref: Mid Sussex Settlement Sustainability Review May 2015, Page 5, paragraph 3.15. In addition to this minimum criteria Staplefield is shown to have far more services as shown in Table 6 – Settlement services page Vii of the MSDC Settlement Sustainability Review May 2015. The Draft District Plan is not sound because some settlements shown to be sustainable and meeting all the criteria to be a Limited Local Service Centre e.g. Staplefield have not been assessed. Page 16 paragraph 3.15 : the draft district plan is not sound because MSDC have inconsistently completed SHLAA assessments and have inconsistently ruled out or included sites for assessment e.g. SHLAA sit 668 has been included in the assessment yet it is remote from a built up area boundary and remote from any settlement and is an un-sustainable location yet sites in sustainable locations have been discounted from assessment e.g. SHLAA sites 25, 28, 641 and 659. The draft District plan is not sound because it does not follow the National Planning Policy Framework (NPPF) with its golden thread of a presumption in favour of sustainable development, MSDC have knowingly ruled sites out that are in sustainable and viable settlements for example any sites within the village of Staplefield, without even the courtesy of a review. Technical Report 9 (Built Up Area Boundaries 2002) has never been reviewed, this includes a review to ensure it reflects changes resulting from the NPPF guidance and subsequent legislation and guidance updates. Due to the continued reliance on out of date and un-reviewed reports the Draft District Plan is not sound since it cannot guarantee that the data used or methods utilised for its drafting are compliant with legislation and NPPF guidance. The Draft District Plan is not sound because it is measuring a false capacity within MSDC and due to this false limitation imposed by MSDC of a minimum of 6 dwellings to be considered within the SHLAA which is against the NPPF guidance which states 5 or more dwellings should be considered, and so MSDC will never be in a position to realise its proper potential or meet the needs of its residents and neighbouring authorities. This is even more shocking when history shows MSDC has been heavily reliant on windfall and small scale development of less than six units which have made up an average of 57% of MSDC’s annual building completions that MSDC are then happy to claim as evidence when justifying the Housing Land Supply (Mid Sussex District). The draft district plan is not sound because the overall palette of sites is not correct it should be shown to be 11786 homes, as detailed in point 45 above not the “maximum pallet in Mid Sussex” which is stated to be 11,700. SHLAA Site id 642 - Reason for Exclusion: Site is wholly outside and unrelated to existing settlement built up area boundary and is therefore excluded from assessment in accordance with the Methodology (2015, paragraph 4.9). Paragraph 4.9 does not exist in the MSDC SHLAA Methodology and so is a spurious reason to exclude a site. The Draft district plan is not sound because the SHLAA report basis a decision to discount 30% for non-delivery on small sites and refers me to a paragraph that does not exist for the rationale reference. The proposed draft District Plan is not sound because MSDC has not extended the same courtesies to all who submitted sites for consideration within the SHLAA process. I have not been treated the same as other developers or agents. I was not invited to the developer workshop – this is the title MSDC gave it on the agenda & minutes and this session was not advertised or opened to all. Page 30-31 DP5 – the draft District Plan is not sound because MSDC submitted all sites considered within the SHLAA to the Parishes and Towns for consideration within the Neighbourhood plans, if the SHLAA sites are rejected through the Neighbourhood planning process how can they be considered to be in line with Localism if parishes and town councils are then forced into communities who have previously rejected them? This reliance on sites that do not fit with Localism makes the draft District plan not sound, Localism is a bottom up approach not a top down (or enforced by District) approach.

Ref# Comment# Respondent:

16427 35 Mr E Fielding

Code: 1h

Policy: Sustainability Appraisal?

When will MSDC be reviewing the constraining policy decisions in particular the addition of a further criteria to exclude sites from detailed assessment: "Sites wholly outside or unrelated to existing settlement built up area boundaries" (Page 8 Figure 2 of the MSDC Strategic Housing Land Availability Assessment Updated Methodology February 2015)?http://www.midsussex.gov.uk/media/SHLAA_Methodology_June_2015.pdf An example is the sustainable village of Staplefield that has no record of how the policy for this village to have no built up area boundary was originally made, not even the date of this original decision is held on record by MSDC (as advised by MSDC Officers 7th April 2015) and subsequently this historic unrecorded decision has not been reviewed for in excess of 23 years.

Ref# Comment# Respondent:

16427 36 Mr E Fielding

Code: 1h

Policy: Sustainability Appraisal?

The Draft District Plan is not sound because it is measuring a false capacity within MSDC and due to this false limitation which is against the NPPF

Ref# Comment# Respondent:

16427 37 Mr E Fielding

Code: 1h

Policy: Sustainability Appraisal?

Page 16 paragraph 3.12 – The Draft District Plan is not sound because the conclusion drawn from the HEDNA is not on complete, robust or even factual data, by claiming for example that Land Prices have "no readily available data was available for analysis, so this market signal was excluded from this assessment" was incorrect, lazy and misleading. Land Registry could for example provide this data or one of many of the land agents servicing this District. Page 16 paragraph 3.12 - The Draft District Plan is not sound because when looking at the reference HEDNA Update page 12 paragraph 4.9 the use of Uttlesford and Eastleigh as examples as to why MSDC could justify a reduced uplift on top of the OAN to determine the correct required new dwelling number does not hold true since Uttlesford Council formally withdrew its Local Plan in 21st January 2015 following the review by the Inspector, and Eastleigh Local plan 2011-2029 was considered to be unsound by the Inspector in November 2014. This use of two plans, neither of whom have passed inspection to be the rationale for a decision is flawed and unsound and hence the draft District plan is not sound. MSDC provided two examples to show a point but neither have managed to get their plans past Inspection stage and so one can only conclude if this flawed thinking was adopted by MSDC then this draft district plan is not sound.

Ref# Comment# Respondent:

16427 38 Mr E Fielding

Code:

Policy: DP5 Object

Sustainability Appraisal?

Page 31 DP5 – the plan is not sound since it has missed the housing completion target of 650 per annum in the first year 2014-2015 and yet has not recalculated the requirements for subsequent years, this would lead the plan to never actually meet or satisfy its needs. The shortfall on target is being carried forwards not dealt with or corrected.

Ref# Comment# Respondent:

16427 39 Mr E Fielding

Code:

Policy: DP5 Object

Sustainability Appraisal?

Page 30-31 DP5 – The Draft District Plan is not sound because it has no buffer, on page 16 paragraph 3.11 the DCLG projects the district's housing need to be 656 houses per year and even if the District were in a position to ignore the 1% (or 6 dwellings per annum) which related to the South Downs National Park which is outside the Plan area, it has no 20% buffer as detailed on page 30. This lack of a 20% buffer is further substantiated by the use of an out of date and in fact correctly shown to be revoked set of targets from the South East Plan which was revoked in March 2013, some years prior to the drafting of this Draft District Plan. The use of knowingly incorrect and in fact revoked targets further demonstrate that this draft District Plan is not sound.

Ref# **Comment#** **Respondent:**

16427 40 Mr E Fielding

Code:

Policy: DP5 Object

Sustainability Appraisal?

Page 30-31 DP5 – the draft District Plan is not sound because the figure given for 5,405 commitments within the planning process does not allow for any sites that do not go on to be built due to a variety of factors

Ref# **Comment#** **Respondent:**

16427 41 Mr E Fielding

Code:

Policy: DP5 Object

Sustainability Appraisal?

Page 18 paragraph 3.23 How are allocations matched to evidenced needs? What happens when the Neighbourhoods do not allocate sufficient housing to meet OAN (as detailed in the MSDC Housing Provision Paper June 2015 page 13 paragraph 4.20) or land as is the case that in all Neighbourhood Plans made to date, this leads to me to conclude that this approach is unviable and the proposed District Plan is not sound.

Ref# **Comment#** **Respondent:**

16427 42 Mr E Fielding

Code:

Policy: DP5 Object

Sustainability Appraisal?

MSDC will never be in a position to realise its proper potential or meet the needs of its residents and neighbouring authorities. This is even more shocking when history shows MSDC has been heavily reliant on windfall and small scale development of less than six units to make up MSDC's annual net building completions (reference MSDC Housing Land Supply – Completions <http://www.midsussex.gov.uk/8312.htm>) that MSDC are then happy to claim as evidence when justifying the Housing Land Supply (Mid Sussex District). This is a significant contribution towards annual target for new dwellings. To add insult to injury MSDC have not even calculated the potential additional source of new dwellings by opening up the correct capacity of the district to encompass all sites capable of delivering five or more units within their assessments. Page 17 paragraph 3.16: The draft district plan is not sound because any sites in the AONB require allocation through the relevant Neighbourhood Plan since they can only be used to meet local needs if a local need is identified and there are no other sites that can accommodate this need and so should be allocated by MSDC to make up a shortfall in housing.

Ref# **Comment#** **Respondent:**

16427 43 Mr E Fielding

Code:

Policy: DP5 Object

Sustainability Appraisal?

Page 16 paragraph 3.13 – The draft District plan is not sound because it does not meet its infrastructure requirement as set out in the West Sussex Structure Plan 2001-2016 which states that 680dpa is required. This number has never been met by MSDC and so MSDC is always in deficit against needs.

Ref# **Comment#** **Respondent:**

16478 1 Mr J Clayton

Code: 1i

Policy:

Sustainability Appraisal?

I am concerned and disappointed that public consultation on this Pre-Submission Draft does not, to me, appear to have been well advertised

Ref# **Comment#** **Respondent:**

16478 2 Mr J Clayton

Code: 3i

Policy:

Sustainability Appraisal?

Given that the public perceives large-scale housing developments have taken place over recent years, mostly without supporting infrastructure development, there is already an infrastructure deficit – sewerage, water supply, open space and sports/play provision. The plan recognises this but does not show how the current deficit will be addressed and funded

Ref# Comment# Respondent:

16478 3 Mr J Clayton

Code:

Policy: DP5 Object

Sustainability Appraisal?

The housing number commitment of 11,050 over 17 years is a big uplift on the 10,600 homes over 20 years proposed in the last plan submitted – (530p.a to 650p.a. - a 22.6% uplift). Also, I see the 3% p.a. economic growth aspiration contained in the last submitted plan has been deleted from this Pre-Submission document. Coupled with the above doubtful consultation and current infrastructure deficit, this housing uplift is a major concern

Ref# Comment# Respondent:

16478 4 Mr J Clayton

Code:

Policy: DP28 Object

Sustainability Appraisal?

The assessed housing needs of the District show a primary requirement for smaller homes to provide start-up accommodation for the young and downsizing possibilities for the elderly (see DP28 paragraph 2).

Ref# Comment# Respondent:

16478 5 Mr J Clayton

Code: 3c

Policy: Sustainability Appraisal?

Delivery of the committed housing numbers is largely reliant on plans for the Burgess Hill Kings Way and Northern Arc land allocations

Ref# Comment# Respondent:

16478 6 Mr J Clayton

Code: 1e

Policy: Sustainability Appraisal?

The Duty to Cooperate requirement has been properly addressed and should now be seen as NPPF compliant

Ref# Comment# Respondent:

16478 7 Mr J Clayton

Code: 3g

Policy: Sustainability Appraisal?

The anticipation that Neighbourhood Plans will have progressed to at least submission stage by autumn 2015 is almost certainly optimistic given the rate of progress over the past few years

Ref# Comment# Respondent:

16478 8 Mr J Clayton

Code: 1a

Policy: Sustainability Appraisal?

I'm supporting submission and adoption of the District Plan as I think the future of Mid-Sussex could be even worse without it

Ref# Comment# Respondent:

16478 9 Mr J Clayton

Code: 2b

Policy: Sustainability Appraisal?

Chapter 2 paragraph 2.8 mentions how well the District is connected but fails to mention the peak hours overcrowding of trains and the ever more noticeable pressure on rural roads.

Ref# Comment# Respondent:

16478 10 Mr J Clayton

Code: 2c

Policy: Sustainability Appraisal?

Most people in the community would say that the environmental objectives of the District Plan have not been recently met and will be continue to be sacrificed by this pre-submission plan – loss of BMV land to housing, ever closer coalescence and the Districts abandonment of defined strategic gaps, new build that clashes with the design and scale of existing properties, diminishing natural green infrastructure, built infrastructure under substantial pressure.

Ref# Comment# Respondent:

16478 11 Mr J Clayton

Code:

Policy: DP1 Neutral

Sustainability Appraisal?

Chapter 4 DP1 paragraph 2. Typo? "...circumstances in account"?

Ref# Comment# Respondent:

16478 12 Mr J Clayton

Code:

Policy: DP2 Object

Sustainability Appraisal?

Chapter 4 DP2 paragraph 5. "...278 new jobs per year being generated". Evidence?

Ref# Comment# Respondent:

16478 13 Mr J Clayton

Code:

Policy: DP7 Neutral

Sustainability Appraisal?

Chapter 4 DP7 paragraph 1. "...necessary community facilities". I have heard people express concern about the possible loss of The Martlets but have heard nothing about a replacement facility.

Ref# Comment# Respondent:

16478 14 Mr J Clayton

Code:

Policy: DP13 Object

Sustainability Appraisal?

Chapter 4 DP13 policy, bullets 1 & 2. The word "or" at the end of bullet 1 changed to "and" might help better protect the countryside landscape. Also, "...certain other full time rural workers" lacks definition.

Ref# Comment# Respondent:

16478 15 Mr J Clayton

Code:

Policy: DP22 Neutral

Sustainability Appraisal?

Chapter 4 Policy DP22. Any proposed loss or relocation of existing facilities will have implications on other areas of the Plan – travel, security, school timetables, sports provision, the health of future

Ref# Comment# Respondent:

16478 16 Mr J Clayton

Code:

Policy: DP24 Object

Sustainability Appraisal?

Chapter 4 Policy DP24 bullet 6. Noise and air quality implications should also be taken into account.

Ref# Comment# Respondent:

16478 17 Mr J Clayton

Code:

Policy: DP31 Object

Sustainability Appraisal?

Chapter 4 DP31 paragraph 2. "...an appropriate timescale" this wording will not satisfy travellers or potential house purchasers.

Ref# **Comment#** **Respondent:**

16478 18 Mr J Clayton

Code:

Policy: DP34 Object

Sustainability Appraisal?

Chapter 4 Policy DP34. The term "...adjacent to" is welcome but is likely to be challenged by developers

Ref# **Comment#** **Respondent:**

16478 19 Mr J Clayton

Code:

Policy: DP41 Object

Sustainability Appraisal?

"...development should seek to reduce the risk of flooding by achieving a reduction from existing run-off rates" – where is it specified how this achievement will be monitored for each development? What remedial action will be required from developers if / when failures occur?

Ref# **Comment#** **Respondent:**

16478 20 Mr J Clayton

Code:

Policy: DP42 Object

Sustainability Appraisal?

Chapter 4 Policy DP42. As worded, this policy doesn't seem to address the cumulative impact of multiple concurrent developments. How will this problem be addressed? How will the achievement of the consumption standard of 110 litres per person per day be measured and monitored? What will be the penalty on developers who fail to deliver?

Ref# **Comment#** **Respondent:**

16478 21 Mr J Clayton

Code: 1g

Policy:

Sustainability Appraisal?

Appendix A. Housing Trajectory. Too small to read and comprehend.
Appendix B. Many of the evidence-based documents are 9-10 years old! This won't go unnoticed.
Pre-Submission Sustainability Appraisal.
Paragraph 6.2. 15 District Plan Objectives not 14.

Ref# **Comment#** **Respondent:**

16478 22 Mr J Clayton

Code:

Policy: DP14 Object

Sustainability Appraisal?

The provision of SANG(S) will not guarantee mitigation of adverse impacts on the Ashdown Forest. People, once in their cars, will travel to the green space they prefer. The natural environment and scale of the Ashdown Forest will be a big attraction over any SANG.

Ref# **Comment#** **Respondent:**

20139 1 Mr D Blackman

Code:

Policy: DP7 Object

Sustainability Appraisal?

DP7 - I think greater priority should be given to walking and cycling infrastructure from Burgess Hill to Haywards Heath and to the South Downs. A Massive priority must be given to replacement of Martlets Hall with a cultural centre that is bigger and more flexible.

Ref# **Comment#** **Respondent:**

20139 2 Mr D Blackman

Code:

Policy: DP9 Neutral

Sustainability Appraisal?

DP9 - ensure the Beadlands open space is not compromised.

Ref# **Comment#** **Respondent:**

20139 3 Mr D Blackman

Code:

Policy: DP40 Object

Sustainability Appraisal?

Linked- DP40, DP25, DP39: Mid Sussex could make it a Living Space standard that ALL new building (Housing and Commercial) should have as much solar panelling as possible on roofs. This would really be an indication of intent about green infrastructure.

Ref# **Comment#** **Respondent:**

20139 4 Mr D Blackman

Code:

Policy: DP25 Object

Sustainability Appraisal?

Linked- DP40, DP25, DP39: Mid Sussex could make it a Living Space standard that ALL new building (Housing and Commercial) should have as much solar panelling as possible on roofs. This would really be an indication of intent about green infrastructure.

Ref# **Comment#** **Respondent:**

20139 5 Mr D Blackman

Code:

Policy: DP39 Object

Sustainability Appraisal?

Linked- DP40, DP25, DP39: Mid Sussex could make it a Living Space standard that ALL new building (Housing and Commercial) should have as much solar panelling as possible on roofs. This would really be an indication of intent about green infrastructure.

Ref# **Comment#** **Respondent:**

20193 1 Mr P Giles

Code: 1f

Policy:

Sustainability Appraisal?

There is nothing relating to land instability/assessment, which was covered by Mid Sussex Local Plan policy CS21, which stated:

Development of an area of known or suspected land instability will be permitted only where it can be demonstrated that the site can be developed and used safely without adding to the instability of the site or adjoining land. Any necessary stabilisation measures must be environmentally acceptable.

Ref# **Comment#** **Respondent:**

20193 2 Mr P Giles

Code:

Policy: DP24 Object

Sustainability Appraisal?

DP24 should be rephrased as follows:

does not cause significant harm to the amenities of existing nearby residents and future occupants of new dwellings, including taking account of the impact on noise and disturbance, privacy, overlooking, outlook, daylight and sunlight;

Ref# **Comment#** **Respondent:**

20193 3 Mr P Giles

Code:

Policy: DP29 Object

Sustainability Appraisal?

DP29 should replace the current text under 'The Council will seek:':

On housing developments of 4 or more dwellings, there will be a 30% 'affordable' homes content, for rent and assisted purchase schemes for local people and generally, not more than 25% of affordable homes being of shared ownership. On residential developments of less than 4 dwellings and in other circumstances where on-site provision is not practicable a commuted payment towards off-site provision will normally be required equivalent to providing 30% on-site affordable housing provision.

Ref# **Comment#** **Respondent:**

20193 4 Mr P Giles

Code:

Policy: DP27 Object

Sustainability Appraisal?

DP27 In addition to current light pollution paragraph:

There should be no adverse impact from car headlights shining into the windows of dwellings/ new development lighting encroaching on the enjoyment of current dwellings.

Ref# **Comment#** **Respondent:**

20240 1 Mr C Laband

Code: 1f

Policy:

Sustainability Appraisal?

I'd like to see MSDC adopt an open, more transparent approach to the planning approval process. Critically include a set of model standard conditions that mirror existing standards in parallel policies.

Ref# **Comment#** **Respondent:**

20254 1 Mr M Mayall

Code:

Policy: DP41 Neutral

Sustainability Appraisal?

Relevant to DP 41; These fields are required for flood attenuation to protect Lindfield and Haywards Heath from flooding

Ref# **Comment#** **Respondent:**

20254 2 Mr M Mayall

Code:

Policy: DP32 Neutral

Sustainability Appraisal?

The fields in question are the last remnants of a mediaeval assart field system which has most significant archaeological importance.

Fields are proximate to two extremely fine grade 2* listed buildings whose outlook and context would be spoiled by construction on these fields

Ref# **Comment#** **Respondent:**

20254 3 Mr M Mayall

Code:

Policy: DP10 Neutral

Sustainability Appraisal?

These fields are required for flood attenuation to protect Lindfield and Haywards Heath from flooding.

These fields are included in the Green Corridor

Ref# **Comment#** **Respondent:**

20254 4 Mr M Mayall

Code:

Policy: DP14 Neutral

Sustainability Appraisal?

The fields in question are the last remnants of a mediaeval assart field system which has most significant archaeological importance

Ref# **Comment#** **Respondent:**

20254 5 Mr M Mayall

Code:

Policy: DP11 Neutral

Sustainability Appraisal?

the fields should not be developed to prevent coalescence of existing developed areas

Ref# **Comment#** **Respondent:**

20254 6 Mr M Mayall

Code:

Policy: DP36 Neutral

Sustainability Appraisal?

the fields contain exceptionally diverse flora and fauna, woodland and hedgerows

Ref# **Comment#** **Respondent:**

20257 1 Mrs C Loewy

Code:

Policy: DP10 Support

Sustainability Appraisal?

DP10 - Protection& Enhancement of the Countryside. I wholly support this policy to prevent urban sprawl in a rural town. I particularly support the Green Corridor (the lungs of the town) which will not be allocated for development in the future.

Ref# **Comment#** **Respondent:**

20257 2 Mrs C Loewy

Code:

Policy: DP11 Support

Sustainability Appraisal?

DP11- Prevent Coalescence. I support this policy to protect the open rural character between towns&villages. Failure to do this will result in blocks of characterless housing estates merging settlements thereby losing their identity.

Ref# **Comment#** **Respondent:**

20257 3 Mrs C Loewy

Code:

Policy: DP14 Support

Sustainability Appraisal?

DP14 - Protect High Weald of Outstanding Natural Beauty. I support this policy and would like to see the addition of the 'High Weald Fringes' such as those that exist intact to the north of the town including intact medieval field landscape. I would support a special designation and conservation of this site to preserve and protect for future generations.

Ref# **Comment#** **Respondent:**

20257 4 Mrs C Loewy

Code:

Policy: DP32 Support

Sustainability Appraisal?

DP32 - Heritage. This policy has never been more important with developers displaying a total disregard for the heritage buildings in our town together with their settings. I strongly support the Heritage policy.

Ref# **Comment#** **Respondent:**

20257 5 Mrs C Loewy

Code:

Policy: DP36 Support

Sustainability Appraisal?

DP36 - Trees, Woodland & Hedgerows : The fields surrounding our town contain and support exceptional biodiversity. Special regard and protection must be afforded to ancient woodland and hedgerows.

Ref# **Comment#** **Respondent:**

20257 6 Mrs C Loewy

Code:

Policy: DP41 Neutral

Sustainability Appraisal?

DP41 - Flooding. "Land that is considered to be required for current flood management will be safeguarded from development". I propose that Birchen Fields and the adjoining fields north of Wickham Way be retained for flood attenuation for the special and unique qualities and protection from downstream flooding they provide. They should be safeguarded from development.

Ref# **Comment#** **Respondent:**

20258 1 Mrs A Heath

Code: 1a

Policy:

Sustainability Appraisal?

I would like to register that this plan has been well prepared and thought through so that it represents the needs of Mid Sussex as a whole as well as local residents.

Ref# **Comment#** **Respondent:**

20258 2 Mrs A Heath

Code:

Policy: DP10 Support

Sustainability Appraisal?

1. a desire to retain the character of the area which is acknowledge to be rich in character 2. a need for more green spaces and a great provision for sport

Ref# **Comment#** **Respondent:**

20258 3 Mrs A Heath

Code:

Policy: DP11 Support

Sustainability Appraisal?

3. a need to prevent coalescence which will destroy the nature of many villages and the economic vitality that they provide

Ref# **Comment#** **Respondent:**

20258 4 Mrs A Heath

Code:

Policy: DP36 Support

Sustainability Appraisal?

4. the need and desire by residents to retain wildlife corridors to we can have a healthy and enjoyable lifestyle

Ref# **Comment#** **Respondent:**

20259 1 Mr M Turner

Code:

Policy: DP10 Support

Sustainability Appraisal?

Protection & Enhancement of the Countryside (DP10): It is vital that our locally elected representatives can identify in advance those areas where it is sensible to allow housing development and to protect those areas where it would be wrong to develop. As regards my own town of Haywards Heath, I strongly support the intent to maintain a northern Green Corridor around the town.

Ref# **Comment#** **Respondent:**

20259 2 Mr M Turner

Code:

Policy: DP11 Support

Sustainability Appraisal?

Prevent Coalescence (DP11): I support the intent to protect the rural nature of the existing gaps between housing settlements. Losing the gaps risks, among other things, destroying the character of our separate communities.

Ref# **Comment#** **Respondent:**

20259 3 Mr M Turner

Code:

Policy: DP32 Support

Sustainability Appraisal?

Heritage (DP32): Where we have buildings and fields of genuine antiquity, then these must be protected from development. For example the land adjacent to the listed buildings known as Sunte House and Wickham Farm in Haywards Heath must be protected in his way

Ref# **Comment#** **Respondent:**

20259 4 Mr M Turner

Code:

Policy: DP36 Support

Sustainability Appraisal?

Trees, Woodland & Hedgerows (DP36): Undeveloped land containing exceptional biodiversity re flora, fauna, woodland and hedgerows should not be disturbed

Ref# **Comment#** **Respondent:**

20259 5 Mr M Turner

Code:

Policy: DP41 Support

Sustainability Appraisal?

Flooding (DP41): Parts of Haywards Heath and Lindfield have ben subject to flooding in the past (including the quite recent past), and it is vital we do not develop any fields which currently mitigate the risk of future flooding by serving as natural soakaways.

Ref# **Comment#** **Respondent:**
20260 1 Mrs H Billings Code: 1i Policy: Sustainability Appraisal?
I seriously question how "normal" folk are supposed to comment on a plan that is communicated so poorly to the general public. If MSDC seriously wanted residents comments they would facilitate this in a manner that encouraged comment - for this reason I consider MSDC do not want to know what residents think and that they make the entire process so complicated they get no thoughts of their constituents and can ride roughshod over their villages.

Ref# **Comment#** **Respondent:**
20261 1 Mr R McDowell Code: Policy: DP10 Support Sustainability Appraisal?
I would like to support the District plan and in particular Policy DP10

Ref# **Comment#** **Respondent:**
20261 2 Mr R McDowell Code: Policy: DP41 Support Sustainability Appraisal?
I would like to support the District plan and in particular Policies DP41

Ref# **Comment#** **Respondent:**
20261 3 Mr R McDowell Code: Policy: DP32 Support Sustainability Appraisal?
I would like to support the District plan and in particular Policies DP32

Ref# **Comment#** **Respondent:**
20261 4 Mr R McDowell Code: Policy: DP14 Support Sustainability Appraisal?
I would like to support the District plan and in particular Policies DP14

Ref# **Comment#** **Respondent:**
20261 5 Mr R McDowell Code: Policy: DP10 Support Sustainability Appraisal?
I would like to support the District plan and in particular Policies DP10

Ref# **Comment#** **Respondent:**
20261 6 Mr R McDowell Code: Policy: DP11 Support Sustainability Appraisal?
I would like to support the District plan and in particular Policies DP11

Ref# **Comment#** **Respondent:**
20261 7 Mr R McDowell Code: Policy: DP36 Support Sustainability Appraisal?
I would like to support the District plan and in particular Policies DP36

Ref# **Comment#** **Respondent:**

20262 1 C & L O'Grady

Code: 1a

Policy:

Sustainability Appraisal?

We support your local plan. The plans for Burgess Hill will help support the housing need in Mid Sussex.

Ref# **Comment#** **Respondent:**

20269 1 Mr J Stone

Code: 1a

Policy:

Sustainability Appraisal?

I congratulate the MSDC Council Planners on a well thought out and constructed Plan as this is an extremely difficult and delicate task whereby not everyone's interests and opinions can be satisfied.

Ref# **Comment#** **Respondent:**

20269 2 Mr J Stone

Code:

Policy: DP10 Support

Sustainability Appraisal?

DP10 & DP11 - Protection and Enhancement of the Countryside and Preventing Coalescence. This will be so important as pressure builds on greenfield sites. We applaud the concepts of a Green Corridor to the North of Haywards Heath and although, sadly, Penland Farm fields are regrettably to be lost, the those of Wickham and Birchen Fields are included in the Green Corridor.

Ref# **Comment#** **Respondent:**

20269 3 Mr J Stone

Code:

Policy: DP11 Support

Sustainability Appraisal?

DP10 & DP11 - Protection and Enhancement of the Countryside and Preventing Coalescence. This will be so important as pressure builds on greenfield sites. We applaud the concepts of a Green Corridor to the North of Haywards Heath and although, sadly, Penland Farm fields are regrettably to be lost, the those of Wickham and Birchen Fields are included in the Green Corridor.

Ref# **Comment#** **Respondent:**

20269 4 Mr J Stone

Code:

Policy: DP8 Object

Sustainability Appraisal?

very careful protection needs to be addressed when DP8 Kings Way and DP9 north and north-west of Burgess Hill are cleared for development. This could easily become an urban sprawl and undermine the efforts to prevent coalescence of the two towns. The roads access to these areas are currently wanting south of the Haywards Heath ring road and the planned large scale development would put a huge burden on the existing road network.

Ref# **Comment#** **Respondent:**

20269 5 Mr J Stone

Code:

Policy: DP9 Object

Sustainability Appraisal?

very careful protection needs to be addressed when DP8 Kings Way and DP9 north and north-west of Burgess Hill are cleared for development. This could easily become an urban sprawl and undermine the efforts to prevent coalescence of the two towns. The roads access to these areas are currently wanting south of the Haywards Heath ring road and the planned large scale development would put a huge burden on the existing road network.

Ref# **Comment#** **Respondent:**

20269 6 Mr J Stone

Code:

Policy: DP19 Support

Sustainability Appraisal?

Happily, DP19 attempts to recognise these constraints. Read comment 4 & 5.

Ref# Comment# Respondent:20269 7 Mr J Stone Code: Policy: DP20 Support Sustainability Appraisal?

DP20, DP32, DP33, DP36, DP37, DP38 and DP41 - acknowledge the importance of protecting what beautiful Wealden landscapes we are entrusted to protect for future generations. Pressure by greedy developers should be resisted at all costs as once the land has gone, it cannot be reclaimed.

Ref# Comment# Respondent:20269 8 Mr J Stone Code: Policy: DP32 Support Sustainability Appraisal?

DP20, DP32, DP33, DP36, DP37, DP38 and DP41 - acknowledge the importance of protecting what beautiful Wealden landscapes we are entrusted to protect for future generations. Pressure by greedy developers should be resisted at all costs as once the land has gone, it cannot be reclaimed.

Ref# Comment# Respondent:20269 9 Mr J Stone Code: Policy: DP33 Support Sustainability Appraisal?

DP20, DP32, DP33, DP36, DP37, DP38 and DP41 - acknowledge the importance of protecting what beautiful Wealden landscapes we are entrusted to protect for future generations. Pressure by greedy developers should be resisted at all costs as once the land has gone, it cannot be reclaimed.

Ref# Comment# Respondent:20269 10 Mr J Stone Code: Policy: DP36 Support Sustainability Appraisal?

DP20, DP32, DP33, DP36, DP37, DP38 and DP41 - acknowledge the importance of protecting what beautiful Wealden landscapes we are entrusted to protect for future generations. Pressure by greedy developers should be resisted at all costs as once the land has gone, it cannot be reclaimed.

Ref# Comment# Respondent:20269 11 Mr J Stone Code: Policy: DP37 Support Sustainability Appraisal?

DP20, DP32, DP33, DP36, DP37, DP38 and DP41 - acknowledge the importance of protecting what beautiful Wealden landscapes we are entrusted to protect for future generations. Pressure by greedy developers should be resisted at all costs as once the land has gone, it cannot be reclaimed.

Ref# Comment# Respondent:20269 12 Mr J Stone Code: Policy: DP38 Support Sustainability Appraisal?

DP20, DP32, DP33, DP36, DP37, DP38 and DP41 - acknowledge the importance of protecting what beautiful Wealden landscapes we are entrusted to protect for future generations. Pressure by greedy developers should be resisted at all costs as once the land has gone, it cannot be reclaimed.

Ref# Comment# Respondent:20269 13 Mr J Stone Code: Policy: DP41 Support Sustainability Appraisal?

DP20, DP32, DP33, DP36, DP37, DP38 and DP41 - acknowledge the importance of protecting what beautiful Wealden landscapes we are entrusted to protect for future generations. Pressure by greedy developers should be resisted at all costs as once the land has gone, it cannot be reclaimed.

Ref# **Comment#** **Respondent:**

20269 14 Mr J Stone

Code:

Policy: DP41 Neutral

Sustainability Appraisal?

Finally, DP41 - Flood Risk and Drainage - appears to recognise the increasing effects that new built areas have upon the drainage and how past events of heavy rain have caused flooding in older developments previously unaffected by flooding. This problem is particularly important where the West Common Stream in Haywards Heath and Lindfield has to be severely managed to prevent further flooding downstream. SUDS appear to offer a solution, but who pays for their upkeep and security - very dangerous places where there are children, and it has to be managed in perpetuity.

Ref# **Comment#** **Respondent:**

20270 2 Mr D Edwards

Code:

Policy: DP5 Object

Sustainability Appraisal?

The proposal that windfall development shall be encouraged along with the use of brownfield sites for building purposes; only when all such areas have been utilised should consideration be given to building on greenfield sites. Naturally, developers would not agree; the ease and returns of large-scale building on a greenfield site are very attractive.

Ref# **Comment#** **Respondent:**

20270 3 Mr D Edwards

Code: 3i

Policy:

Sustainability Appraisal?

Extra housing puts strain on the local infrastructure and amenities, the schools, doctors' surgeries, roads etc., all of which are under our control – adequate supplies of water are not. DP42 makes it clear that there is a shortage of water in the area, so whatever the external constraints to meet housing targets, this shortage will play a role of paramount importance in deciding future developments.

Ref# **Comment#** **Respondent:**

20270 4 Mr D Edwards

Code:

Policy: DP13 Support

Sustainability Appraisal?

It is most encouraging to see the affordable housing provisions contained in DP13 and DP30 which will go some way to meet a crying need.

Ref# **Comment#** **Respondent:**

20270 5 Mr D Edwards

Code:

Policy: DP30 Support

Sustainability Appraisal?

It is most encouraging to see the affordable housing provisions contained in DP13 and DP30 which will go some way to meet a crying need.

Ref# **Comment#** **Respondent:**

20270 6 Mr D Edwards

Code:

Policy: DP11 Support

Sustainability Appraisal?

Coalescence has occurred already in many areas, but DP11 gives hope for the future as do the contents of DP10, 14,27 and 32 which should do much to protect us from the impact of urban sprawl and erosion of the countryside.

Ref# **Comment#** **Respondent:**

20270 7 Mr D Edwards

Code:

Policy: DP36 Support

Sustainability Appraisal?

All building, especially on greenfield sites has an adverse effect on the flora and fauna, but DP36 and 37 promise to mitigate these effects; a most desirable state of affairs.

Ref# **Comment#** **Respondent:**

20270 8 Mr D Edwards

Code:

Policy: DP37 Support

Sustainability Appraisal?

All building, especially on greenfield sites has an adverse effect on the flora and fauna, but DP36 and 37 promise to mitigate these effects; a most desirable state of affairs.

Ref# **Comment#** **Respondent:**

20270 9 Mr D Edwards

Code:

Policy: DP19 Support

Sustainability Appraisal?

Too many applications are made to develop sites which would lead to huge increases in the use of the car: DP19 offers a balanced approach to the problem.

Ref# **Comment#** **Respondent:**

20279 1 Mr T Rook

Code:

Policy: DP6 Object

Sustainability Appraisal?

Policy describes a development hierarchy based primarily on the size of the settlements rather than detailed consideration of the each location. It merely lumps together the 3 largest towns as Category 1, Categories 2 to 5 are on progressively smaller settlements. No explanation of why this approach should be used is provided in the Plan.

The Plan should consider the merits of each location and not just categories by size. Each location should be categorised by consideration of its merits using some kind of points system. There should not be a simple categorisation by size.

There are many locations presently in Category 2 that more suitable for development than areas in Category 1

The town of East Grinstead has poor road connections and already has saturation in the local roads. It should be in a lower category than Burgess Hill, Haywards Heath and several smaller locations.

Ref# **Comment#** **Respondent:**

20282 1 Mr A Farquhar

Code:

Policy: DP5 Object

Sustainability Appraisal?

The evidence of population increases and employment demands set out in the plan demonstrate a demand of 800 homes per annum, not 650 as set out in the plan.

Ref# **Comment#** **Respondent:**

20282 2 Mr A Farquhar

Code: 3c

Policy: Object

Sustainability Appraisal?

Plan relies heavily on the release of land at Burgess Hill to fill its housing strategy when the deliverability of the infrastructure and in particular the road system is not known, There appears to be no assessment of any other place as an alternative.

Ref# **Comment#** **Respondent:**

20282 3 Mr A Farquhar

Code: 1e

Policy: Object

Sustainability Appraisal?

The plan is not consistent with NPPF Para 14 as it fails to meet the needs of the area and its neighbouring authorities.

Ref# **Comment#** **Respondent:**

20282 4 Mr A Farquhar

Code: 3l

Policy: Object

Sustainability Appraisal?

In Para 3.17, it is acknowledged that Gatwick may expand with a second runway i.e. in 4 years time. The plan should be able to be flexible to deal with such a situation.

Ref# **Comment#** **Respondent:**

20282 5 Mr A Farquhar

Code: 1g

Policy: Object

Sustainability Appraisal?

Figure 4 refers to land around Bolney as DP9 and figure 5 as DP10. Needs to be clarified as to whether its subject to DP9, DP10 or both.

Ref# **Comment#** **Respondent:**

20282 6 Mr A Farquhar

Code: 3g

Policy: Object

Sustainability Appraisal?

Neighbourhood Plans are on hold until final outcome of housing numbers known. Villages such as Bolney situated on two strategic roads (A23/A272) have capacity to take houses. Such villages have lost shops due to little or no housing over past 20 years. Limited development on the fringes of village over time will support services and provide local building employment. Not recognised in plan which is reliant on Burgess Hill that will take years to deliver due to infrastructure shortages and constraints. Small sites around villages can be delivered far more quickly and assist sustainability of a village.

Ref# **Comment#** **Respondent:**

20282 7 Mr A Farquhar

Code:

Policy: DP5 Object

Sustainability Appraisal?

A Site Allocations DPD should be part of the Local Plan to demonstrate the deliverability and soundness of the Plan for the next twenty years. Letting villages decide numbers and no Site Allocations DPD seems back to front and not sound practice.

Ref# **Comment#** **Respondent:**

20288 1 Mr K Walker

Code:

Policy: DP27

Sustainability Appraisal?

Policy review should be undertaken over noise pollution in Mid Sussex. There are strict guidelines for contractors and building developers but my request is specifically the activity of bottling out at bars and restaurants and deliveries to pubs, bars and restaurants in the area. There should be new regulation regarding the times that this can take place. These activities are a permanent daily noise that local residents have to live with for which there is little or no regulation unlike building contractors who are strictly regulated for the life of the development which is generally short.

I am sure that Mid Sussex receive many complaints of this kind and perhaps an adoption of this kind would save many hours and thus reduce costs to our community.

Ref# **Comment#** **Respondent:**

20294 1 Mr R Crease

Code:

Policy: DP41 Object

Sustainability Appraisal?

Policy DP41 of the Plan is unsound only to the extent that it is ineffective by failing to specify that Sustainable Drainage Systems should be maintained and managed for their lifetime by public or statutory bodies. The maintenance and management of such systems by small, private residents' associations, established by developers, does not reduce the risk of flooding arising from failings in those activities to a level that is as low as is reasonably practicable. Under present arrangements, such small entities would be unable adequately to recompense neighbouring property owners for any damage arising from such failings. Policy DP41 of the Plan is unsound with respect to national policy by virtue of national policy itself being ineffective adequately to address the point made in the previous paragraph.
(Views formed after consideration of a submission dated 23 December 2014, made to MSDC by Southern Water in respect of planning application reference 14/04475/OUT).

I consider that national policy should be that Sustainable Drainage Systems should be adopted by appropriate public or statutory bodies (such as drainage undertakings or the Environment Agency) in consideration of initial financial contributions to be made by developers and continuing contributions by the developers' successors in land ownership. I consider that policy DP41 of the Plan should reflect that national policy.
I suggest that the sentence in policy DP41 that states:
"Arrangements for the long term maintenance and management of SuDS should also be identified."
should be replaced by:
"SuDS shall be implemented only if appropriate public or statutory bodies have agreed to adopt them."

Ref# **Comment#** **Respondent:**

20297 1 Mr F Giles

Code: 1f

Policy: Sustainability Appraisal?

There is nothing relating to land instability/assessment, which was covered by Mid Sussex Local Plan policy CS21, which stated:
Development of an area of known or suspected land instability will be permitted only where it can be demonstrated that the site can be developed and used safely without adding to the instability of the site or adjoining land. Any necessary stabilisation measures must be environmentally acceptable.
New policy (equivalent to CS21) which states:
Development of an area of known or suspected land instability will be permitted only where it can be demonstrated that the site can be developed and used safely without adding to the instability of the site or adjoining land. Any necessary stabilisation measures must be environmentally acceptable.

Ref# **Comment#** **Respondent:**

20297 2 Mr F Giles

Code:

Policy: DP24 Object

Sustainability Appraisal?

DP24 seems to be a direct replacement for B3 (from the Mid Sussex Local Plan), but is missing key points such as: overlooking, in addition to noise & disturbance. DP24 should have the following paragraph rephrased as follows, to incorporate key elements of B3 (which DP24 is replacing):
does not cause significant harm to the amenities of existing nearby residents and future occupants of new dwellings, including taking account of the impact on noise and disturbance, privacy, overlooking, outlook, daylight and sunlight.

Ref# **Comment#** **Respondent:**

20297 3 Mr F Giles

Code:

Policy: DP29 Object

Sustainability Appraisal?

DP29 does not supply a realistic affordable housing stipulation (as these are the most requested property types), and affordable housing should be advocated on housing developments of 4 or more dwellings DP29 should replace the current text under 'The Council will seek: On housing developments of 4 or more dwellings, there will be a 30% 'affordable' homes content, for rent and assisted purchase schemes for local people and generally, not more than 25% of affordable homes being of shared ownership. On residential developments of less than 4 dwellings and in other circumstances where on-site provision is not practicable a commuted payment towards off-site provision will normally be required equivalent to providing 30% on-site affordable housing provision.

Ref# **Comment#** **Respondent:**

20297 4 Mr F Giles

Code:

Policy: DP27 Object

Sustainability Appraisal?

DP27 should incorporate potential light pollution from headlights (mainly with regard to new dwellings sited on higher ground)
DP27 In addition to current light pollution paragraph:
There should be no adverse impact from car headlights shining into the windows of dwellings/ new lighting encroaching on the enjoyment of current dwellings.

Ref# **Comment#** **Respondent:**

20304 1 Mrs M Day

Code: 1h

Policy:

Sustainability Appraisal?

Para 3:11Total capacity of sites by settlement states "Lindfield including Lindfield Rural" as 200 units in category 2. The District's OAN of 656 dpa (11,152 in total over the plan period) for "Lindfield including Lindfield Rural" shows an indication of future need for Lindfield as 478 and Lindfield Rural as 204 (682 units rather than 656) which jointly clearly exceeds the sustainability figure of 200. Part of Lindfield Rural is Walstead, classified as category 5 with zero capacity for settlement. It should be noted that Scamps Hill falls within Walstead, so the inclusion of 150 units in the site ID6 in the table for 'Sites not currently in the planning process' (SHLAA) at Scamps Hill contradicts Walstead being classified a category 5 settlement.

Ref# **Comment#** **Respondent:**

20313 1 Mr G Mackley

Code:

Policy: DP10 Support

Sustainability Appraisal?

One element of the plan is that it will identify areas where we are content to see housing development and those where we are not. In order to prevent urban sprawl, the plan includes a Green Corridor around the town. Importantly, Birchen Fields is an area subject to a planning application to which I strongly object and is included within this Green Corridor, which is not allocated for development.

Ref# **Comment#** **Respondent:**

20313 2 Mr G Mackley

Code:

Policy: DP41 Neutral

Sustainability Appraisal?

"Land that is considered to be required for current flood management will be safeguarded from development"

The fields under threat should be kept free of development for flood attenuation. Lindfield and parts of Haywards heath are subject to flooding and Birchen fields are an important part of our protection

Ref# **Comment#** **Respondent:**

20313 3 Mr G Mackley

Code:

Policy: DP32 Neutral

Sustainability Appraisal?

The fields in question are the last remnants of a mediaeval assart field system. This is highly regarded by archaeologists. The Sunken Lane is also of great archaeological significance.

The area of Birchen fields contains two exceptionally fine grade 2* listed buildings whose setting and outlook would be irrevocably destroyed by development

Ref# **Comment#** **Respondent:**

20313 4 Mr G Mackley

Code:

Policy: DP14 Neutral

Sustainability Appraisal?

The fields in question are the last remnants of a mediaeval assart field system. This is highly regarded by archaeologists. The Sunken Lane is also of great archaeological significance.

Ref# **Comment#** **Respondent:**

20313 5 Mr G Mackley

Code:

Policy: DP10 Neutral

Sustainability Appraisal?

The fields in question are the last remnants of a mediaeval assart field system. This is highly regarded by archaeologists. The Sunken Lane is also of great archaeological significance.

Ref# **Comment#** **Respondent:**

20313 6 Mr G Mackley

Code: 3i

Policy:

Sustainability Appraisal?

As you are already aware the road access to this area is very poor. Congestion is already severe, and there has been a recent fatality on one of the main feeder routes. It is illogical to build road improvements in the south of the town and then to develop the north. The infrastructure, including schools and doctors surgeries, are full in the north of the town and excessive development would necessitate new residents crossing town to reach available facilities.

Ref# **Comment#** **Respondent:**

20314 1 Mrs J Mackley

Code:

Policy: DP10 Support

Sustainability Appraisal?

One element of the plan is that it will identify areas where we are content to see housing development and those where we are not. In order to prevent urban sprawl, the plan includes a Green Corridor around the town. Importantly, Birchen Fields is an area subject to a planning application to which I strongly object and is included within this Green Corridor, which is not allocated for development.

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Code:

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20314 5 Mrs J Mackley

Code:

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Sustainability Appraisal?

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Code: 3i

Policy:

Sustainability Appraisal?

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Ref# **Comment#** **Respondent:**

20324 1 Mr J Collings

Code:

Policy: DP5 Support

Sustainability Appraisal?

I recognise the need for additional housing in the area, and support the development around Burgess Hill, as it is the newest town in the District and with the least "character".

Ref# **Comment#** **Respondent:**

20324 2 Mr J Collings

Code:

Policy: DP6 Support

Sustainability Appraisal?

I agree with the hierarchy proposed. It is important that villages do not get swamped with developments.

Ref# **Comment#** **Respondent:**

20324 3 Mr J Collings

Code:

Policy: DP10 Support

Sustainability Appraisal?

It is important to prevent urban sprawl, and I am pleased to see the plan includes a Green Corridor around Haywards Heath. I note that importantly, Birchen Fields is included within this Green Corridor, which is not allocated for development.

Ref# Comment# Respondent:

20324 4 Mr J Collings

Code:

Policy: DP41 Support

Sustainability Appraisal?

I agree that it is important that land required for current flood management will be safeguarded from development. Lindfield and parts of Haywards heath are subject to flooding and Birchen fields are an important part of our protection

Ref# Comment# Respondent:

20324 5 Mr J Collings

Code:

Policy: DP32 Neutral

Sustainability Appraisal?

The Birchen fields on the North side of Haywards Heath are the last remnants of a mediaeval assart field system. This is highly regarded by archaeologists. The Sunken Lane is also of great archaeological significance. These features should be protected

Ref# Comment# Respondent:

20324 6 Mr J Collings

Code:

Policy: DP14 Neutral

Sustainability Appraisal?

The Birchen fields on the North side of Haywards Heath are the last remnants of a mediaeval assart field system. This is highly regarded by archaeologists. The Sunken Lane is also of great archaeological significance. These features should be protected

Ref# Comment# Respondent:

20324 7 Mr J Collings

Code:

Policy: DP10 Neutral

Sustainability Appraisal?

The Birchen fields on the North side of Haywards Heath are the last remnants of a mediaeval assart field system. This is highly regarded by archaeologists. The Sunken Lane is also of great archaeological significance. These features should be protected

Ref# Comment# Respondent:

20324 8 Mr J Collings

Code:

Policy: DP32 Neutral

Sustainability Appraisal?

The area of Birchen fields contains two exceptionally fine grade 2* listed buildings whose setting and outlook would be irrevocably destroyed by development currently proposed. This is unnecessary given the housing provision included in the draft Haywards heath neighbourhood plan and the District Plan

Ref# Comment# Respondent:

20324 9 Mr J Collings

Code:

Policy: DP11 Support

Sustainability Appraisal?

It is vitally important that policy to protect the open rural character of undeveloped gaps between settlements is maintained as proposed. It would ruin mid-Sussex if towns and villages were allowed to sprawl and the green spaces between them were lost.

Ref# Comment# Respondent:

20324 10 Mr J Collings

Code:

Policy: DP36 Support

Sustainability Appraisal?

I am please to see this included in the Plan. There are pockets of exceptional ancient woodland (Bedelands nature reserve and areas to the North side of Haywards heath. A number of these fields (including Birchen field) contain exceptional biodiversity in terms of flora and fauna, woodland and hedgerows

Ref# **Comment#** **Respondent:**

20331 1 Mr P Bishop

Code:

Policy: DP11 Support

Sustainability Appraisal?

Look at the draft plan and support the proposals to maintain the green corridor around each town and village to stop coalescence.

Ref# **Comment#** **Respondent:**

20331 2 Mr P Bishop

Code:

Policy: DP10 Support

Sustainability Appraisal?

Also supportive of not allowing development on prime agricultural land. Think ban on development should also be extended to lower grades of greenfield space. Reason being quite often prime arable land is not accessible to the public because of crops growing on it. Lower grade land is usually more accessible and therefore used by dog walkers, and non dog walkers. Lower grade land is therefore to all intents and purposes a public amenity and the council's stated aim is to enhance public amenities, not diminish them.

Ref# **Comment#** **Respondent:**

20331 3 Mr P Bishop

Code: 3i

Policy:

Sustainability Appraisal?

Did not see in the draft plan any firm proposals for new schools or doctor's surgeries to cope with the expected population growth of how to staff them, especially as there is a shortage of doctors and teachers. May have been something in plan that touched on these points but did not notice much space covering them. Did not seem much in the proposals as to how to manage all the extra traffic that would ensue from extra house building, a subject of some importance given most local roads are little more than country lanes.

Ref# **Comment#** **Respondent:**

20331 4 Mr P Bishop

Code:

Policy: DP29 Neutral

Sustainability Appraisal?

Where consent is given a much greater proportion should be affordable. The Council should also make it clear that affordable should mean that which is obtainable by ordinary shop workers, office workers and people on the front line keeping our public services running. The developers may not like this but the last thing we need around here are more four and five bedroom 'executive' houses.

Ref# **Comment#** **Respondent:**

20332 1 Ms J Hill

Code: 1f

Policy:

Sustainability Appraisal?

I'd like to see MSDC adopt an open, more transparent approach to the planning approval process. Critically include a set of model standard conditions that mirror existing standards in parallel policies.

I believe our Mid Sussex District Plan Objectives should always consider the amenity interests of residents foremost, and moreover that MSDC should include standard ongoing "noisy" activity conditions to restrict/limit noise pollutions at the preapproval stage, and attached as a standard policy requirement. Applicants would be free to ask for variations, however there would be a strong expectation that very good supporting reasons would be needed to allow variations.

Adoption of this policy with the Mid Sussex District Plan would save vital officer time, relieve residents from the ongoing concerns that commercial planning applications raise, and critically reduce the time taken at committee as residents would have less reason to submit objections. This inbuilt protective support mechanism for residents would improve the transparency and openness of the process and ultimately save time and critically reduce planning costs which further burden the public purse

Ref# **Comment#** **Respondent:**

20335

1

Mr G Kalu

Code: 1f

Policy:

Sustainability Appraisal?

I'd like to see MSDC adopt an open, more transparent approach to the planning approval process. Critically include a set of model standard conditions that mirror existing standards in parallel policies.

I believe our Mid Sussex District Plan Objectives should always consider the amenity interests of residents foremost, and moreover that MSDC should include standard ongoing "noisy" activity conditions to restrict/limit noise pollutions at the preapproval stage, and attached as a standard policy requirement. Applicants would be free to ask for variations, however there would be a strong expectation that very good supporting reasons would be needed to allow variations.

Adoption of this policy with the Mid Sussex District Plan would save vital officer time, relieve residents from the ongoing concerns that commercial planning applications raise, and critically reduce the time taken at committee as residents would have less reason to submit objections. This inbuilt protective support mechanism for residents would improve the transparency and openness of the process and ultimately save time and critically reduce planning costs which further burden the public purse.

Ref# **Comment#** **Respondent:**

20338

1

Rt Hon N Herbert MP

Code: 1a

Policy:

Sustainability Appraisal?

Support the District Plan and its evidence base.

Based on experience and detailed knowledge of the District and the feedback of constituents, the Plan achieves the right balance between deliverable levels of housing and employment land and protecting the special environmental characteristics of the District.

The Plan has been positively developed with neighbouring authorities and with active support for Neighbourhood Planning which has enabled a wider group of Mid Sussex residents to become directly involved in the Plan making process.

Submission District Plan 2015 - Consultation Responses: Organisations

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
56	1	Ms S Mamoany	Ardingly Parish Council	
Code:	1a	Policy		Sustainability Appraisal? <input type="checkbox"/>

Ardingly Parish Council welcomes the publication of the pre-submission District Plan and supporting documents and supports the District Plan and all the policies detailed within the Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
58	1	Mrs R Robertson	Balcombe Parish Council	
Code:	1a	Policy		Sustainability Appraisal? <input type="checkbox"/>

Balcombe Parish Council supports the Mid Sussex District Plan. We believe its policies will guide positive development in the area until 2031.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
58	2	Mrs R Robertson	Balcombe Parish Council	
Code:		Policy DP6	Object	Sustainability Appraisal? <input type="checkbox"/>

Many villages have areas suitable for development within the village boundary yet separated from the current built up area. The intervening land might be a grave yard, a sloping site or amenity land. The potential development land might nevertheless be very suitable for development in terms of sustainability and position. DP6 in its current form excludes these sites from consideration, and could result in less sustainable sites being favoured for development.

Balcombe has one potential site opposite the church that is entirely suitable for development: near the village centre, existing footways and transport links. It won much support in our consultation but cannot be included in our plan because it fails the DP6 criteria. We feel this is a mistake and that DP6 lacks flexibility in this respect.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
58	3	Mrs R Robertson	Balcombe Parish Council	
Code:		Policy DP12	Object	Sustainability Appraisal? <input type="checkbox"/>

We feel that the first paragraph is in inappropriately dismissive of agriculture. Agriculture may account for only 5% of our economy, but it accounts for 80% of the land in the district. (We include forests in this figure.) Farming puts its stamp on our landscape, and ensures much of its beauty. People who move to Sussex and set up businesses here are drawn to the county partly by the beauty of the countryside. Without agriculture and forestry, the 'Gatwick Diamond' area would be far less attractive for small businesses.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
58	4	Mrs R Robertson	Balcombe Parish Council	
Code:		Policy DP16	Neutral	Sustainability Appraisal? <input type="checkbox"/>

We assume that areas of land surrounding the South Downs National Park are defined in the Integrated Landscape Character Assessment 2011. If not they require definition.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
58	5	Mrs R Robertson	Balcombe Parish Council	
Code:		Policy DP26 Object	Sustainability Appraisal? <input type="checkbox"/>	

We consider a level of just 5% for 'wheelchair-user dwelling standards' to be very low. We would prefer at least 10%. How does this accord with the provisions of the Disability Discrimination Act?

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
58	6	Mrs R Robertson	Balcombe Parish Council	
Code:		Policy DP32 Object	Sustainability Appraisal? <input type="checkbox"/>	

Whose responsibility it is to demonstrate 'thorough understanding of the significance of the listed building and its setting'? This is not clear. We assume that it is the applicant's responsibility. Should the first bullet point mirror the wording of the final bullet point, indicating responsible party?

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
59	1	Mrs D Thomas	Bolney Parish Council	
Code:	1a	Policy	Sustainability Appraisal? <input type="checkbox"/>	

Bolney Parish Council supports MSDC's draft district plan. It builds on both the made and emerging Neighbourhood plans as well as supports close local working.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
60	1	Mr S Cridland	Burgess Hill Town Council	
Code:	1a	Policy	Sustainability Appraisal? <input type="checkbox"/>	

Council supported the District Council's approach to the District Plan and the resubmission District Plan document.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
61	1	Mrs A Jones	Cuckfield Parish Council	
Code:	1a	Policy	Sustainability Appraisal? <input type="checkbox"/>	

Cuckfield Parish Council welcomes the District Plan reaching its pre-submission stage and recognises the improvements to the latest version. We understand from our own experience the hard work involved in plan making and the importance of consultation with the community leading to the full Examination, having successfully worked with you to achieve conformity for our 'made' Cuckfield Neighbourhood Plan.

We fully support the strategic objectives of the Plan and the District Council in its efforts to achieve adoption as quickly as possible.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
61	2	Mrs A Jones	Cuckfield Parish Council	
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP6	<input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?

The Parish Council is concerned about the effect that the DP6 policy will now have on Neighbourhood Plans within the District. Mid Sussex District Council's stated strategy, in accordance with the National Planning Policy Framework of a 'bottom-up' led approach, gives local communities the ability to "...shape and direct sustainable development in their area".

The Parish Council believe this has the effect of watering-down the influence of Neighbourhood Plans from previous versions of the draft District Plan, by allowing any Development Plan Document to be used by developers as justification for further nonstrategic housing location, even if not in accordance with local wishes in respective Neighbourhood Plans. We would therefore wish to see the wording amended to:
 "The site is allocated in the District Plan or Subsequent Development Plan Document and a Neighbourhood Plan where made; and"

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
61	3	Mrs A Jones	Cuckfield Parish Council	
Code:	1h <input type="checkbox"/> Policy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Sustainability Appraisal?

Two non-strategic greenfield sites, significant in Cuckfield, have now been identified as 'developable' in the latest version of the District Plan SHLAA. The Cuckfield Neighbourhood Plan Parish Housing Land Availability Assessment (PHLAA) identifies sites N2/3 and E1/2 (SHLAA sites 89 and 479) as 'not-developable', as did previous versions of the SHLAA. We have experienced at first hand the significance and impact that this appraisal document can have in planning deliberations. The Parish Council therefore worked closely with Mid Sussex District Council on this matter as we have been very keen to ensure conformity and avoidance of uncertainties in site status.

Unfortunately, the recent alterations to the two sites in the latest SHLAA, have been made seemingly with little reference to the detailed landscape and other sustainability assessments completed and examined for the Neighbourhood Plan.

In order to re-affirm its findings ahead of this response, the Parish Council sought renewed advice from our Planning Consultant, Tony Fullwood BA(Hons), DipUD, DMS, MRTPI, who formed part of our original Neighbourhood Plan team. His report is attached to this submission and recommends some minor wording amendments to the SHLAA, which the Parish Council concur with.

We recognise the consultation between the Parish Council and Mid Sussex District Council on this matter during the publication period.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
61	4	Mrs A Jones	Cuckfield Parish Council	
Code:	1g <input type="checkbox"/> Policy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Sustainability Appraisal?

3. Absence of Neighbourhood Plan Rural Policies

We note that although Neighbourhood Plan Urban policies are included within the policy maps, Neighbourhood Plan Rural policies do not appear and recommend these should be included.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
62	1	Mrs E Bennett	Ansty and Staplefield Parish Council	
Code:	1c	Policy		Sustainability Appraisal? <input type="checkbox"/>

1. Numerical discrepancies

Page 19 para 3.27 of the plan refers to the Northern Arc as producing 3980 homes, but elsewhere in the plan the figure of 3500 is used.

page 20 what is the definition of "locality" and "normally" ? The impact of the Northern Arc is likely to extend well beyond the development itself.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
62	2	Mrs E Bennett	Ansty and Staplefield Parish Council	
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

Ansty is shown as having a church which it no longer has and Staplefield has a pavilion which is not listed.(Table 6 Settlement Services of the Mid Sussex Settlement Sustainability Review)

Page 33 - Staplefield is listed as a "small village with limited services often only serving the settlement itself". The village has St Marks School, Brantridge School, 2 churches, a village hall and a pavilion which are often used by people from outside the village. Is this the correct category for Staplefield?

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
62	3	Mrs E Bennett	Ansty and Staplefield Parish Council	
Code:	1g	Policy		Sustainability Appraisal? <input type="checkbox"/>

The map for Ansty and Staplefield does not show the full extent of the parish - some of the Northern Arc area is missing.

There is no inset map for Staplefield or Brook Street.

P41 of plan shows the built up area boundary for Burgess Hill extending into our Parish. A boundary change has not occurred and the bulk of the Northern Arc is still within the parish of Ansty and Staplefield.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
62	4	Mrs E Bennett	Ansty and Staplefield Parish Council	
Code:		Policy	DP31 Neutral	Sustainability Appraisal? <input type="checkbox"/>

page 68 Is there still a traveller site at Highfields, near Warninglid? We thought that it had become residential.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
62	5	Mrs E Bennett	Ansty and Staplefield Parish Council	
Code:		Policy DP9 Neutral	Sustainability Appraisal? <input type="checkbox"/>	
page 40 - will the affordable housing provision be at a minimum of 30				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
62	6	Mrs E Bennett	Ansty and Staplefield Parish Council	
Code:	1h	Policy	Sustainability Appraisal? <input type="checkbox"/>	
The infrastructure plan does not include the most recent information passed by us to MSDC.				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
63	1	Ms J Holden	East Grinstead Town Council	
Code:	1a	Policy	Sustainability Appraisal? <input type="checkbox"/>	
The Town Council believes that a District Plan is necessary for developing the growth, while protecting heritage and environmental assets. A new adopted primary Local Plan to supersede the existing 2004 Local Plan is long overdue and must now come to fruition.				
We thank you once again for the opportunity to comment further, on what we believe is now a fit for purpose plan which East Grinstead Town Council is keen to see adopted through the examination process.				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
63	2	Ms J Holden	East Grinstead Town Council	
Code:		Policy DP15 Support	Sustainability Appraisal? <input type="checkbox"/>	
The identification of the Strategic SANGS within East Grinstead is welcome from a regional standpoint and East Grinstead Town Council needs to be closely involved with its ongoing management through the proposed Steering Group, in order to prove the positive impact of a SANGS and alleviate local resident concerns as to its' relationship with the placement of housing in the whole District and beyond.				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
63	3	Ms J Holden	East Grinstead Town Council	
Code:		Policy DP6 Neutral	Sustainability Appraisal? <input type="checkbox"/>	
East Grinstead is committed to its share of the delivery of the new future housing as laid out within the Settlements Sustainability Strategy, however it will be critical for the District Council to ensure that all other Parishes similarly 'buy in' to this delivery mechanism. The Tier 1 settlements have their own challenges which cannot be disregarded if other parishes fail to plan appropriately.				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
63	4	Ms J Holden	East Grinstead Town Council	
Code:	3c	Policy		Sustainability Appraisal? <input type="checkbox"/>

In similar vein, the District Plans housing delivery strategy is strongly reliant upon the Burgess Hill development of over four thousand houses and it will therefore be critical to ensure that this is seen as sustainable and deliverable to ensure that the strategic growth is in areas where the complementary infrastructure and support is already under discussion.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
63	5	Ms J Holden	East Grinstead Town Council	
Code:	3i	Policy		Sustainability Appraisal? <input type="checkbox"/>

A significant concern in East Grinstead, remains the serious shortfall in Infrastructure provision compared with its demands. This is particularly well documented in our transport deficits, highlighted within the Atkins and Jubb Transport Reports. As you are aware, these constraints have necessitated a modest future housing growth number for our Town. We consider it vital now moving forward, that the District Plan makes an absolute priority to produce (in partnership with WSCC and the LEP) an implementable and deliverable Infrastructure Delivery Plan both for the short, medium and long term.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
65	1	Miss L Baker	Hassocks Parish Council	
Code:	1j	Policy		Sustainability Appraisal? <input type="checkbox"/>

There are a number of policies which were saved from previous plans and had hereto been included in earlier draft District Plans but will no longer be included in this draft. We will take steps to include them in our Neighbourhood Plan, particularly.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
65	2	Miss L Baker	Hassocks Parish Council	
Code:		Policy	DP10 Object	Sustainability Appraisal? <input type="checkbox"/>

We have some concerns viz DP10, DP11 & DP12 and feel that these policies are rather watered down on their predecessors from the Mid Sussex Local Plan 2004 policies C1, C2 and C3; whilst we will seek to bring forward more robust policies in our Neighbourhood Plan we believe you should revisit the suggested new policies.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
65	3	Miss L Baker	Hassocks Parish Council	
Code:		Policy	DP11 Object	Sustainability Appraisal? <input type="checkbox"/>

We have some concerns viz DP10, DP11 & DP12 and feel that these policies are rather watered down on their predecessors from the Mid Sussex Local Plan 2004 policies C1, C2 and C3; whilst we will seek to bring forward more robust policies in our Neighbourhood Plan we believe you should revisit the suggested new policies.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
65	4	Miss L Baker	Hassocks Parish Council	
Code:		Policy DP12	Object	Sustainability Appraisal? <input type="checkbox"/>

We have some concerns viz DP10, DP11 & DP12 and feel that these policies are rather watered down on their predecessors from the Mid Sussex Local Plan 2004 policies C1, C2 and C3; whilst we will seek to bring forward more robust policies in our Neighbourhood Plan we believe you should revisit the suggested new policies.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
65	5	Miss L Baker	Hassocks Parish Council	
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

in the revised HEDNA issued in June 2015 the mathematical share of the District assessed need for Hassocks is 630 of a total for the District of 11,152. However 3.16 of the Draft Plan says the number of dwellings required is 11,050.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
65	6	Miss L Baker	Hassocks Parish Council	
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP5 discusses these numbers further and it is self-evident that the HEDNA numbers are unhelpful and arguably misrepresentative of what is needed in each Parish of the District if the Plan target for Parishes is 1515 dwellings. All of this creates a vacuum of confusion and renders it difficult for Neighbourhood Plan's to effectively plan for housing need as a proportion of District need.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
65	7	Miss L Baker	Hassocks Parish Council	
Code:	3g	Policy		Sustainability Appraisal? <input type="checkbox"/>

The District Plan indicates a reliance on evidence that will be collated as part of Neighbourhood Plan preparation, as such it is incumbent on the District Council to commit the necessary resources to enable (for example) Parishes to undertake an assessment of the need of housing type in its area. We strongly feel that the District has not provided sufficient support in this area. Perhaps policies could be phrased, for e.g. To set the type of housing need, unless a Neighbourhood Plan requires otherwise. That would mean there is a robust policy in place that can nonetheless be over-ridden by a Neighbourhood Plan if appropriate.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
65	8	Miss L Baker	Hassocks Parish Council	
Code:		Policy DP27	Object	Sustainability Appraisal? <input type="checkbox"/>

We are very concerned by the lack of strength or integrity in DP27 particularly with regard to air pollution. We believe that this policy should be strengthened considerably so that any development must deliver an improvement to the underlying and future air quality and that they must go beyond the minimum requirements of any Air Quality Management Plan. It is not acceptable that a development should have any negative impact on air quality. We refer you again to the Appeal decision in APP/D3830/A/14/2226987 Land at London Road, Hassocks

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
66	1	Mr S Trice	Haywards Heath Town Council	
Code:	1a	Policy		Sustainability Appraisal? <input type="checkbox"/>

Haywards Heath Town Council commented on the District Plan at its Planning meeting date the 27th July 2015.

'Members were supportive of the District Plan as there is need to the get the Plan adopted at the earliest opportunity so to stop unwanted development in Mid Sussex.'

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
68	1	Mr S Hoyles	Hurstpierpoint & Sayers Common Parish Council	
Code:	1a	Policy		Sustainability Appraisal? <input type="checkbox"/>

1. We support the Vision and Objectives, the Overall Strategy, and the Policies of the Plan, and note that our own Neighbourhood Plan, PARISH 2013, which is now 'made', is consistent in supporting these policies where they are relevant to our Parish.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
68	2	Mr S Hoyles	Hurstpierpoint & Sayers Common Parish Council	
Code:		Policy	DP27 Neutral	Sustainability Appraisal? <input type="checkbox"/>

Our Neighbourhood Plan, with the strong support of our residents at the referendum, makes provision for part of the 'Northern Arc' strategic development situated north and northwest of Burgess Hill, and confirms our support for this strategy in meeting a substantial part of the District's housing needs. Some of the land allocations are only indicative in the District Plan and the Parish Council confirms its understanding that it will be included in the detailed development planning of the 'Northern Arc', including appropriate representation on any development or advisory board that oversees the development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
68	3	Mr S Hoyles	Hurstpierpoint & Sayers Common Parish Council	
Code:		Policy	DP2 Neutral	Sustainability Appraisal? <input type="checkbox"/>

We note the District Plan policy which provides for consideration of a science and technology park, which is indicated as being wholly within our Parish. We acknowledge that this proposal might bring notable benefits to the Parish, as well as making a major contribution to high value economic development across a wider area, but it is essential that the safeguards listed in Policy DP2 are closely followed. We therefore would welcome close dialogue with MSDC as this matter is explored. Accordingly the Parish Council offers to establish a A2300 Science Park Memorandum of Understanding with MSDC, to define key areas to be investigated and addressed before the Parish Council confirms its support.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
69	1	Mrs C Irwin	Lindfield Parish Council	
Code:	1a	Policy		Sustainability Appraisal? <input type="checkbox"/>

1. LPC is broadly very supportive of the pre-submission District Plan and in particular is pleased to see that it includes policies that reflect the submitted Lindfield and Lindfield Rural Neighbourhood Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
69	2	Mrs C Irwin	Lindfield Parish Council	
Code:		Policy DP6	Object	Sustainability Appraisal? <input type="checkbox"/>

It is not clear whether this means a site allocated in the District Plan, or a Neighbourhood Plan – or does it mean the District Plan and a Neighbourhood plan, i.e. what is the position if a site is in the District Plan, but not a Neighbourhood Plan. Also the word “supported” may carry more weight than intended. The word “considered” is preferable.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
69	3	Mrs C Irwin	Lindfield Parish Council	
Code:		Policy DP10	Object	Sustainability Appraisal? <input type="checkbox"/>

There is a natural conflict to some extent, with Policy DP6, in that any expansion of a settlement in a predominately rural area such as this Parish (at least to the north and east), is bound to encroach into the countryside.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
69	4	Mrs C Irwin	Lindfield Parish Council	
Code:		Policy DP11	Object	Sustainability Appraisal? <input type="checkbox"/>

Comment: As has been said in previous consultation responses, this is an important consideration for Lindfield and Lindfield rural. There is a concern that the strategic gap between Lindfield and the hamlet of Walstead is already being incrementally eroded contrary to the intentions behind this policy (and existing Local Plan policy). Indeed, there appears to be a suggestion in some quarters that because the gap had already been significantly eroded, it doesn’t really matter anymore. In LPC’s view quite the reverse is true. Therefore, any revisions to the 2008 small sites allocations development plan, in terms of the strategic gap set out in that document particularly as it relates to the Gravelly lane site, should be fully respected.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
69	5	Mrs C Irwin	Lindfield Parish Council	
Code:	3i	Policy		Sustainability Appraisal? <input type="checkbox"/>

This is an issue that LPC fully identifies with in preparing its Neighbourhood Plan. In particular it highlighted the recent considerable expansion of the two Lindfield Primary Schools (it is thought due to the recent large scale housing developments in both Lindfield Parishes), the Lindfield Medical Centre being fully subscribed and the difficulty for residents in obtaining NHS Dentistry services. There also are concerns about both fresh and foul water provision for new developments. We would like to see measures with the Plan to address current infrastructure issues, and to prevent new developments making them worse in the future.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
69	6	Mrs C Irwin	Lindfield Parish Council	
Code:		Policy DP19	Neutral	Sustainability Appraisal? <input type="checkbox"/>

LPC has been receiving considerable correspondence about traffic issues within Lindfield recently and we have recently written to West Sussex Highways about the problems caused to our village and others in Mid Sussex by heavy lorry movements along unsuitable roads. Many of these seem to have had their routings diverted through Mid Sussex by action taken by East Sussex to prevent environmental damage to the Ashdown Forest by such lorries. This is a problem that the District Plan should seek to address along with other transport issues.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
69	7	Mrs C Irwin	Lindfield Parish Council	
Code:		Policy DP18 Object	Sustainability Appraisal? <input type="checkbox"/>	

Comment: The delivery of infrastructure needs to be a key consideration in planning decisions. LPC is concerned that the infrastructure demands of ever more development are simply not being met at the present time, and all too often, developers can seek to avoid the issue by simply "throwing" money at the problem, either through s.106 contributions currently, or CIL in the future. These funds are simply not translating into adequate facilities, such as schools and medical centres. Of course, it also has to be recognised that the provision of off-site infrastructure will in itself create its own land take pressures.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
69	8	Mrs C Irwin	Lindfield Parish Council	
Code:		Policy DP28 Neutral	Sustainability Appraisal? <input type="checkbox"/>	

The overall message LPC received from its communities during the preparation of the Neighbourhood Plan, was a need for small scale developments, within the built up area if possible, that consisted mainly of small 1 or 2 bed properties suitable for local first time buyers or current residents wishing to down side but not leave their village. Is there anything in the Plan that might seek to encourage such developments in order to meet this clear local need?

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
70	1	Mrs D Morgan	Lindfield Rural Parish Council	
Code:	1a	Policy	Sustainability Appraisal? <input type="checkbox"/>	

This Council is also supportive of the pre-submission District Plan and welcomes the opportunity to comment. Policies included reflect the views contained in our submitted Neighbourhood Plan and LRPC agrees that the comments made also apply to the areas covered by this Parish.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
74	1	Miss S McLean	Slaugham Parish Council	
Code:	1a	Policy	Sustainability Appraisal? <input type="checkbox"/>	

Detailed reading of the Draft District Plan shows it to be an excellent document and one on which we can base our future strategy

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
74	2	Miss S McLean	Slaugham Parish Council	
Code:		Policy DP5 Neutral	Sustainability Appraisal? <input type="checkbox"/>	

There are one or two specific issues requiring attention. Policy DP5 Housing page 31 para.2 line 4 quotes a housing number of 5301 yet the arithmetic and conclusions clearly indicate that the figure should be 5015.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
74	3	Miss S McLean	Slaugham Parish Council	
Code:		Policy	Object	Sustainability Appraisal? <input type="checkbox"/>
		DP6		

Regarding settlements, Pease Pottage is scheduled as Category 3 whilst we contend that it should be Category 4 since it has no school and it's shops number a florist and a motorway service station.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
74	4	Miss S McLean	Slaugham Parish Council	
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

Finally, we have studied the Housing figures in some detail and agree with the strategy. The recently released HEDNA of June 2015 gives a figure for Slaugham Parish of 220 during the period 2014/31 which is in line with our own thoughts.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
74	5	Miss S McLean	Slaugham Parish Council	
Code:	3g	Policy		Sustainability Appraisal? <input type="checkbox"/>

The decision to allow town and village specific policies to come forward through Neighbourhood Plans is welcome, and we are very grateful for the encouragement and practical support that MSDC has provided in preparing Slaugham's NHP

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
74	6	Miss S McLean	Slaugham Parish Council	
Code:	1f	Policy		Sustainability Appraisal? <input type="checkbox"/>

To avoid villages whose NHPs have not been completed by the time the District Plan is adopted being open to unintended, unwanted development, could MSDC have a policy whereby the specific village-related provisions of the 2004 Local Plan will continue to apply until the NHPs covering those villages have been adopted?

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
74	7	Miss S McLean	Slaugham Parish Council	
Code:		Policy	Object	Sustainability Appraisal? <input type="checkbox"/>
		DP6		

Pease Pottage has been included as a Category 3 settlement ("medium sized villages providing essential services for the needs of their own residents.....can include key services such as primary schools, shops, recreational and community activities"). It has a (limited and expensive) convenience stores at the Services, no school, no recreational or community facilities (yet!) and so could be considered more appropriately a Category 4 village.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
74	8	Miss S McLean	Slaugham Parish Council	
Code:		Policy DP30 Object	Sustainability Appraisal? <input type="checkbox"/>	

DDP Policy DP30, Rural Exception sites. Rural exception sites are allowed only where the proposal is 100% affordable housing. As we are aware from looking at St Martin Close, where Parishes own land which could provide affordable housing for local people (via a CLT or otherwise), in order to be able to finance the project, a small number of market houses may be necessary. Could some alteration be made to the policy to reflect this fact, possible restricted to developments by town / parish councils?

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
74	9	Miss S McLean	Slaugham Parish Council	
Code:		Policy DP39 Object	Sustainability Appraisal? <input type="checkbox"/>	

DDP Policy DP39 Sustainable design and construction. Any encouragement to improve energy efficiency and sustainable approaches to water and other scarce resources in the design of new houses are welcome. In view of the fact that Cardiff University announced today details of a house which produces more electricity than it consumes, and can be built for the same price as an affordable home at the moment, should the targets set by MSDC be more ambitious in these respects?

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
75	1	Mrs C Marsh	Turners Hill Parish Council	
Code:	1a	Policy	Sustainability Appraisal? <input type="checkbox"/>	

We write in support of the Submission District Plan and hope that the Examination progresses well.

We are pleased with the collaborative work between ourselves and the District Council and with the 'bottom-up' approach the District Council has taken. This has allowed us to produce a plan which will provide for the needs of our Parish and which will be strongly supported by the District Plan.

Allowing the Parishes to allocate development sites should ensure that the needs of the District are provided for whilst the local housing need is catered for successfully.

Things of importance to us, like protecting the rural environment, the conservation areas, infrastructure and sustainability, are secured via the District Plan."

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
77	1	Mrs H Schofield	West Hoathly Parish Council	
Code:	3g	Policy	Sustainability Appraisal? <input type="checkbox"/>	

West Hoathly Parish Council would like to highlight the fact that their Neighbourhood Plan (now made by Mid Sussex) used a bottom-up approach to identify a housing need for 55 houses which have been incorporated into their Neighbourhood Plan. Due to this and the fact that the parish is wholly within the High Weald AONB the Parish Council would not expect the parish to be required to provide more dwellings than this for the time period of the District Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
82	1	Planning Policy	Adur and Worthing Councils	
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

Adur District Council, Worthing Borough Council and Mid Sussex District Council have been working together through a number of mechanisms to meet the requirements of the Duty to Co-operate and address cross-boundary matters. This long standing commitment has been summarised with a Memorandum of Understanding (July 2015) which I have attached for ease of reference.

Likely to result in unmet employment needs and a significant shortfall in housing delivery when related to the Objectively Assessed Housing Need for the areas. As a consequence, Adur and Worthing Councils will continue to work with all local authorities within the sub region to assess whether any of this need could be met within other Districts / Boroughs. In this regard, whilst discussions will continue with Mid Sussex District Council it is accepted the sustainability assessment of the Mid Sussex Local Plan advises that any supply in excess of local need is most likely be absorbed by Crawley and Brighton & Hove, which have the strongest economic and functional links with Mid Sussex.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
84	1	Ms K Banks	Arun District Council	
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

Although Arun District Council is not a neighbouring authority, it is satisfied that it has been kept up to date about the preparation of the District Plan, including the further work relating to housing that has been undertaken by Mid Sussex District Council.

The Council also acknowledges and supports reference within the Plan, particularly at paragraph 3.38 to Duty to Cooperate, specifically the Coastal West Sussex and Greater Brighton Strategic Planning Board, of which Arun District Council is a part and Mid Sussex District Council joined in October 2014.

As part of meeting the Duty to Cooperate requirements, a Memorandum of Understanding has been prepared between the two authorities which relates to the preparation of local development plans in the two local planning authority areas with the overall aim to ensure appropriate planning for the cross-boundary strategic planning issues that exist and/or are likely to arise in the foreseeable future between the two authorities.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
84	2	Ms K Banks	Arun District Council	
Code:	1a	Policy		Sustainability Appraisal? <input type="checkbox"/>

Overall, Arun District Council is happy to support the District Plan and would be pleased to continue to cooperate proactively and in partnership with your Council as both Local Plans progress towards adoption.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
87	1	Mr M Randall	Brighton and Hove City Council	
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

2. The City Council recognises the significant progress that has been made by Mid Sussex District Council regarding the Duty to Co-operate in the preparation of its District Plan. This includes membership of the Coastal West Sussex and Greater Brighton Strategic Planning Board, the City Deal bid and the Greater Brighton Economic Board.

3. A recent example of effective joint working has been the preparation of the Greater Brighton & Coastal West Sussex Background Papers regarding Economy, Housing and Transport across the Greater Brighton City Region and Coastal West Sussex areas (to be published July 2015). These papers recognise that long term sustainable growth across the Greater Brighton and wider Coastal West Sussex area will depend upon addressing key strategic issues in an integrated and deliverable way. This work will help inform the Strategic Planning Board / Greater Brighton Economic Board's update of the Local Strategic Statement, define priorities to support funding bids as well as supporting Local Plan preparation.

7. In terms of Duty to Cooperate, the further proposed modifications indicate that we will be seeking a commitment from neighbouring authorities to continue to look at longer term opportunities for housing. This includes seeking a commitment from neighbouring authorities to participate in further sub-regional work such as building upon the Local Strategic Statement for the Coastal West Sussex and Greater Brighton Area and the sub-regional work of the Greater Brighton Economic Board. This will allow long-term opportunities to be explored for meeting unmet housing needs and the identification of delivery mechanisms including local plan reviews.

8. The City Council welcomes the clear statement made at paragraph 3.38 (Duty to Co-Operate, Overall Strategy) of the Plan that joint working will need to continue in order to address the very significant challenges for the wider area in meeting housing and other development needs. There are, however, a number of areas where we believe you may wish to acknowledge strategic challenges and further clarify and strengthen your commitment to future effective joint working between the local authorities in the wider area. The suggested areas are set out below.

16. With respect to housing delivery, the City Council welcomes the opportunity to continue and develop duty to cooperate discussions to explore long-term opportunities to meet unmet housing needs.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
87	2	Mr M Randall	Brighton and Hove City Council	
Code:	1c	Policy		Sustainability Appraisal? <input type="checkbox"/>

The ongoing cooperation between local authorities in the area has been positive and effective during the preparation of this Plan, as evidenced in the Council's 'Duty to Cooperate Statement'. These relationships and joint working practices will need to continue to be effective and constructive on an ongoing basis to address the very significant challenges for the wider area in delivering housing and other development needs. especially If a second runway at Gatwick is recommended by the Airports Commission and supported by Government, this will present a further significant challenge for the wider area. The main mechanisms for this cooperation will be the Gatwick Diamond Initiative, and the Coastal West Sussex and Greater Brighton Strategic Planning Board and the Greater Brighton Economic Board. The outcomes

from these discussions and any underpinning technical work will be taken into account in and progressed through Local Plan reviews. Mid Sussex District Council is fully committed to continuing to work positively and proactively with partners to plan strategically for the wider area in the longer term. This will include exploring long term opportunities to work together with others to meet the notable unmet housing needs across the wider area. Should further housing capacity be identified over and above that required to meet the District's OAN, priority will be afforded to assisting in meeting the unmet housing needs of Brighton & Hove in the south of the District and those of Crawley in the north.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
87	3	Mr M Randall	Brighton and Hove City Council	
Code:		Policy DP5 Neutral	Sustainability Appraisal? <input type="checkbox"/>	

We note that the Mid Sussex revised OAN figure has increased to 656 dwellings per annum (from 623 dwellings per annum as at February 2015) which takes account of CLG 2012 Household Projections) and that the housing provision target for the Plan period to 2031 in Policy DP5 is 11,050 dwellings across plan period (650 units per annum).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
87	4	Mr M Randall	Brighton and Hove City Council	
Code:	1h	Policy	Sustainability Appraisal? <input type="checkbox"/>	

11. In terms of the evidence base supporting the Plan's housing provision we note the publication of the June 2014 Capacity Study and the Sustainability Appraisal of Cross Boundary Options which considers whether any of the neighbouring authorities' unmet housing needs could be met within Mid Sussex. These studies were shared with us at draft stage. They are key studies in determining Mid Sussex's overall capacity for housing and identifying broad locations where additional capacity is further tested through the Mid Sussex SHLAA.

12. We support, in principle, the broad approach taken in the preparation of these evidence studies. We particularly welcome the clear acknowledgement of the strong functional economic relationships that exist in the south of the District between Mid Sussex and Brighton & Hove. This is particularly the case in terms of travel to work areas, commuting patterns and the wider housing market area. These functional relationships underpin the need to continue to work together on a sub-regional basis regarding critical cross-boundary issues such as housing and employment.

15. Given that there are significant unmet housing needs across the Greater Brighton and Coastal West Sussex areas, it is critical that Mid Sussex's evidence base is rigorous and robust. This is especially important in terms of adopting a 'positive stance' to new housing development in accordance with national policy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
87	5	Mr M Randall	Brighton and Hove City Council	
Code:		Policy DP25 Support	Sustainability Appraisal? <input type="checkbox"/>	

17. The City Council is supportive of the MSDP with respect to housing policies DP25, DP26 regarding dwelling space standards and accessibility standards, DP28 with regard to housing mix and DP28 which seeks to secure 30% affordable housing on appropriate sites.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
87	6	Mr M Randall	Brighton and Hove City Council	
Code:		Policy DP26 Support	Sustainability Appraisal? <input type="checkbox"/>	

17. The City Council is supportive of the MSDP with respect to housing policies DP25, DP26 regarding dwelling space standards and accessibility standards, DP28 with regard to housing mix and DP28 which seeks to secure 30% affordable housing on appropriate sites.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
87	7	Mr M Randall	Brighton and Hove City Council	
Code:		Policy DP28 Support	Sustainability Appraisal? <input type="checkbox"/>	

17. The City Council is supportive of the MSDP with respect to housing policies DP25, DP26 regarding dwelling space standards and accessibility standards, DP28 with regard to housing mix and DP28 which seeks to secure 30% affordable housing on appropriate sites.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
87	8	Mr M Randall	Brighton and Hove City Council	
Code:		Policy DP2 Support	Sustainability Appraisal? <input type="checkbox"/>	

19. Given the extent of unmet employment land needs from neighbouring local authorities in the Gatwick Diamond and wider Coast to Capital LEP area including from Brighton and Hove the development of strategic employment sites in Mid Sussex as outlined in DP2 Sustainable Economic Development is welcomed as it will provide opportunities for employment growth to be more evenly spread across the sub-regional economy

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
87	9	Mr M Randall	Brighton and Hove City Council	
Code:	1h	Policy	Sustainability Appraisal? <input type="checkbox"/>	

11. In terms of the evidence base supporting the Plan's housing provision we note the publication of the June 2014 Capacity Study and the Sustainability Appraisal of Cross Boundary Options which considers whether any of the neighbouring authorities' unmet housing needs could be met within Mid Sussex. These studies were shared with us at draft stage. They are key studies in determining Mid Sussex's overall capacity for housing and identifying broad locations where additional capacity is further tested through the Mid Sussex SHLAA.

12. We support, in principle, the broad approach taken in the preparation of these evidence studies. We particularly welcome the clear acknowledgement of the strong functional economic relationships that exist in the south of the District between Mid Sussex and Brighton & Hove. This is particularly the case in terms of travel to work areas, commuting patterns and the wider housing market area. These functional relationships underpin the need to continue to work together on a sub-regional basis regarding critical cross-boundary issues such as housing and employment.

15. Given that there are significant unmet housing needs across the Greater Brighton and Coastal West Sussex areas, it is critical that Mid Sussex's evidence base is rigorous and robust. This is especially important in terms of adopting a 'positive stance' to new housing development in accordance with national policy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
87	10	Mr M Randall	Brighton and Hove City Council	
Code:	1h	Policy		
Sustainability Appraisal? <input type="checkbox"/>				

11. In terms of the evidence base supporting the Plan's housing provision we note the publication of the June 2014 Capacity Study and the Sustainability Appraisal of Cross Boundary Options which considers whether any of the neighbouring authorities' unmet housing needs could be met within Mid Sussex. These studies were shared with us at draft stage. They are key studies in determining Mid Sussex's overall capacity for housing and identifying broad locations where additional capacity is further tested through the Mid Sussex SHLAA.

12. We support, in principle, the broad approach taken in the preparation of these evidence studies. We particularly welcome the clear acknowledgement of the strong functional economic relationships that exist in the south of the District between Mid Sussex and Brighton & Hove. This is particularly the case in terms of travel to work areas, commuting patterns and the wider housing market area. These functional relationships underpin the need to continue to work together on a sub-regional basis regarding critical cross-boundary issues such as housing and employment.

15. Given that there are significant unmet housing needs across the Greater Brighton and Coastal West Sussex areas, it is critical that Mid Sussex's evidence base is rigorous and robust. This is especially important in terms of adopting a 'positive stance' to new housing development in accordance with national policy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
87	11	Mr M Randall	Brighton and Hove City Council	
Code:		Policy	DP5	Support
Sustainability Appraisal? <input type="checkbox"/>				

We also welcome the priority afforded to meeting unmet housing needs of Brighton & Hove in the south of the District should further housing capacity / supply be identified over and above that needed to meet the District's OAN (see Housing Provision Paper paragraphs 4.125 – 4.130).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
99	1	Ms E Brigden	Crawley Borough Council	
Code:	1a	Policy		
Sustainability Appraisal? <input type="checkbox"/>				

Crawley Borough Council confirms that it considers the Mid Sussex District Plan to be both legally compliant and 'sound' in relation to meeting the Duty to Cooperate.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
99	2	Ms E Brigden	Crawley Borough Council	
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

Joint working across the two local authority areas through the Gatwick Diamond Initiative pre-dates its formalisation and the statutory duty to cooperate imposed by the Localism Act 2011. Critically, this representation has been prepared in the context of:

- Continual joint working on cross-boundary matters as neighbouring authorities;
 - The commissioning of joint strategic evidence, in conjunction with Horsham District Council as part of the Northern West Sussex Authorities;
 - The ongoing joint working as part of the Gatwick Diamond, including the adoption of the Gatwick Diamond Memorandum of Understanding and Local Strategic Statement.
- This representation is made on the basis of the signed joint position statement between Crawley Borough Council, Horsham District Council and Mid Sussex District Council (March 2015) and the understanding that an updated position will be agreed to incorporate the newly published household projections for Mid Sussex District.

Crawley Borough Council welcomes the positive references throughout the Pre-Submission Draft District Plan in relation to the wider economic context within which the Plan has been prepared, and the confirmation that the Plan has been informed by the discussions the District Council has had with neighbouring authorities regarding needs and planning issues of cross-boundary importance (paragraph 1.5).

Crawley acknowledges the positive joint working that has been carried out during the preparation of the Mid Sussex District Plan across the Gatwick Diamond and, locally, across the NWS HMA. In March 2015, as part of the Crawley Borough Local Plan examination, an updated Position Statement was signed by the three northern West Sussex Authorities. This set out the combined housing need figures for the three main administrative areas within the NWS HMA, as they were known at that time, alongside the combined intended housing supply figure from each authority's most up-to-date published document. The NWS Position Statement is currently in the process of being updated further, to include the most recent figures established within the three emerging Local Plans. This is now showing the objectively assessed housing needs of the HMA cannot be met within the NWS HMA. This must also be considered within the context of the known and anticipated levels of unmet needs emerging from the wider surrounding area, including Coastal West Sussex (including Brighton and Hove and Lewes); East Sussex; East Surrey; and London.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
99	3	Ms E Brigden	Crawley Borough Council	
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

A number of strategic evidence base documents have been prepared to support the preparation of the individual authorities' Local Plans; these were jointly commissioned by Crawley Borough Council, Horsham District Council and Mid Sussex District Council, and include:

- Joint Northern West Sussex Strategic Housing Market Assessment (2009, 2012 and 2014) GVA/Chilmark Consulting
- Joint Northern West Sussex Housing Land Availability Assessment – strategic sites (prepared jointly 'in-house')
- Joint Northern West Sussex Economic Growth Assessment (2014) NLP
- New Market Town Study (2010) GL Hearn
- At Crawley Study (2009) GL Hearn
- Joint Northern West Sussex Economic Appraisal and Employment Land Review (2009 and 2010) GL Hearn

The outcomes of the housing and employment studies form the basis for the NWS Position Statement. Crawley Borough Council is pleased to note the joint evidence base undertaken across northern West Sussex has influenced the strategy and policies in the Plan (paragraph 3.10).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
99	4	Ms E Brigden	Crawley Borough Council	
Code:		Policy DP2 Support	Sustainability Appraisal? <input type="checkbox"/>	

Crawley Borough Council welcomes reference in the text preceding Mid Sussex District Plan Policy DP2 to the joint economic evidence base and ongoing joint working between Crawley, Horsham and Mid Sussex, and the recognition of the extent of unmet employment land needs from neighbouring local authorities in the Gatwick Diamond. It is implied that the allocation of 30ha employment land at Burgess Hill, together with further floorspace at the Science Park, will help address unmet employment land needs from surrounding areas. However, it should be noted that the joint EGA 2014, para 9.59, cautions that should it not be possible to meet future needs in Crawley, this would not necessarily translate into a commensurate increase in land requirements for adjoining authorities. More broadly, EGA 2014, para. 9.60, outlines that such a scenario would represent a shift in the sub-region's commercial property market away from Crawley.

It is, therefore, considered that further work should be undertaken to establish how the Science Park proposal in DP2 fits with the objectives for the economy of the Gatwick Diamond, and identifies how it will impact on other key employment locations, such as Manor Royal within the Heart of the Diamond location identified in the LEP.

This further work should also include assessment of the housing need generated by any additional employment floorspace. It is appreciated that there is an aspiration to reduce out-commuting from Mid Sussex, but there is risk that an under supply of housing compared to the proposed level of employment floorspace could generate labour supply shortages in Mid Sussex, or in surrounding areas like Crawley.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
99	5	Ms E Brigden	Crawley Borough Council	
Code:		Policy DP5 Support	Sustainability Appraisal? <input type="checkbox"/>	

In view of this high level of unmet need, and the importance placed on delivering housing through the Plan-led system, Crawley Borough Council welcomes the confirmation in Policy DP5 that the "requirement may be exceeded if communities wish to promote higher levels of development to fund additional local infrastructure improvements or support local facilities or services" and emphasises the importance of maximising delivery of suitable and available sites within the constraints of sustainability and for higher densities to be encouraged, where appropriate, to maximise the land available.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
99	6	Ms E Brigden	Crawley Borough Council	
Code:		Policy DP3 Support	Sustainability Appraisal? <input type="checkbox"/>	

The Mid Sussex District Plan identifies limited capacity for convenience (3,232 square metres) and comparison (10,487 square metres) retail floorspace over the Plan period, most of which is accounted for by development schemes that are in the pipeline. The District Plan does not propose to include reference to the identified amount of retail capacity within Policy DP3 (Town Centre Development), although this is included within the policy justification. For Crawley, the Inspector considered it appropriate to include the identified retail capacity in the supporting text rather than in the policy. It is recognised from the evidence base that this floorspace is intended to serve the needs of the town centres' own communities and not bring in customers from surrounding towns.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
99	7	Ms E Brigden	Crawley Borough Council	
Code:		Policy DP9 Support	Sustainability Appraisal?	<input type="checkbox"/>

Crawley Borough Council is supportive of the strategic allocation for 3,500 homes and a proposed business park allocation north of Burgess Hill. As identified within the Northern West Sussex Economic Growth Assessment (NLP, 2014) there is strong commuting inter-relationship between Mid Sussex and Crawley, and significant demand for additional housing and employment land within the Gatwick Diamond. As recognised within the EGA (9.57), the site at Burgess Hill will largely meet indigenous business growth needs of Mid Sussex, as well as some capacity for growth beyond this level. Crawley Borough Council would welcome being involved in further joint work which will help to clarify the role of the Burgess Hill allocation in relation to the Gatwick Diamond and the Greater Brighton City Region and establish if it is seeking to help in meeting wider growth needs from across of the Gatwick Diamond and, if so, how much of the unmet need it is proposing to accommodate.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
99	8	Ms E Brigden	Crawley Borough Council	
Code:	3l	Policy	Sustainability Appraisal?	<input type="checkbox"/>

As stated within the Crawley Borough Local Plan (Modifications Consultation Draft), Crawley's ability to accommodate its employment needs will be determined by a final government decision on the future of UK airport expansion and, in particular, whether land at Gatwick Airport will continue to be safeguarded. Should safeguarding remain, continued joint working between Crawley Borough Council and the other Gatwick Diamond authorities will be vital in planning for any unmet employment needs which cannot be accommodated in Crawley, to ensure that these are planned in an appropriate and sustainable manner that reflects the established role and function of Crawley at the heart of the Gatwick Diamond.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
99	9	Ms E Brigden	Crawley Borough Council	
Code:	1h	Policy	Sustainability Appraisal?	<input type="checkbox"/>

Crawley Borough Council, therefore, welcomed the opportunities offered by Mid Sussex District Council to be engaged in the preparation of the 'Sustainability Assessment of Cross-Boundary Options for the Mid Sussex District Plan', and supports the conclusions which confirm there are very strong links between Crawley and Mid Sussex. This is reflected in paragraph 4.130 of the Mid Sussex District Council Housing Provision Paper (June 2015) which states that "the links with Brighton and Hove and Crawley mean these authorities should be given priority should there be any capacity within Mid Sussex to assist... Assisting Crawley is more sustainable, as well as showing stronger historic links overall..."

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
100	1	Mr R Bates	CTC (Cycling Touring Club)	
Code:	1f	Policy	Sustainability Appraisal?	<input type="checkbox"/>

A separate Policy DP is needed to respond to the recent Government - Walking and Cycling Infrastructure Act to deliver on the aims of this legislation within in the framework of this Act.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
100	2	Mr R Bates	CTC (Cycling Touring Club)	
Code:		Policy DP19 Object	Sustainability Appraisal? <input type="checkbox"/>	
DP19 - Transport - Policy to reduce vehicle trips but no plan to say how				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
100	3	Mr R Bates	CTC (Cycling Touring Club)	
Code:		Policy DP20 Object	Sustainability Appraisal? <input type="checkbox"/>	
DP20 - Rights of Way and Protective Routes - Mitigation measures refers to connecting places but there are many places where this is not the case				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
100	4	Mr R Bates	CTC (Cycling Touring Club)	
Code:	SA-b	Policy	Sustainability Appraisal? <input type="checkbox"/>	
Sustainability Appraisal cont. 3.44 - High car ownership and congestion - needs sustainable modes of transport to mitigate impact but does not say how. Sustainability Appraisal cont. 3.45 - Bridleways 117 km but does not comment on suitability for Utility cycling as part of an integrated signed network				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
100	5	Mr R Bates	CTC (Cycling Touring Club)	
Code:	3i	Policy	Sustainability Appraisal? <input type="checkbox"/>	
One of the major problems of this plan is that Policies relate to New development and a good case study is where Bolnore Village in Haywards Heath has built a cycle friendly Estate and ticks the boxes for safe cycling – so when a person undertakes a trip beyond the Village it is more than likely that it will merge with existing road networks deemed unsafe for many cyclists. It could be argued that a Council has a duty to extend the network in a meaningful way. Have an agreed cycle network, some interim measures and a S106 programme and or Highways funded programme within the Plan duration. No such document is referred to.				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
100	6	Mr R Bates	CTC (Cycling Touring Club)	
Code:	SA-b	Policy		Sustainability Appraisal? <input type="checkbox"/>

3.41 Journeys to work lump walking and cycling together as 12% when separate figures needed.
 3.44 High car ownership and congestion – needs sustainable modes of transport to mitigate impact but does say how
 3.45 Bridleways 117 km but does not comment on suitability for utility cycling as part of an integrated signed network

DP 20 – Rights of Way and Protected Routes – Mitigation measures refers to connecting places but there are many places where this is lacking

Appendix 1 – PPPSGI's

District Plan should have regard to Government Transport Plans for the next 30 years – The Future of Transport – White Paper 2004 but seems to have scant regard

Appendix 2 – Sustainability Framework Baseline – Objective 11 – Reduce road congestion/pollution levels and the need to travel by car. Thus reducing greenhouse gases. It really begs the question if this will be the case at Haywards Heath Station with current development providing more car parking, increasing car movements and regular commuter congestion with engines running!

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
100	7	Mr R Bates	CTC (Cycling Touring Club)	
Code:		Policy	DP18	Object Sustainability Appraisal? <input type="checkbox"/>

Objective 6 refers to a sustainable transport network but cycle routes inadequate and bus services being withdrawn

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
107	1	Ms J Field	Natural England	
Code:	2c	Policy		Sustainability Appraisal? <input type="checkbox"/>

We welcome the fact that “protecting and enhancing the environment” is one of the four priority themes underpinning the vision of the Plan (p7) and support objectives to protect valued landscapes, provide green infrastructure and maintain wildlife corridors.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
107	2	Ms J Field	Natural England	
Code:		Policy	DP10	Support Sustainability Appraisal? <input type="checkbox"/>

We welcome the proposals in Policy DP10, Protection and Enhancement of the Countryside, particularly the commitments to protect landscape character and quality agricultural land. Ensuring no net loss of priority habitat and minimising impacts on protected species should also be a primary concern in this policy, given the government's aim of halting the decline in biodiversity.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
107	3	Ms J Field	Natural England	
Code:		Policy DP10 Neutral	Sustainability Appraisal?	<input type="checkbox"/>

Whilst we support the statement that “The countryside will be valued for its own sake, recognising its intrinsic character and beauty” (p43), it should also be noted that the local area derives multiple benefits from open land such as flood risk mitigation, carbon storage, food production, water provision and recreation (NPPF para 17), as well as offering a pleasant setting to attract visitors and encourage new businesses to locate to the area. The planning system should contribute to and enhance the natural and local environment by recognising the wider benefits of ecosystem services (NPPF para 109) and we therefore welcome the inclusion of policies dealing with services such as the water environment, flood management and recreational routes.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
107	4	Ms J Field	Natural England	
Code:		Policy DP16 Support	Sustainability Appraisal?	<input type="checkbox"/>

We note that the Plan does not deal with the area lying within the SDNP which will be covered by the SDNPA Local Plan and welcome the inclusion of DP16 “Setting of the SDNP”.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
107	5	Ms J Field	Natural England	
Code:		Policy DP41 Neutral	Sustainability Appraisal?	<input type="checkbox"/>

We support the commitment to “Identify and manage the risks posed to water quality associated with the historic land uses and support the delivery of ‘Good’ ecological status of the River Adur and Copyhold Stream in accordance with DP41 Water Infrastructure and the Water Environment” (p39). However, this should also seek to address the potential for negative impacts on water quality associated by the new developments, for example that posed by run-off from roads and other potential sources of pollution.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
107	6	Ms J Field	Natural England	
Code:		Policy DP13 Support	Sustainability Appraisal?	<input type="checkbox"/>

We support proposals for the re-use of rural buildings within DP13 (p 47) as this can be a useful and economically viable way to preserve otherwise redundant traditional buildings. However, a caveat should be added to attempt to limit additional infrastructure such as roads, car parking, gardens, fences and garden paraphernalia which can lead to creeping urbanisation around such buildings.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
107	7	Ms J Field	Natural England	
Code:		Policy DP36 Support	Sustainability Appraisal?	<input type="checkbox"/>

We support the provisions to protect trees and hedgerows in Policy DP36 (p73). We would like the addition of an aspiration to use creation of new plantings within development to not only maintain wildlife corridors but also create links between areas of woodland (particularly the fragmented Ancient Woodland) where possible.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
107	8	Ms J Field	Natural England	
Code:		Policy DP12 Neutral	Sustainability Appraisal?	<input type="checkbox"/>

Policies DP12, DP13 and DP 17 also need to consider impact on priority habitats and protected species.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
107	9	Ms J Field	Natural England	
Code:		Policy DP13 Neutral	Sustainability Appraisal?	<input type="checkbox"/>

Policies DP12, DP13 and DP 17 also need to consider impact on priority habitats and protected species.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
107	10	Ms J Field	Natural England	
Code:		Policy DP17 Neutral	Sustainability Appraisal?	<input type="checkbox"/>

Policies DP12, DP13 and DP 17 also need to consider impact on priority habitats and protected species.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
107	11	Ms J Field	Natural England	
Code:		Policy DP37 Neutral	Sustainability Appraisal?	<input type="checkbox"/>

Monitoring of DP37 requires a measure of the amount and type of priority habitat created and lost to ensure the Government ambition of no net loss is being achieved. Use of biological records can also indicate trends in protected species populations.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
107	12	Ms J Field	Natural England	
Code:		Policy DP38 Support	Sustainability Appraisal?	<input type="checkbox"/>

We welcome the commitment to creating Green Infrastructure and note that Green Infrastructure Mapping will be a component of the evidence base for assessing DP38. We look forward to seeing the results of this exercise.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
107	13	Ms J Field	Natural England	
Code:	3k	Policy	Sustainability Appraisal?	<input type="checkbox"/>

The success of several of the policies will be determined by the number of applications refused contrary to the policy (Monitoring Schedule p84 – 92). We would like to see more detail including scale of proposals and trend data to be considered.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
107	14	Ms J Field	Natural England	
Code:		Policy DP40 Neutral	Sustainability Appraisal? <input type="checkbox"/>	

It would be useful to have a breakdown of the "Allowable Solutions" within DP40 to identify the type and scale of schemes being permitted or refused.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
108	1	Ms H Hyland	Environment Agency	
Code:		Policy DP41 Support	Sustainability Appraisal? <input type="checkbox"/>	

Overall we support this policy and are pleased to see specific requirements for SuDS to consider issues associated with the redevelopment of contaminated land.

As we have previously stated whilst we support the reference to a variety of sources of flood risk we recommend that you consider what the implications are for development proposals in these areas. For example would they need to be accompanied by a Flood Risk Assessment, and if so who would assess the information?

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
108	2	Ms H Hyland	Environment Agency	
Code:		Policy DP42 Support	Sustainability Appraisal? <input type="checkbox"/>	

We are pleased to see a specific policy that relates to the water environment and make specific reference to the Water Framework Directive and the requirements for developments to be in accordance with its objectives and as such seek to improve water quality.

We also support the inclusion of the new tighter standard for water efficiency under the Building Regulations of 110 litres per person per day.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
108	3	Ms H Hyland	Environment Agency	
Code:		Policy DP39 Support	Sustainability Appraisal? <input type="checkbox"/>	

We support this policy and in particular the specific reference to water efficiency and climate change resilience.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
108	4	Ms H Hyland	Environment Agency	
Code:		Policy DP18 Support	Sustainability Appraisal? <input type="checkbox"/>	

We support the inclusion of a full range of infrastructure in this policy, notably green infrastructure.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
108	5	Ms H Hyland	Environment Agency	
Code:		Policy DP37 Support	Sustainability Appraisal?	<input type="checkbox"/>

We are supportive of this policy and consider that it is a strong policy that should be effective in protecting and enhancing biodiversity.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
108	6	Ms H Hyland	Environment Agency	
Code:		Policy DP38 Support	Sustainability Appraisal?	<input type="checkbox"/>

We are supportive of this policy and the specific reference to the water environment and its function as part of green infrastructure.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
108	7	Ms H Hyland	Environment Agency	
Code:		Policy DP9 Support	Sustainability Appraisal?	<input type="checkbox"/>

We are pleased to see that the policy has incorporated our previous comments and suggested wording. We believe that as worded the policy will be effective to ensure that development will consider the constraints from flood risk; manage risks from contaminated land and seek to improve water quality.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
108	8	Ms H Hyland	Environment Agency	
Code:		Policy DP7 Support	Sustainability Appraisal?	<input type="checkbox"/>

We support the recognition of the need to ensure development is phased with the provision of adequate wastewater infrastructure.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
117	1	Mr D Bowie	Highways England	
Code:	1h	Policy	Sustainability Appraisal?	<input type="checkbox"/>

Highways England expects the Transport Study to adopt a robust approach to the assessment of the individual and cumulative impacts of the development proposals identified by the District plan and in the emerging plans of neighbouring authorities. As such your engagement with adjacent local authorities is welcomed. Highways England will welcome early sight of the completed Transport Study and supporting evidence in order that these can be reviewed and that any issues identified. This can help to avoid any potential conflicts or surprises which might arise at later stages in the process.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
117	2	Mr D Bowie	Highways England	
Code:		Policy DP19 Neutral	Sustainability Appraisal? <input type="checkbox"/>	

Identifying and Assessing Need for Highway Infrastructure

In relation to the potential on the SRN for capacity enhancements and infrastructure required to deliver strategic growth, Paragraph 33 of the DfT Circular 02/2013 explains that need for such schemes should be identified at the local plan stage (rather than at the subsequent planning application submission stage). Paragraphs 37 to 44 set out the policy to be adopted in relation to new accesses to the SRN. In summary this seeks, subject to certain tests, to restrict the formation of new accesses onto the high speed SRN in order that the safe and effective movement of goods and people is not compromised.

Paragraph 18 of DfT 02/2013 explains that Highways England will work collaboratively with your authority and strategic delivery bodies to identify whether infrastructure schemes are suitable, viable and deliverable and how they could potentially be funded.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
117	3	Mr D Bowie	Highways England	
Code:	3i	Policy	Sustainability Appraisal? <input type="checkbox"/>	

Identifying and Assessing Need for Highway Infrastructure

In relation to the potential on the SRN for capacity enhancements and infrastructure required to deliver strategic growth, Paragraph 33 of the DfT Circular 02/2013 explains that need for such schemes should be identified at the local plan stage (rather than at the subsequent planning application submission stage). Paragraphs 37 to 44 set out the policy to be adopted in relation to new accesses to the SRN. In summary this seeks, subject to certain tests, to restrict the formation of new accesses onto the high speed SRN in order that the safe and effective movement of goods and people is not compromised.

Paragraph 18 of DfT 02/2013 explains that Highways England will work collaboratively with your authority and strategic delivery bodies to identify whether infrastructure schemes are suitable, viable and deliverable and how they could potentially be funded.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
117	4	Mr D Bowie	Highways England	
Code:	2a	Policy		Sustainability Appraisal? <input type="checkbox"/>

Priority Themes

The priority themes for 2031 are welcomed insofar as they relate to transportation. The 'Protecting and enhancing the environment' theme seeks to "ensure that development is accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This includes the provision of efficient and sustainable transport networks". The 'Promoting economic vitality' theme seeks "To provide opportunities for people to live and work within their communities, reducing the need for commuting." The 'Supporting healthy lifestyles' priority theme seeks "To create places that encourage a healthy and enjoyable lifestyle by the provision of first class cultural and sporting facilities, informal leisure space and the opportunity to walk, cycle or ride to common destinations."

It is considered that the approach is compatible with Section 4 of the NPPF (Promoting sustainable transport) and paragraphs 16-17 of the DfT Circular 02/2013 (Promoting sustainable transport solutions through Local Plans). Highways England is keen to see that the production of Local Plans supports development whose location and type allows:

- Uptake of sustainable transport modes;
- The support of wider social and health objectives;
- The support of existing business sectors; and
- Economic growth.

On that basis Highways England supports the preferred approach, and the priority themes and the strategic objectives for the District Plan as they relate to transportation.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
117	5	Mr D Bowie	Highways England	
Code:		Policy DP1	Support	Sustainability Appraisal? <input type="checkbox"/>

Highways England gives support in principle to this policy, with its emphasis on sustainable development and improving travel choice as it accords with NPPF and hence DfT 02/2013 policy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
117	6	Mr D Bowie	Highways England	
Code:		Policy DP7	Support	Sustainability Appraisal? <input type="checkbox"/>

Highways England gives support in principle to these policies to ensure that the A23/ A2300 junction and considers it generally compatible with the DfT Circular. However due to the quantum of development proposed at Burgess Hill, we would suggest that the infrastructure requirements should not be considered an exhaustive list and that each large planning application will need to assess its impact on the SRN, this may include junctions such as the A23/ A272 at Bolney and the A23/M23. It is noted that we have been advised that the updated Transport Study to support the requirements for the named aspects of infrastructure is not yet completed or available. Highways England will only be able to fully support policies DP7 and DP9 when the Transport Study is completed and available for review.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
117	7	Mr D Bowie	Highways England	
Code:		Policy DP9	Support	Sustainability Appraisal? <input type="checkbox"/>

Highways England gives support in principle to these policies to ensure that the A23/ A2300 junction and considers it generally compatible with the DfT Circular. However due to the quantum of development proposed at Burgess Hill, we would suggest that the infrastructure requirements should not be considered an exhaustive list and that each large planning application will need to assess its impact on the SRN, this may include junctions such as the A23/ A272 at Bolney and the A23/M23. It is noted that we have been advised that the updated Transport Study to support the requirements for the named aspects of infrastructure is not yet completed or available. Highways England will only be able to fully support policies DP7 and DP9 when the Transport Study is completed and available for review.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
117	8	Mr D Bowie	Highways England	
Code:		Policy DP18	Support	Sustainability Appraisal? <input type="checkbox"/>

Highways England supports this policy in principle and would request input into any mechanism for funding infrastructure, in particular the future Community Infrastructure Levy (CIL) consultation. It will be necessary to demonstrate how the key schemes relating to the SRN will be funded and delivered. We would recommend that all potential funding sources are listed along with an estimate of the likelihood of acquiring funds from each source to demonstrate the funding viability and deliverability of infrastructure requirements.

You will be aware that PPG states that infrastructure proposals on the SRN are not considered suitable for funding through receipts from CIL due to their scale and nature². Similarly, PPG explains that the restrictions placed by CIL Regulations on the use of legal agreements made under the Highways Act 1980 do not apply to the Highways Agency or its successor bodies.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
117	9	Mr D Bowie	Highways England	
Code:		Policy DP19	Support	Sustainability Appraisal? <input type="checkbox"/>

Highways England supports the preferred approach to development management detailed in Policy DP19. The policy is compatible with policy contained in the DfT Circular that development management measures should be employed which support sustainable transport choice and retain capacity within the transport network. Highways England offers some modest suggested amendments to the policy text and these are outlined below.

The third criteria for the permission of development to be granted refers to the severe cumulative impact of development in terms of road safety and increased traffic congestion, is important and welcomed.

Highways England considers that Neighbourhood Plans will need to include clear and compelling justification for the inclusion of parking standards (as a method of managing the local road network) in their Neighbourhood Plans, as this is a requirement set by a ministerial statement in March 2015³.

The policy states that development proposals should be supported, where appropriate, with a Transport Assessment and Travel Plan that is effective and deliverable. The policy should note that such documents should set out how transport infrastructure arising from the expected demand may be funded and delivered.

Highways England welcomes the inclusion of the seventh criteria which requires development to mitigate impacts on the local or strategic road networks. We suggest the inclusion of a reference to transport improvements being secured by legal agreements would be considered helpful.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
117	10	Mr D Bowie	Highways England	
Code:	1c	Policy		Sustainability Appraisal? <input type="checkbox"/>

The term 'highway authority' is used in the glossary. It may be helpful to elaborate on this and explain that West Sussex County Council is the local highway authority and Highways England is the highway authority for trunk roads and motorways (the SRN).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
117	11	Mr D Bowie	Highways England	
Code:	SA-a	Policy		Sustainability Appraisal? <input type="checkbox"/>

Paragraph 3.36 notes that Stage 2 of the Mid Sussex Transport Study demonstrated that planned strategic development would cause congestion issues on SRN junctions including the A23/A2300 Hickstead Interchange and the M23/A23 junction.

We support Sustainability Objective 11: To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
119	1	Mrs J Dawe	Horsham District Council	
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

With regard to your Local Plan and the Horsham District Planning Framework and how these fit together where there are strategic issues that cross administrative boundaries, please can you consider the HDPF together with the Proposed Main Modifications.

Our approach to the Duty to Co-operate was noted by the Inspector to be good and constructive and we confirm that we will be continuing with this approach. We would welcome ongoing joint working and discussions to ensure that our two strategies remain compatible.

Horsham District Council has undertaken an assessment of the Objectively Assessed need for the District which has informed a housing target in the HDPF. The Objectively Assessed Need is 636. In our original submission we proposed a housing target of 650 homes per year. This was increased to 750 in the light of the Inspectors first findings and will be increased to 800 as a result of his final set of findings.

HDC would like to confirm at this round of consultation that within the district our objectively assessed housing need can be met and HDC are not be requesting Mid Sussex to meet our housing needs.

The National Planning Policy Framework (NPPF) requires Local Plans to meet the full objectively assessed need for housing in the Housing Market Area. MSDC will be aware, through our joint evidence, that HDC and MSDC are in the same Housing Market Area (HMA) and that in line with national guidance it will be necessary for the policies in your plan to reflect the greatest possible contribution that MSDC can make to meet the housing need within the HMA. The Northern West Sussex Position Statement March 2015 indicates that there is a shortfall of housing provision across the Housing Market Area. HDC has provided for its own needs as well as a proportion of the housing market area, with particular reference to Crawley. This was as a result of Duty to Co-operate Discussions during the policy development of the Horsham District Planning Framework and the Inspectors Findings notes during the Examination. As documented on background evidence to the HDPF it was assumed that some unmet need from neighbouring authorities who cannot meet their needs would be met by Mid Sussex District Council.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
119	2	Mrs J Dawe	Horsham District Council	
Code:	3a	Policy		Sustainability Appraisal? <input type="checkbox"/>

HDC confirms that it considers that the options identified by Mid Sussex Council (MSDC) appear to be a sustainable approach to development within your district and would not conflict with the strategy in the HDPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
119	3	Mrs J Dawe	Horsham District Council	
Code:		Policy DP5	Neutral	Sustainability Appraisal? <input type="checkbox"/>

We note that the consultation draft did not include a housing figure and that in para 3.11 of the Proposed Submission document the objectively assessed need for MSDC is identified as 656 and the housing target that has now been included (as it was not included in the consultation document in January) states that the annual housing target is 650. HDC note that this now means that MSDC cannot meet their own needs by 6 units per year and are no longer making any contribution to the unmet needs of other authorities.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
119	4	Mrs J Dawe	Horsham District Council	
Code:		Policy DP5	Neutral	Sustainability Appraisal? <input type="checkbox"/>

HDC are aware of the background evidence supporting the Mid Sussex District Plan June 2015: Pre-Submission Draft District Plan Consultation and through discussions under the Duty to Cooperate understand that the target of 650 set by Mid Sussex also reflects the sustainability limits of the Mid Sussex District. HDC are concerned about the implications this may have as the HDPF was developed under the presumption that a portion of the unmet need from the Northern West Sussex Housing Market Area and in particular the needs of Crawley would be met by Mid Sussex. It should be noted that the Sustainability Appraisal for the HDPF indicates that a figure above 800 units per year is not sustainable at the current time as the provision of infrastructure such as schools, roads and sewage treatment works cannot be completed in a timeframe that would prevent significant social and environmental impacts arising from an increased scale of development. Notwithstanding this our Inspector has concluded that we should have a figure of 800 units per year – a 23% increase over our original submission and as a consequence, HDC is not in a position to meet any more of the needs of the housing market area.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
127	1	Mr E Sheath	Lewes District Council	
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

Based on the findings of the Mid Sussex SHLAA and the Sustainability Assessment of Cross-Boundary Options for the Mid Sussex District Plan it has been concluded that the Mid Sussex District Plan is unable to plan for any of the unmet housing needs from neighbouring authorities. Lewes District Council does not wish to contest this position, or the findings from the relevant evidence base and therefore accepts the proposed housing delivery target for the district.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
127	2	Mr E Sheath	Lewes District Council	
Code:		Policy DP5 Neutral	Sustainability Appraisal? <input type="checkbox"/>	

Based on the findings of the Mid Sussex SHLAA and the Sustainability Assessment of Cross-Boundary Options for the Mid Sussex District Plan it has been concluded that the Mid Sussex District Plan is unable to plan for any of the unmet housing needs from neighbouring authorities. Lewes District Council does not wish to contest this position, or the findings from the relevant evidence base and therefore accepts the proposed housing delivery target for the district.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
127	3	Mr E Sheath	Lewes District Council	
Code:	3b	Policy	Sustainability Appraisal? <input type="checkbox"/>	

Lewes District Council are keen to ensure that there is a strong commitment from Mid Sussex District Council to take an active role in continuing to explore the issue of unmet housing needs in the housing market areas that are common to their own plan area. Paragraph 3.38 of the District Plan does provide some assurance that this should happen, but we would contend that a commitment to work in a positive and proactive manner on this issue, and review the District Plan (if deemed necessary), should be more clearly stated within the plan. The Lewes District Joint Core Strategy, which is currently at examination, does have such a commitment within Spatial Policy 1 and we are of the view that a similar commitment should be expressed in the Mid Sussex District Plan. Potentially this could be through an amendment/additional wording to paragraph 3.38. We would be happy to agree such wording with yourselves before you present this to the Inspector as a modification to your plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
127	4	Mr E Sheath	Lewes District Council	
Code:	1h	Policy	Sustainability Appraisal? <input type="checkbox"/>	

Based on the findings of the Mid Sussex SHLAA and the Sustainability Assessment of Cross-Boundary Options for the Mid Sussex District Plan it has been concluded that the Mid Sussex District Plan is unable to plan for any of the unmet housing needs from neighbouring authorities. Lewes District Council does not wish to contest this position, or the findings from the relevant evidence base and therefore accepts the proposed housing delivery target for the district.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
133	1	Ms H Pierce	Mid Sussex Bridleways Group	
Code:	1j	Policy	Sustainability Appraisal? <input type="checkbox"/>	

can we be assured that those writing the NPs are fully aware that they must explicitly list the old Mid Sussex Local Plan policies as 'Saved' in their own plan. Additionally there is the possibility of a time lapse between adoption of the District Plan and the creation and adoption of a NP. If all the policies are not listed in the DP then saved policies could be in limbo for some considerable time or should a parish fail to produce a NP, a policy or policies may become entirely lost.

I believe that the wording at the head of Appx C of the District Plan allows adequately for MSDC to list the full set of saved policies (as in the draft plan) and then 'dispose' of their responsibility for each saved policy when (and only when) that policy is absorbed into the appropriate adopted NP.

The whole list of the policies that have been carried forward from the Local Plan 2004 should thus be re-instated in Appx C as per Appx B of the draft that preceded this Pre-Submission version.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
164	1	Ms C Gibbons	Southern Water	
Code:	1a	Policy		Sustainability Appraisal? <input type="checkbox"/>

We are pleased that our earlier representations have been accepted and support the plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
180	1	Ms L Brook	Sussex Wildlife Trust	
Code:		Policy DP1	Support	Sustainability Appraisal? <input type="checkbox"/>

DP1: Sustainable Development in Mid Sussex

This policy is consistent with national policy and accurately reflects the three mutually dependent pillars of sustainable development. We particularly agree that sustainable development means that which: 'protects, enhances, restores and utilises natural and environmental assets, including special protections for irreplaceable habitats'.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
180	2	Ms L Brook	Sussex Wildlife Trust	
Code:		Policy DP15	Support	Sustainability Appraisal? <input type="checkbox"/>

DP15: Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC) We strongly support this policy and believe it is sound and is legally compliant. The policy conforms with paragraph 113 of the National Planning Policy Framework (NPPF) and to the provisions of the Habitat Regulations. The Trust supports the inclusion of the final paragraph 'Where bespoke mitigation is provided...' and the explicit reference to advice from Natural England. This policy offers an alternative to the provision of SANGs and is therefore compliant with the recent Court of Appeal judgement on the Wealden District Core Strategy Local Plan policy ref: Ashdown Forest Economic Development Llp v Wealden District Council and South Downs National Park Authority [2015] EWCA Civ 681.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
180	3	Ms L Brook	Sussex Wildlife Trust	
Code:		Policy DP21	Support	Sustainability Appraisal? <input type="checkbox"/>

DP21: Communication Infrastructure

The Trust supports the wording in this policy to protect 'sensitive areas, including areas of ecological interest...' It conforms with NPPF paragraphs 109, 115 and 156 and contributes to ensuring development is truly sustainable.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
180	4	Ms L Brook	Sussex Wildlife Trust	
Code:		Policy DP24	Support	Sustainability Appraisal? <input type="checkbox"/>

DP24: Character and Design

The Trust particularly supports the requirement for developments to 'protect open spaces, trees and gardens...'

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
180	5	Ms L Brook	Sussex Wildlife Trust	
Code:	<input type="checkbox"/>	Policy DP36	Support	Sustainability Appraisal? <input type="checkbox"/>

DP36: Trees, Woodland and Hedgerows

We strongly support the inclusion of this policy and are pleased to see that Mid Sussex District Council implemented our previous comments regarding it. The inclusion of 'does not sever ecological corridors created by these assets' sits better in line with the aims in the NPPF for plans to promote the preservation, restoration and re-creation of ecological networks (para 117) and makes the policy robust. We also strongly support the requirement for a minimum buffer of 15 metres and the statement that ancient woodland and aged or veteran trees will be protected. This conforms to national policy and strategies and ensures that this irreplaceable habitat will be protected.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
180	6	Ms L Brook	Sussex Wildlife Trust	
Code:	<input type="checkbox"/>	Policy DP37	Support	Sustainability Appraisal? <input type="checkbox"/>

DP37: Biodiversity

The Trust strongly supports this policy and the inclusion of our suggested wording. In particular the requirement for development to create net gains in biodiversity is extremely positive and is consistent with NPPF paragraph 109 and the Government's Biodiversity 2020 strategy. This policy will also help Mid Sussex District Council conform to the requirements of the Natural Environment and Rural Communities Act 2006. As it stands the policy is sound and legally compliant, we would not support the watering down of any of the language or criteria in this policy. We strongly support the recognition of the importance of the contribution that designated sites make to wider ecological networks.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
180	7	Ms L Brook	Sussex Wildlife Trust	
Code:	<input type="checkbox"/>	Policy DP38	Support	Sustainability Appraisal? <input type="checkbox"/>

DP38: Green Infrastructure

This policy is sound and legally compliant and should ensure that the District's green infrastructure needs are met. We particularly support the requirement for development to 'promote the restoration, management and expansion of priority habitats' which is consistent with NPPF paragraph 117. We encourage the Council to produce a Green Infrastructure Strategy for the district as soon as possible to ensure that the implementation of this policy is effective and contributes to the wider green infrastructure aspirations of neighbouring authorities.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
180	8	Ms L Brook	Sussex Wildlife Trust	
Code:	<input type="checkbox"/>	Policy DP40	Support	Sustainability Appraisal? <input type="checkbox"/>

DP40: Renewable Energy Schemes

The requirement for schemes to have regard for 'Ecology and biodiversity...' is welcomed by the Trust and should ensure that proposals align with the pillars of sustainable development in a holistic manner.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
180	9	Ms L Brook	Sussex Wildlife Trust	
Code:		Policy DP41 Support	Sustainability Appraisal?	<input type="checkbox"/>

DP41: Flood Risk and Drainage

The Sussex Wildlife Trust supports the emphasis on Sustainable Drainage Systems within this policy and the requirement for SuDS to be located to promote improved biodiversity.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
180	10	Ms L Brook	Sussex Wildlife Trust	
Code:		Policy DP42 Support	Sustainability Appraisal?	<input type="checkbox"/>

DP42: Water Infrastructure and the Water Environment

We strongly support this policy and the decision for Mid Sussex District Council to apply the optional requirement for water efficiency under Building Regulations – Part G. This policy is underpinned by a good evidence base and will contribute to ensuring development in the District is truly sustainable. We do have concerns about some elements of the pre-submission Draft District Plan. However we feel that changes can be incorporated during the Examination process to make the Plan entirely sound and allow it to proceed to adoption.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
180	11	Ms L Brook	Sussex Wildlife Trust	
Code:		Policy DP37 Neutral	Sustainability Appraisal?	<input type="checkbox"/>

it is not clear what weight the supporting text in the plan will have in relation to decisions on planning applications. For example the supporting text of policy DP37 states that 'Development proposals should be informed by local ecological and geological evidence and national guidance. Local ecological evidence should include protected and notable species as well as considering the potential effects of the development on the habitats and species on the Natural Environment and Rural Communities Act 2006 section 41'. We strongly support this statement, but the wording is not reflected in the corresponding policy. We believe that the supporting text should be considered when deciding on planning applications and suggest that the plan includes a statement clarifying this point.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
180	12	Ms L Brook	Sussex Wildlife Trust	
Code:	3c	Policy	Sustainability Appraisal?	<input type="checkbox"/>

we always suggest that allocations are subject to a thorough assessment of the suitability of sites, including their ecological value as well as their wider contribution in delivering and sustaining ecosystem services within the district and for those services that maybe utilised by adjoining authorities. We question whether the District's natural capital can absorb this level of development and recommend that the council work towards an assessment of this.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
180	13	Ms L Brook	Sussex Wildlife Trust	
Code:	3g	Policy		Sustainability Appraisal? <input type="checkbox"/>

We also support the council's decision to allow the remainder of the housing requirements to be delivered through neighbourhood plans.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
180	14	Ms L Brook	Sussex Wildlife Trust	
Code:	3k	Policy		Sustainability Appraisal? <input type="checkbox"/>

DP27 – the indicator only refers to air pollution. There should be additional indicators to measure the policy's success at preventing unacceptable light and noise pollution from developments.

DP36 – in addition to the existing indicator, the success of this policy would be better judged through an indicator of the amount of ancient woodland lost to development in the District. The target would be zero.

DP37 – Natural England now gives limited advice on biodiversity issues mainly focussing on designated sites. Given that this policy refers to the wider ecological network, non-designated sites and producing net gains in biodiversity, a better indicator would be the number of nondesignated sites lost to development along with the loss/gain in priority habitat in the district.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
181	1	Mr J L Phillips	Tandridge District Council	
Code:	3a	Policy		Sustainability Appraisal? <input type="checkbox"/>

This Council has support for the vision and objectives of the Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
181	2	Mr J L Phillips	Tandridge District Council	
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

We consider that minor changes to the HEDNA would make it more robust in setting out the housing delivery target for Mid Sussex. This would assist Mid Sussex in substantiating the Plan as 'sound' and firming up the position between us on the ability to provide for housing as part of our on-going duty to cooperate conversations. Such conversations will of course continue post adoption of your plan as Tandridge develops its own Plan.

For these reasons we believe that the HEDNA should ensure that it has at least acknowledged the issues with the 2015 household projections. For example, when looking at individual districts the overall projection can be found to be inaccurate when factoring in age group differences and the categorisation has been regrouped within this model compared to other models meaning projections done previously that are incorporated into reaching an OAN are difficult to compare and difficult to use together without adjustment.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
181	3	Mr J L Phillips	Tandridge District Council	
Code:		Policy DP5 Neutral	Sustainability Appraisal? <input type="checkbox"/>	

For clarity any provision relied on through neighbourhood plans should be clearly shown and highlighted in the projected housing trajectory, set against neighbourhood plan progress/actual on the ground delivery.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
181	4	Mr J L Phillips	Tandridge District Council	
Code:		Policy DP2 Object	Sustainability Appraisal? <input type="checkbox"/>	

We are supportive of the Plan's objective to give opportunities for people to live and work within their communities, reducing the need for commuting. This objective will have benefits for both authorities in terms of reducing congestion and improving air quality etc. We think it would be helpful, by way of a minor change to the submission papers, to make it clear that new job figures have been matched with housing need and delivery. This should be done spatially as well as statistically to ensure that this mutually important objective is robustly fulfilled.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
181	5	Mr J L Phillips	Tandridge District Council	
Code:	3i	Policy	Sustainability Appraisal? <input type="checkbox"/>	

Tandridge would support the regeneration of East Grinstead as this is a well-used centre by the residents of Tandridge. Tandridge are aware that there are considered to be capacity issues on the A22 / A264 between Felbridge and East Grinstead. The MSDC Local Plan sets this out as an issue on page 7 of the Local Plan. It is noted that the Infrastructure Delivery Plan sets out some improvements to the A22 / A264 junction that will be paid by the Community Infrastructure Levy. We are of the view that it would assist communities if a minor change to the Plan brought more clarity to the trigger point for delivery of this infrastructure improvement.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
181	6	Mr J L Phillips	Tandridge District Council	
Code:	1e	Policy	Sustainability Appraisal? <input type="checkbox"/>	

As discussed by respective officers Tandridge is unlikely to meet its traveller and travelling showpeople needs due to the constraints and land availability within our district. If the option to defer the allocation of traveller sites within the Mid Sussex Plan is a sound one, Tandridge would like to engage and cooperate with MSDC on the preparation of this document.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
181	7	Mr J L Phillips	Tandridge District Council	
Code:		Policy DP15 Neutral	Sustainability Appraisal? <input type="checkbox"/>	

Due to the small amount of buffer zone around the Ashdown Forest falling within Tandridge District, Tandridge have in the past taken the pragmatic approach that this strategic issue is unlikely to have a significant impact on development within Tandridge. However, more recently, an appeal decision determined that the distance of the buffer zone around the Ashdown Forest is no longer applicable and therefore Tandridge could be more affected by the European designation of a Special Conservation Area and Special Protection Area on the Ashdown Forest. We are of the view that this issue needs early discussion with your Inspector and Natural England, and we are happy to join you for those discussions as it may be of mutual benefit. We also reiterate our current commitment to working with you on Strategic Access Management and Monitoring (SAMM) and the provision of a Suitable Alternative Natural Greenspace (SANG) within Mid Sussex. Tandridge understand that MSDC have secured a SANG and we look forward to seeing the arrangements for its provision and maintenance in perpetuity as well as the arrangements for its operation in relation to housing delivery across the partners.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
189	1	Mrs M Brigginsshaw	Wealden District Council	
Code:	HRA-	Policy	Sustainability Appraisal? <input type="checkbox"/>	

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). 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.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
192	1	Mr C Owen	West Sussex County Council	
Code:	1g	Policy	Sustainability Appraisal? <input type="checkbox"/>	

In its response in January of this year to the Mid Sussex District Plan 2014-2031 Consultation Draft the County Council requested amendments to ensure soundness and achieve consistency with the adopted West Sussex Waste Local Plan (WSWLP) and West Sussex Minerals Local Plan (2003) (WSMLP). It is welcomed that the WSWLP allocation in Mid Sussex District at Goddards Green and the WSMLP safeguarded mineral railhead site at Ardingly are both now identified on the Draft Policies Maps.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
192	2	Mr C Owen	West Sussex County Council	
Code:	1c	Policy		Sustainability Appraisal? <input type="checkbox"/>

The other requested changes were for MSDC to:

- Set out a commitment to consult with the County Council on developments proposed at, adjacent or proximal to existing waste sites/infrastructure.
- Set out text within the Mid Sussex District Plan to reflect a general presumption against development which may harm or prejudice the operation of existing and allocated mineral facilities and infrastructure. Additionally, set out a commitment to consult with the County Council on any such proposals.

It is understood that MSDC intends to respond to these outstanding matters by putting forward a modification to the District Plan supporting text to include the following wording, or similar:

In paragraph 2.4 it is suggested that the reference to “West Sussex County Council’s Sites and Monuments Record” in the third sentence be amended to read “West Sussex Historic Environment Record”.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
193	3	Mr Ford	West Sussex Deaf and Hard of Hearing Association	
Code:		Policy	DP35	Neutral Sustainability Appraisal? <input type="checkbox"/>

The final sentence of Policy DP35 outlines circumstances in which applicants may be required to carry out an appropriate archaeological assessment. However unlike the similar wording in paragraph 128 of the NPPF there is no reference to the requirement for a field evaluation “where necessary”. It is suggested that the policy wording be more closely aligned with NPPF paragraph 128 to avoid the potential misinterpretation that a desk-based approach will always satisfy the need for an “appropriate archaeological assessment”.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
193	4	Mr Ford	West Sussex Deaf and Hard of Hearing Association	
Code:		Policy	DP7	Neutral Sustainability Appraisal? <input type="checkbox"/>

There appears to be a minor error in the ninth bullet point which refers to note 6 – this should perhaps reference note 2 in which the reference to horse-riding is welcomed.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
193	5	Mr Ford	West Sussex Deaf and Hard of Hearing Association	
Code:		Policy	DP17	Neutral Sustainability Appraisal? <input type="checkbox"/>

Suggest Strategic Objective 15 should be referenced because public rights of way can and do already contribute to sustainable tourism.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
1846	1	Mr M Smith	The Rail Estate Consultancy	Bluebell Railway Plc
Code:	1a	Policy		Sustainability Appraisal? <input type="checkbox"/>

We have commented previously on the emerging plan on behalf of our client, Bluebell Railway PLC generally supporting the overall vision and objectives of the draft plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
1846	2	Mr M Smith	The Rail Estate Consultancy	Bluebell Railway Plc
Code:		Policy DP17 Support		Sustainability Appraisal? <input type="checkbox"/>

We note that the policy text relating to the Bluebell Railway continues to provide land that will be safeguarded from development which will be required to deliver the reinstated railway link and associated facilities for the Bluebell Railway along the route of the railway corridor between Horsted Keynes and Haywards Heath railway stations. This policy is therefore a welcome continuation from the adopted Local Plan of the robust strategic policy support for the safeguarding of the route of the former Ardingly branch line and potential western extension of the Bluebell Railway.

As noted in our earlier comments regarding the former Ardingly station site, we trust that Policy DP17 will be effective as a successor policy in respect of the Unilateral Undertaking given by the Ardingly rail depot operator to West Sussex County Council in 2010, which provides that a route for the proposed reinstated railway link will be safeguarded at the depot.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
2335	1	Mr C Hough	Sigma Planning Services	Rydon Homes
Code:	2a	Policy		Sustainability Appraisal? <input type="checkbox"/>

The plan is unsound because the four priority themes that underpin the vision of the plan does not provide sufficient emphasis upon the Need to boost significantly the supply of housing and to meet the full Objectively Assessed Need for market and affordable housing in the housing market area. Accordingly the vision does not properly reflect the emphasis given by Government policy (NPPF para 47 and elsewhere) upon delivery of housing. Mid Sussex is one of the least constrained Districts in the South-East region and needs to play a significant part in meeting the needs for economic growth with particular emphasis on housing provision.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
2335	2	Mr C Hough	Sigma Planning Services	Rydon Homes
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

The plan is unsound because it fails to properly consider and fully address the effects of the inability of London to meet its own housing needs. The London Mayor's OAN is based on a 5% increase in out migration and a 3% decrease in in-migration. This has implications for all authorities in the South-East. The Pickett Report needs to be addressed in the context of out-migration to Mid Sussex District and the relevant HMA. The Mayor of London is a prescribed body for the purposes of the Duty to Co-Operate. The "wider context" section of the Plan does not address the London effect and there is little in the evidence base to demonstrate that it has been taken into consideration or that the Duty to Co-Operate has been adequately discharged in this respect.

South East Plan recognised that Mid Sussex was a least constrained authority. Unless some Districts fulfil the role of meeting strategic requirements, housing need across the region cannot be met.

The approach of using the SHLAA as a maximum palette is not acceptable and is not consistent with the NPPF which does not seek to impose any arbitrary cap on the level of housing provision. The SHLAA accepted 83 developable sites but rejected 164 sites. Rydon consider this not a justified or robust assessment of the housing site potential across the District and that there are far more opportunities to provide housing than are admitted in the SHLAA. An increased OAN of 880dpa is likely to be able to be accommodated.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
2335	3	Mr C Hough	Sigma Planning Services	Rydon Homes
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

Although the HEDNA has been published only recently, new CLG figures at a 2012 base have been published, as addressed in the HEDNA update (June 2015). This shows a significant increase in household requirement and the ONS 2014 mid-year population estimates indicate that this trend is likely to continue. The earlier 2011 household figures were influenced by both a period of recession and a failure by Mid Sussex to deliver adequate housing completions. The household provision during that period has therefore been suppressed and there is a latent housing shortfall that needs to be addressed. Work undertaken by Nexus Planning using the same "Popgroup" forecasting model as that used by the Council demonstrates an annual OAN of 880 dpa which is significantly greater than the 656dpa on which the plan is based. It would result in an overall housing requirement of 13,100 dwellings in the plan period, there is therefore a shortfall in housing provision of 2,050 dwellings.

The total housing commitments figure set out in the policy is inaccurate because it includes historic Local Plan allocations that show little sign of coming forward or may be double counted (eg Freeks Farm is part of the Northern Arc strategic development at Burgess Hill). The historic allocations figure should not be carried forward and the sites in Appendix C should be removed from the plan.

The housing provision in Policy DP5 should be increased to at least 13,000 dwellings at an average of 880dpa. The commitments figure should be reduced by the deletion of unimplemented housing allocations in the current Local Plan, and the "elsewhere" figure should be increased to meet the balance of the housing requirement after deducting completions, the reduced Housing Commitments figure and the strategic development to the north of Burgess Hill. This residual figure should then be distributed between the "other" settlements having regard to the settlement hierarchy and the capability of each settlement to accommodate new housing.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
2335	4	Mr C Hough	Sigma Planning Services	Rydon Homes
Code:	3l	Policy		Sustainability Appraisal? <input type="checkbox"/>

It is recognised that the uncertainty surrounding the scale of future expansion of Gatwick Airport makes it very difficult to include specific proposals in the plan. However, the current proposal of addressing this through a review of the plan is not practical or pragmatic having regard to the track record of Mid Sussex in the time taken to produce local plans and taking them to adoption. Some growth at Gatwick during the plan period will inevitably take place and the plan should identify what this level of growth is likely to be in terms of a single runway outcome and a second runway scenario with contingent policies to address either situation. It is not adequate to say that the uncertainty makes the problem too difficult to address at this stage and leaving the issue to a future review process.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
2335	5	Mr C Hough	Sigma Planning Services	Rydon Homes
Code:		Policy	DP6	Object Sustainability Appraisal? <input type="checkbox"/>

Whilst the principle of localism involves a "bottom up" approach, the District Plan should at least provide a clear indication of what the District level expectation is in terms of the scale and location of housing across the District. Neighbourhood Plans can then address the exact locations for this development and, in exceptional circumstances, or preferably through the consultation process of the District Plan, indicate that they cannot accommodate the expected level of housing and explain why.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
2335	6	Mr C Hough	Sigma Planning Services	Rydon Homes
Code:		Policy	DP10	Object Sustainability Appraisal? <input type="checkbox"/>

The policy is unsound because it identifies best and most versatile agricultural land as a primary constraint thereby giving it an unjustified level of weight when balanced with other planning considerations. This is inconsistent with the weight attributed to this factor by the NPPF. Para 112 states that the economic benefits should be taken into account and where significant development of agricultural land is demonstrated to be necessary poorer quality land should be used in preference to that of higher quality.

References to high quality agricultural land being a "primary constraint" should be removed from policy DP10 and elsewhere in the text.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
2335	7	Mr C Hough	Sigma Planning Services	Rydon Homes
Code:	1j	Policy		Sustainability Appraisal? <input type="checkbox"/>

The saved local plan allocations that are proposed to continue should be rescinded. In each case they have been identified for a lengthy number of years but have failed to come forward for development due to individual and continuing constraints. There is no realistic prospect of them delivering housing the foreseeable future and therefore they are causing a distortion in the true picture of the ability to deliver housing. The appendix should be removed from the Plan and the status of the sites as development plan allocations/commitments should be lost.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
2335	8	Mr C Hough	Sigma Planning Services	Rydon Homes
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

It is not considered that the housing trajectory is realistic because:1) The bar chart display does not allow detailed interrogation of the housing numbers or identify expected progress and the ability to maintain a five year supply of housing at all times (NPPF para 47). A more conventional tabular format should be used.2) The existing supply of housing sites is not likely to deliver the very high completion numbers projected for years 2015-19. additional sites capable of immediate development are required.3) The proportion of housing completions in the period 2020-2031 and particularly 2025-2031 is too heavily reliant upon the Burgess Hill Strategic Site which is inflexible in terms of choice of housing location.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
2335	9	Mr C Hough	Sigma Planning Services	Rydon Homes
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

There is an obvious inconsistency between the statement at paragraph 3.28 to the effect that Neighbourhood Plans can provide more housing than allowed for in the District Plan and the statement that the SHLAA sites represent an absolute cap on housing provision capacity. Rydon consider that there is capacity at the locations other than Burgess Hill for considerable more than 1,515 dwellings. The figure of 1,515 does not give sufficient guidance as to the location and scale of new housing to assist in the preparation of Neighbourhood Plans or to provide a basis for the preparation of a Housing Allocations Local Plan in the event of default. It is Rydon's experience that many Town and Parish Councils are resistant in principle to accommodating new housing development at their settlement beyond meeting their identified local housing need for affordable homes.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
2335	10	Mr C Hough	Sigma Planning Services	Rydon Homes
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

The total housing commitments figure set out in the policy is inaccurate because it includes historic Local Plan allocations that show little sign of coming forward or may be double counted (eg Freeks Farm is part of the Northern Arc strategic development at Burgess Hill). The historic allocations figure should not be carried forward and the sites in Appendix C should be removed from the plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
3139	1		Prospective Planning Ltd	Village Developments PLC
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

Duty to co-operate - although the local plan discusses this issue pages 20-21 there is no background paper to explain how the duty has been undertaken to ensure it is effective, as required in the NPPF. it is noted that Horsham DC have been asked by the Inspector to increase its housing target to 800dpa from 650dpa to take account of the housing deficit across the HMA covering MSDC, Horsham and Crawley. The MSDC local plan clearly fails to take account of the deficit across this HMA and the adjoining South Coast HMA which is significant and the plan fails to say why MSDC cannot make further housing land allocations without relying on NP to plan properly and co-operate to meet the OAN of the wider HMA.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
3139	2		Prospective Planning Ltd	Village Developments PLC
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

my clients have commissioned an independent report on the Mid Sussex and Bolney Housing Needs Assessment. the report concludes that there area a number of issues within the Councils evidence in each stage of the of the assessment which means that the overall assessment does not represent the full OAHN in line with the NPPF and the PPG. the issue are:1 A vacancy rate has not been applied to the household projections to arrive at 'dwellings' needed and thus the starting point itself is flawed; 2 Despite poor and worsening market signals in the District, the study concludes no uplift should be made to the figure of 656; 3 The job growth figure set out by the Council is well below a number of econometric forecasts for the District. Notwithstanding, the figure used by the Council indicates upward pressure on the demographic-led housing needs, though this has not been acknowledged; 4 The Council has made an incorrect assessment of affordable housing needs, concluding no uplift is needed.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
3139	3		Prospective Planning Ltd	Village Developments PLC
Code:		Policy	DP5	Object
				Sustainability Appraisal? <input type="checkbox"/>

reliance on NP's is not considered to be a positively prepared District Plan. The evidence for this is that the HEDNA has determined an OAN of 656 DPA. However the study prepared for our client concludes that: The National Planning Policy Framework (NPPF) sets out that Local Planning Authorities should define and then seek to meet full objectively assessed housing needs, whilst the Planning Practise Guidance (PPG) sets out an approach to assessing this need. Following this, and utilising a range of demographically modelled scenarios, NLP has concluded that a minimum figure for a full objective assessment of need for Mid Sussex District is 808 dwellings per annum over the period 2014 2031. This is based on:

a Baseline Demographic Needs – The CLG 2012-based household projections indicate household growth of 656 households over the plan period. Updating this to account for more recent data (and taking account of dwelling vacancy rates) indicates a need for 657 dwellings per annum (2014-31). Adjusting this to ensure consistent assumptions around future migration to/from London indicates a need for 692 dwellings per annum – this is considered to be the demographic starting point; b Market Signals – Having consistently performed poorly against the County and nationally in terms of house prices, rents and affordability, there is sufficient market signals evidence to justify an uplift on demographic needs to help improve these. Using 10% as an estimate of reasonable uplift for market signals this increases need to 761 dwellings per annum; c Economic and Employment Alignment – To support future job growth potential in Mid Sussex, as indicated by economic forecasts, there is a need for 808 dwellings per annum. This indicates clear upward pressure on the demographic-led starting point and the market signals uplift; d Affordable Housing Needs – Based on the affordable housing need identified in the HEDNA Update, and target delivery rates of 30% affordable housing, Mid Sussex District would need to deliver between 1,683 and 1,880 total dwellings per annum in order to meet full affordable housing needs. The lower end of this range should be considered a minimum (relating only to Reasonable Preference Categories), and this clearly indicates the upward pressure on overall housing needs. The above is before taking account of the requirement to accommodate unmet needs from other areas, such as London, Crawley and Brighton. The submission plan does not achieve this and fails to address the lack of a 5 year land supply.

Effective - As stated above the SDP is planning for a significant reduction in the level of housing provision for the district over the plan period even when compared to the OAN referred to previously by the Council let alone the suggested higher OAN as indicated by the independent study commissioned by our client. Given the existing level of housing provision and the lack of a 5 year housing land supply the failure of the plan to provide for the OAN is an indication of its ineffectiveness in meeting the requirements of the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
3139	4		Prospective Planning Ltd	Village Developments PLC
Code:		Policy DP5 Object	Sustainability Appraisal? <input checked="" type="checkbox"/>	

Justified- The plan should be the more appropriate strategy when considered against reasonable alternatives. It is felt that the alternative of increased housing throughout the district including settlements in categories 1-3 as set out in DP6 settlement hierarchy has not been adequately assessed as an alternative to the strategic development of Burgess Hill. The decision to take this scenario forward on the basis of environmental constraints cannot be justified as appears to be the case. It is noted that the SHLAA has assessed the potential for MSDC to accommodate 11,786 dwellings which is more than that allowed for in the submission plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
3139	5		Prospective Planning Ltd	Village Developments PLC
Code:		Policy DP29 Object	Sustainability Appraisal? <input type="checkbox"/>	

Consistent with National Policy: the plan is not consistent with National Policy in that Policy DC29 in relation to affordable housing is not consistent with the provisions of the NPPF and subsequent ministerial statements. These are looking to a more flexible regime based on viability criteria rather than prescriptive percentage numbers. In addition the plan does not include a basis for considering schemes for self build developments for which there is now considerable government encouragement.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
3581	1	Mr B High	Fox Hill Association	
Code:	3g	Policy	Sustainability Appraisal? <input type="checkbox"/>	

In our view the MSDC plan for the period 2014-2031 should be based on the Town and Neighbourhood Plans, a number of which have not yet seen the light of day.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
3581	2	Mr B High	Fox Hill Association	
Code:	3b	Policy	Sustainability Appraisal? <input type="checkbox"/>	

The MSDC plan refers to the need to take account of the requirements, principally in respect of new housing, put forward by the newly created Greater Brighton City Deal, the "Coast to Capital" LEP, and the Gatwick Diamond Initiative. There is a real danger that forward planning within the Mid Sussex district will become subordinated to the needs of the Greater Brighton City Deal to the South of the District and the requirements of the Gatwick Diamond Initiative to the north of the District.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
3581	3	Mr B High	Fox Hill Association	
Code:	1e	Policy	Sustainability Appraisal? <input type="checkbox"/>	

Given the government's recent announcement regarding the easing of planning conditions in respect of residential development on brownfield sites, we would expect an Inspector reviewing the MSDC plan to examine at the same time the plans of adjoining local authorities to ensure that each of their own plans have fully considered the availability of housing development on brownfield land within their own districts. After all, a key measure of sustainable development is the creation of new housing close to new job opportunities, thereby reducing pressure on infrastructure as a consequence.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
3581	4	Mr B High	Fox Hill Association	
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

We are concerned that the new housing forecasts contained in the MSDC plan appear to be running well ahead of local housing needs and forecasts for new job opportunities within the District. In our view the proposed new housing development figures will only facilitate the trend to greater "in" and "out" commuting across the District, thereby encouraging further the exodus from London and from Brighton. This does not fit easily with the notion of sustainable development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
3581	5	Mr B High	Fox Hill Association	
Code:	3i	Policy		Sustainability Appraisal? <input type="checkbox"/>

We share the concerns expressed in the Plan regarding the existing infrastructure deficits in sewerage and water supply, and open space and sports provision, and that further development will exacerbate these problems. To this list we should add schools, roads and sustainable transport facilities e.g. cycle lanes, designated running routes etc. The proposed new housing development at Greenfield Way falls within the planning jurisdiction of Lewes District Council, but the infrastructure burden will fall on MSDC and its residents.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
3581	6	Mr B High	Fox Hill Association	
Code:		Policy DP18	Object	Sustainability Appraisal? <input type="checkbox"/>

Given our recent experience in connection with a new housing development adjacent to our area, we do not have confidence in the ability or willingness of the Council to enforce planning conditions and building controls in relating to housing development and infrastructure requirements. In addition the plan remains silent on how the current deficit is to be tackled. We would also expect the plan to confirm that monies raised via the CIL are "ring-fenced" and only spent on specific infrastructure improvements and not taken to subsidise the Council's revenue budget.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
3581	7	Mr B High	Fox Hill Association	
Code:		Policy DP11	Object	Sustainability Appraisal? <input type="checkbox"/>

Recent new developments on the Southern boundary of Haywards Heath have breached the built-up area boundary of the town which had been carefully protected under earlier plans, and it is very disappointing, but perhaps not surprising, to find that the new plan only pays lip service to the concept of preventing coalescence. Indeed the plan has not been able to define the Council's criteria in this respect. Given the current pressure from developers for new greenfield sites, this is not acceptable.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
11677	1	Mr S R Ankers	South Downs Society	
Code:		Policy DP16	Support	Sustainability Appraisal? <input type="checkbox"/>

We are content with the wording of Policy DP16 on the Setting of the National Park, which adequately reflects the significance of this special landscape and its need for special protection as set out in the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
11677	2	Mr S R Ankers	South Downs Society	
Code:		Policy DP16 Neutral	Sustainability Appraisal? <input type="checkbox"/>	

We would however point out that the plan narrative preceding Policy DP16, which refers to the statutory purposes and duty on the NPA arising from the Environment Act 1995, could helpfully be extended to include specific reference to Section 62 of the same Act which imposes a duty on the district council (and others) to have regard to the park's designation.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
13146	1	Mr M Carpenter	Enplan	Sunleys
Code:	3f	Policy	Sustainability Appraisal? <input type="checkbox"/>	

These representations are made on behalf of Sunley Estates Ltd, in respect of land on the east of Kings Way in Burgess Hill – a plan identifying the location of the subject site is at Document 1.

We submitted representations to the Strategic Housing Land Availability Assessment (SHLAA) in April 2015 which at that time included the subject site with the land and the planning permission for 480 dwellings within the same SHLAA site (site reference 233). Our representations sought to increase to housing to provision to 550 homes for that site to reflect the reasonable development capacity of the subject land.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
13146	2	Mr M Carpenter	Enplan	Sunleys
Code:		Policy DP8 Object	Sustainability Appraisal? <input type="checkbox"/>	

The Proposals Map for Burgess Hill (Map 7) includes the subject site as part of policy DP8 – Strategic Allocation to the east of Burgess Hill at Kings Way (apart from the existing house on the site). However, the plan identifying the strategic allocation on page 37 excludes the subject site and should be amended. In the light of this, the following amendments to the Plan should be made:

- Policy DP8 to state that “up to 550 new homes” will be provided, not 480 homes.
- The Plan on page 37 should include the subject site.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
13146	3	Mr M Carpenter	Enplan	Sunleys
Code:	1g	Policy	Sustainability Appraisal? <input type="checkbox"/>	

The Proposals Map for Burgess Hill (Map 7) includes the subject site as part of policy DP8 – Strategic Allocation to the east of Burgess Hill at Kings Way (apart from the existing house on the site). However, the plan identifying the strategic allocation on page 37 excludes the subject site and should be amended. In the light of this, the following amendments to the Plan should be made:

- Policy DP8 to state that “up to 550 new homes” will be provided, not 480 homes.
- The Plan on page 37 should include the subject site.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	1	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:	Policy	DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Unlike the HEDNA of February 2015, the June 2015 update does not however provide any uplift to accommodate market signals. Nor does it provide for any adjustment to reflect the continuing affordable housing needs of the district, or adjustment to accommodate the unmet needs of adjacent authorities. In addition it provides contradictory evidence on the issue of balancing jobs and housing.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	2	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The February 2015 HEDNA incorporated a 10% uplift in the OAHN to accommodate market signals. The June 2015 report suggests this is no longer necessary as to do this would take the housing requirement over 700dpa, and this would be undeliverable and unsustainable. However the June 2015 SHLAA identifies suitable, available and deliverable sites capable of accommodating 723dpa. So in reality the OAHN + 10% (721dpa) could be delivered on suitable, available and deliverable sites.

In addition to the above we note that policy DP2 indicates that the total number of additional jobs required within the district over the plan period is estimated to be an average of 278 jobs per year. Table 13 of the HEDNA (June 2015) suggests that accommodating 656dpa would equate to just 249 jobs per annum; so there is a clear mismatch between job creation and the OAHN. To provide for 278 jobs per annum the plan would need to accommodate at least 730dpa.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	3	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:	3b	Policy		Sustainability Appraisal? <input type="checkbox"/>

Given the fact Para 3.10 of the DPPS indicates that 'Another central aim of the Plan is to ensure local housing needs can be met over the Plan period.' and strategic objective 13 of the DPPS is 'to provide the amount and type of housing that meets the needs of all sectors of the community', we believe that the housing strategy being advocated in the PSDP is at odds with one of its central aims.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	4	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

The Mid Sussex Housing Provision Paper (June 2015) acknowledges at table 3 that the unmet need within adjacent authorities amounts to some 33,000 dwellings. This however is based upon information provided in August 2014 and has since been superseded by events; and as a result is now even higher¹. Whilst not wishing to get into the eternal question of 'if everyone fails to meet their OAHN who eventually deals with this issue'; and acknowledging that it is not reasonable to look to Mid Sussex to address all its neighbours unmet needs, we do believe, where there are strong links in terms of commuting and migration there is a case for some assistance to be proffered – if possible.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	5	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

In the context of the above we note that the Housing Provision Paper acknowledges the strong commuting and migration links with Crawley. Whilst para 4.71 suggests that partially meeting Crawley's needs would lead to negative environmental impacts that would outweigh any positive effects, this is not borne out by the sustainability assessment of the options – as set out on page 32 of the Housing Provision Paper. This clearly indicates that the implications of meeting Crawley's unmet needs based upon travel to work data or internal migration data are balanced. Furthermore despite what is said in the Housing Provision Paper there are in our opinion sites in and around the Copthorne/Crawley Down area that could help address this need – such as the land my clients have an interest in west of Turners Hill Road (SHLAA site ref 271 and 688).

In this context, it would appear that whilst the SA on p28 suggests meeting Brighton and Hove's unmet needs based upon travel to work data (200dpa) or internal migration data (110dpa) would result in negative impacts that may slightly outweigh the positive impacts, we would question whether a smaller contribution – of say circa 55dpa would result in a positive outcome; as despite what is said in the Housing Provision Paper there are in our opinion sites in and around the Haywards Heath and Lindfield area that could help address this need – such as the land my clients have an interest in east of Northlands Brook and south of Scamps Hill, Lindfield (SHLAA site ref 483).

We believe the PSDP document needs to review the merits of the SHLAA sites, especially those where LUC have suggested there is no landscape impact, and said sites about category 2 settlements, with a view to making site specific allocations in the District Plan. Sites such as land west of Turners Hill Road Crawley Down (SHLAA site ref 271) and land east of Northlands Brook and south of Scamps Hill, Lindfield (SHLAA site ref 483) could provide in excess of 270 dwellings between them (50 at Crawley Down and 220 at Lindfield. Similarly land at 15 Crawley Down Road, Felbridge (SHLAA site 197) could deliver circa 60 dwellings as the accessing issues identified in the SHLAA are now being addressed.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	6	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:		Policy	DP5	Object
			Sustainability Appraisal? <input checked="" type="checkbox"/>	

The SA suggests that delivering 700-800dpa may be unsustainable. There is however no clear reasoning/ justification behind this statement and it clearly contradicts the statement in the SHLAA and HPP that the LPA can deliver 723/737dpa (depending on which report you look at). Even if this statement was justified surely 750dpa is a reasonable alternative that should have been tested, especially when MSDC were well aware of the fact the Horsham Inspector had suggested that Horsham increase their housing requirement from the 650dpa they originally proposed to 750dpa in December 2014 (he has since said it should in fact be 800dpa), to more adequately address their OAHN and the needs of neighbouring authorities.

How can the SA assess the sustainability of policy DP5 if the scale and direction of growth in the neighbourhood plans is unknown? How does the DC ensure this approach does not prejudice their objectives in terms of housing delivery, sustainable economic growth, sustainable travel, environmental protection etc.? The fact that the location of over 30% of the housing requirement (after completions and existing commitments) is to be left to the Neighbourhood Plans means there is effective of the potential implications of this strategy and the potential alternatives

Whilst we note that the SA10 having assessed a strategic allocation of 500 dwellings on land east of Northlands Brook and south of Scamps Hill, Lindfield (SHLAA site ref 483), dismissed it on landscape impact grounds, the level of development being assessed greatly exceeds that which we believe this site has the landscape capacity to accommodate. A development of circa 220 dwellings could be contained within the lower lying western parts of the site

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	7	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:		Policy DP6	Object	Sustainability Appraisal? <input type="checkbox"/>

Despite what is said in section 7 of the June 2015 HEDNA about the implications of the OAHN for Neighbourhood Plans, we are surprised that policy DP5 does not provide clearer guidance about the level of housing development required in the parishes to meet their OAHN, and promote sustainable growth. We are in this respect, surprised to note that of the Neighbourhood Plans that have emerged to date in the category 2 settlements, only Cuckfield and Hurstpierpoint and Sayers Common actively look to promote housing allocations. Lindfield, Lindfield Rural and Worth (Crawley Down) all avoid the issue despite the fact they are sustainable locations as set out in the settlement hierarchy at policy DP6.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	8	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:	3b	Policy		Sustainability Appraisal? <input type="checkbox"/>

Having regard to the above we consider the fact the PSDP document fails to allocate any additional development to that identified at Burgess Hill means it does not provide for any flexibility, and is not a sound document as it is not positively prepared, is not justified, is not effective, and is not consistent with national policy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	9	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:		Policy DP18	Support	Sustainability Appraisal? <input type="checkbox"/>

I am pleased to be able to advise that Wates actively support PSDP policy DP18 (securing infrastructure), DP24 (character and design) and DP29 (affordable housing).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	10	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:		Policy DP24	Support	Sustainability Appraisal? <input type="checkbox"/>

I am pleased to be able to advise that Wates actively support PSDP policy DP18 (securing infrastructure), DP24 (character and design) and DP29 (affordable housing).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	11	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:		Policy DP29	Support	Sustainability Appraisal? <input type="checkbox"/>

I am pleased to be able to advise that Wates actively support PSDP policy DP18 (securing infrastructure), DP24 (character and design) and DP29 (affordable housing).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	12	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:	<input type="checkbox"/>	Policy	DP28	Object
			Sustainability Appraisal?	<input type="checkbox"/>

Wates are however concerned about the implications of policy DP28 (housing mix). We do not believe the need to provide permanent pitches for Gypsies and Travellers on strategic sites (i.e. those exceeding 10 hectares), has been justified. To request this is on our opinion potentially prejudicial to housing delivery and thus the plan and has been discouraged elsewhere. If the need for Gypsies and Travellers site is so acute it may be more realistic to require a contribution from strategic sites to pay for the acquisition of land elsewhere, so as to reflect Gypsies and Travellers nomadic lifestyle; albeit this would need to be modelled into the viability assessment.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	13	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:	1h	Policy	<input type="checkbox"/>	<input type="checkbox"/>
			Sustainability Appraisal?	<input type="checkbox"/>

MSDC have in our opinion adopted a similar approach to Lewes, and could, in reviewing their SHLAA identify additional sites to try and boost significantly the supply of housing whilst still protecting the environmental character and quality of the area. Indeed we note that the LUC review of the Landscape and Visual Aspects of Site Suitability (Jan 2015) identifies a number of sites in the SHLAA that are in part suitable in landscape terms for development, yet are still identified as unsuitable for development in the June 2015 SHLAA; such as my clients sites in Crawley Down and Lindfield. The 2015 SHLAA (table 1) produced in association with the PSDP suggests that there are sites capable of accommodating some 2,881 sites not currently in the planning process that are suitable available and deliverable. Whilst some of these may well be allocated though the neighbourhood planning process the fact remains that the District Council could, given the findings of the SHLAA, look to accommodate more of their objectively assessed need on sites that have been identified as suitable if they so choose. The fact is MSDC have decided against this without any clear rational as to why they have adopted the approach they have, which leads us to conclude that the plan has not been positively prepared and has not been justified.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	14	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:	<input type="checkbox"/>	Policy	DP5	Object
			Sustainability Appraisal?	<input type="checkbox"/>

The PSDP and associated documents make no mention of how the District Council have sought to address the issue of the shortfall in housing supply against the SEP for the period 2006 - 2014. It appears that whilst the SEP requirement of 855 dpa would have generated the need to deliver 6840 dwellings during the 8 year period 2006/7-2013/14, only 3,658 dwellings were completed – a shortfall of 3,182 dwellings. Not only have MSDC failed to meet the housing requirements of the SEP since 2006, but have failed to meet the requirements of previous regional plans (there was a shortfall of -855 dwellings between 2001 and 2006 against the Structure Plan/former RPG9 requirement). This is why, in part, there is such an acute housing need in the district now. The fact the District Council have chosen to ignore this and start their plan period in 2014, when they expect to be able to deliver 699dpa (+) year on year for the next 5 years suggests to us a plan that has not been positively prepared. The housing requirement has instead been set at a level that the DC feel comfortable they can accommodate and no more.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	15	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:	<input type="checkbox"/>	Policy	DP5	Object
			Sustainability Appraisal?	<input type="checkbox"/>

Reliance on a site allocations DPD is not an effective mechanism to address this situation. This will merely delay delivery and lead to uncertainty for both developers and residents alike.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	16	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:	<input type="checkbox"/>	Policy	DP5	Object
			Sustainability Appraisal? <input type="checkbox"/>	

Furthermore, no evidence has been presented to demonstrate that the scale of development expected through the Neighbourhood Plans will come to fruition. In addition to the above, if the category 2 settlements do not accommodate 'their fair share' and the lower category settlement look to address this how does this facilitate a sustainable pattern of growth across the district? And how can the policies effectiveness be monitored? Policy DP5 needs to be more prescriptive in the scale of growth to be accommodated across the district through the Neighbourhood Plans i.e. it should refer the parishes to table 18 of the June 2015 HEDNA and the scale of growth it recommends given the OAHN, or similar taking into account the level of growth being directed to Burgess Hill. This approach would in our opinion reflect the Distribution of Development strategy advocated in the PSDP and supported by the SA. In the context of the above, and without any evidence to the contrary, we believe, having reviewed the emerging Neighbourhood Plans on MSDC's web site that they are unlikely to deliver anything more than circa 1000 dwellings i.e. 500 short of that promoted in policy DP5.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	17	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:	<input type="checkbox"/>	Policy	DP5	Object
			Sustainability Appraisal? <input type="checkbox"/>	

Unfortunately none of the documentation produced in support of the PSDP provides a detailed critique of the existing commitments – it is not in the SHLAA, Housing Position Statement, HEDNA or the draft plan itself. Having investigated further however we note that the Commitment Schedule (as at 1st April 2015) found on MSDC's web site⁸ provides information on large sites (6+ units) over the Plan Period. This indicates commitments of 5124 from larger sites and 281 from small sites giving an overall total of 5,405. Whilst we have not undertaken a detailed review of the commitments set out in the April 2015 commitments table, we note that this comprises sites allocated in the MSLP 2004 and the SSHA DPD 2008, as well as sites allocated through the Cuckfield and Sharpthorne Neighbourhood plans, and a number of sites that have resolution to grant but are pending S106 agreements; have not commenced and have permissions that are about to expire. Not only do we find it odd that sites that have been allocated for so long and account for over 400 units are still considered deliverable, but that no provision for non-delivery appears to have been placed against the large sites; especially when a discount of 30% has been applied to the small sites⁹ to allow for expected non-delivery based on past experience. In our opinion a 10% discount for the non-delivery of some of the large sites would not be unreasonable; and would amount to some 500 units. Given the above we believe the true level of commitments to be at least 500 less than suggested, and that as a result MSDC need to identify additional strategic sites if they are to meet their housing requirement / provide for any flexibility as required by the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	18	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:	<input type="checkbox"/>	Policy	DP5	Object
			Sustainability Appraisal? <input type="checkbox"/>	

We believe the housing requirement should be increased to properly take into account the issue of market signals, the affordable needs of the area, the mismatch between jobs and housing and the unmet needs of neighbouring authorities with strong commuting and migration links – such as Crawley and Brighton and Hove. Whilst the housing requirements could in our opinion range from 720 – 880dpa, we appreciate the constraints placed upon the area by the South Downs National Park, High Weald AONB and the Ashdown Forest SPA, and as such, having regard to the findings of the SA and our views upon this (see 4 below), feel that a realistic level of housing provision, consistent with the aims and objectives of national government guidance would be circa 800dpa.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	19	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP5	<input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?

As the links with the likes of Adur, Lewes, Tandridge and Wealden are not as strong as those with Crawley and Brighton and Hove we have not sought to comment upon these. That said, in looking at the situation based purely upon MSDC's own evidence base its clear to us that the decision to provide for just 650dpa has not been justified. Furthermore, having regard to Para 182 of the NPPF we would also question whether the PSDP has been positively prepared in terms of its consideration of issues such as market signals, affordable housing need, the mismatch between job creation and the OAHN, and the issue of the unmet need of neighbouring authorities and London. Para 47 of the NPPF looks to 'boost significantly the supply of housing'. MSDC were required to provide for at least 850dpa under the South East Plan. To provide for just 650dpa now means the council are in effect promoting a 23.5% reduction in housing provision - a position which is clearly at odds with the emphasis promoted in para 47 of the NPPF. The SHLAA demonstrates that there are suitable, available and deliverable sites capable of accommodating 723dpa. We believe there are in fact further sites that are suitable for residential development that have been discounted in the SHLAA. Such as those mentioned above.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	20	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP5	<input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?

Given the above we would suggest that MSDC should be looking to provide for at least 167dpa over and above the OAHN to meet some of Crawley's unmet housing needs i.e. 50% of 335dpa. Given the above we would suggest that MSDC should be looking to provide for at least 55dpa over and above the OAHN to meet Brighton and Hove's unmet needs.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14681	21	Ms J Ashton	Judith Ashton Associates	Wates Developments LTD
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP5	<input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?

As already indicated the June 2015 SHLAA identifies suitable, available and deliverable sites capable of accommodating 723dpa. In addition the HEDNA (June 2015) indicates at para 5.10 that in delivering 656dpa the plan would provide for up to 85% of the net annual affordable housing needs as identified from the Total Housing Waiting List Using CLG Household Projection, 2012. This however assumes all sites provide 30% affordable housing. If the plan wanted to provide for 100% of the need identified in the total waiting list it should be looking to accommodate at least 770 dwellings per annum. The housing requirement for MSDC is even greater if a proportion of the unmet need for London is factored in. Given the above the housing strategy advocated in policy DP5 could actively stifle rather than encourage and facilitate the economic growth of the authority as promoted by policy DP2. There is thus an internal conflict within the plan that needs to be rectified.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14810	1	Ms C Millington	Environmental Dimension Partnership	Mr D J Peacock of Barredale Court
Code:	3i	Policy		Sustainability Appraisal? <input type="checkbox"/>

We can see there is little evidence that the material points raised in our January 2015 submission have been considered or addressed, particularly noting that two issues constitute serious constraints that will determine the level and timing of development. These are, the Districts rich designated environmental and historic heritage and the provision of infrastructure and in particular highway capacity, especially in East Grinstead.

Since 2004 new highway provision in East Grinstead has not kept pace with earlier development and general growth and the existing highway is no longer adequate to cope with traffic demands placed on it. Unless significant improvements are made, further large developments of 50 and more residential units would only exacerbate this situation and would not be appropriate. During this period and recognising the constraints, approval for dispersed small housing developments dovetailed and matched against the planned improving capacity of the EG traffic network is appropriate.

In late 2014 Mr Peacock commissioned Jubb Consulting to carry out Surveys and Review of East Grinstead and Surrounds Traffic conditions, 2 days in November 2014 and 6 days in late February/early March 2015 which provides, compliant with NPPF 158, the most comprehensive 'up to date' survey ever of East Grinstead [EG] traffic conditions.

The Jubb EG November 2014 Survey found that A22 junctions queue lengths at peak hours were significantly longer than the Atkins Stage 3 November 2011 surveys [Felbridge double, Imberhorne three times and Lingfield an increase of 65%] with this 'severe' congestion materially deteriorating further four months later with surveys at the end February/early March 2015 showing all junctions operating at over 100% degree of saturation and theoretical capacity.

This severe state of the A22 traffic network was accepted by WSCC in June by their inclusion of the Jubb reports as a material consideration in their technical evidence that WSCC consider in relation to planning applications in East Grinstead. It was also acknowledged in the MSDC District Plan 2014-2031 Pre-submission Draft June 2015 - Settlement Hierarchy Review paragraph 4.4 which states it is recognised that EG is subject to 'severe highway constraints'

As set out above, the primary infrastructure deficiency in EG is Transportation. Until this situation is remedied which the District Plan will in the longer term, it needs to be recognised that planning applications will be limited [see 1.3, 1.5 above] until properly accommodated by the necessary infrastructure.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14810	2	Ms C Millington	Environmental Dimension Partnership	Mr D J Peacock of Barredale Court
Code:	2b	Policy		Sustainability Appraisal? <input type="checkbox"/>

East Grinstead is more landscape constrained than Haywoods Heath. This was confirmed by the LUC report June 2014 'Capacity of Mid Sussex District to Accommodate Development Report' particularly noting EG lies within the Ashdown Forest SPA 7km protection zone.

Protection to the setting of the designated EG landscapes needs to be recognised commensurate with the proximity and inherent sensitivity, as well as the designated areas as well. This accords with the findings of various recent planning inquiry appeals for development close to, but not within, such designated areas.

Proposed changes:

2.9 page 7:

East Grinstead in particular *is subject to severe highway constraints and* has acknowledged congestion problems along the A22/A264;

2.13 page 13:

To ensure that development is *sustainable it must be* accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This includes the provision of efficient and sustainable transport networks. *This situation varies between settlements, at East Grinstead WSCC Transport Plan states 'East Grinstead suffers from acute*

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14810	3	Ms C Millington	Environmental Dimension Partnership	Mr D J Peacock of Barredale Court
Code:		Policy	DP32	Neutral
				Sustainability Appraisal? <input type="checkbox"/>

Proposals that relate to development adjacent to a listed building or structure or any other designated Heritage site, including its setting, should be refused when a harms v benefit analysis of the development site shows that the development harm has a significant detrimental on the architectural, or historic attributes, and the character and setting of the Heritage Asset and views of the heritage asset. This is a very important consideration for EG in its drive for growth of tourism aided by the recent success of the Bluebell Railway in extending the line to East Grinstead and its potential to promote further substantial growth.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14810	4	Ms C Millington	Environmental Dimension Partnership	Mr D J Peacock of Barredale Court
Code:		Policy	DP1	Object
				Sustainability Appraisal? <input type="checkbox"/>

Include WSCC transport studies, Atkins Stage 3 and Jubb November 2014 and March 2015 survey reports in the evidence base list.

Add: The Council will also have due regard to the limitations to the presumption in favour of sustainable development set out in Paragraph 14, notably footnote 9.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14810	5	Ms C Millington	Environmental Dimension Partnership	Mr D J Peacock of Barredale Court
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Proposed Changes:

This requirement may be exceeded if communities wish to promote higher levels of *sustainable* development to fund additional local infrastructure improvements or support local facilities and services. Higher levels of development should only be promoted through Neighbourhood Plans and will be acceptable provided they have regard to the Sustainability Hierarchy in DP6 and do not conflict with the other policies, vision and objectives of this District Plan or the policies in National Planning Policy Framework *and take full account of up to date evidence including infrastructure, transport and environmental constraints.*

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14810	6	Ms C Millington	Environmental Dimension Partnership	Mr D J Peacock of Barredale Court
Code:		Policy DP6	Object	Sustainability Appraisal? <input type="checkbox"/>

Proposed changes:

Paragraph 1: add "Burgess Hill has fewer constraints than other locations"

Paragraph 3: add "The availability of suitable housing sites and localised infrastructure constraints and opportunities will also be factors which will legitimately influence the amount of development planned for individual settlements."

Paragraph 4: delete "The availability of suitable housing sites and localised infrastructure constraints and opportunities will also be factors which will legitimately influence the amount of development planned for individual settlements."

Paragraph 5: add reference to policy DP15.

Add Jubb reports to the list of evidence base studies.

Move East Grinstead into category 1b - same settlement characteristics as 1a but "lies within the 7km zone of influence and with acknowledged severe traffic conditions".

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:	
14810	7	Ms C Millington	Environmental Dimension Partnership	Mr D J Peacock of Barredale Court	
Code:	<input type="checkbox"/>	Policy	DP19	Object	Sustainability Appraisal? <input type="checkbox"/>

Paragraph 2: add "a number of transport studies are available. These include the Mid Sussex Transport Study [2012] ,the Jubb East Grinstead Transport Studies [2014 & 2015], the Atkins East Grinstead Stage 3 Study [May 2012] and the MTRU report for EGTC [2012]"

Paragraph 3: add "This plan proposes no significant traffic infrastructure improvements to resolve the severe and acute highway constraints in East Grinstead."

Paragraph 4: add "Depending on the size and likely transport impact of development, a Transport Statement or Transport Assessment will be submitted alongside planning applications as per 'MSDC Validation Criteria for planning applications, local requirements June 2015, Transport Assessment guidance page 13, 14'."

Include WSCC transport studies, Atkins Stage 3 and Jubb November 2014 and March 2015 survey reports in the evidence base list.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14810	8	Ms C Millington	Environmental Dimension Partnership	Mr D J Peacock of Barredale Court
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

Proposed Amendments to Settlement Sustainability Review:

Methodology

- 1) Service provision. Add "The effectiveness of the local transport system in allowing access to these services is a material consideration."
- 2) Accessibility. Amend to "related to the capacity of the local public and road transport networks to access employment, services and facilities; and opportunities to gain local employment;"
- 3) Overriding environmental *and Infrastructure constraints*. Add transport infrastructure.

Environmental Constraints

- 3.35. Add "Similarly a town might be constrained not just by environmental constraints but by the capacity of its road network"
 - 3.36. Add " Settlements lying within the 7km zone of influence around Ashdown Forest"
 - 3.39. Delete "and to put in place appropriate measures which reduce visitor pressure. The proposed approach is to provide Suitable Alternative Natural Greenspace sites (SANGs), and Strategic Access Management and Monitoring (SAMM) measures on Ashdown Forest itself."
 - 3.40. add "The proposed approach is to mitigate for disturbance by providing appropriate measures which reduce visitor pressure, comprising both Suitable Alternative Greenspace sites [SANGs] and Strategic Access Management and monitoring [SAMM] measures on Ashdown forest itself". Delete "A 33 Hectare strategic SANG at East Court and Ashplats Wood in East Grinstead has been provided with an estimated capacity to cater for around 1,500 homes"
 - 3.41. Add "These measures must be physically in place prior to the occupation of the first dwelling mitigated by them and to meet Regulation 61 of the Habitats Regulations the Council must be certain that this will be achieved"
 - 3.42 add "as it is not demonstrated that further adverse effects can be avoided or that"
- 4.3. Include "In contrast East Grinstead suffers from 'severe highway constraints' [see 4.4]"
- 4.4 amend to "The level of overriding environmental constraints that ultimately check the amount of future development varies between the settlements, to a significant degree considered to justify East Grinstead being placed into a lower category; or a sub-category:"
- East Grinstead: amend to: "The town lies within the 7km zone of Influence around Ashdown Forest SPA/SAC sites protected under the EU Habitats Directive and is further constrained by the High Weald Area of Outstanding Natural Beauty which runs up to the built up area boundary of the town to the east, south and south west. There are numerous areas of woodland including pockets of ancient woodland surrounding the town and a site of nature conservation interest to the east. The town is also constrained by the Surrey County/ Tandridge District administrative boundary that runs along the northern boundary of the town. Also Why whilst not an environmental constraint as such for the purposes of this [see 3.36] it is recognised that the town is subject to subject to severe highway constraints which until resolved will restrict major housing development."

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14810	9	Ms C Millington	Environmental Dimension Partnership	Mr D J Peacock of Barredale Court
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The proposed spatial strategy based on the newly published Settlement Hierarchy Review is not sound, because it fails to reflect the major constraints posed at East Grinstead. This evidenced in 3.2 above must be reflected in the District Plan if it is to be found sound and so provide an effective framework for local development to be planned, managed and monitored over the plan period. Particularly noting and supporting the East Grinstead Neighbourhood Plan which has just been placed on the EGTC website prior to its public consultation. In reviewing the list of Evidence Base documents Pages 94-98, the 'up to date' documents that need to be added to the evidence base in compliance with NPPF 158 are: Highway Infrastructure- the primary infrastructure deficiency and constraint in - Atkins East Grinstead Traffic Management Study Stage 3 final Report 3rd May 2012 prepared for West Sussex County Council www.eastgrinstead.gov.uk [reference Neighbourhood Plan] -Jubb East Grinstead and Surrounds November 2014 Survey and Review of Traffic Conditions. www.eastgrinstead.gov.uk [reference Neighbourhood Plan]-Jubb Supplementary Report to East Grinstead and Surrounds November 2014 Survey and Traffic Conditions Headline Summary Report February V3. A22 junctions day Survey. March 2015 copy attached.-MSDC Validation Criteria for planning applications, local requirements June 2015, www.midsussex.gov.uk [JUBB Transport report attached]

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14879	1	Ms J Noble	West Sussex Local Access Forum	
Code:		Policy	DP20	Support Sustainability Appraisal? <input type="checkbox"/>

In general, WSLAF welcomes the commitments MSDC has made in the District Plan to the protection and enhancement of public rights of way and access, through robust policy wording contained in DP20: Rights of Way and other Recreational Routes and DP38: Green Infrastructure. However, during Members' discussion, points were raised regarding the supporting wording in DP20, where it was felt this should be more accurate regarding prou in the District. There are in fact too few bridleways and they are generally fragmented and of limited use for cyclists and equestrians. WSLAF is aware there are other strategic cycle routes being developed (one between Rocky Lane and Bolnore) and feels these could have been mentioned. Two Sustrans NCN routes are mentioned, but both are in need of improvement. The routing/road marking and signage of NCN21 through East Grinstead is poor. The section of NCN20 north of Pyecombe is right alongside the dual carriageway, really no more than a footway, and is little used due to safety concerns.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14879	2	Ms J Noble	West Sussex Local Access Forum	
Code:		Policy	DP38	Support Sustainability Appraisal? <input type="checkbox"/>

In general, WSLAF welcomes the commitments MSDC has made in the District Plan to the protection and enhancement of public rights of way and access, through robust policy wording contained in DP20: Rights of Way and other Recreational Routes and DP38: Green Infrastructure.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14879	3	Ms J Noble	West Sussex Local Access Forum	
Code:	<input type="checkbox"/> Policy	DP7 <input type="checkbox"/> Support	<input type="checkbox"/> Sustainability Appraisal?	<input type="checkbox"/>

Members are also pleased to see in DP7 (bullet point 8), the support for a continuation of the existing 'Green Circle' of linked areas of informal open space around the town with its associated network of multi-functional paths, the Green Circle network, and links into the town centre. The southern section of the 'Green Circle', which is already in use and dedicated as bridleway, is hugely popular with walkers, cyclists and equestrians and is of great community benefit.

Another important commitment in DP7 (bullet point 8) is support for the delivery of a multi-functional route between Burgess Hill and Haywards Heath, which the Forum is also keen to see delivered.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14901	1	Mr D Wilson	Savills (UK) Limited (Thames Water)	Thames Water Utilities Ltd (Thames Water)
Code:	<input type="checkbox"/> Policy	DP42 <input type="checkbox"/> Support	<input type="checkbox"/> Sustainability Appraisal?	<input type="checkbox"/>

As previously set out in relation to the Consultation Draft Local Plan (previously Policy DP41), Thames Water support Policy DP42 in principal as it is largely in line with their previous representations in relation to sewerage infrastructure.

As mentioned above, Thames Water support Policy DP42 in principal as it is in accordance with previous representations. However, Thames Water consider that the Gatwick Sub Region Water Cycle Study requires a review to ensure that the housing numbers considered within it are still correct and therefore any conclusions are still accurate.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14901	2	Mr D Wilson	Savills (UK) Limited (Thames Water)	Thames Water Utilities Ltd (Thames Water)
Code:	<input type="checkbox"/> Policy	DP27 <input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?	<input type="checkbox"/>

Thames Water support the new requirements that development be assessed where it is located within 800m of a sewage treatment works or 15m of a sewage pumping station as this in line with their previous representations to the Consultation Draft.

Thames Water consider that this should be further improved by confirming that where any such study identifies there is an odour impact for proposed development and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development.

Crawley Sewage Treatment Works is located to the north east of Crawley close to the boundary with Mid Sussex.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14901	3	Mr D Wilson	Savills (UK) Limited (Thames Water)	Thames Water Utilities Ltd (Thames Water)
Code:		Policy	Support	Sustainability Appraisal? <input type="checkbox"/>
		DP18		

Reasons Why

Regarding the funding of water and sewerage infrastructure, it is Thames Water's understanding that Section 106 Agreements can not be required to secure water and waste water infrastructure upgrades. However, it is essential to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems.

It is important that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development. Thames Water therefore support Policy DP42 in this respect.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	1	Mr M Brown	CPRE - Mid Sussex	
Code:		Policy	Sustainability Appraisal? <input type="checkbox"/>	
		3a		

We welcome the recognition, right at the outset of the proposed Plan, that Mid Sussex is a rural district, and that its plan must be formulated and effected in that context. CPRE actively supports the need for our local villages and towns to remain economically vibrant and self-sustaining, and recognises the need for a strategic plan that will encourage sustainable growth and development that is sensitively planned for its environment, and of good quality: a plan that meets local need within the environmental and infrastructure constraints of the District's geography and economy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	2	Mr M Brown	CPRE - Mid Sussex	
Code:		Policy	Sustainability Appraisal? <input type="checkbox"/>	
		DP15	Object	

one core part of your proposed plan fails those tests of soundness, namely your policy that purports to protect the two Ashdown Forest EU protected sites. We have been unable to convince you to change this policy, and you have rebuffed our requests for an explanation as to why you are confident that your proposed Plan policies vis a vis the EU sites are robust and its evidence base is sufficient, current and justified. So we are left with no real option but to ask for an audience at the public examination to explain our concerns, which have wide ramifications for the content of the Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	3	Mr M Brown	CPRE - Mid Sussex	
Code:	<input type="checkbox"/>	Policy DP6	Object	Sustainability Appraisal? <input type="checkbox"/>

We also still have a concern that the proposed Plan fails to give adequate weight to the promotion of the District's rural economy (with a weak evidence base to support what policy it does have in this area), and the linked issue of the need for a consistently applied spatial strategy that supports the evidence base as to the future distribution of development in currently rural parts of the district.

Fourthly, DP6 fails to support the conclusion of the Capacity Study that the District clearly does not have the capacity to absorb sustainably the huge rural settlement proposed by Mayfield. The Council's OAN study effectively rules out the need for such large-scale new housing. But, in any case, the location proposed by the developer is wholly unsuitable and in your Council's own words "fundamentally unsustainable", even if it were deliverable, which is doubtful.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	4	Mr M Brown	CPRE - Mid Sussex	
Code:	<input type="checkbox"/>	Policy DP12	Object	Sustainability Appraisal? <input type="checkbox"/>

We also still have a concern that the proposed Plan fails to give adequate weight to the promotion of the District's rural economy (with a weak evidence base to support what policy it does have in this area), and the linked issue of the need for a consistently applied spatial strategy that supports the evidence base as to the future distribution of development in currently rural parts of the district

Policy DP12, despite its title "Sustainable rural development and the rural economy", is very limited in scope and ambition. Tourism is the only "rural" business activity identified for positive promotion.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	5	Mr M Brown	CPRE - Mid Sussex	
Code:	1b	Policy <input type="checkbox"/>	<input type="checkbox"/>	Sustainability Appraisal? <input type="checkbox"/>

It is CPRE Sussex's case that the draft Plan is unsound to the extent that it fails to recognise the extent to which the 2010 HRA Regulations constrain the ability to permit future development around the EU sites' boundary

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	6	Mr M Brown	CPRE - Mid Sussex	
Code:	<input type="checkbox"/>	Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

The proposed Plan fails to give proper recognition of the extent to which the correct application of the Regulation HRA constrains the District's capacity to absorb new development to meet its objectively assessed housing need and neighbouring district overspill, or its spatial policies for new development growth within a "zone of influence" around the Sites.

It is our view that, having regard to environmental and infrastructure constraints, the sustainable, deliverable, housing target is lower than the 650 homes p.a. tipping point discussed in the HEDNA. If we are correct in that view, it would follow that the District's ability to offer surplus housing sites to meet excess needs of other authorities is less than the Council's Housing Provision Paper concludes.

[See appendix for full calculation].

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	7	Mr M Brown	CPRE - Mid Sussex	
Code:	HRA- Policy		Sustainability Appraisal?	<input type="checkbox"/>

(a) As the HRA depends on 2007/8 scoping work that is long out of date, the HRA fails the NPPF para 158 requirement for up to date evidence on which Council policy for future development around the two EU sites can safely rely;

(b) The HRA does not comply with the Habitats Regulations requirement for a cumulative impact assessment that considers all plans and projects liable to affect the protected sites since the scoping work was carried out and projected under the new District Plan. The one-by-one incremental assessments by the Council and Natural England (as was) of individual developments allowed since 2008 do not amount to the regulatory-required cumulative assessment of the considerable development permitted since 2008

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	8	Mr M Brown	CPRE - Mid Sussex	
Code:	HRA- Policy		Sustainability Appraisal?	<input type="checkbox"/>

Whilst the 2007/8 scoping and the HRA both identified already increasing visitor disturbance to the SPA from new development within 7km of the EU sites' boundaries, and traffic-caused nitrogen deposition to the SAC habitats, as potentially significant impacts on the sites, the actual harm to which they are exposed is liable to be far more significant in extent and degree when the overall degree of development permitted and proposed within the zone is factored in;

as regards the traffic pollution implications, a "monitor-only" policy is not supported by the HRA's own evidence as to the major degree to which critical levels of nitrogen deposition on the EU sites are exceeded, and it also fails to consider the potential implications for human and protected bird health of the April 2015 Supreme Court decision that UK Government standards on acceptable levels of NO2 emissions fail to comply with mandatory EU rules despite the HRA identifying that NO2 levels there considerably exceed those current lax UK standards.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	9	Mr M Brown	CPRE - Mid Sussex	
Code:	Policy	DP15 Object	Sustainability Appraisal?	<input checked="" type="checkbox"/>

The Council has also failed in its regulatory duty under the SEA Regulations 2004 to consider whether even the harm already identified can be avoided by adopting a reasonable alternative policy to ensure the effective the protection of the two EU Sites on Ashdown Forest. The Council's SANGS mitigation policy is in effect one that would allow unconstrained levels of development around the EU Sites (beyond a 400 metre buffer zone) so long as "sufficient" SANGS is made available to accommodate the population increase (at a rate of 8ha per 1,000 new people). This is the only option that has been considered. But it is not the only available option to avoid identified harm. And it is not an option that is most likely to be effective to achieve it's required purpose in this case.

Whilst CPRE Sussex does not challenge the evidence that new development within a radius of 7km of the boundaries of the EU sites can lead to a harmful increase in visitor numbers at those sites, we note that the Council has not considered whether using the Plan policies to set a limit on the overall level of development growth that should be permitted within an identified zone of influence would be the most effective and sustainable option for avoiding harm to the sites.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	10	Mr M Brown	CPRE - Mid Sussex	
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Para 182 accepts that a Plan is positively prepared even if does not meet objectively assessed need or unmet requirements from neighbouring authorities where, as in this situation, it is not reasonable to do so or unsustainable. Adjacent Wealden is an example of a district which has had its new Core Strategy found to be sound with a housing requirement well below that of the full OAN for the district based on the constraints of the High Weald AONB and Ashdown Forest.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	11	Mr M Brown	CPRE - Mid Sussex	
Code:		Policy DP15	Object	Sustainability Appraisal? <input type="checkbox"/>

Our third point relates to the inappropriateness of its SANGS/SAMM policy. It is a mitigation rather than an avoidance strategy at all and, as such, should not be considered unless no realistic avoidance strategy is available. Moreover, In deciding to pursue its proposed SANGS/SAMM strategy to mitigate increased disturbance to the SAC from visitors (without regard to any avoidance alternative) the Council has not produced a shred of evidence that this strategy is the most appropriate way to avoid harm to the EU sites, or that a SANGS/SAMM policy would even be effective sufficiently to mitigate even the visitor disturbance harm that has been identified.

The Council is not justified in applying a generic solution that has been adopted for different situations without evaluation of its likely effectiveness in this case to achieve its purpose of diverting visitors and their dogs away from the Ashdown Forest sites. There is a strong case for anticipating that it will be ineffective here, given that the evidence shows an enthusiasm amongst local residents to go well out of their way specifically to visit Ashdown Forest for the sake of the views and habitats that they can enjoy there and nowhere else.

the Council cannot simply ignore the need for a SANG to absorb extensive, unmitigated, development that has already occurred within the 7km zone since increased visitor disturbance was identified as a problem in 2007/8 (nearly 1,500 houses in Mid Sussex alone between 2008 and 2014);

Secondly, the Council appears to us to have significantly miscalculated the amount of new development that a SANG could "absorb". It's methodology (deriving ultimately from Natural England, as was) uses a different methodology to calculate the SANG area needed to accommodate new residents (8 ha per 1,000 additional population) from the methodology it uses to assess the discount needed for existing users of a SANG site (8ha per 1,000 walkers). This considerably underestimates the discount required. For example, the proposed East Court SANGS, even if the optimal solution, would only "compensate for" about 550 additional houses within the 7km zone – barely one third of the new homes for which permission has already been granted by the Council since the increased visitor harm was identified in 2008 - not the 1,698 houses that the Council's new draft Plan and the Settlement Sustainability Review assume. We illustrate the comparative calculations in an appendix at the end of this letter.

It is for these summarised reasons that we consider that Policy DP15 is unsound in terms of NPPF para 182, and other plan paragraphs and policies dealing with housing delivery and spatial allocation of housing are also unjustified to the extent that they fail to take sufficient account of the constraint imposed by the need to comply with the Habitats Regulations, and are unsupported by reliable current evidence

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	12	Mr M Brown	CPRE - Mid Sussex	
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

No economic evidence base has been submitted as to how the needs of smaller and rural businesses should best be encouraged, nor as to the facilities/infrastructure needed to support rural economic growth.

It is significant that chapter 4 of the Settlement Sustainability Review makes no reference to the proximity of the EU Sites as constraining factors affecting the hierarchy of settlements proposed in policy DP6, thereby rendering that policy unsound to the extent that it fails to take account of the Habitats Regulations constraint.

the Settlement Sustainability Review on which the hierarchy in DP6 solely relies fail to recognise the Habitats Regulations constraint, but it also admits (para 1.7) that it takes no account of infrastructure deficit or local site availability constraints identified in other parts of the available evidence base: For example,

~~We~~ we understand that West Sussex County Council has recently received a detailed report advising on the capacity of the District's infrastructure to absorb new development.

At the time of writing that important evidence has not been published, and so we do not know what implications it may have for the growth capacity of the district, or different parts of the district, for the Council's district infrastructure delivery plan, or for the Council's ability to demonstrate that the Plan is positively prepared and effective. That

evidence needs to be made public urgently, to inform and influence the content of the District Plan policies, particularly policies DP6 and DP 18 (Securing Infrastructure); and

~~long~~ long standing, seemingly unresolvable, and newly evidenced traffic constraints around East Grinstead (identified as long ago as the District's 2004 Local Plan) place an unrecognised practical constraint on its ability to absorb new development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	13	Mr M Brown	CPRE - Mid Sussex	
Code:		Policy	DP6	Object Sustainability Appraisal? <input type="checkbox"/>

The proposed new settlement hierarchy policy DP6 (which is newly introduced into the draft Plan and has not been the subject of previous public consultation) fails adequately to address our previously expressed spatial strategy concerns. It ignores core evidence and legal constraints. As such it cannot be justified and is unsound

Firstly, to our surprise, the LUC Capacity Study is not identified as a key part of the evidence base supporting this policy and influencing its operation. Even more surprisingly the Settlement Sustainability Review, which is the only identified evidence supporting DP6, itself makes no reference at all to the Capacity Study. The inference is that the Capacity Study commissioned by the Council has been ignored and that it has not influenced DP6 policy at all, which surely cannot be intended or correct. Given that DP6 does not in itself address the allocation of housing between hierarchy categories, the Capacity Study is a crucial part of the evidence on which the future operation of DP6 should be based if it is to be a justified, sound policy.

Secondly, DP6 is infected by the unsoundness of policy DP15. The evidence base supporting the spatial allocation of housing is not justified with respect to the degree of constraint imposed on development in the north eastern part of the District by reason of the regulatory requirement to ensure that any significant risk of harm to the two EU protected sites on Ashdown Forest is avoided. Accordingly that constraint is not given sufficient weight in the settlement hierarchy set out in DP6 or in the Council's Settlement Sustainability Review on which it currently relies for its evidence.

DP6 is not justified unless it expressly rules out large-scale development in rural locations in line with the Capacity Study and the other evidence as to the sites' unsustainability. we would like to see an assurance from the Council included within DP6 that it would not seek to adopt an SPD without having consulted with residents of any town or parish concerned and will take account of their views

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	14	Mr M Brown	CPRE - Mid Sussex	
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

The deliverability of the self-sustaining town promised by Mayfield based a half-sized (5,000 dwelling) development on the Mid Sussex side of the boundary must be highly questionable, and (if it isn't to be self-sustaining) the impact on the infrastructure pressures on the wide surrounding area would highlight the Mayfield proposal's non-sustainability all the more.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	15	Mr M Brown	CPRE - Mid Sussex	
Code:		Policy DP10	Object	Sustainability Appraisal? <input type="checkbox"/>

there are areas of particular tranquillity (e.g. within the Low Weald) that are outside areas that are specially designated for landscape or other characteristics. Smaller areas of relative tranquillity exist in and around more urban settings, and can be equally valued as such by local townspeople.

In order for the Council to meet the requirement of NPPF para 132 to identify areas and protect we propose an additional paragraph to policy DP10 in the following terms:
 "The Council will before 2020 identify and record on Proposals Maps specific areas of tranquillity within the District In order to ensure their protection and to assist planning decisions affecting the countryside. This process will be based on local landscape character assessments and local mapping."

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	16	Mr M Brown	CPRE - Mid Sussex	
Code:		Policy DP32	Object	Sustainability Appraisal? <input type="checkbox"/>

The opening language of these two policies, which is materially similar, has the presumptive effect that development will necessarily be allowed if the conservation effects identified in each policy is satisfied. That is not compatible with national policy: i.e. the statutes under which listed building and conservation area designations are created, and chapter 12 of the NPPF. These require the protection of these designated areas/buildings to be prioritised. New development proposals that are incompatible with their protection may have to be rejected.

This problem with proposed policies DP32 and DP33 can be cured by adding the words ",where compatible with national policy," into the first line of each policy after the word "Development".

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	17	Mr M Brown	CPRE - Mid Sussex	
Code:	<input type="text"/>	Policy DP33	Object	Sustainability Appraisal? <input type="checkbox"/>

The opening language of these two policies, which is materially similar, has the presumptive effect that development will necessarily be allowed if the conservation effects identified in each policy is satisfied. That is not compatible with national policy: i.e. the statutes under which listed building and conservation area designations are created, and chapter 12 of the NPPF. These require the protection of these designated areas/buildings to be prioritised. New development proposals that are incompatible with their protection may have to be rejected.

This problem with proposed policies DP32 and DP33 can be cured by adding the words “,where compatible with national policy,” into the first line of each policy after the word “Development”.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14982	18	Mr M Brown	CPRE - Mid Sussex	
Code:	3k	Policy <input type="text"/>	<input type="text"/>	Sustainability Appraisal? <input type="checkbox"/>

The last sentence in the second paragraph of Chapter 5 (Monitoring the District Plan) is unsound by reason of its failure to provide a timescale within which the annual Monitoring Report will be published.

We ask for the last sentence of the second paragraph of Chapter 5 to be amended so as to read “The indicators are reported through the Council’s monitoring information and report, which will be published no later than the publication of the Council’s Annual Accounts and Report for that same year.”

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14998	1	Ms J Liu	CBRE	CBRE Global Investors
Code:	3f	Policy <input type="text"/>	<input type="text"/>	Sustainability Appraisal? <input type="checkbox"/>

CBRE Limited (Planning) (CBRE) acts as planning consultants to CBRE Global Investors in respect of their property – 220 to 228 London Road, East Grinstead RH19 1HF (see site plan). CBRE Limited is instructed by CBRE Global Investors to submit representations to the ‘Mid Sussex Pre-Submission Draft District Plan (June 2015)’ in respect of their land interests. CBRE Global Investors welcomes the opportunity to engage with Mid Sussex District Council in respect of the emerging District Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14998	2	Ms J Liu	CBRE	CBRE Global Investors
Code:	<input type="text"/>	Policy DP5	Object	Sustainability Appraisal? <input checked="" type="checkbox"/>

CBRE notes that the last sentence of paragraph 3.16 states that “the maximum housing figure that could be delivered sustainably in Mid Sussex is 650 dwellings per annum (or 11,050 for the period 2014-2031)”. This is incorrect as the Council’s Sustainability Appraisal (June 2015) concludes that only a level of over 700 dwellings per annum would have negative impacts on a number of environmental objectives and should be ruled out (p.80). In other words, the Council’s evidence establishes that development of up to 700 dwellings per annum is acceptable on sustainability grounds.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14998	3	Ms J Liu	CBRE	CBRE Global Investors
Code:	<input type="checkbox"/>	Policy	<input type="checkbox"/> DP5	Object
			Sustainability Appraisal? <input type="checkbox"/>	

Furthermore by placing a cap on housing development, it would appear that paragraph 3.16 directly contradicts paragraph 3.28 which states that the 1,515 new homes, this being the residual figure after housing commitments, allocations in the Local Plan (2004) and emerging allocations are factored in, are proposed by the Council to be delivered through the Neighbourhood Planning process for the District. The policy text states that “the Plan recognises any housing provision figure will be a floor (minimum) rather than a ceiling (maximum) figure”. We would therefore welcome explicit text at paragraph 3.16 to state that the provision of 650 dwellings per annum is a minimum figure.

The third paragraph of the supporting text to Policy DP5 states that “the preferred strategy is for these 1,515 new homes to be delivered through Neighbourhood Plans. Twenty Neighbourhood Plan Areas have been designated in Mid Sussex, covering all of the towns and Parishes within the Plan Area. As at June 2015, four of these plans have been made and three more are at examination stage.” The preferred strategy rests on all Neighbourhood Plans progressing to examination stage and adopted in the next five years in order to ensure deliverability of this part of the housing supply. However, as the Council rightly acknowledge, there is a risk that Neighbourhood Plans may not deliver the required amount of development, and consequently a Site Allocations DPD will need to be prepared.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14998	4	Ms J Liu	CBRE	CBRE Global Investors
Code:	<input type="checkbox"/>	Policy	<input type="checkbox"/> DP2	Object
			Sustainability Appraisal? <input type="checkbox"/>	

Draft policy DP2 seeks to incorporate “employment provision within large scale housing development as part of mixed use development where it is appropriate”. As drafted, the policy text is unclear as to whether employment provision will only be sought for outline, mixed-use proposals where broad uses are defined or for housing-led development. In addition, CBRE would welcome further clarity in terms of what constitutes “large scale” housing development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14998	5	Ms J Liu	CBRE	CBRE Global Investors
Code:	<input type="checkbox"/>	Policy	<input type="checkbox"/> DP3	Object
			Sustainability Appraisal? <input type="checkbox"/>	

Whilst acknowledging the need for a local threshold to be established, we consider that the extent of this threshold should be flexible and reflect the relative health of town centres. East Grinstead for example, the closest Town Centre to the site at 220 to 228 London Road, is described within the Council’s Retail Study Update (2014) as ‘an attractive and busy historic centre with a good mix of comparison goods shops and service businesses, and relatively low vacancy levels.’

Under this context we feel that, as one of the District’s principal settlements, it would be appropriate to set a threshold of 1,000 sqm for East Grinstead rather than adopting a lower, District wide threshold of 500 sqm which could inhibit growth.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14998	6	Ms J Liu	CBRE	CBRE Global Investors
Code:	<input type="checkbox"/>	Policy DP18	Object	Sustainability Appraisal? <input type="checkbox"/>

The adoption of CIL will be the primary mechanism for securing infrastructure. As such, the use of tariff style contributions are unlikely to be necessary or justified especially given the limitations on pooling introduced in the CIL Regulations. This should be reflected in the policy text. The suggested text is set out below.

“In the case of residential development, tariff-style financial contributions (other than those required under Policy DP15: Ashdown Forest Special Protection Area and Special Area of Conservation) may xwillx be secured from development providing a net increase of 11 dwellings and above or which have a maximum combined gross floorspace of more than 1,000 sq.m [INSwhere these are deemed necessary and capable of being pooled within the limitations of CIL Regulations]”.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14998	7	Ms J Liu	CBRE	CBRE Global Investors
Code:	<input type="checkbox"/>	Policy DP22	Object	Sustainability Appraisal? <input type="checkbox"/>

Whilst we are supportive in principle for the need for residential development to being brought forward alongside sufficient provision for play areas, we welcome the acknowledgement within the policy drafting that this may not be appropriate in all circumstances. This is especially true of constrained sites within built up areas where it may not be feasible, or indeed desirable, to provide onsite play provision.

Moreover, through the introduction of a local Community Infrastructure Levy, therein lies an opportunity for the Council to pursue a more co-ordinated and strategic approach to the provision of play space facilities to ensure that they are provided in the most appropriate locations and to a high standard.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14998	8	Ms J Liu	CBRE	CBRE Global Investors
Code:	<input type="checkbox"/>	Policy DP25	Neutral	Sustainability Appraisal? <input type="checkbox"/>

Minor additions to improve clarity of policy DP25 is requested as the minimum nationally described space standards have not yet been adopted. As such, suggested policy text below: “[INSOnce adopted], minimum nationally described space standard for internal floor space and storage space will be applied to all new residential development [...]”

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14998	9	Ms J Liu	CBRE	CBRE Global Investors
Code:	<input type="checkbox"/> Policy	DP29	Object	Sustainability Appraisal? <input type="checkbox"/>

As drafted, the requirements of Policy DP29 do not provide sufficient flexibility in the approach to securing affordable housing as advised by the NPPF. There are instances where site constraints prevent on-site provision of affordable housing. In such cases, off-site provision or a commuted payment towards affordable housing would be more appropriate.

CBRE suggest the following policy text:

“The [INSON-site] provision of a minimum of 30% affordable housing for all residential developments providing a net increase of 11 dwellings and above or a maximum combined gross floorspace of more than 1000m2. [INSIf it can be demonstrated that on-site affordable housing may not be appropriate, offsite development of affordable housing may be acceptable. If off-site development is not achievable, the Council will seek a commuted sum to enable provision elsewhere within the borough]”.

“[INSWhere on-site provision of affordable housing is appropriate], free serviced land should be made available for the affordable housing, which should be integrated with market housing, [INSwhere possible], and meet the Design and Quality Standards published by the Homes and Communities Agency or any other such standard which supersedes these.”

Paragraphs 21 to 23 of the National Planning Practice Guidance introduced the application of Vacant Building Credits. The NPPG states that “where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought. Affordable housing contributions may be required for any increase in floorspace”. As such, the policy text to DP29 should be amended to acknowledge government guidance.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14998	10	Ms J Liu	CBRE	CBRE Global Investors
Code:	3f	<input type="checkbox"/> Policy	<input type="checkbox"/>	Sustainability Appraisal? <input type="checkbox"/>

In our view, the allocation of the site for approximately 24 dwellings accords with the relevant development plan policies. It provides an exciting opportunity to create a high quality, attractive development that makes best use of the site’s notable features. In summary, allocation of the site for residential uses will deliver a number of benefits,

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14998	11	Ms J Liu	CBRE	CBRE Global Investors
Code:	<input type="checkbox"/> Policy	DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Based on historic rates, CBRE believe there is likely to be greater capacity on large brownfield sites within built area boundaries which are yet to be identified. On that basis, it is likely that a number of large sites will come forward in the built up areas in the District which are not identified in the SHLAA which will continue to provide a good source of housing supply.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
14998	12	Ms J Liu	CBRE	CBRE Global Investors
Code:	<input type="checkbox"/> Policy	DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

CBRE would welcome further text which commits the Council to a review into the need for a Site Allocations DPD as soon as the housing supply situation has been established upon adoption of the District Plan. Indeed, this appears to be the approach reflected in the latest Local Development Scheme (March 2015).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15043	1	Mrs A Purdye	Gatwick Airport Ltd	
Code:		Policy DP24 Support	Sustainability Appraisal? <input type="checkbox"/>	

Policy DP24 Character & Design includes paragraphs with regard to the need to comply with aerodrome safeguarding requirements which we support

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15043	2	Mrs A Purdye	Gatwick Airport Ltd	
Code:		Policy DP40 Support	Sustainability Appraisal? <input type="checkbox"/>	

DP40 Renewable energy includes paragraphs with regard to the need to comply with aerodrome safeguarding requirements which we support

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15095	1	Ms E Peck	Rydon Homes	
Code:		Policy DP9 Object	Sustainability Appraisal? <input checked="" type="checkbox"/>	

We note that the Sustainability Appraisal Pre Submission Report assesses a number of Strategic Site Location Options across the District. We support the overall balance and outcome of the SA in that it scores the Northern Arc consistently higher than any other site option, a conclusion which is consistent with its highly sustainable location and ability to deliver strategic infrastructure. However, we OBJECT to the ranking given to Option A (Strategic Allocation to the North and North West of Burgess Hill) in respect of; Objective 8 (Conserve and Enhance Biodiversity) scores ‘-?’ for the Burgess Hill Northern Arc on the basis that it contains several areas of designated ancient woodland and SNCIs. We object to the assessment that this should score negatively as the Northern Arc emerging masterplan, shows how ancient woodland can be retained and protected within the development. In addition, the appraisal is incorrect in so far that the Northern Arc strategic allocation does not contain land within a SNCI. Whilst the eastern extent of the Northern Arc strategic allocation (at Lowlands Farm) is located adjacent to Bedelands SNCI, the SNCI is located outside the Lowlands Farm site. Policy DP9 proposes the extension and inclusion of substantial areas of additional land within the Lowlands Farm site comprising of Ancient Woodland (around 15 acres/6 hectares) within Bedelands SNCI. The protection and management of the additional land as part of Bedelands SNCI has the potential to provide a net additional gain to biodiversity for Lowlands Farm. On the basis of the retention of all Ancient Woodland (and buffers), coupled with the support of MSDC’s aspirations to extend Bedelands SNCI into the Lowlands Farm site (Ancient Woodland only), it is advocated that a negative ranking for site A is inappropriate and that Option A should score more highly against this objective.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15117	1	Mr A Ransome	Plainview Planning	Mentin Ltd
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

Mentin Ltd is promoting the land at Northlands Farm for development as a high-quality Class B logistic and distribution park. They also consider that this site could also represent a suitable location for a high quality Science and Technology Park.

Land at Northlands Farm extends to approximately 9 ha (22 acres) and has the capacity to deliver approximately 37,000 sq m of high quality logistics and distribution floorspace and/or over 100,000 sq m of Class B floorspace in connection with a science and technology park. The economic vision statement for Northlands Farm, which sets out its strategic and local context, is contained in Appendix A.

The extant planning permission is particularly important considering the provisions of the NPPF which seeks to support economic growth. Paragraph 28 of the NPPF specifically states that the sustainable growth and expansion of all types of business will be supported in rural areas and that this could be achieved through the conversion of existing buildings. Northlands Farm has extant planning permission for a circa 7,200 sq m agricultural market and given this fallback position, it is important that the economic and strategic potential is fully realised and intensified.

It is also relevant that both the 'Burgess Hill Employment Sites Study' and the 'Coast to Capital Local Enterprise Partnership: Strategic Economic Plan' (2014) identify Burgess Hill as a significant strategic business and employment location for strategic growth. The 'Burgess Hill Employment Sites Study' specifically states that employment development should be located to the west of the town as it would have better links with the M23/A23 corridor and would reduce congestion within town itself. Clearly the site at Northlands Farm fulfils this criteria and meets the overall economic objectives, yet the Council has failed to consider it as part of the District Plan preparation.

The site at Northlands Farm is located centrally within the Gatwick Diamond and has excellent strategic connections with wider sub-region, which makes it an ideal location for a Class B Business Park incorporating office, logistics and distribution uses.

☑ Within the sub-region adjoining Local Authorities and West Sussex County Council supports the provision of increased employment land within the Gatwick Diamond catchment area.

☑ Extant planning permission exists at the Northlands farm site (ref: TW/9/89 and TW/1/91) for an agricultural market comprising circa 7,200 sq m. When permission was originally granted, the A23 had not been built, however this has now been constructed and the access to the site from the roundabout has also been built.

☑ The Northlands Farm site has recently been identified as a preferred site within the West Sussex County Council Waste Plan for 'built waste facility' that could manage between 100,000 to 250,000 tonnes of waste per annum and for the delivery of this tonnage the County Council.

☑ Mentin Ltd and the Council have recently been engaged in preapplication discussions and an application has been pending at the site since December 2013.

☑ The Council's LDF evidence base is not based on credible evidence as it has failed to assess the reasonable alternatives to the strategic employment allocation. There is no reference to Northlands Farm in any of the evidence base documents or background papers.

☑ The Council cannot demonstrate that it has consulted the local community on all the reasonable alternatives to their employment strategy.

☑ The Northlands Farm site has not been assessed as a reasonable alternative strategic employment allocation. consequently this sustainability appraisal has not been prepared in accordance the EU

Directive (2001/42/EC) on Strategic Environmental Assessment and the associated Environmental Assessment of Plans and Programmes Regulations 2004 (SI No.1633).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15117	2	Mr A Ransome	Plainview Planning	Mentin Ltd
Code:		Policy	Object	Sustainability Appraisal? <input type="checkbox"/>
		DP2		

The Council's employment strategy and provision has not been justified as it cannot be demonstrated that the Council's chosen approach is the most appropriate given the reasonable alternatives. Specifically, the Council has failed to consider the identification of land at Northlands Farm as a strategic Class B logistics and distribution park or as a high quality Science and Technology Park.

This site's context, its planning history and the Council's evidence base all represent significant material considerations to justify its inclusion as a strategic employment location. These matters are considered in more detail in the following paragraphs.

The Council has also failed to allocate sufficient land to meet the critical need for employment land within the Burgess Hill area.

The site at Northlands Farm has been subject to recent planning activity for a large scale development. Given this planning history, it is surprising that the Council has failed to assess the economic potential of this site.

The County Council conducted a shortlist of sites in 2011, which was followed by the Proposed Submission Waste Site Pro-forma in November 2012. The Northlands Farm site was taken forward as part of this consultation but was subsequently only removed as a preferred location on the advice of the landowner who no longer wanted to promote this site as a 'built waste facility'. Despite the identification of this site as a strategic site by the County Council, it is unclear why Mid Sussex has not considered this site any further in their development plan preparation.

For the District Plan to be found sound, it must be demonstrated that the most appropriate strategy has been chosen when considered against the alternatives. This means that the District Plan should be based on a robust and credible evidence base involving research and fact finding. The Council has failed to assess the site at Northlands Farm as a strategic Class B logistic and distribution park or high quality Science and Technology Park and as such their policy approach is unsound.

As mentioned above, various evidence base documents identify a need for between 30 and 62 ha of employment land for the period 2014 to 2031. However Policy DP2 only identifies 30 ha of land. This allocation is insufficient to meet the identified economic needs for the area and as such the Pre-Submission District Plan is not consistent with the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15117	3	Mr A Ransome	Plainview Planning	Mentin Ltd
Code:	3h	Policy	Object	Sustainability Appraisal? <input type="checkbox"/>

The site is located at a strategically important position within the 'Gatwick Diamond'

business location. The Council's reaffirms the vision for this area, which is: "By 2016 the Gatwick Diamond will be a world class, internationally recognised business location achieving sustainable prosperity"

Delivering the vision requires a step change in the economic performance of the Gatwick Diamond by offering first rate operating conditions for business, attracting new investment, being served by excellent links to other UK and international economic centres and being supported by a highly motivated, knowledgeable work force.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15117	4	Mr A Ransome	Plainview Planning	Mentin Ltd
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

Despite this recent extensive planning activity, there is no reference to this site in any of its evidence base documents or background papers. For the avoidance of doubt, the following evidence base documents have failed to assess the merits of Northlands Farm for strategic economic development:

- ☒ Burgess Hill Employment Study (2012);
- ☒ Feasibility Study for Development options at Burgess Hill (2005);
- ☒ Employment Land Review Part 1 (2009); and
- ☒ Employment Land Review Part 2 (2010).

Since the preparation of the previous Pre-Submission District Plan, the Council has published a number of new evidence base documents. None of these discuss the merits of Northlands Farm as a strategic employment location but it is clear from these documents that the adopted Local Plan has failed to deliver the required employment space to meet the economic needs of the District and wider area.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15117	5	Mr A Ransome	Plainview Planning	Mentin Ltd
Code:	1i	Policy		Sustainability Appraisal? <input type="checkbox"/>

Given the strategic importance of Northlands Farm within the local area, its access to the strategic road network and its extensive planning history it would be expected that this would have been considered for strategic development during the DPD process and subsequently subject to public consultation. The Council has not consulted on this important strategic site.

The Council has failed to consult on a potentially important sub-regional strategic employment location, denying the local community an opportunity to express their views on the reasonable alternatives.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15117	6	Mr A Ransome	Plainview Planning	Mentin Ltd
Code:		Policy	DP2	Object <input type="checkbox"/> Sustainability Appraisal? <input checked="" type="checkbox"/>

Despite the extensive planning activity, the Northlands Farm site has not been assessed as a location for strategic economic growth within the Proposed Submission Sustainability Appraisal. Indeed the sustainability appraisal states on page 94 that there are no other alternative options for the proposed scale of employment within the District, which is clearly not correct, given the availability and deliverability of Northlands Farm. There no evidence of Northlands Farm having ever been assessed as a strategic employment location in any of the earlier versions of the Sustainability Appraisal.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15117	7	Mr A Ransome	Plainview Planning	Mentin Ltd
Code:		Policy	DP9	Object <input type="checkbox"/> Sustainability Appraisal? <input type="checkbox"/>

For a DPD to be found sound, it must be demonstrated that the most appropriate strategy when considered against the alternatives. The Council's employment strategy and provision has not been justified as it cannot be demonstrated that the Council's chosen approach is the most appropriate given the reasonable alternatives. Specifically, the Council has failed to consider the identification of land at Northlands Farm as a strategic employment allocation.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15117	8	Mr A Ransome	Plainview Planning	Mentin Ltd
Code:		Policy DP9	Object	Sustainability Appraisal? <input type="checkbox"/>

The NPPF seeks to build a strong and competitive economy (Paragraphs 19 to 21) and the Council's evidence base demonstrates a requirement for between 30 and 62 ha of new employment land to meet identified economic need. The Council is however only proposing to allocate 30ha of employment land and by restricting the employment land release and ignoring the site at Northlands farm, the Council is undermining the delivery of an important sub-regional economic hub that will deliver significant growth in terms of economic growth and job creation.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15175	1	Mr T Slaney	South Downs National Park Authority	
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

The SDNPA welcomes the reference which has been added to the duty of regard under Section 62 of the Environment Act 1995 for all relevant bodies including Mid Sussex District Council to have regard to the statutory Purposes of the National Park.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15175	2	Mr T Slaney	South Downs National Park Authority	
Code:	2c	Policy		Sustainability Appraisal? <input type="checkbox"/>

The SDNPA requested that the impact on nationally protected landscapes and their setting be included as one of the key challenges. This has not happened and the SDNPA request that this list (para 2.9) is amended accordingly. In addition the SDNPA note strategic objective 3) and request the following minor amendments to better reflect the purposes of the National Park.

Objective 3) To protect valued and designated landscapes for their visual, historical, heritage and biodiversity qualities.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15175	3	Mr T Slaney	South Downs National Park Authority	
Code:	<input type="checkbox"/> Policy	DP16	Neutral	Sustainability Appraisal? <input type="checkbox"/>

The SDNPA has reviewed policy DP16 and recommends that the following minor amendments are made to ensure that it accurately reflects the evidence base and is up to date.

DP16: Setting of the South Downs National Park

Evidence Base: The South Downs Partnership Management Plan, South Downs Integrated Landscape Character Assessment and DEFRA Duty of Regard.

Development within land that contributes to the setting of the South Downs National Park will only be permitted where it does not detract from or cause detriment to, the visual and special qualities (including dark night skies), tranquillity and essential characteristics of the National Park, and in particular should not adversely affect transitional open green spaces between the site and the boundary of the SDNP, and the views, outlook and aspect, into and out of the National Park by virtue of its location, scale, form or design.

Development should be consistent with National Park purposes and must not significantly harm the National Park or its setting. Assessment of such development proposals will also have regard to the South Downs Partnership Management Plan and *emerging National Park Local Plan and other adopted planning documents and strategies.

* The SDNPA Local Plan is due to be adopted in 2017.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15175	4	Mr T Slaney	South Downs National Park Authority	
Code:	<input type="checkbox"/> Policy	DP27	Object	Sustainability Appraisal? <input type="checkbox"/>

DP27: Noise, Air and light Pollution

It is noted that this policy makes reference to the level of impact that might occur in rural locations, close to designated areas. It is however considered that this policy could be enhanced by reference to the SDNP and links be made to policy DP16: Setting of the South Downs National Park.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15175	5	Mr T Slaney	South Downs National Park Authority	
Code:	<input type="checkbox"/> Policy	DP31	Support	Sustainability Appraisal? <input type="checkbox"/>

Policy DP31: Gypsies, Travellers and Travelling Showpeople

The SDNPA supports the designation of a site(s) for 24 pitches in Burgess Hill.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15175	6	Mr T Slaney	South Downs National Park Authority	
Code:		Policy DP7	Object	Sustainability Appraisal? <input type="checkbox"/>

In Policy DP6 (now DP7) - General Principles for Strategic Development at Burgess Hill, the NPA would like to see an addition to the fifth bullet point to say 'in particular, on the special qualities of the South Downs National Park'. The sixth bullet point should incorporate the phrase 'including... minimising additional vehicle movements through the South Downs National Park'. Bullet Point 8 is supported.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15175	7	Mr T Slaney	South Downs National Park Authority	
Code:		Policy DP8	Support	Sustainability Appraisal? <input type="checkbox"/>

Regarding Policy DP7 (now DP8) - Strategic Allocation East of Burgess Hill, the third bullet point regarding Ditchling Common SSSI is supported. In addition, the NPA looks forward to an up to date transport assessment for this site in combination with other developments proposed for Burgess Hill, carried out in cooperation with West Sussex and East Sussex County Councils, that takes into account the National Park status of some of the roads on which this development is likely to have an effect, and proposes solutions that will minimise the impact of the development on the National Park. The final version of this policy should include requirements for the delivery of those solutions.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15175	8	Mr T Slaney	South Downs National Park Authority	
Code:		Policy DP19	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP18 (now DP19) - Transport- the NPA would like to see the addition of a bullet point stating that new development should avoid generating traffic impacts that harm the special qualities of the South Downs National Park. Potential means to achieve this should be established by transport assessment, but may include developer contributions to improvement of sustainable access to the National Park, investment in the diversion of additional traffic towards the A23 and away from the B2112, and measures to reduce the impact of existing vehicular movements through Ditchling and surrounding villages.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15175	9	Mr T Slaney	South Downs National Park Authority	
Code:	3g	Policy		Sustainability Appraisal? <input type="checkbox"/>

The SDNPA recognises the importance of neighbourhood planning to the delivery of the District Plan and will continue to support those communities who are within both planning authority areas. For clarity it is suggested that it may be worth identifying those Neighbourhood Plan areas which fall partially or fully within the National Park area in the table at para 3.22.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15175	10	Mr T Slaney	South Downs National Park Authority	
Code:		Policy DP5	Neutral	Sustainability Appraisal? <input type="checkbox"/>

The SDNPA notes that Mid Sussex has set out that it cannot contribute towards meeting neighbouring authorities housing needs. However Mid Sussex has confirmed that the figure for the objectively assessed housing need for Mid Sussex includes the communities within the National Park, and therefore it is assumed that their very low level of needs will be met alongside those of the planning authority area of Mid Sussex.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15514	1		Parker Dann	Mrs L Wells
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

In essence my client's concern is that the Council's classification of her land at "high value multifunctional greenspace" adversely affects its development potential and has been allowed to subsist without any form of justification. The designation stems from the Council's PPG17 Assessment of Open Space, Sport and Recreation. The final report was completed in 2006. It is not appropriate to rely on such an outdated document which is not consistent with current national policy to inform policy making some 10 years later.

The consequence of misapplication of the "high value multifunctional greenspace" is that the Council has failed to recognise the true number of developable sites available to it within its Strategic Housing Land Availability Assessment (May 2015) (SHLAA) and this has led to an artificially constrained housing target.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15514	2		Parker Dann	Mrs L Wells
Code:		Policy	DP38	Object Sustainability Appraisal? <input type="checkbox"/>

I object to Policy DP38 relating to green infrastructure of the basis that it is not sound, particularly that it is not justified as it is not based on proportionate evidence and not effective as the aspirations of the policy are not deliverable.

It can be seen that the aspiration of the policy is to create a network of green space around Burgess Hill which can perform a range of functions leading to social, environmental and economic benefits.

The inclusion of my client's land and buildings, which unfairly fetters their development potential, is not justified as there is no public access to my client's land. It cannot be used for recreation of any sort. There are no social benefits arising from the site's inclusion, similarly there are no economic benefits. There could be an environmental benefit although this seems unlikely given the land is unimproved grassland. The Council do not point to any environmental benefits arising from the lands inclusion. Fundamentally it does not perform a range of functions, let alone functions that actively lead to social, environmental and economic benefits.

In any event, the "high value multifunctional greenspace" designations is a policy constraint akin to a more general policy of countryside protection, it is not an insurmountable technical constraint that restricts development on my client's site. The Council's strategy in relation to housing provision and open space is not based on a proportionate evidence base and is therefore not justified.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15514	3		Parker Dann	Mrs L Wells
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

Policy DP5 concerning the overall housing provision for the District is not sound as it is not consistent with national planning policy to "boost significantly the supply of housing" outlined at paragraph 47 of the Framework. The Council should seek to accommodate growth from neighbouring authorities which have been proven at Examination to be unable to meet their own objectively assessed housing needs. This is in line with the duty to co-operate which seeks to replace planning at a regional scale. I note the now revoked South East Plan set Mid Sussex District Council a materially higher housing target than it now seeks to deliver and this was prior to the instructions at paragraph 47 outlined above.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15521	1	Mr T Rumble	Woolf Bond Planning	Taylor Wimpey Strategic Land
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

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

Our clients have a controlling interest in land to the east of Graveley Lane, Lindfield that is located outside of protected land. Having regard to the highest status of protection of National Park and AONB land referenced in the NPPF, urban sites should be favoured first; followed by unconstrained previously developed land sites on the edge of the District's largest settlements second; and greenfield sites on the edge of the District's largest settlements third, with protected land considered only in the last instance.

Proposed Change:

Land to the east of Graveley Lane, Lindfield to be allocated for up to approximately 150 residential dwellings within the plan period to 2031 and appraised with the Council's Sustainability Appraisal.

[Further details and site assessments attached]

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15521	2	Mr T Rumble	Woolf Bond Planning	Taylor Wimpey Strategic Land
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

The need to update OAN to account for the CLG projection update is acknowledged. However this has resulted in a change in approach by MSDC as to the District's ability to meet adjoining authorities' needs and the need to include a 10% uplift to the requirement figure to account for market signals. There is no justification set out for this change in approach, whereby in February 2015 there was an acknowledgment of affordability issues in MSDC and thus a need to include a 10% uplift for market signals that now has been removed.

We do not consider that robust evidence exists to demonstrate that higher levels of housing growth are 'unsustainable'. However even if they were, 'market signals' are to be accounted for in calculating an OAN on a 'policy off' basis first and then consideration of 'policy on' constraints is necessary at a latter stage. There is no justification for the Council's change in approach in respect of market signals.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15521	3	Mr T Rumble	Woolf Bond Planning	Taylor Wimpey Strategic Land
Code:		Policy	DP29	Object Sustainability Appraisal? <input type="checkbox"/>

HEDNA para 5.10 confirms that the proposed housing requirement of 656dpa will not meet 'full' affordable housing needs as required by paragraph 47 of the NPPF. Clearly a higher housing requirement and the release of further land would increase prospects for meeting affordable housing needs in 'full'.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15521	4	Mr T Rumble	Woolf Bond Planning	Taylor Wimpey Strategic Land
Code:	1e	Policy	<input type="checkbox"/>	Sustainability Appraisal? <input type="checkbox"/>

Consequently there is strong pressure on MSDC to meet needs from under delivering neighbouring authorities. If this is not to be achieved there is a necessity for strong evidence justifying why a contribution towards neighbouring authorities' needs cannot be achieved. The above unmet need must be met somewhere in the HMA. To quantify the issue, it forms 38% of the overall OAN across the HMA as referred to in Table 3. If solutions are not identified, significant adverse economic and social impacts will result. In addition, this significant under delivery in itself provides evidence that affordability is only going to decline across the HMA and therefore further justifies an uplift to the OAN to account for market signals.

Such an approach would be consistent with the recent neighbouring Horsham EiP where the Inspector agreed approximately 100 dwellings per annum needed to be added to the housing requirement to account for unmet needs at the LPA's of Crawley and Brighton & Hove. The Inspector in that case referred to the District being largely unconstrained by designated Green Belt, National Park, AONB, SSSI's, SPA or biodiversity/landscape protection. Whilst MSDC is partly constrained by AONB and SPA, a large area in its centre adjoining its two largest settlements is not constrained by such designations. Consequently the same applies to MSDC whereby a reasonable contribution towards neighbouring authorities' needs is imperative.

The HMA work also needs to account for the option of Mid Sussex accounting for some of Greater London's needs. The Inspector's Report on the Further Alterations to the London Plan (15th December 2014) recognises the implications of the requirement set out in the London Plan on those areas with existing migration / commuting relationships with London.

Para 57 of the FALP report is particularly relevant to Mid Sussex given the strong commuting links available in the District to London via train. It is therefore considered critical that the HEDNA is updated to assess the Greater London position before the Plan is submitted for examination and reveal the true and yet higher level of unmet needs in the region.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15521	5	Mr T Rumble	Woolf Bond Planning	Taylor Wimpey Strategic Land
Code:		Policy	Object	Sustainability Appraisal? <input checked="" type="checkbox"/>
		DP5		

Whilst assertions have been made by MSDC that higher levels of housing growth would result in significant environmental impacts, we note that the Transport Study is awaiting review and no other technical evidence is referred to in justifying the above position. In the absence of such evidence, the above represents an unjustified position and thus the Council's strategy as drafted is 'unjustified' having regard to the NPPF tests of soundness.

Despite the above evidence of need and site developability, our client's site is presently not included as an option within the Council's Sustainability Appraisal. We assume this is because the site is considered too small to be considered at this District Plan stage. However we are aware of a number of Council's that have proposed the allocation of sites of this size within Core Strategies or first parts of their Local Plans. Sites of around 150 dwellings provide greater opportunity to deliver within the short to medium term. Consequently there is a strong need for the site to be included as an allocation within the District Plan.

The supporting text to Policy DP5 does refer to the potential need for MSDC to prepare a Site Allocations Development Plan in the event that Neighbourhood Plans do not deliver the required amount of development. In the case of Lindfield this is already the case. However MSDC's commitment to a Site Allocations DPD is not reflected in headline policy.

There is insufficient evidence to justify MSDC's position that an increased housing requirement would result in significant negative effects.

There are sites available that have been defined as 'developable' in the Council's SHLAA that could meet the above needs and not result in cumulative adverse environmental effects.

One such site is our client's site at Gravelye Lane, Lindfield that is identified as suitable, available and achievable in the Council's SHLAA.

There is a defined OAN for Lindfield / Lindfield Rural Parishes that will not be met even if all 'developable' SHLAA sites come forward.

The plan making process set out in Policy DP5 refers to potential allocations via the Neighbourhood Plan process. The submitted Lindfield Neighbourhood Plan fails to acknowledge OAN or make any allocations to meet it, whilst the District Plan defers these decisions to the Neighbourhood Plan. As drafted, the much needed 'developable' sites are consequently excluded from the plan making process.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15521	6	Mr T Rumble	Woolf Bond Planning	Taylor Wimpey Strategic Land
Code:	3c	Policy		Sustainability Appraisal? <input type="checkbox"/>

MSDC's spatial strategy moving forward is heavily predicated upon Burgess Hill and two strategic sites. The largest one being 'North Burgess Hill' that is scheduled to deliver 3,000 units. The Housing Trajectory at Appendix A suggests that no completions will come forward from this site within the present 5 year period but will begin in 2020/21 and run through to 2030/31. Delivery on this site will be between 310 and 325 units per annum over an 11 year build out period, enabling the entire allocation to be delivered within the plan period.

There are two key points we wish to make in relation to this proposed distribution strategy. First, this site does not enable delivery within the 5 year period at a time when MSDC have a longstanding housing land supply deficit. The benefit of identifying smaller sites that can deliver within the 5 year period and can supplement this longer term delivery strategy is therefore clear. Second, if the strategic allocation were delayed by only one year, an immediate deficit of 325 units set against the overall 11,050 requirement would emerge. As with any site of this size there are significant infrastructure requirements associated with it including the need for a relief road. It is therefore quite possible that delivery on the site could be delayed and the delivery strategy is heavily dependent upon it. Consequently we consider that without some further smaller site allocations the Plan's distribution strategy is not effective in terms of generating a flexible plan and does not provide for positive planning.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15521	7	Mr T Rumble	Woolf Bond Planning	Taylor Wimpey Strategic Land
Code:		Policy	DP11	Object
				Sustainability Appraisal? <input type="checkbox"/>

We continue to object to the Council's proposal to implement Local Gaps between a number of the District's settlements.

The most recent national guidance on the matter comprises Planning Policy Statement 7 (Sustainable Development in Rural Areas) that was published in 2004 and provided a clear presumption against the use of rigid local designations.

The reason behind the change in national policy emphasis was to ensure that LPA's manage development needs in a pro-active way rather than relying upon restrictive controls which may prevent sustainable development.

The potential use of local gaps in Policy DP11 is a restrictive one that is entirely unnecessary and threatens the delivery of sustainable development principles. Sufficient protection of countryside land can be contained within other policies that cover the appropriateness of built development in countryside locations and policies regarding the need to take landscape character into account when determining planning applications (as referred to in Policy DP10 and the NPPF).

It therefore follows that Policy DP11 doesn't serve any rational purpose in terms of meeting the document's overarching objectives. Ultimately impact on the landscape is a core factor in determining any planning application and applying the NPPF's presumption in favour of sustainable development.

The use of local gaps is not consistent with national policy, is not justified by any evidence base, is not effective in terms of generating a flexible plan and does not provide for positive planning.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15521	8	Mr T Rumble	Woolf Bond Planning	Taylor Wimpey Strategic Land
Code:	<input type="checkbox"/>	Policy	DP5	Object
			<input type="checkbox"/>	Sustainability Appraisal? <input type="checkbox"/>

There is a demonstrable need for approximately 682 dwellings in Lindfield and Lindfield Rural Parishes over the Plan period (2014-2031). Page 20 of the Council's Housing Provision Paper (June 2015) also confirms this and refers to a combined approximate OAN in Haywards Heath / Lindfield of 2,886 units. This is set against a combined potential supply of 2,119 units. It is therefore apparent that even if all sites identified in Haywards Heath / Lindfield are delivered through the plan making process, OAN in this part of the District will not be met.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15521	9	Mr T Rumble	Woolf Bond Planning	Taylor Wimpey Strategic Land
Code:	<input type="checkbox"/>	Policy	DP5	Object
			<input type="checkbox"/>	Sustainability Appraisal? <input type="checkbox"/>

There is an acknowledgement that there are 'developable' sites already available to deliver greater levels of housing growth. However MSDC's concern is that this would result in potential adverse cumulative impacts. However it is apparent that if a site can be demonstrated not to have a cumulative adverse impact and is identified as 'developable' in the SHLAA then it should be allocated as part of the District Plan process. As discussed below our client's site benefits from this position. Second, there is a suggestion that no other sites are available to meet needs. However there are a very large proportion of sites that are included in the SHLAA but not assessed as 'developable' for varying reasons. MSDC could roll back certain 'develop ability' constraints in order to meet further needs. Consequently there are available sites to meet higher needs, it is the Council's own assessment of suitability/developability that is restricting their delivery. Irrespective of this second point however, it is imperative that where sites are assessed as 'developable' their delivery is secured during the plan period. Significant strategic growth is scheduled for Burgess Hill in policies DP8 and DP9. It therefore follows that the majority of any additional growth necessary should be scheduled to come forward at Haywards Heath. Strategic sized releases able to deliver within a 5 year period should be identified within the District Plan adjoining the Haywards Heath/Lindfield urban area now. Any proposal to delay such decisions to a later development plan document would fail to meet the 'effective' test of soundness as the plan would fail to be sufficiently deliverable in accounting for the pressing needs for housing development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15552	1	Mr M Best	Parker Dann	Norris Farms Partnership
Code:	3f	Policy	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	Sustainability Appraisal? <input type="checkbox"/>

My clients have put forward approximately 100 hectares of land outside of any designated landscape for development which abuts the edge of Ansty and extends towards Cuckfield and Haywards Heath. The site lies within an area identified by the District Council as being a potential broad location for unmet need arising from neighbouring authorities (please refer to Figure 1 Housing Provision Paper). In any event 100 hectares of land is available for residential development outside of the AONB. Whilst the Council contend that this area has a low landscape capacity for change, the importance of meeting housing needs is highlighted by the example I refer to above where Lewes District Council were required to include a development proposal for circa 500 dwellings in the National Park. Clearly having an alleged low landscape capacity for change should not preclude the site from delivering housing.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15552	2	Mr M Best	Parker Dann	Norris Farms Partnership
Code:	<input type="checkbox"/>	Policy DP5	<input type="checkbox"/>	Object Sustainability Appraisal? <input type="checkbox"/>

The Mid Sussex District Plan Proposed Submission Document proposes to meet approximately 76% of the South East Plan (2009) figure extrapolated over the plan period i.e. 650 dwellings per annum as opposed to 855 dwellings per annum. This is a significant reduction. Whilst the South East Plan has been revoked, it was tested extensively and went through numerous consultations before ultimately being found 'sound'. I concede that some of the evidence base that informed the preparation of this document is now aging however much of it remains overtly relevant. Demographics and the economic climate may have altered but protected landscapes, Sites of Special Scientific Interest (SSSI's), transport infrastructure and many other elements have remained the same. These issues were considered cumulatively and a target of 855 dwellings per annum for Mid Sussex District was found to be appropriate. This should be seen in the context of the NPPF which places a stronger emphasis than ever before on growth.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15552	3	Mr M Best	Parker Dann	Norris Farms Partnership
Code:	1e	Policy <input type="checkbox"/>	<input type="checkbox"/>	Sustainability Appraisal? <input type="checkbox"/>

The Council addresses the Duty to Cooperate within its emerging District Plan at paragraph 3.38. No evidence of effective or constructive working practices as these should be judged on the results they yield. In relation to the Duty to Cooperate the National Planning Policy Guidance (NPPG) refers to "outcome" no fewer than 9 times. The outcome of efforts to meet the acknowledged unmet housing needs of the wider area has been utterly fruitless.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15552	4	Mr M Best	Parker Dann	Norris Farms Partnership
Code:	<input type="checkbox"/>	Policy DP5	<input type="checkbox"/>	Object Sustainability Appraisal? <input type="checkbox"/>

A higher figure than the 650 proposed per annum will be required within the District to meet the needs of the local economy, to discourage the rate of an aging population and to reduce in commuting for work. To promote sustainable communities, a younger age profile needs to be encouraged, where more people travel locally to work in line with the NPPF.

None of the DP objectives can be met with a housing figure that restricts local economic growth by not providing sufficient homes in places where people want to live. The plan has therefore not been positively prepared and is not consistent with national planning policy. It is therefore unsound.

Developers require certainty to bring forward ambitious schemes. Allocations create certainty. The Council has created an uncertain environment for developers to operate in through its delay in adopting a Core Strategy. It cannot use the speculative environment created through its own tardiness to justify a housing number which is in my view too low. The best way to deliver additional housing, as acknowledged by the Framework, is through the plan led system and with this in place it is reasonable to believe the Council can deliver a greater portion of housing.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15552	5	Mr M Best	Parker Dann	Norris Farms Partnership
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The Sustainability Assessment of Cross-Boundary Options looks at the feasibility of Mid Sussex meeting acknowledged unmet housing needs from its neighbours. It tests a number of different options for meeting unmet housing need including an option to accommodate all of the unmet needs totalling some 37,733 dwellings within Mid Sussex. I am unclear as to why it was necessary to test this figure, because as the Council contend if meeting 50 per cent of this figure is unsustainable then it surely follows that meeting the entire figure would also be unsustainable.

In my view this document produced as a 'box ticking' exercise by the Council and adds very little to the argument. Rather than focusing on housing numbers which even the most optimistic developer would deem unrealistic, the Council should be focusing its attention on what it can deliver and if it can meet a portion, however small, of its neighbours unmet need.

Of the options set out I believe a realistic option is discussed in the conclusion at paragraph 6.5 of the document which indicates: "Although the options based on past trends in migration would result in a smaller increase of around 4,140 additional dwellings, this would still amount to nearly 40% more housing than was provided in the withdrawn Mid Sussex District Plan, and would be likely to require significant urban extensions to deliver."

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15552	6	Mr M Best	Parker Dann	Norris Farms Partnership
Code:	3g	Policy		Sustainability Appraisal? <input type="checkbox"/>

Mid Sussex District Council have failed to consider the resources available for implementing their strategy of bringing development forward through Neighbourhood Plans. The availability of land and the infrastructure surrounding development sites are important considerations which the Council have failed to take into account. It is far too simplistic to assume that because a Neighbourhood Plan indicates a desire to bring forward housing development that the necessary resources will automatically be available to implement the proposals. The District Plan is not legally compliant.

The District Council should indicate how much development it believes each Parish / settlement should accommodate from the 1,515 dwellings attributed to Neighbourhood Plans. This would aid deliverability of the Plan.

The Framework is clear that where housing needs are established, every effort should be made to meet the housing needs of the area. It is against the spirit of the NPPF to delay until an unspecified time waiting to see if Neighbourhood Plans perform as intended before commencing work a site allocations document. It is suggested that a date is inserted into this policy to motivate neighbourhood plan makers.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15552	7	Mr M Best	Parker Dann	Norris Farms Partnership
Code:	<input type="text"/>	Policy <input type="text"/> DP5 <input type="text"/>	Sustainability Appraisal? <input checked="" type="checkbox"/>	

Concerning site (p), my client's site I disagree with the conclusions of the sustainability appraisal in the following areas. As I have stated above, I believe there is a "reasonable prospect" of the site being delivered within the Plan period. It would therefore provide decent and affordable homes. It is envisaged the site would provide new education facilities on site therefore this would contribute positive to the existing offer and enhance surrounding areas such as Cuckfield and Ansty which would also benefit from these facilities. The same applies to access to retail and community facilities. In relation to creating cohesive, safe, crime resistant communities I am unclear why my client's site has been marked negatively. The new settlement could be designed in a safe and crime resistant fashion. Similarly, I believe that the development would encourage regeneration of town and village centres as both Cuckfield and Haywards Heath are proximate to the site and would be utilised by the occupants of the development. It is inappropriate to mark the site negatively against objective 15.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15552	8	Mr M Best	Parker Dann	Norris Farms Partnership
Code:	1h	Policy <input type="text"/>	Sustainability Appraisal? <input type="checkbox"/>	

The Council states at paragraph 3.15 of its emerging District Plan that sites submitted to the SHLAA were "rigorously tested to see if constraints could be overcome". This is not the case. At no point did the District Council engage with us, identify its concerns and seek to work with us to provide solutions. It goes on to cite a workshop with representatives of the housebuilding industry which I attended to test the SHLAA's methodology among other things. As I have canvassed in my representations on behalf of Mrs. Wells, the Council roundly ignored the feedback it received. Part of the justification put forward for not accommodating a higher quantum of housing is based on land availability. In our view the Council has adopted a very negative approach to the assessment of sites. There are many sites in sustainable locations, the impacts of which are or could be made acceptable, which have been dismissed on rather spurious grounds. I believe this is entirely deliberate on the part of the Council. The Council has attempted to artificially constrain the amount of potentially suitable housing land in order to justify its contention that it cannot deliver more significant growth. The Council claim in the emerging District Plan that independent consultants were commissioned to review judgements on landscape grounds but go to indicate that this took place "when this was the only factor that was preventing the site from being considered part of the supply". (Paragraph 3.15) (My emphasis) Given that the Council also raise issues in relation infrastructure provision and landscape impact was therefore not the only factor preventing the site being suitable in the Council's opinion, I assume no expert landscape advice was sought in relation to the assessment of the site. In relation both infrastructure and landscape impact, the Council has failed to specify what information it would like to see in order for it to acknowledge that the site is suitable, available and achievable. In the assessment of the site's suitability the Council also refer to a perceived significant impact on the settlements of Ansty and Cuckfield. This is a subjective planning judgement. The SHLAA should be a technical assessment of a site's constraints. The impact on the character of a given area can be assessed through subsequent DPD's. The SHLAA should seek to maximise the 'pool' of potentially housing to provide a genuine choice of sites and competition between developers.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15552	9	Mr M Best	Parker Dann	Norris Farms Partnership

Code: Policy DP5 Object Sustainability Appraisal?

Policy DP5 indicates that 1,515 dwellings will be allocated through Neighbourhood Plans or other appropriate planning documents. The location of these dwellings will be determined through Neighbourhood Plans many of which have yet to be prepared. This is not an appropriate strategy. The Council have also not taken account of their legal obligations concerning plan preparation. The Planning and Compulsory Purchase Act (2004) (PCPA 2004) provides a legislative basis which informs that in preparing a development plan document the local planning authority must have regard to the resources likely to be available for implementing the proposals in the document. (PCPA 2004 Section 19 (2) (i)).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	1	Mr J Stevens	Home Builders Federation Ltd	
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

We note that the District Plan is unsupported by a paper in the background documents that considers the duty to cooperate and strategic cross boundary issues. It is impossible therefore for interested parties to judge what the Council has done to discharge the duty.

The duty to cooperate section of the local plan (pages 20-21) includes no discussion of the wider situation across the HMA in Crawley and Horsham. . Clearly the extent of the unmet need in Crawley, coupled with the pressures from London, will exert an influence on the scale of housing demand in Mid Sussex. The failure of the Mid Sussex plan to account for this strategic issue on its border is a clear sign of the failure of cooperation (as well as a sign of the failings of planning as a professional discipline).

The GLA has convened a series of strategic planning meetings. Mid Sussex has not provided a commentary on the proceedings of these meetings and how these issues may have influenced its plan.

We consider that it is essential that the Mid Sussex Local Plan demonstrates how it has taken into account the London influence and its migration assumptions and what it has done to engage with the London Boroughs to address the strategic housing issues prompted by London. This is not only a question of compensating for London's unmet needs but also accounting for the Mayor of London's migration assumptions that underpin the Mayor's own OAN that informed the new London Plan.

Mid Sussex Council, therefore, will need to demonstrate how it has cooperated with the London Boroughs in preparing its plan. The duty to cooperate resides with the London Boroughs and with Mid Sussex.

Mid Sussex Council does not refer to developments in this area. It does not refer to the London dimension at all. This is a significant failing. The London problem will affect Mid Sussex district even if the Council chooses to ignore it.

Without a shared evidence base eg SDMA it is difficult for third parties to judge whether the duty to cooperate is being discharged effectively.

It is indicative of the lack of cooperation on the strategic matter of housing that Mid Sussex Council has chosen to use a different time-period for its local plan compared to its partners in the HMA – Crawley and Horsham – both of whom have elected to use the plan period 2011 – 2031.

We recommend that Mid Sussex re-bases its plan using the period 2011-2031 thereby bringing it into line with the others. This would enable the three authorities to undertake a coordinated review of their plans on a common date.

The duty may not be a duty to agree, but the lack of discussion is it not an excuse to ignore problems. There is no evidence before the HBF, and other interested parties, to enable it to determine how far Mid Sussex has discussed the problem of Crawley's shortfall with Crawley and Horsham and how this problem is to be addressed.

The Council may aspire to effective cooperation in the future to resolve many of the problems that this plan neglects (see page 20) – particularly with regard to the very large unmet housing need in Crawley, Brighton and elsewhere, but it must be realistic about the likelihood of this really happening.

We have already queried why the Council has chosen to root its plan in the year 2014 rather than 2011 like its fellow HMA authorities. Using 2011 as a base date would have been very helpful in terms of preparing aligned plans that enabled effective planning for housing across the HMA. A common base date would have enabled consistent planning and review.

The scale of the need in Tandridge and the ability of this Green Belt constrained authority to deliver its OAN also needs to be considered.

Alternatively, Mid Sussex would need to agree a statement with the South Downs National Park authority in respect of its commitment (under the duty to cooperate) that it will be preparing a local plan that will accommodate its own OAN in full (including the needs of arising from those other local authorities that the Park straddles).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	2	Mr J Stevens	Home Builders Federation Ltd	
Code:	2b	Policy		Sustainability Appraisal? <input type="checkbox"/>

Also the 'Challenge Facing the District' on page 6 of the district plan makes no reference to the housing deficit in the HMA although it does refer to other deficits (sewerage/water supply, open space, sports provision etc).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	3	Mr J Stevens	Home Builders Federation Ltd	
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Across the Gatwick Diamond area the annual unmet need amounts to at least 1,270 dwellings. This is a conservative assessment as we have used the lower end of the OAN range in the cases of Chichester and Lewes Councils. Once London's unmet need is considered the crisis of the housing supply versus need imbalance looms even larger. We consider that Mid Sussex must reconsider its plan and make provision for: a) an element of Crawley's substantial unmet need. We consider that Mid Sussex's share of Crawley's unmet need should be 100 dwellings per year. This is the same as in Horsham; and b) re-model its housing projections to take into account increased migration from London (5%) and decreased out-migration from Mid Sussex (3%).

We are not recommending that the Mid Sussex plan makes specific provision for an element of London's shortfall, but we do consider that the plan must allow for a net increase in household formation above the indications provided by DCLG 2012 household projections. It is for this reason that an assessment of Mid Sussex's housing needs that considers the district in isolation from wider influences and which relies solely on the 2012 household projections as the basis for the OAN is unlikely to be realistic. We also note that the South Downs National Park will be required to provide 6 dpa, or 102 dwellings overall (6 x 17), to provide for the needs of those households who are within the area of Mid Sussex that is also covered by the South Downs National Park. We consider that Mid Sussex should provide these dwellings.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	4	Mr J Stevens	Home Builders Federation Ltd	
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

Although London is not an immediate neighbour the London housing market casts a long shadow. Paragraph 180 of the NPPF states that local planning authorities need to take into account different geographic areas including travel-to-work areas.

Mid Sussex Council, therefore, will need to consider very carefully the efficacy of relying too heavily on population and household projections that reflect past behaviour – as it does in its HEDNA Update –

without making any other upward adjustments to account for overspill from London.

There is no common SHMA for the HMA despite the advice in the NPPF in paragraph 47.

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The HEDNA Update records that the OAN of 656 dpa would only sustain the creation of 249 jobs per annum (Table 13, page 21). While we acknowledge the argument in paragraph 6.5 of the HEDNA Update, we consider that the OAN is too slender and may not allow a sufficient margin for error in terms of housing supply to ensure that the labour supply can be provided to support the employment objectives of the plan.

Our first observation is that we are concerned that the Council is confusing the question of the OAN with judgements about capacity and sustainability. This is apparent in paragraph 4.21 of the HEDNA Update where the Council argues that an increase above 656 dpa would be undeliverable. This confuses the two stages in plan preparation which is: a) to first undertake an objective assessment of housing need; and b) to then consider whether there is sufficient capacity to accommodate this need in full having regard to the policies in the NPPF.

In the report the Council expresses surprise that the new 2012 household projection is indicating that household formation in the district is projected to be higher than the 2011-based interim projection. We are not surprised because of the evidence in the 2011 Census about the considerable growth in population in London and the south east. We consider that the Council should make an allowance for transactional vacancies, long term vacant dwellings and second homes. This is necessary to accurately convert households into dwellings (as they are not necessarily the same thing). This is often applied by other councils (recent examples are Cornwall, Canterbury and Arun councils). Importantly Mid Sussex's HMA partners Crawley Council and Horsham Council have applied such an allowance. A figure of 3% is often used.

According the National Housing Federation's Home Truths 2014/15 report for the South East there are 440 long term vacant dwellings in Mid Sussex and second homes accounted for 0.5% of the total stock in 2013. The DCLG Live Table 615: Vacant Dwellings by Local Authority since 2004 records that in 2014 there are 1,123 vacant dwellings in Mid Sussex (short and long term). The total dwelling stock in Mid Sussex is 60,670, so the vacant dwellings would represent 1.8% of the total. Combined with second homes of 0.5% this suggests that a 3% allowance which would be justified.

The HEDNA Update considers the ratio of lower quartile prices to lower quartile earnings and shows that the ratio has risen by 1.2 points since 2009. This is quite a short time-frame for analysis. The NPPG advises considering how affordability has improved/decreased over the longer term. It is, therefore, appropriate to consider a time-frame that embraces the pre-recessionary period, i.e. before 2008 to consider whether affordability was in decline before the recession.

Median house prices have nearly doubled over the period 1999 to 2013. In 1999 median house prices were 5.15 times median incomes. In 2013 the ratio was 9.76. This is not as great as in Horsham but it is worse than the regional figure and much worse than the national trend.

We note the argument in paragraph 4.38 of the HEDNA Update regarding whether it is feasible to counter the deterioration in affordability nationally through planning. The Government does not agree with the Council. It does consider that by increasing the housing supply this will help to improve affordability. If it did not think this was possible it would not have included the aim of improving affordability in the NPPF (paragraph 17) and the NPPG.

The HEDNA Update does not provide an analysis of rents and how these have performed. This is another element of the market signals assessment. The NPPG advises the following on rents:

We note in paragraph 4.24 that the Council argues that making an allowance for market signals would introduce an element of supply-side bias into the OAN. This is not correct. This is incorrect because the NPPG explains that the OAN may legitimately include allowances to compensate for factors that might have suppressed household formation. Implicit within all projections are the consequences of past planning strategy. It is necessary, therefore, to consider how these past strategic planning decisions may

have affected household formation and therefore affordability.

Brighton is an immediate neighbour so even if the Mid Sussex plan does not make specific provision for an element of Brighton's shortfall, the effect of the undersupply in the city will exert an influence on Mid Sussex and its residents. For this reason, an assessment which consists of only a demographic projection for Mid Sussex – a projection considered in isolation from its neighbours – derived from the 2012 household projections lacks credibility as an assessment of the district's future needs.

We note that the SHLAA has assessed that there is the potential to accommodate 11,786 dwellings. If this is the case than it suggests that the Council may be able to provide more than 11,050 homes over the plan. Paragraph 4.21 of the HEDNA Update says that there could be a maximum capacity for 12,292 potentially deliverable units – or the equivalent of 723dpa.

We note in paragraph 4.8 of the accommodate development report that some 63.6% of the district is covered by primary designations. When secondary constraints are added then this figure rises to 92.1%. However, paragraph 113 of the NPPF advises that distinctions should be made between the hierarchy of designations so that protection is commensurate with their status. It is therefore debateable whether it is appropriate that so much weight should be accorded to all the secondary designations, desirable as it might be to avoid harming these areas. .

The Council maintains that it has commitments totalling to 5,405 dwellings. The Council needs to be careful not to assume that all these will materialise. We strongly recommend the application of a non-implementation allowance of 10% to provide some contingency. This would be in keeping with paragraph 14 of the NPPF which requires local plans to have some flexibility.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	5	Mr J Stevens	Home Builders Federation Ltd	
Code:		Policy DP1	Object	Sustainability Appraisal? <input type="checkbox"/>

The plan may be effective at securing certain environmental objectives but because an element of the housing need (1,500 dwellings) is contingent upon the timely production of Neighbourhood Plans the Council cannot be reasonably certain that the local plan objectives in relation to housing and the economy (i.e. job creation, sustainable communities, minimising the need to travel etc) will be achieved by 2031. We consider that the plan fails to achieve the right balance as set out in paragraph 9 of the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	6	Mr J Stevens	Home Builders Federation Ltd	
Code:		Policy DP2	Object	Sustainability Appraisal? <input type="checkbox"/>

The plan is unsound because it is unjustified and ineffective. The district plan fails to align housing supply with the jobs target and the housing requirement lacks the flexibility to respond to potentially higher levels of growth.

The problem of using Neighbourhood Plans to deliver an important share of the overall housing need means that there is a risk that the jobs target may not be secured. The economic objectives of the plan will therefore be jeopardised by the Council's dependency on the Neighbourhood planning process to deliver the majority of the homes needed.

the plan is inconsistent with the balanced approach to sustainable development set out in paragraph 9 of the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	7	Mr J Stevens	Home Builders Federation Ltd	
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

We consider that the 2012 household projection provides a valid starting point for the assessment of Mid Sussex's housing needs.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	8	Mr J Stevens	Home Builders Federation Ltd	
Code:	3f	Policy		
Sustainability Appraisal? <input type="checkbox"/>				

Mid Sussex should follow the positive example set by Horsham and plan for an element of Crawley's unmet need. Like Horsham we consider that Mid Sussex should provide for an additional 100 dpa on top of its own OAN to provide for the unmet housing needs of Crawley. The relatively unconstrained area around Cophorne/Crawley Down may be an appropriate allocation.

We note figure 6.1 in the study. This indicates that there is land around the three principal settlements that are not subject to primary constraints and also much of this land is subject to only one or two secondary constraints.

Furthermore we note figure 4.2 of the study. This shows that there is land in the district that is subject to neither primary nor secondary designations. The map shows:

- There is land to the west of Burgess Hill and around Wivelsfield Station that is free from primary or secondary constraints;
- There is land to the east, west and south of Haywards Heath that is free from primary and secondary constraints;
- That there is an area of land between Hickstead and Sayers Common that is free from either primary or secondary constraints;
- There is land at Crawley Down that is free from primary and secondary constraints.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	9	Mr J Stevens	Home Builders Federation Ltd	
Code:		Policy	DP5	Object
Sustainability Appraisal? <input checked="" type="checkbox"/>				

We are aware that the Sustainability Appraisal (SA) has suggested that a requirement of 700-800 dpa would be unsustainable. However, we are concerned that this assertion is not entirely supported by the evidence, such as the SHLAA but also the Capacity of Mid Sussex District to Accommodate Development report.

The SA does indicate that it may be feasible to accommodate a higher housing requirement. We note that if Sustainability Appraisal Option C had been pursued it could deliver an additional 2,720 dwellings with the development spread across the district including in the villages.

We would challenge the claim in paragraph 7.23 of the SA that it would not be feasible to accommodate an element of the shortfall from Crawley or Brighton & Hove. The Council argues that Mid Sussex could not consider this until it is known what capacity these local planning authorities might have to accommodate their own needs. This is a deliberate evasion of the issue.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	10	Mr J Stevens	Home Builders Federation Ltd	
Code:		Policy DP10	Object	Sustainability Appraisal? <input type="checkbox"/>

The content of the policy is unjustified in view of the need to find land for 1,500 dwellings, windfalls and potentially more if the commitments do not materialise in the number anticipated.

We consider that the wording of this policy is negative and will prevent suitable land being identified in the Neighbourhood Plans to provide for the 1,500 – 2,000 dwellings needed to ensure the OAN can be achieved by 2031.

The policy refers to agricultural land of grade 3A and above being a ‘primary’ constraint. This is not strictly true. The NPPF does accord weight to protecting land of environmental value (NPPF, paragraphs 17 and 110), but it does not prohibit its use outright, especially where such land may provide other planning benefits.

We consider that the reference to the protection of agricultural land of grade 3A and above is unjustified and this reference should be removed because it is unjustified when judged against the Council’s own evidence.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	11	Mr J Stevens	Home Builders Federation Ltd	
Code:	3g	Policy		Sustainability Appraisal? <input type="checkbox"/>

Alternatively, the Council could identify specific sites in or around the villages of its settlement hierarchy which would provide the 1,500 dwellings needed by 2031.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	12	Mr J Stevens	Home Builders Federation Ltd	
Code:		Policy DP11	Object	Sustainability Appraisal? <input type="checkbox"/>

we consider that a policy that maintains that it is vital to maintain the separate identify of individual towns and villages is untenable. In view of the land capacity issues that the Council asserts prevail in Mid Sussex a policy that aims to stop coalescence would be unjustified. Local plans should be aspirational but they must also be realistic.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	13	Mr J Stevens	Home Builders Federation Ltd	
Code:		Policy	DP25	Object
Sustainability Appraisal? <input type="checkbox"/>				

The council has not met the required tests set out the Written Ministerial Statement of 25 March 2015 and the NPPG that need to be satisfied to enable the Council to adopt the nationally described space standard.

On page 60 the Council argues that it had previously introduced dwelling space standards through an SPD and therefore the cost of complying with these standards is already factored into typical build costs in the district. The problem with this is: a) the requirement was introduced through an SPD and therefore not through an examined development plan document. As such it does not satisfy the stricter requirements of the NPPF in terms of not using SPDs to introduce policy.

The Council should provide evidence that the housing stock in the district is largely smaller than the nationally described space standards. We do not think that dwellings built in the district are consistently smaller than the nationally described space standard. We do not consider that this is a problem.

Secondly, in view of the capacity constraints that the Council has cited which it argues prevents it from accommodating a higher housing requirement we consider that the adoption of the nationally described space standard is unjustified.

It is therefore unclear whether the Council had adequately accounted for the cost of this new and additional policy requirement.

Given the evidence in the District Plan about the barriers to first time buyers (page 65), the high cost of housing (page 65 and paragraph 2.9) and the general worsening of affordability (the evidence in the HEDNA Update) we do consider that there is a case for adopting the nationally described space standard when this may militate against the provision of low cost market and affordable housing.

The WMS and the NPPG both advise that the local authority may need to allow a reasonable transition period following adoption of the new policy of space standards in the local plan to enable developers to factor the cost into future land acquisitions. The policy allows for no period of transition. This is inadvisable as it may impede delivery. We would recommend that at least a year is allowed before the policy comes into force.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	14	Mr J Stevens	Home Builders Federation Ltd	
Code:	<input type="checkbox"/>	Policy	DP26	Object
			Sustainability Appraisal? <input type="checkbox"/>	

The Council does not have an up-to-date SHMA that justifies the need for accessible and adaptable and wheelchair user dwellings. The evidence that the Council refers to in the policy – the HEDNA report – does not explore this dimension in detail.

We have been unable to locate an assessment of the impact of requiring Part M4(2) and Part M4(3) on the viability of development.

However, in part 3 of the policy, the Council allows for developments of 10 or fewer flats to be exempted from Part M4(2). This suggests that there may be an issue of viability. However, as we have mentioned before, we have been unable to detect this analysis. The NPPG states that where step-free access is not viable, neither of the optional requirements in Part M should be applied.

We note the requirement for the provision of gypsy and traveller pitches on strategic sites. We have a number of observations in connection with this particular policy requirement. Firstly, the wording of the policy places the emphasis on the applicant to identify if there is a need for such pitches. It is the Council's role to identify the need for gypsy and traveller pitches and to provide the location for these sites where they are needed. It is not the role of house builders to do this. Secondly, the Council will need to consider the effect of this policy requirement on the net developable area of the strategic housing allocation/s. This is particularly important in view of the capacity constraints across the district that the Council has cited. Thirdly, the Council will need to consider the effect of this policy requirement as part of its local plan viability assessment. This will result in a reduction in the net developable area and therefore the sales revenue, although some revenue could be achieved from selling pitches. Fourthly, the Council will need to consider the effect that this policy requirement will have on the delivery of its strategic site/s. The effect of integrating gypsy and traveller sites among conventional dwellings while laudable in principle, may be unrealistic in practice. The NPPF requires local plans to be aspirational but also realistic.

Starter Homes:-

We consider that the Council should provide some guidance on how it intends to respond to the Government's initiative to provide Starter Homes.

Self-build homes:-

The Government is keen to increase opportunities for self-build homes. The Council should consider how its local plan will provide for these opportunities.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	15	Mr J Stevens	Home Builders Federation Ltd	
Code:	<input type="checkbox"/>	Policy	DP29	Object
			Sustainability Appraisal? <input type="checkbox"/>	

The policy requires that 75% of the affordable housing element is provided as social or affordable rent while the other 25% is provided as intermediate homes. This conflicts with the viability assessment. At paragraph 1.29 the consultants recommend that a target of 30% affordable housing can be sustained on the basis of the modelling of 75% affordable rent and 25% intermediate. The NPPF requires that local authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing. Since modelling affordable rent will tend to generate a more favourable viability result than social rent, it is necessary for the Council to reflect the mix that has been modelled in the local plan policy.

We note the reference to the HCA's Design and Quality Standards. The Council should check whether these have been superseded by the revised Building Regulations and the new optional technical standards.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	16	Mr J Stevens	Home Builders Federation Ltd	
Code:	Policy	DP30	Sustainability Appraisal?	<input type="checkbox"/>

This conflicts with the NPPF at paragraph 54 which advises that local planning authorities consider whether it is feasible to provide affordable housing without an element of market provision. We are unaware of any assessment of the viability of such sites coming forward with 100% affordable housing though there may be opportunities where landowners are willing to sell their land at less than residential development value.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	17	Mr J Stevens	Home Builders Federation Ltd	
Code:	Policy	DP38	Sustainability Appraisal?	<input type="checkbox"/>

We would question the efficacy of providing a multi-functional 'Green Circle' around Burgess Hill in view of the constraints on housing land supply. If Burgess Hill is the only feasible area for substantial and strategic growth the inclusion of this Green Circle would limit the potential capacity of the area.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	18	Mr J Stevens	Home Builders Federation Ltd	
Code:	Policy	DP39	Object	Sustainability Appraisal? <input type="checkbox"/>

The requirement for Sustainability Statements should be deleted.
 The council should not prescribe how developers comply with Part L of the Building Regulations. This is a matter for the Building Regulations. It is not a planning matter. The reference to complying with the energy hierarchy should be deleted.
 This policy should be revised in the light of the Government's announcement to delay the implementation of zero carbon homes which was scheduled for April 2016. Applicants, therefore, will not have to demonstrate how they intend to address the timetable for zero carbon homes.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	19	Mr J Stevens	Home Builders Federation Ltd	
Code:	Policy	DP42	Object	Sustainability Appraisal? <input type="checkbox"/>

The NPPG states that the tighter water efficiency standard may be adopted where there is a clear local need and after considering the impact on viability and housing supply of such a requirement.
 While we can see that there may be a case adopting the tighter water efficiency standard the viability test has not been satisfied

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	20	Mr J Stevens	Home Builders Federation Ltd	
Code:	1h	Policy	Sustainability Appraisal?	<input type="checkbox"/>

We note Appendix 6 of the SHLAA and the discussion on windfalls. We consider that 45 dpa from windfalls for year six onwards is a reasonable allowance but it should not be treated as a contingency for the plan (page 30 of the plan). Windfalls form an element of the overall land supply calculation. Contingency sites will be those that have not been allocated by the local plan but can be brought forward if the identified sites, commitments, windfalls and Neighbourhood plans fail to deliver at the pace anticipated.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	21	Mr J Stevens	Home Builders Federation Ltd	
Code:	<input type="checkbox"/>	Policy	DP5	Object
			<input type="checkbox"/>	Sustainability Appraisal?

We are unconvinced by the Council's claim that it has achieved 630 completions in 2014/15 (as expressed in the table embedded in policy DP5). The DCLG Live Table 253: Permanent Dwellings Stated and Completed, by Tenure and District, 2014-15 records that Mid Sussex has only achieved 380 completions in 2014-15. We consider the DCLG data to be authoritative. The DCLG statistics are based on returns provided by local authorities. The data on permanent completions by tenure by district serves as the basis for much government monitoring. The extent of the disparity between the Council's quoted position and that compiled by the DCLG based on the Council's own returns cannot be explained by the difference between counting completions on a calendar or financial year basis. We submit that the DCLG data should provide the basis for assessing the number of net completions in the district since the beginning of the plan. We are concerned that there may be a large degree of double-counting or the counting of dwellings which are not yet completed and are still being built out. This is a common error. The Council should explain the reasons for the discrepancy between its figures and those of the DCLG.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	22	Mr J Stevens	Home Builders Federation Ltd	
Code:	<input type="checkbox"/>	Policy	DP5	Object
			<input type="checkbox"/>	Sustainability Appraisal?

The HBF acknowledges the very real constraints that confront the district, particularly the presence of the South Downs National Park and the Hugh Weal AONB. The protection of these national assets should be accorded significant weight. However, we consider that the Council is attaching too little weight to the importance of boosting housing supply by attaching too much weight to secondary and tertiary (local) environmental designations, as well as citing other reasons – such as infrastructure capacity – as a reason why the Council is unable to accommodate more housing. Table 4.2 of the study shows that there is 1,427.95 ha of land (excluding urban areas) that is free from primary and secondary constraints. This would suggest that if you developed at an average of 20 dwellings per hectare (and this is quite conservative but we have alighted on this figure to reflect the character of residential development in Mid Sussex and the need to provide open space and potentially SANG too) then the Council theoretically could accommodate 28,540 dwellings before one also factors-in those brownfield redevelopment opportunities in the towns and villages of the district.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	23	Mr J Stevens	Home Builders Federation Ltd	
Code:	<input type="checkbox"/>	Policy	DP5	Object
			<input type="checkbox"/>	Sustainability Appraisal?

A compound adjustment of 20% to the baseline demographic projection of 675 dpa would require an additional 135 dpa to be provided. This would generate a figure of 810 dpa. Mid Sussex should follow the positive example set by Horsham and plan for an element of Crawley's unmet need. Like Horsham we consider that Mid Sussex should provide for an additional 100 dpa on top of its own OAN to provide for the unmet housing needs of Crawley. The relatively unconstrained area around Copthorne/Crawley Down may be an appropriate allocation. Conclusion on the OAN for Mid Sussex:-Base demographic need – 656 dpa Adjust households to dwellings – 675 dpa Add 10% for market signals (and London and Brighton) Add 10% for the backlog (and London and Brighton) 20% adjustment = 135 dpa extra OAN = 810 dpa (675 + 135) Add 100 dpa for Crawley Overall requirement = 910 dpa Whether Mid Sussex has the capacity to provide 910 dpa is another matter.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	24	Mr J Stevens	Home Builders Federation Ltd	
Code:		Policy	Object	Sustainability Appraisal? <input type="checkbox"/>
		DP5		

A 10% adjustment above the trend projection of 675 dpa is warranted to help alleviate the problems of affordability in the district. In combination with the 10% upward adjust for the backlog that we have recommended above, this would require a 20% increase overall to the baseline demographic need. The Council also argues that the NPPG allows the Council to decide what would be a reasonable adjustment to make (paragraph 4.24). This is quite true. However, the Council has decided to make no adjustment for market signals. We would contend that this is an unreasonable in view of the evidence. We consider an adjustment of 10% is warranted. This would be in addition to a 10% adjustment we have recommended to compensate for the effect of poor past delivery.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15604	25	Mr J Stevens	Home Builders Federation Ltd	
Code:		Policy	Object	Sustainability Appraisal? <input type="checkbox"/>
		DP5		

The Council considers that the baseline, unadorned, demographic projection of 656 households per annum is equivalent to the OAN. This is debateable. The NPPG advises that the use of the latest household projections provides the starting point for the assessment of the OAN, but plan-makers are invited to consider other factors when carrying out their assessment of housing need over the plan period. We do consider that the Council should account for the effect of its persistent under-performance against the South East Plan (SEP) housing target of 855 dpa and how this would have affected the population and household projections. It is a matter of record that Mid Sussex has persistently failed to match the target of 855 dpa. Consequently, this will have directly fed-through into the population and household projections. Put simply, if the homes were not built then the local population will not have increased by as much, and the rate of household formation will have fallen. It is important, therefore, for Mid Sussex to reflect upon how its past performance has influenced household formation. This is a consideration that the NPPG advises. Section ID 2a-015 of the Housing and Economic Development Needs Assessments chapter of the NPPG advises that: The Council must make an allowance for this failure of delivery and the effect that this has had on the pattern of household formation in the district over the last decade. We consider that a 10% uplift on the baseline demographic need of 675 dpa is warranted.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15605	1	Mr E Hanson	Barton Willmore	Glenbeigh Developments Ltd and Dacorar
Code:		Policy	Support	Sustainability Appraisal? <input type="checkbox"/>
		DP9		

The proposed Northern Arc policy (DP9: Strategic allocation to the north and northwest of Burgess Hill) is accompanied by a proposals maps. Between 20 – 30 hectares of land is earmarked for a business park. My clients site comprises 15 hectares and a redline boundary plan is continued with this representations. My client supports the draft policy allocation and within their outline application they draw on evidence contained in the Employment Needs Assessment undertaken by Vail Williams and Styles Harold Williams (April 2013).

The employment allocation proposed is required now and there will be no available space in Burgess Hill over the next plan period. This provides certainty that even without the wider Northern Arc Development, there is a strong existing demand for new employment space and development should come forward in advance of the wider residential proposals which may not start for some years.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	1	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

1.5 In addition to the representations to the Mid Sussex District Plan, a Hybrid planning application was submitted to MSDC on 02 February 2015 (Application ref. DM/15/0429). The description of development is set out below:

“Outline Planning Application (with all matters reserved except for means of access from Turners Hill Road) for up to 200 dwellings, provision of new internal access roads and footpaths, landscaping, open space, Sustainable Drainage system (SuDs), earthworks and associated infrastructure. Full application for the provision of Suitable Alternative Natural Greenspace (SANG)”

1.6 At the time of writing these representation, the planning application is yet to be determined (anticipated to be heard at Committee in August 2015). The application nevertheless sets out in detail, the justification for the submission (lack of 5-year supply of land for housing), the context of the Site and that the proposals constitute sustainable development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	2	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

We do not consider the Objectively Assessed Needs (OAN) figure of 656dpa has been appropriately prepared and is not justified. We do not consider the evidence base, notably the HEDNA (Feb 2015) and HEDNA Update (June 2015) are robust or credible and have not established the correct OAN figure.

The HEDNA does not ‘convert’ household formation rates to dwellings. The 656 figure is the CLG 2012-based household projections. Making the appropriate allowance for vacancy rates, this increases the OAN starting point figure to 673 dwellings per annum (i.e. increase in 17 dwellings). This is the figure that should be seen as the OAN ‘starting point’.

The PSD OAN housing target of 656dpa is not considered to be appropriate. It is not based on a robust evidence base or methodology and will not meet the housing needs identified in the District. It does not accommodate existing backlog, nor does it accommodate any unmet need for neighbouring authorities. The Housing Provision Paper (June 2015) provides for a breakdown as to where the greatest and lowest housing needs are. A review of the table indicates that Burgess Hill has a need of 2,378, followed by Haywards Heath (2,204) and then East Grinstead (2,126). The next highest Need area is Worth at 804 dwellings. This supports the recommendations of the SA, however, it is not borne through into Policy DP5 and the PSD’s spatial strategy. All the strategic growth is focussed towards Burgess Hill even though it is recognised that the three largest settlements have a similar proportion of need in the District.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	3	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

In addition, we consider the Sustainability Appraisal (June 2015) and SHLAA (April 2015) to be flawed which has in turn influenced the OAN figure. Furthermore, it is considered that a critical piece of Evidence Base is missing, namely, an assessment/review of the emerging/adopted Neighbourhood Plans and if the amount of housing being proposed in each is appropriate, whether the existing committed supply is taken into account already within these plans (i.e. is double counting occurring) and if an appropriate analysis of the committed supply forms part of the SA conclusions in respect of its spatial distribution.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	4	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

Table 3 of the Housing Paper (June 2015) confirms that Brighton and Hove will have an unmet need of 10,800 dwellings and Crawley and unmet need of 4,173 dwellings. Overall, in all the neighbouring Local Authority areas, there is a total unmet need of at least 37,733 dwellings. This is significant and must be addressed

Furthermore, the unmet needs of London also need to be considered, which again, the HEDNA has not done so.

Given the scale of the wider unmet need, it would be entirely appropriate that MSDC seeks to accommodate at least some of this unmet need.

As a result, MSDC does not propose to accommodate any of its neighbouring authorities needs, particularly Brighton and Hove and Crawley (where it acknowledges it has the strongest links to). As a result, the unmet need will continue to be unmet and will in fact worsen over time. Given Brighton and Hove Council has already had to withdraw a previous Local Plan (as it could not demonstrate effectively how it was going to meet its unmet need elsewhere), MSDC's position is considered to fail the Duty-to-Cooperate (NPPF paras 178 – 181) and is not being proactive to address these issues.

Given the scale of the wider unmet need, it would be entirely appropriate that MSDC seeks to accommodate at least some of this unmet need.

As a result, MSDC does not propose to accommodate any of its neighbouring authorities needs, particularly Brighton and Hove and Crawley (where it acknowledges it has the strongest links to). As a result, the unmet need will continue to be unmet and will in fact worsen over time.

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Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	5	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)
Code:		Policy	Object	Sustainability Appraisal? <input checked="" type="checkbox"/>
		DP5		

The SA: Non-Technical Study confirms on p12 that five housing options were tested ranging from 500dpa to 800+dpa, a range of only 300dpa. It is somewhat surprising that two of the options (A at 500dpa and B at 600dpa) were tested, bearing in the mind MSDC acknowledges its CLG starting point figure to be 656dpa. Nevertheless, the SA tested a very small range of growth, and to a maximum of only 800+ dwellings. This is only 150dpa above the OAN starting figure and is woefully inadequate.

A robust SA is critical to the soundness of the District Plan. In the light of the identification that the OAN figure could be as high as 1,000dpa, and coupled with the backlog and unmet need elsewhere, it is considered that the SA, in testing a maximum of 800+dpa will result in the plan being required to be withdrawn at the Examination stage, if the Inspector concludes that a higher than 800dpa is appropriate for the District.

It is further disappointing to note that Options D and E (i.e. 700 to 800 and 800+) are considered to be so detrimental (in SA terms) that any growth at this level is dismissed, even though Option D is only 50dpa more than the proposed housing figure.

Upon closer inspection of the justification (p12), Options D and E were excluded as ‘the SHLAA indicates that there may not be enough suitable sites to achieve this, this is reflected in the more negative scores under environmental objectives.’ This conclusion is considered to be wholly incorrect, as the SA is being led by the SHLAA conclusions, which are officer led and high level subjective views on the deliverability of sites. The SA has therefore been influenced by subjective views on ‘sustainability’ contained within the SHLAA rather than a holistic approach to the full suite of the evidence base.

The SA does continue to state for Options D and E that ‘Evidence within the Transport Study and Capacity could also have more negative impacts’ (our underline). This statement is vague and does not take into consideration the potential positive effects that growth can bring to such infrastructure issues as part of longer term planned growth.

The SA has not been appropriately undertaken and is itself not based on robust or credible evidence (i.e. the SHLAA). This in turn has led to an unsound OAN housing figure.

South East Plan process, subject to a lengthy and robust independent public examination, considered environmental capacity in Mid Sussex before arriving at the housing requirement of an annual average of 855 net dwellings for Mid Sussex District. It is also relevant to note that paragraph 47 of the NPPF is written in the clear context of significantly boosting the supply of housing. It is therefore surprising to note that the SA comes to a different conclusion in that 800+ dwellings cannot be sustainably delivered.

In addition, the SA concludes that a housing target of 650 is deemed sustainable, but by an increase of only 50 dwellings per annum (to 700 dpa) the SA concludes that this level of growth is unsustainable. We query how this relatively minor increase in growth can result in such a significant variation in the result to the SA between preferred Option c (650 dwellings) and Rejected Option D (700 – 800dpa). The SA assumptions in this respect are therefore flawed and not based on robust technical evidence but the subjective dismissal of SHLAA sites and the claim that there are not any further suitable sites available – which is simply not the case.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	6	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The HEDNA Update report (June 2015) is considered fundamentally flawed. We consider that the OAN target of 656dpa identified is incorrect. This is on the basis that the HEDNA: i. Has not 'converted' household formation rates to dwellings;ii. Has treated the CLG 'starting point' figure as the Plans minimum housing target; iii. Will not support the PSD'S own aspirations for job growth; iv. Has incorrectly applied Full Time Equivalent (FTE) jobs rather than Workforce jobs; v. Has not taken into account any market signals (and contradicts the previous HEDNA February 2015 report which accommodated a 10% uplift); and vi. Considers it cannot meet any unmet need from elsewhere based on 'land supply' and impacts on sustainability constraints.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	7	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

We do not consider the SHLAA (April 2015) is a robust piece of Evidence Base and its 'use' to justify the lack of availability of sites, and thus keep the OAN target low is inappropriate. The SHLAA has excluded a significant number of sites, based on potential landscape impact. Landscape Impact is recognised as being a sensitive matter, particularly in MSDC which does have high quality landscape areas (i.e. AONB). However, there are less sensitive landscape areas in the District, for instance in and around East Grinstead and where sites should be viewed in the wider context of the constraints of the District as a whole.

The consequence of the approach is that the SHLAA has discounted a significant number of sites (based on the subjective views of officers at a high level assessment), which has in turn dictated the strategy in both the SA (in concluding that there are insufficient sites to meet a higher housing target) and the OAN figure.

Given the central importance MSDC places on the outcomes of the SHLAA (as this dictates the conclusions of the SA and the SA dictates the conclusions of the HEDNA) it is considered necessary that the SHLAA Evidence Base is reviewed, and an additional level of scrutiny of the 'dismissed' sites undertaken to establish fully whether the SHLAA has concluded correctly on these dismissed sites.

SHLAA suggests the site has low landscape suitability, but that certain areas are less sensitive. Furthermore, discussion also refers to the site coming forward in 'isolation' or how the site would be accessed albeit goes onto discuss how the site is relatively accessible to various services.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	8	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

Notwithstanding, Hill Place Farm is now subject of a planning application, and is considered to be an example of a Site in a sustainable location, relatively uninhibited by constraints (with no primary constraints), that could deliver up to 200 much needed dwellings in the District.

It is considered that the final housing requirement in the District is likely to be significantly higher than the 656dpa and additional areas and sites will be required to be identified.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	9	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

What is not clear is:

- how this evidence base is being reflected within the PSD (namely Policy DP5);
- how each of the emerging Neighbourhood Plan's provides for a sufficient number of housing;
- is the housing being brought forward in the Neighbourhood Plan being double counted?
- How do committed sites support the SA?
- Is this delivery (both committed sites and Neighbourhood Plans) in accordance with the settlement hierarchy (Policy DP6)?

It is therefore considered that a key piece of Evidence Base is missing which addresses the above and demonstrates how the spatial strategy is being met and accords with the other parts of the Evidence Base. We address this matter further in Section 3.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	10	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)
Code:		Policy DP5	Object	Sustainability Appraisal? <input checked="" type="checkbox"/>

The SA: Non Technical Study (June 2015), identifies on P10 that the preferred option for growth is one that 'focuses development within or adjacent to the three towns (Burgess Hill, East Grinstead, Haywards Heath), but encourage both larger villages and smaller villages to take growth to support the provision of additional services and meet local needs'. We agree with this conclusion. However, Policy DP5, as currently drafted does not ensure this strategy is adhered to i.e. it is not effective.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	11	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)
Code:	3g	Policy		Sustainability Appraisal? <input type="checkbox"/>

- That the LPA has not established if the committed sites are being double counted in the Neighbourhood Plans (see Burgess Hill);
- That some Neighbourhood Plans are in fact not including committed sites in the emerging allocations (see Antsy and Staplefield);
 - Which Neighbourhood Plans are expected to meet the additional 1,500 dwellings in the light of the emerging NPs that are being progressed vs. those that are not being progressed;

It is noted that there are a significant number of Neighbourhood Plans coming forward in the District. Each is coming forward with its own housing target, and most now based on out-of date data. By way of example, the East Grinstead Neighbourhood Plan, is only seeking to deliver a total of 1,406 dwellings (based on what it terms as a 'theoretical capacity'). This is some 520 dwellings short of the identified OAN target identified in the PSD Housing Topic Paper, but ironically accommodates nearly all of the 'elsewhere in the district target' of 1,515 dwellings unless of course the East Grinstead Plan s made up of already committed sites (such as the Burgess Hill NP). This again only raises serious soundness concerns in respect of deliverability and how effective the policy is.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	12	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)
Code:	1i	Policy		Sustainability Appraisal? <input type="checkbox"/>

The most fundamental and controversial issue, i.e. the housing requirement, is only to subject to one round of public consultation (this PSD). This does not allow a fundamental issue to have the scrutiny required and how overall growth was tested as a reasonable alternative;

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	13	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

Policy DP5 fails to appropriately demonstrate that the spatial strategy reflects the Evidence Base, including the Settlement Hierarchy and the OAN figures set out on a Parish by Parish basis at Table 5 of the Housing Provision Paper. The District Plan is over reliant on the committed sites (which is circa 50% of the plan requirement), which have in the main come forward on the basis of a lack of a 5-year supply of land for housing. It does not necessarily represent a coherent and plan-led approach to the delivery of the housing needs in the area and no assessment is presented in the Evidence Base to demonstrate how this element of the supply is in accordance with the principles of the Settlement Sustainability Review (May 2015).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	14	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

Despite significant preamble dedicated to Neighbourhood Plans there is no indication of the total quantum of housing likely to be proposed through the Neighbourhood Plan process and how this relates to committed sites; The PSD is not clear whether a housing allocations document is necessary and what trigger is required to engage this document/process; By way of example, how does Policy DB5 establish where in the District the additional 1,500 dwellings should be delivered? This issue is significant, as the supporting Evidence Base to the PSD identifies on a Parish by Parish basis, each OAN target that each NP should be aiming for (Housing Provision Paper June 2015 Table 5). But there is no requirement in the Policy for the Neighbourhood Plans to adhere to this or if part of the committed supply is already being accommodated in the Neighbourhood Plans? To simply suggest 'other appropriate planning documents can come forward and identified SHLAA sites in years 1-5', does not represent a Local Plan policy which seeks to positively and proactively deliver development in sustainable locations in a planned approach. DP5 needs to be expanded, to include a list of the Neighbourhood Plans coming forward and include a housing target against each, based on the correct OAN target (on a Parish by Parish basis) as well as a direction for any outstanding requirement based on the Settlement Hierarchy set out in Policy DP6.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	15	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)
Code:	<input type="checkbox"/> Policy	DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

It is recognised by MSDC that it cannot demonstrate that it has a 5-year supply of land for housing. Unhelpfully, MSDC does not publish its actual 5-year supply position. However, 'backlog' from the previous plan period is recognised as being necessary and appropriate to be carried forward through to this District Plan as it also represents unmet need (PAS Guidance - 06 July 2015). Based on historic completion data available, and measured against the last recognised housing target (the now revoked South East Plan), it is considered reasonable to assume that there is at present, an existing backlog of 3,182 dwellings. No consideration appears to have been taken into account in the HEDNA in this respect. This backlog would need to be rectified at 159dpa over the lifetime of the plan (20yrs) (albeit this backlog should be addressed within the first 5 years). This would raise the plan requirement to approximately 1,159dpa.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	16	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)
Code:	<input type="checkbox"/> Policy	DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Based on the above analysis, the full OAN target lies in the region of 1,000dpa. It is estimated that the OAN housing target should be in the region of 1,000 dwellings per annum. The introduction of the backlog, increases this to 1,125dpa and a proportion should also be considered for wider unmet need.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	17	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)
Code:	<input type="checkbox"/> Policy	DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

☑ The Council's economic aspirations for job growth is 278 Full Time Equivalent (FTE) jobs per annum. The use of FTE as a measure of job growth is not appropriate as FTE is not a measure of individual workforce jobs. Instead, the FTE approach consolidates individual jobs into a 37.5 hour working week and reduces the likely level of labour force required to occupy future jobs. Accordingly, the FTE approach does not fully reflect individual job growth, and the 'workforce jobs' measure is considered more robust and indeed industry standard.☑ However, even at 656dpa, only 246 FTE jobs per annum will be supported, some 32 FTE jobs less than the PSD proposes. The Workforce job projections, as set out in Experian's 'workforce jobs' forecasts (May 2013 and December 2014) show a much higher job growth between 521 and 478 jobs per annum (over the 2011-2031 period). It should be noted that the Experian forecasts (June 2015) shows 'workforce jobs' growth of 528 jobs per annum between 2011-2031. This figure is similar with the 'baseline' EGA forecast (521 jobs per annum) set out in the Northern West Sussex Growth Assessment (April 2014).☑ As a consequence, an upwards adjustment (of circa 300 additional dpa) to the demographic-led OAN is required to support economic growth in-line with the Council's aspirations and/ or to support growth projected by current economic forecasts.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15616	18	Mrs L Wilford	Barton Willmore	Linden Homes (Hill Place Farm)
Code:	<input type="checkbox"/> Policy	DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

The HEDNA Update (June 2015) has not accommodated any uplift for market signals. It is noted that the HEDNA report (Feb 2015) considered it necessary to provide for a 10% uplift. However, the HEDNA Update (June 2015) has now removed completely this uplift. No justification why this removal is appropriate has been set out. A 10% uplift on the OAN dwelling (of 673dpa) is therefore considered necessary, resulting in an increase of 67 dwellings, resulting in a figure of 740dpa.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	1	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings
Code:		Policy DP10	Object	Sustainability Appraisal? <input type="checkbox"/>

LRM Planning and W.T. Lamb Holdings object to Policy DP10 (Protection and Enhancement of the Countryside) of the Pre-Submission District Plan. As outlined in our representation to DP5 (housing provision), whilst para. 143 of the NPPF does indicate that the long term protection of the best and most versatile agricultural land should be safeguarded, this needs to be read in the context of the NPPG. Para. 26 Ref ID: 8-026-20140306 confirms that: “where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality in preference of a higher quality.”

In circumstances where the development of the best and most versatile land is unavoidable, preference should be given to meeting development needs. Neither the NPPF nor the NPPF provide acknowledgement that the quality of agricultural land should be any way restrict development. There is certainly no planning justification to preclude development on Grade 3a or above land. This policy requirement should therefore be removed in future iterations of the District Plan.

We note that there is reference to a Site Allocations DPD within the emerging policy. The NPPF is clear that additional development plan document should only be used where clearly justified. No justification has been provided within the emerging District Plan or its evidence base for such a document and therefore any reference to it in the Plan should be removed.

Moreover, issues relating to minerals is a matter for the County Council and policies should not be introduced at the District level.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	2	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings
Code:	2b	Policy		Sustainability Appraisal? <input type="checkbox"/>

Despite the significant housing pressures faced by Mid Sussex District Council and the other Authorities within the HMA, meeting housing need and demand features only as the 6th bullet point in para. 2.9 of the consultation Plan, which identifies a list of challenges facing the Authority.

This list sets a clear context for the emerging District Plan, which places a significant emphasis on stifling housing growth below the OAN and not meeting any unmet housing need from neighbouring authorities, due to existing constraints. There is very little, if any, discussion on the role that the planning system can play in overcoming these existing constraints, to ensure that both the OAN and some unmet need from neighbouring authorities is delivered over the plan period.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	3	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The Capacity of Mid Sussex to Accommodate Development (June 2014): As outlined above, both the NPPF and the PPG provide clear advice on where development should be restricted. Even in these areas, there will still be opportunities for development to occur, having regard to specific national policy.

Despite this clear guidance, the Report has attempted to assess a number of additional primary and secondary constraints affecting land outside of existing urban areas within Mid Sussex. Many of these constraints will be characteristics shared by many other local authorities and does not provide Mid Sussex District will a unique set of circumstances to ignore national planning policy to meet OAN in full and to look to meet additional unmet need from neighbouring authorities. In many cases, the constraints identified will be easily overcome.

a significant number of primary and secondary constraints identified within the background paper could be overcome through the planning process and therefore will not form absolute constraints that will preclude development. Accordingly the conclusions of the work cannot be relied upon to provide the justification, in the context of the tests established by para. 14 and footnote 9 of the NPPF, to not meet the objectively assessment needs of the local authority, or any additional unmet need from neighbouring authorities.

Moreover, in our experience, it is very unusual for a local authority to commission such a report that falls short of ranking potential areas outside of existing urban areas as to their suitability to accommodate development and providing an assessment of the ways identified constraints could be overcome. Such an approach would have allowed for the identification of potential broad locations, which could have been subject to further analysis within the SHLAA.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	4	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings
Code:		Policy	DP5	Object Sustainability Appraisal? <input checked="" type="checkbox"/>

Given our analysis and the Sustainability Appraisal Objective to “provide the amount and type of housing that meets the needs of all sectors of the community” it is extremely alarming to note that para. 6.11 of the Sustainability Appraisal asserts that Policy DP5 meets all the Sustainability Objectives. With the significant shortfall of housing against the full OAN, this cannot be considered as being true.

Once the full OAN is provided as part of the Sustainability Appraisal, the results would be significantly different, with a significant emphasis placed on the environment, at the expense of social or economic impacts.

Given this analysis, the Sustainability Appraisal cannot be relied to provide the justification, in the context of para. 14 of the NPPF, to constrain housing provision below the full OAN.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	5	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings
Code:	SA-b	Policy		Sustainability Appraisal? <input type="checkbox"/>

Moreover, we note that the Sustainability Appraisal accompanying the now revoked 2009 South East Plan, stated that the impact of a housing provision of 36,000 houses within the Gatwick Sub-Region, which included a large part of Mid Sussex, could be mitigated through infrastructure provision. For Mid Sussex this Sustainability Appraisal supported a housing provision of 855 dwellings per annum.

There are no known circumstances or newly identified constraints which have arisen since the publication of the Sustainability Appraisal supporting the South East Plan, which would result in a dramatically different conclusion to that presented therein.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	6	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings
Code:	<input type="text"/>	Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Aside from existing commitments, and the north and north west Burgess Hill strategic allocation, Policy DP5 provides only 1,515 dwellings to be provided at all settlements. In our view this significantly underplays the role that some settlements can make to meeting the OAN in full as well as unmet need from neighbouring authorities. This is demonstrated through the example of Haywards Heath.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	7	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings
Code:	1e	Policy	<input type="text"/>	<input type="text"/> Sustainability Appraisal? <input type="checkbox"/>

Of particular concern is the analysis relating to unmet need arising from the various Local Authorities in close proximity (Mid Sussex Council has estimated this to be 37,733 dwellings – para. 4.2 of the Housing Provision Paper confirms) and the lack of cross boundary work to meet the tests of para. 47 of the NPPF

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	8	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings
Code:		Policy	Object	Sustainability Appraisal? <input type="checkbox"/>
		DP2		

There appears to be a constraint placed on potential jobs growth through labour supply factors, specifically challenging whether the discounting of economic forecast growth levels is appropriate. The approach outlined in the HEDNA appears to be one of limiting to the POPGROUP determined jobs growth level.

The HEDNA Update claims that the latest baseline housing need figure / CLG 2012 Starting Point generates a job figure of 249 jobs per annum. This aligns with the original HEDNA baseline work plus market signals, which also provided 249 jobs per annum. It is not immediately evident why this would be the case given that the original HEDNA baseline that drew on the same population projections as the HEDNA Update baseline (which generate 180 jobs per annum – Table 13 of the HEDNA Update refers). The inclusion of market signals in the original HEDNA was demonstrated to support additional workforce through the building of additional dwellings and one presumes accommodation of additional population. That would suggest that the original HDNA plus market signals scenario would be based upon a greater population than the HEDNA Update baseline / CLG 2012 Starting Point. We respectfully request further information / justification from the Council as to why this is not the case.

There is a lack of clarity as to which exact measure of jobs or employment is being presented within the HEDNA (i.e. is it workplace or resident based and what allowance has been made for in and out commuting). These are very important factors and there is an absence of clarity in the definition. The balance of in and out commuting is very important at the HMA and Functional Economic Market Area level. We again respectfully request clarification of this definition and associated workings and would wish to reserve the right to submit further representations on these matters as part of the Examination process, if appropriate.

It is not clear whether some employment land provision is delivering unmet need from elsewhere. There is also no mention of supporting LEP aspiration and encouraging inward investment. It is certainly not clear how many additional jobs (above 250 per annum) will be met in workforce terms, particularly given the unmet housing needs in neighbouring areas and the potential implications for commuting. The lack of a proper HMA / FEMA wide assessment means that there is no clear evidence that this is a sustainable and balanced approach in terms of labour supply and demand. Indeed, the consideration of labour demand is very limited and largely discounted.

As noted above, para. 6.14 claims an average of 294 jobs per annum to be created. This appears to be a reference to jobs within the B Use Class alone and compares with a stated figure of 40 jobs per annum within the B Use Classes derived from the Experian projections over the plan period. When the aggregate plan period figures are considered, the comparison is 676 jobs based on Experian and 5,000 based on provision. This is B Use Class jobs alone, and as the Experian based analysis shows, many more jobs will be created outside the B Use Class, potentially 4,080 new jobs, which suggests in excess of 9,000 new jobs over the plan period (529 jobs per annum). As shown above, in historic terms, this might be achievable, but in no way does it align with the level of housing provision.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	9	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings
Code:		Policy	Object	Sustainability Appraisal? <input type="checkbox"/>
	3f			

The housing provision should be increased. Any additional provision to meet the OAN and demand for Mid Sussex should be in addition to other housing being provided to meet unmet need from neighbouring authorities.

As indicated in the submitted Feasibility Study, land at Philpots Quarry is capable of making a contribution to meeting a more appropriate housing provision for Mid Sussex.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	10	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings
Code:		Policy	Object	Sustainability Appraisal? <input type="checkbox"/>
		DP28		

Given the latest information provided within various population and household projections, it is important that Mid Sussex District Council have a planning strategy for the forecast increase in the number of elderly residents over the Plan period. A strategic planning response is warranted to reduce the pressure on housing and social infrastructure as a result of this demographic change. Such an approach accords with para. 50 of the NPPF.

As a direct policy response to this forecast demographic structural change, Policy DP28 rightfully supports the development of housing to meet the current and future needs of different groups in the community, including older people, including the provision of bungalows. However, the Policy too narrowly limits the provision of such uses to wider housing proposals, ignoring the important role continuing care communities can play in meeting the need for elderly persons care.

The provision of specialist retirement housing for the elderly has also recently received Ministerial support. At a fringe event at the 2013 Conservative Party Conference, the then Planning Minister stated:

“One thing that mystifies me, given that there are few things as predictable as how our demographics are going to change, yet it seems bizarre how little specifically designed housing there is for older people.”

More recently, the current Planning Minister has also stated that developers should be encouraged to build more “quintessentially British” bungalows for the elderly, which he described as being “a really important part of the mix” (August 2014).

Given the pressing need for specific accommodation for the elderly, which is identified as a strategic challenge facing the Authority (para. 2.9 of the emerging Plan refers), the Local Authority should give consideration to making specific allocations for such uses within the emerging District Plan, or at the very least provide a framework requiring the Neighbourhood Planning process to respond to this issue. Absent such a requirement, there is a danger of a policy void being created to address this significant development pressure. Similarly, and as outlined above, the emerging Policy should be recast to acknowledge the important role that continuing care communities can have in meeting the need for accommodation for the elderly and not solely focus on provision for such uses within conventional housing developments.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	11	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The evidence presented in the Council's Housing and Economic Development Needs Assessment (hereafter HEDNA) (February 2015, updated in June 2015) is based entirely on data for Mid Sussex and not the Housing Market Area (hereafter HMA). This point was previously made in our submission to the Draft Consultation District Plan (January 2015) and has not been remedied within the latest iteration of the Plan. The Council's supporting evidence base makes a case for a HMA that includes Horsham, Crawley and Mid Sussex, with previous work being undertaken on this basis. However, whilst the presence of the HMA is acknowledged in the evidence base, an assessment of housing need does not emerge for the work that covers the entire HMA. The HEDNA makes no allowance to convert the projected increase in households, into dwellings. It is typical for there to be a level of vacant stock and second homes in the local area. An allowance should be made when assessing future requirements to ensure sufficient provision. Whilst we note that data from the 2011 Census for Mid Sussex indicates that there were 2.3% more dwellings than households, it is typical for a 3% allowance to be added to the household change figure. Once such a factor is added, there would be a need to increase the baseline figure from 656 dwellings per annum to either 671 or 676 dwellings per annum, depending on which allowance was adopted (i.e an additional 15 or 20 dwellings per annum). The most comprehensive source of workplace based jobs is the ONS jobs density measure. This includes employees, self-employed, government support trainees and HM Forces. This dataset allows a consistent time series from 2000-2013. Other ONS datasets either capture only part of the full picture of jobs, or have an inconsistent time series. We therefore recommend that the jobs density series is used. Average annual job growth since 2002 is 500 jobs per annum and since 2003 is 560 jobs per annum. When considering the calculated average of jobs growth per annum from every start of the year, these are also the median values. In our opinion the evidence does not clearly dismiss the potential for the local economy to add jobs at a rate of around 500 per annum based on this part performance which includes the recessionary period. This scale of growth is dismissed out of hand within the HEDNA. On the basis of the information provided in this representation, Experian economic forecasts should not therefore be flatly excluded and the implications of higher employment growth scenarios should be properly tested when objectively assessing housing need. There is reference to an updated Experian forecast for 282 jobs per annum over the plan period (albeit the Update appears to mix FTE and jobs measures so we are not certain as to which this relates to). The level of B Use Class jobs is stated to be only a small proportion of this total (40 per annum). These jobs are stated to generate a requirement for 19.5ha of B Use Class land over the plan period. Para. 6.13 states that: "overall, the study (Burgess Hill Employment sites Study) concludes that the proposed 30-hectare employment land allocation is appropriate and necessary in order to ensure that Mid Sussex District can meet its economic growth objectives, supporting existing businesses wishing to expand and to encourage inward investment within the District, the Gatwick Diamond and the Coast to Capital LEP area more widely." On this basis, there is some reverse engineering in para. 6.14 which states that 5,000 jobs or 294 jobs per annum are anticipated to be created on what appears to be B Use Class sites alone. There is some evidence that household projections underestimate the likely scale of needs arising from international migration. In recent years, the observed level of international migration has far outstripped the level projected within the 2012 Sub National Population Projections at a national level (in the order of 170,000 persons). It is these population projections that underpin the latest household projections. Whilst Mid Sussex itself may not be a primary destination for foreign in-migration, the effects are complex through implications of decisions to emigrate and also the pattern of internal migration which can take place as a result of international migration. This clearly demonstrates a further upward pressure. Information provided within the 2012 Sub-National Population Projections indicates that over the 17 year period between 2014 and 2031, the population of Mid Sussex will increase by 17,100 residents, of which 12,800 residents will be aged 65 or over. This population growth from the over 65 cohort equates to 75% of population growth for the Local Authority area. Moreover, the latest 2011 Interim Household Projections demonstrate that of the household change figure for Mid Sussex between 2011 and 2021 (5,429 households), 58% will be formed by those in the over 65 cohort.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	12	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The SHLAA: We remain unconvinced that the SHLAA provides a full assessment of the theoretical supply of land for housing within Mid Sussex for the following reasons:1. There has been no cross examination of LUC's Constraint's Report to identify broad locations which could accommodate development on the periphery of towns and villages.2. There has been no assessment of previously completed assessments of broad locations around the major settlements, which could provide further opportunities for development (we discuss this in more depth below).3. There are a number of sites that are considered to be not currently developable, despite being allocated in existing or emerging Development Plans (including Neighbourhood Plans). These sites include:- Site 82 – G and W Motors, Bolney;- Site 92 - Open Air Market, Burgess Hill;- Site 191 – Land to the north and rear of Barnfield Cottages, Balcombe; and- Site 629 – Land at Bolney Road, Ansty.This demonstrates that with an appropriate policy framework, which could be provided through the emerging District Plan, there are additional sites that could deliver housing, above that currently identified in the SHLAA.4. The analysis of some sites, for instance Site 721, downplays the sustainability credentials of the site, which, include being located in close proximity to a school and brownfield land. The analysis also neglects to acknowledge the quantum of residential development surrounding the site. Similarly there is no acknowledgement of the significant tension between the Quarry operator and local residents, caused by the unrestricted vehicle movements (aside from HGVs) provided by the existing mineral consents. The redevelopment of the site for a modest residential scheme, would address this issue for the betterment of all.In 2006, the Local Authority commissioned Atkins to produce a development options assessment for Haywards Heath. This study concluded that there was the potential for between 1,440 and 1,770 dwellings on land around the town. It is therefore particularly surprising that at least one of these options (Option E) is assessed within the SHLAA as being not currently developable. It should be noted that that assessment also only looked at the most sustainable way of delivering c. 1,000 dwellings post 2016. In that regard there may be other options considered in the report that have merit, but weren't considered to be the most suitable. In this regard, there are other sites considered in the assessment that performed well against the criteria set out therein, but have either not been assessed through the SHLAA, or are considered to be currently undevelopable at present.This again suggests that the theoretical supply of land could be increased further, above that indicated in the SHLAA.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	13	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

We specifically identify two examples of when constraints have been applied to the OAN, as follows:- para. 4.20 of the HEDNA Update states that "given the increased baseline OAN, there is no longer any excess supply to support an uplift". This is a clearly supply side constraint.- para. 4.23 states that "importantly a housing number of 713 dpa would not provide a 5-year supply of housing..." This again appears to be a supply side constraint.In both instances these are quite clearly policy choices which are not properly part of the OAN. The uplift of 10% for market signals should therefore be re-instated as part of the OAN. From our adjusted baseline of either 671 or 676 dpa, this increases to either 738 or 744 dpa.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	14	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings
Code: <input type="checkbox"/> Policy <input type="checkbox"/> DP5 <input type="checkbox"/> Object <input type="checkbox"/> Sustainability Appraisal? <input type="checkbox"/>				

The February 2015 HEDNA analysed the housing market signals in Mid Sussex in great depth. It concluded that an uplift of 10% should be applied to the baseline assessment of housing need, which was based purely on demographic and household projections, in order to account for market pressures. W.T. Lamb Holdings, Hardisty Jones Associates and LRM Planning all support the use of an uplift in order to account for the identified market pressures. Whilst the market signals picture is complex, there is evidence of a substantial worsening in relation to overcrowding, albeit from a low base. Nevertheless, the pattern in Mid Sussex is very different to other comparator areas considered, which also started from a low base and the scale of its worsening trend in this regard is exceptional. On this basis alone, the PPG is clear that “a worsening trend in any of these indicators will require upward adjustment to planning housing numbers compared to ones based solely on household projections” (emphasis added) (ID:2a-020-20140306 refers). Furthermore, the lower quartile affordability ratio has worsened substantially since 1997. In 1997 the lower quartile affordability ratio in Mid Sussex was 25% higher than the England average. In 2013, it was 58% higher. Whilst the June 2015 HEDNA Update did not provide any new analysis of market signals, the 10% uplift was removed. This shows a significant inconsistency in the approach and the reasons for removing this uplift are assessed below. However, given that the evidence shows that there is a worsening trend, the PPG is clear that an upward adjustment will be required over the baseline assessment of housing need and demand, adjusted to take account of vacancy and second home ownership. This uplift has been removed from the HEDNA Update, primarily on the basis of supply side constraints. We fundamentally disagree that such a constraint is part of the test of reasonableness when assessing the OAN. The application of market signals is a central element of OAN and should be applied without constraint. The evidence implies that household projections are the OAN, when in fact, they are only the starting point.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	15	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings
Code: <input type="checkbox"/> Policy <input type="checkbox"/> DP5 <input type="checkbox"/> Object <input type="checkbox"/> Sustainability Appraisal? <input type="checkbox"/>				

We note that the Council intends for this situation to be remedied by way of the production of further Development Plan documents, but we note that para. 153 of the NPPF states that “any additional development plan document should only be used where clearly justified.” The failure of a policy to deliver at this very early stage in the development plan process, does not provide the robust justification. Accordingly, the Local Authority should: Remove any reference in future iterations of the District Plan to the need for a future DPD; Identify further strategic allocations; Ensure each emerging Neighbourhood Plan meets their identified requirement in full as a minima; and Conduct an immediate review of all Adopted Neighbourhood Plans to ensure additional housing sites are provided.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	16	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings
Code: <input type="checkbox"/> Policy <input type="checkbox"/> DP5 <input type="checkbox"/> Object <input type="checkbox"/> Sustainability Appraisal? <input type="checkbox"/>				

Whilst we support the approach taken to windfall development as a component of the housing supply, we have two main concerns over the Council’s general approach to windfall provision, as follows: 1. The tests for including a windfall allowance provided by para. 48 of the NPPF states that any allowance should be realistic having regard to past completions and “will continue to provide a reliable source of supply.” The work undertaken by the Council to date simply demonstrates that windfall has been a source of supply in the past, but does not provide any certainty that the trend will continue throughout the Plan period. 2. Whilst we welcome the general approach provided by Policy DP5 to windfall, we are concerned that the Development Plan policy framework will make windfall developments very difficult to achieve. In this regard we draw attention to the West Hoathly Neighbourhood Plan, where housing applications are only encouraged on infill developments within settlement limits. This significantly limits the opportunity to increase the supply of housing in the District and will neglect the valuable contribution brownfield sites located outside existing settlement limits can make in assisting this goal.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15618	17	Mr N Mantell	LRM Planning Limited	W.T. Lamb Holdings
Code:	Policy	Object	Sustainability Appraisal? <input type="checkbox"/>	
	DP5			

Allocated Sites: There are a number of sites identified as being existing commitments in the emerging Plan that are existing Development Plan allocations. In accordance with the NPPF, the Local Planning Authority should ensure that there is a reasonable prospect that the site will deliver over the plan period. This will involve an assessment of why the allocation has not delivered to date and whether the reason for the lack of activity will present itself within the timeframe of the emerging Plan. Sites with planning permission: We note that Policy DP5 of the emerging Plan identifies that there are 5,405 dwellings anticipated to be delivered from existing commitments over the plan period. This figure is derived from analysis presented within both the SHLAA (Table 1 refers) and the Council's housing land supply monitoring information (Commitments Schedule, 1st April 2015). From this information, it appears that only 4 large sites (defined as being sites delivering 6 units or more), are either not anticipated to deliver, or not to deliver in full. No analysis is available for small sites. This would clearly suggest that a non-implementation allowance has not been provided and therefore the vast majority of all existing commitments within Mid Sussex are expected to deliver. This is considered to be unrealistic. Historically, a 10% non-implementation allowance has been used to reflect the fact that certain sites identified for housing will not be developed, will only be developed in part, or may achieve planning permission for an alternative use. We would propose the use of such an allowance in this instance. This would reduce the District capacity figure by 541 dwellings.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	1	Mr R Shepherd	Barton Willmore	Hallam Land Management
Code:	Policy	Sustainability Appraisal? <input type="checkbox"/>		
1b				

Development strategy does not address the Government requirements as set out in legislation. (with particular regard to the duty to cooperate) and the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	2	Mr R Shepherd	Barton Willmore	Hallam Land Management
Code:	Policy	Sustainability Appraisal? <input type="checkbox"/>		
3I				

The recommendations of the Davies Commission into airport capacity up to 2050 have now been published and the role of Gatwick airport clarified. In essence there remains significant growth needs at Gatwick airport to help meet airport capacity across the UK to which Mid Sussex plays an important role as part of the Gatwick Diamond. This is not reflected in the PSDP through its housing provision or infrastructure delivery.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	3	Mr R Shepherd	Barton Willmore	Hallam Land Management
Code:	Policy	Sustainability Appraisal? <input type="checkbox"/>		
2b				

Para. 2.9 of the PSDP acknowledges need to ensure the economy is supported, whilst also highlighting problems of in and out-commuting (principally by car) and the ageing population. The PSDP fails to effectively address these problems in any meaningful way. While the vision (Para 2.10-11) is supported in principle, the PSDP needs to do far more to deliver the vision it aspires to.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	4	Mr R Shepherd	Barton Willmore	Hallam Land Management
Code:	2a	Policy		Sustainability Appraisal? <input type="checkbox"/>

Strategic objectives set out in Para 2.13 are telling in that the delivery of housing (to meet the fully objectively assessed need) is not "centre-stage". Albeit "meeting needs" is mentioned. This illustrates the approach to the Local Plan by the Council is not putting housing need and economic growth at the forefront of their objectives. The NPPF is quite clear in its aspiration and requirements (NPPF Para 17 and Para 47 quoted).

It is alarming that the Council do not embrace the NPPFs' requirement and failing to deliver the homes and economic growth needed in the district and wider sub-region. The implications of not doing so are not adequately considered i.e. impact of not providing sufficient housing on the local and sub-regional economy, affordability, commuting, infrastructure provision, communities and sustainable development objectives.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	5	Mr R Shepherd	Barton Willmore	Hallam Land Management
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

Strategic objectives in Para 2.13 fail to consider wider relationship of Local Plan with neighbouring authorities under Duty to Cooperate. Whilst the PSDP acknowledges the Gatwick diamond objectives (and the MoU), the Brighton City Deal, and the Strategic Planning Board in seeking to demonstrate compliance with the Duty, the Council well knows from the comments of the previous Local Plan Inspector that the Duty has to be "effective" with identified outcomes, not merely an acknowledgement and engagement in a process. Highlighting in Para 3.38 of the PSDP, the outcomes of the various processes will be taken into account in Local Plan reviews. Furthermore, Para 3.14 states the Council is not identifying or addressing any unmet need from adjoining authorities despite 6 of the 8 Councils expressing an need for them to do so.

There is significant need arising from Brighton and Hove, Crawley, Chichester and other authorities more constrained than Mid Sussex. There is significant need arising from the London Boroughs which the GLA is seeking to address through ongoing engagement. This is not even acknowledged within the PSDP. Over the entire HMA, there have been ongoing problems with meeting the OAN, which must not be allowed to be compounded in this Plan.

The PSDP does not identify any review process for such processes to even engage at a later stage, meaning that the wider sub-regional planning needs will not be addressed until 2031. This is a clear failing of the legal and policy requirements of the Duty.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	6	Mr R Shepherd	Barton Willmore	Hallam Land Management
Code:		Policy	DP5 Object	Sustainability Appraisal? <input type="checkbox"/>

In terms of meeting housing needs, the Strategy refers to the DCLG Household Projections of 656 dwellings per annum (Para 3.11) whilst also acknowledging the NPPG requirement that this is merely the starting point. However, the PDSP fails to even plan for this level of housing up to 2031.

Para 3.12 states that no adjustments are needed to reflect market signals. Given the acknowledgment of the problems of affordability, accommodating economic growth, commuting patterns and the NPPF requirements to address barriers to economic growth, including housing (Para 21 refers) it is suggested that this statement cannot be justified.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	7	Mr R Shepherd	Barton Willmore	Hallam Land Management
Code:	<input type="checkbox"/>	Policy DP5	Object	Sustainability Appraisal? <input checked="" type="checkbox"/>

The assentation at Para 3.18 that the SA shows that the Local Plan can only accommodate 11,050 dwellings suggests the evidence base is flawed. Council suggesting that from this point on, no further development can ever be provided in Mid Sussex. Cannot be the case. Might be the case that difficult decisions need to be made, and that additional infrastructure needs to be provided, but additional development will inevitably need to take place and the Council must plan for the quantum of development needed now. The sustainability appraisal must consider in greater detail the implications of not meeting the full objectively assessed need including the effects upon the local/ regional economy, affordability, communities and the ability therefore to deliver the vision and objectives set out in the PSDP.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	8	Mr R Shepherd	Barton Willmore	Hallam Land Management
Code:	3i	Policy	<input type="checkbox"/>	Sustainability Appraisal? <input type="checkbox"/>

Given insufficient housing is being planned for and the reliance on NPs with the associated uncertainty that creates, the Local Plan must do far more to address the infrastructure problems that currently exist, let alone those needing to be addressed through future population and economic growth.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	9	Mr R Shepherd	Barton Willmore	Hallam Land Management
Code:	<input type="checkbox"/>	Policy DP1	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP1 suggests it is reflective of principle of favour of sustainable development (NPPF Para 14/15). Not the case as the PSDP fails to plan for the full objectively assessed need.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	10	Mr R Shepherd	Barton Willmore	Hallam Land Management
Code:	<input type="checkbox"/>	Policy DP2	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP2 identifies a job target of 278 jobs per annum to deliver economic growth anticipated. Given the low levels of unemployment and the ageing population within Mid Sussex, if this economic growth is to be secured, the PSDP needs to provide the quantum of homes needed to support this level of job growth.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	11	Mr R Shepherd	Barton Willmore	Hallam Land Management
Code:	<input type="checkbox"/>	Policy DP6	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP6 set out a settlement hierarchy that is overly simplistic as it fails to consider the wider sustainability objectives beyond local facilities or even the opportunity to enhance the provision of local facilities through development. In the absence of any steer over housing distribution to neighbourhood plan areas, those preparing NPs are likely to interpret this hierarchy as a basis for their own allocations and conclude the larger settlements are providing a higher proportion of development, which isn't necessarily the case.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	12	Mr R Shepherd	Barton Willmore	Hallam Land Management
Code:	<input type="checkbox"/>	Policy DP12	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP12 considers the sustainable rural development and rural economy. This policy fails to identify housing needs in rural areas, including affordable housing, which many rural communities may need or aspire to secure. This policy needs to be amended to reflect the NPPF requirements in this regard.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	13	Mr R Shepherd	Barton Willmore	Hallam Land Management
Code:	<input type="checkbox"/>	Policy DP14	Object	Sustainability Appraisal? <input type="checkbox"/>

DP14 refers to AONB and is considered overly restrictive beyond that set out in the NPPF. The suggestion of "small scale" is not defined which is likely to cause some confusion in development management. Furthermore, the NPPF does not place an embargo on larger scale development. Therefore, the restriction of development to that of a small scale fails to reflect the fact that the AONB objectives may still be able to be achieved whilst accommodating what might be considered as larger scale development. Recent appeals within Mid Sussex and the AONB demonstrate that sustainable development within the AONB can be delivered whilst still meeting the AONB objectives.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	14	Mr R Shepherd	Barton Willmore	Hallam Land Management
Code:	3k	Policy	<input type="checkbox"/>	Sustainability Appraisal? <input type="checkbox"/>

In terms of the monitoring obligations within the PSDP, the Plan fails to identify a review mechanism as required by the NPPF and as relied upon by the Council to meet its legal obligations under the duty to cooperate.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15663	15	Mr R Shepherd	Barton Willmore	Hallam Land Management
Code:	<input type="checkbox"/>	Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

The development strategy outlined in paragraphs 3.24-3.30 identify the focus upon Burgess Hill for the delivery of 3,980 dwellings by 2031, with the remaining housing need (identified as 1,515 homes) met through NPs. This approach is considered flawed in that Para 184 of the NPPF reinforces that (NPPF Para 184 quoted highlighting...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"). The PSDP offers little assistance to neighbourhoods seeking to prepare their plans as to what quantum of development they should therefore be planning for. Unclear if the NPs in total do not plan for the level of housing need. Para 3.29 of the PSDP suggests it will seek to produce Housing Allocations DPD with swift implementation to maintain a five year supply of housing. Mid Sussex does not have a track record of swift plan-making and this places doubt on ability of this approach to address any housing shortfall quickly. Given staggered nature of NP delivery, extent of shortfall won't be known until very late in the Plan period, by which time it will be too late to address the unmet need.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15692	1	Mr B McCurry	Barton Willmore	Thakeham homes
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

Thakeham Homes is the freehold owner of land to the east of Keymer Road, Burgess Hill (which is identified in the Council's SHLAA (May 2015) as site 738) and they have various other land interests across the district.

On behalf of Thakeham Homes, we have recently submitted representations on the Submission Version of the Draft Burgess Hill Neighbourhood Plan (January 2015) and participated in the subsequent Examination in June 2015, along with submitting representations on the Council's Draft Strategic Housing Land Availability Assessment (SHLAA) (February 2015) in respect of Thakeham Homes' land to the east of Keymer Road, Burgess Hill.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15692	2	Mr B McCurry	Barton Willmore	Thakeham homes
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

The 2012-based CLG household projections show growth of 11,144 households in Mid Sussex over the period 2014-2031 (656 households per annum). Once vacancy rates, assumed by the Council to be 2.6%, are applied this would equate to 11,441 over the Plan period or 673 dpa as a 'starting point' for the OAN.

As we have identified above, we consider the 'starting point estimate' is 673 dpa. Application of a 10% uplift would therefore lead to OAN of 12,576 dwellings, 2014-2031 (740 dpa), exceeding the Council's quoted SHLAA figure.

Barton Willmore's analysis shows how at least 673dpa between 2014-2031 is the OAN starting point estimate for MSDC. Whereas The Northern West Sussex Economic Growth Assessment (2014) indicated that there would be a need for 843 dwellings per annum 2011-2031 based on job growth (521 jobs per annum) broadly comparable to the most recent Experian forecasts identified in this report.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15692	3	Mr B McCurry	Barton Willmore	Thakeham homes
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

In addition, despite previously identifying that 23 dpa should be added to the OAN to notionally contribute towards meeting the identified unmet housing needs of neighbouring authorities, the Council is no longer proposing any contribution to help meet the need of neighbouring authorities who have very particular land constraints. This, yet again, raises the question as to whether the Council have adequately carried out their Duty to Co-operate, particularly with Brighton and Hove authority where (to our knowledge) there is still no signed Memorandum of Understanding between the two authorities.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:	
15692	4	Mr B McCurry	Barton Willmore	Thakeham homes	
Code:	<input type="checkbox"/>	Policy	DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

The HEDNA update determines that, in following the approach of the original HEDNA report, application of a 10% uplift would reach OAN of 722 dpa. The update then states how the SHLAA (June 2015) has identified deliverable sites for 723 dpa, and to meet a market signals uplift of 10%, every one of these sites would need to be delivered. The report concludes that this is unsustainable and would mean that the Council would not have a 5-year supply of housing, and on this basis that a market signals uplift of 10% is not 'reasonable'.

This approach wholly conflicts with the PPG, which states how constraints should not be applied to the OAN, such as limitations imposed by the supply of land for new development (ID2a-004). Furthermore as we have identified above, we consider the 'starting point estimate' is 673 dpa. Application of a 10% uplift would therefore lead to OAN of 12,576 dwellings, 2014-2031 (740 dpa), exceeding the Council's quoted SHLAA figure.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:	
15692	5	Mr B McCurry	Barton Willmore	Thakeham homes	
Code:	<input type="checkbox"/>	Policy	DP29	Object	Sustainability Appraisal? <input type="checkbox"/>

According to the June 2015 HEDNA, provision of 650 dpa would provide for 197 affordable dpa. The Council states that this will exceed the assessed current affordable needs (127 dpa) and provide up to 85% of the need for the total waiting list (230 dpa).

However, according to the Affordable Housing Needs Model Update (2014) the full affordable housing need based on the 'high' scenario is identified as 474 dpa. Thereby 197 affordable dpa would only partially meet the affordable need of Mid Sussex.

Whilst we do not object to a 30% affordable housing requirement on new housing schemes per se (subject to scheme viability and site specific circumstances), paragraph 2a-029 of the PPG requires local authorities to increase the total housing figure in the local plan where it could help deliver the required number of affordable homes. This has been clarified recently in the High Court¹², and therefore the OAN figure and housing requirement (in Policy DP5) should be increased (as explained above and in the attached housing need 'Technical Review' report) to help assist in delivering affordable housing in the district.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:	
15692	6	Mr B McCurry	Barton Willmore	Thakeham homes	
Code:	<input type="checkbox"/>	Policy	DP36	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP36 refers to the need to protect ancient woodland and 'aged or veteran' trees.

While we understand the need to protect trees that are statutorily protected via Ancient Woodland or Tree Preservation Order legislation, we do not consider that a blanket protection of all 'aged or veteran' trees is appropriate. Particularly when the loss of such trees might be due to a development proposal where new and additional planting may be proposed and the scheme benefits and disadvantages need to be weighed in the planning balance.

We would suggest that the words 'aged and veteran' should be deleted from the first paragraph of Policy DP36.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15692	7	Mr B McCurry	Barton Willmore	Thakeham homes
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Therefore, it is our view that the Draft District Plan has not, firstly, established the correct 'objectively' based housing need for Mid Sussex and, secondly, put forward a strategy which then seeks to meet the objectively assessed housing need, including the unmet need of neighbouring authorities via the Duty to Cooperate (particularly with Brighton and Hove where there is no known signed Memorandum of Understanding between the two authorities).[Technical Assessment of OAN attached]

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	1	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho
Code:	3h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The strategic objective refers to the need to provide opportunities for people to live and work within their communities, reducing the needs of the community. Notwithstanding this, the employment strategy seeks to allocate additional employment land over and above the District wide requirement as set out in the Employment Land Review. This additional employment land, much of which is allocated to Burgess Hill (Policy DP9), is accommodating a proportion of the adjacent districts' requirement at Crawley, Horsham, and Brighton. This will lead to the inevitable increase in commuting from adjacent districts which conflicts with the principles of this strategic objective. To resolve this conflict, the spatial distribution of employment land should better reflect the geographical need. In particular, additional employment land in the vicinity of Crawley (within Mid Sussex) would appear to be a more sustainable land use distribution.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	2	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho
Code:		Policy DP1	Object	Sustainability Appraisal? <input type="checkbox"/>

Bullet point 4 refers to the need to provide the opportunity for people to spend more time with their communities so they can build stronger relationships. Bullet point 7 seeks to create jobs in towns and villages to minimise the need to travel. Whilst these objectives are supported and consistent with the Strategic Objectives, they are in conflict with the employment distribution strategy that seeks to allocate employment over and above the District employment need to Burgess Hill. This will encourage employment in-commuting from adjacent districts.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	3	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho
Code:		Policy DP2	Object	Sustainability Appraisal? <input type="checkbox"/>

We object to the strategy to allocate 30 hectares of land as a high quality business park at Burgess Hill given our view that such an allocation is not consistent with the evidence base.

The policy should refer to a range of employment land provision as recommended in our representations to Policy DP9, i.e. 20 – 30 ha.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	4	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Work undertaken by Nexus Planning on Objectively Assessed Housing Need (OAN) using the 'Popgroup' forecasting model (the same as the Council) demonstrates an annual OAN of approximately 880 dwellings per annum. We are therefore very concerned that soundness of the District Plan will be aggressively challenged by the development industry on housing need, which is a fundamental government objective. Mid Sussex needs to demonstrate that it can 'boost significantly' the supply of housing in order to be in accordance with the NPPF policy objectives. We cannot see how this is demonstrated.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	5	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho
Code:		Policy DP6	Object	Sustainability Appraisal? <input type="checkbox"/>

We support the identification of Burgess Hill as one of the District's category 1 settlements. This position in the settlement hierarchy is evident given the town's range of retail, education, employment and health facilities as well as its strong public transport links such as its rail links to London and Brighton. The sustainability of this location is reflected in the Council's aspiration to deliver strategic development to the north and north-west of Burgess Hill through Policy DP9.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	6	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho
Code:	<input type="checkbox"/>	Policy	<input type="checkbox"/>	Object
		DP7		Sustainability Appraisal? <input type="checkbox"/>

We support the broad principles for Burgess Hill as set out in the Burgess Hill Town Wide Strategy. We also accept that the development of land within my clients' control and adjacent land controlled by Wates, together with the other identified strategic site at Kings Way, will assist in delivering the Council's policy objectives for the Town. However, Policy DP7 is unclear in that it replicates certain policy requirements set out in the site specific strategic site policies DP8 and DP9. In general terms it seems a lot of these bullet points should be redistributed to these site specific policies.

Further, it identifies certain policy requirements that cannot be delivered by either strategic development sites (e.g. contribute towards a greater range of shops, an expansion of retail floorspace). Whilst attracting additional consumer expenditure through household formation will support the town centre retail role, the policy requirement for a strategic site to deliver such improvements cannot be justified.

Set out below is a summary response to those bullet points in Policy DP7:

1. Is relevant for all development not just the strategic allocations at Burgess Hill.
2. Site specific policy and/ or relevant for all development in Burgess Hill. Also not implementable / deliverable (cannot directly link more retail in town centre with strategic site policy). Therefore, we propose the wording is changed to read: "Contribute towards a better, more accessible town centre by providing support for a greater range of shops..."
3. Our representations regarding the amount of land allocated for the business park through Policy DP9 are set out against this policy.
4. Policy is relevant for all development in Burgess Hill not just strategic sites. Specific policy requirements for the respective allocated sites should be identified within specific site allocation policies. Therefore, consideration should be given to how this requirement would be best represented in the specific policies for the Northern Arc and Kings Way.
5. This is relevant to specific sites and hence should form part of the strategic site policies at Burgess Hill.
6. This is relevant to all development at Burgess Hill.
7. Should be relevant to a site specific policy. In addition it is noted that this policy has been expanded from the District Plan (2013) to now include reference to other facilities. With regards to health facilities the requirement will be identified through discussions with the Clinical Commissioning Group (CCG). It is understood the CCG will shortly be producing its preferred approach to health care provision in and around Burgess Hill, although to date publication of this strategy has been delayed.
8. This refers to site specific requirements and hence should be included in the site specific policies.
9. It is not clear how a development proposal can deliver such a route unless on public highway without the need for third party land requirements. Such a policy requirement could seriously prejudice the delivery of any proposal.
10. Site specific as only the Northern Arc can actually provide the Centre for Community Sport in the vicinity of the Triangle Leisure Centre (but other developments at Burgess Hill can assist in its funding).
11. This is repetition of Policy DP29 (Affordable Housing) however, if this reference were to be retained in the current policy it is important it is consistent with Policy DP29 and makes it clear that the affordable housing requirement is subject to viability and deliverability.
12. This is a general policy relevant to all development and not just that at Burgess Hill.
13. We note this bullet point deals with two issues; sewage capacity; and, environmental quality. We object to the wording which effectively states that any dwelling in the strategic development around Burgess Hill shall not be occupied until improvements at the Goddards Green Waste Water Treatment Works (WWTW) are in place. This is a blanket statement and does not take into account the balance of phasing and infrastructure provision. For example, the environmental issues associated with odour from the WWTW only effect the western area of the site and will be subject to mitigation. It is therefore not appropriate to prevent the wider strategic development from proceeding prior to mitigation for this area being implemented.
14. This is a site specific policy and subject to viability and / or most appropriate scheme to achieve reduced energy targets.

Furthermore, energy needs are not necessarily best met using CHP and/or community energy. Therefore, 'wherever possible' should be replaced with 'where both

commercially and technically feasible’.

If many of the site specific policy elements are moved to the strategic site policies for the Northern Arc (DP9) and Kings Way (DP8) then the Council may wish to review the scope and content of Policy DP7 and whether it is required at all.

As a further point the policy contains reference to a footnote no.6 although this is not actually included as a footnote. We reserve the right to comment on this further once the footnote has been included.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	7	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho
Code:		Policy	Object	Sustainability Appraisal? <input type="checkbox"/>
		DP9		

Supportive of the strategic growth to the north / north-west of Burgess Hill and have been working closely with District/Town Councils on an appropriate growth strategy for the Town. Confident that significant housing delivery can take place within the plan period subject to a supportive policy framework on housing and infrastructure delivery.

There are some policy requirements in the District Plan that complicate the delivery of the Northern Arc. Of major concern is the lack of housing identified south of the A2300 on the policy inset plan. This was raised in representations to the Consultation Draft District Plan (November 2014) but is unresolved. The masterplan produced by the developers includes residential development to the south of the A2300 and has been justified, in design terms, to the District and Town Councils. There is no planning or technical reason why residential development cannot be located in this area. A significant area would remain outside of a mitigated odour contour from the Goddards Green Waste Water Treatment Works and could deliver housing. Without housing south of the A2300 the number of dwellings accommodated would be less than the Council is anticipating.

The land south of the A2300 is in a highly sustainable location for residential development and could be integrated with the existing town by downgrading adjoining roads and the implementation of the Northern Arc Link Road. Given the range of leisure, employment and educational facilities in the area, this land is one of the most sustainable Northern Arc locations to accommodate residential development.

It should be noted that detailed masterplanning, taking account of site constraints, is giving a likely overall site capacity significantly lower than that proposed. Our scheme includes approximately 220 dwellings to the south of the A2300 and, without this land, the allocation will have a lower housing capacity than is sought. The average net density proposed is approximately 37 dwellings per hectare, so scope for intensification is low. Critical that all unconstrained development land within the policy area is optimised for residential development.

The policy plan also proposes the delivery of 30 hectares of land as a high quality business park south of the A2300. Our earlier representations objected to this quantum of development and considered it was not supported by evidence. The Council has now published the Burgess Hill Employment Sites Study (2015) which is addressed below.

The wording of Policy DP9 has changed from the Consultation Draft, which identified a range of 20-30 ha for employment. The current proposed employment allocation (30 ha) includes the consented Hub scheme (ref: 13/01618/OUT) which received outline planning consent in May 2014 for 50,000 sqm of B1(b), B1©, B2 and B8 employment uses on the 15 hectare (approx.) and, 15 ha of employment provision within the remainder of the strategic allocation which is not yet subject to planning consent (land controlled by my client).

The emerging masterplan proposes approximately 10 ha of employment south of the A2300 (i.e 5 ha short of that sought through the emerging allocation) in an area which is spatially consistent with the proposed allocation in the District Plan. The remaining land is proposed for residential development and would deliver approximately 213 units.

A total of 25 ha of employment would therefore be delivered with the combination of the emerging planning application for the western site and the extant consent for the 'Hub' scheme. This is 5 ha less than required by the draft policy.

Representations have previously been submitted on employment provision for the strategic allocation. The Economic Growth Assessment (April 2014) identifies a district wide employment land requirement of 30.7 ha against a supply of 29.9 ha; resulting in a modest shortfall of 0.8 ha. This supply does not include any allocations proposed in the draft District Plan except the 15 ha 'Hub' employment area. The Burgess Hill Employment Sites Study (2015) concludes that a potential employment land demand figure for Mid

Sussex over the period 2014-2031 should be assumed at 25-30 hectares. Paragraph 6.9 of that report identifies that a supply assessment has been carried out identifying 30 hectares of employment (including 15 ha at 'the Hub' development).

It is therefore clear that the current land demand figure of 25-30 ha for Mid Sussex is met by the 30 ha of employment land in the supply assessment. This does not include the remaining employment land identified in the proposed allocation within my client's control.

The Employment Sites Study indicates additional need for 18-37 hectares in Mid Sussex from other authorities unmet employment land needs. This represents 25%-50% of other authorities' total unmet needs (Adur (3.9 ha); Brighton & Hove (10.2 ha); Crawley (34.9 ha); and, Horsham (25.4 ha)). This strategy is further made clear in the supporting text for Policy DP2 (page 24). The Burgess Hill Employment Sites Study concludes that the proposed employment land allocation would be needed to satisfy employment land needs within the District and support unmet needs from neighbouring authorities.

Policies DP2 and DP9 require 15 hectares of land to be delivered on my client's site in order to meet unmet needs of adjacent authorities and seek that the District's entire contribution to meeting unmet employment needs is accommodated in Burgess Hill. Query why the Consultation Draft District Plan Policy of 20-30 hectares of employment provision has been changed in the Pre Submission District Plan to the upper end of 30 hectares.

The proposed planning application for the Northern Arc West site include 10.4 hectares of employment land. This would make a significant contribution to meeting the unmet needs of other authorities.

The District Plan housing figure of 11,050 (650 pa) only proposes 391 units (23 units per annum) towards unmet needs of other authorities out of an unmet need of 37,733 units for the period 2011-2031. Mid Sussex is proposing to take a disproportionate amount of employment from other authorities compared to housing. Reducing housing to meet the 'maximum' employment allocation appears perverse and unsustainable. It would lead to long distance commuting. Meeting policy DP9 employment provision would reduce Northern Arc residential capacity by around 220 dwellings and this would need to be accommodated by additional allocations within the District. It is therefore considered that the range of employment identified in the policy should be amended to refer again to 20-30 hectares of employment and the supporting policies map should be changed to show my client's land south of the A2300 as mixed employment and residential.

The policy makes reference to the delivery of 3,500 homes in the Northern Arc. Furthermore, appendix A to the District Plan sets out a predicted housing trajectory which shows the Northern Arc delivering housing in 2020/21 at the rate of 310 units per year increasing to 325 units per year by 2025/26. The full 11 year build out is expected to be concluded by 2030/31. We are concerned that the trajectory assumes first completions in 2020. Outline planning applications will be submitted for a substantive part of the site in summer 2015, and we assume the remainder of the site in late summer 2015. Assuming outline planning permission is granted by early 2016 it is reasonable to assume that first completions on the site will be in 2018. The trajectory should therefore be amended to reflect the earlier start date.

Notwithstanding the above, in order that the Northern Arc can achieve this quantum of development every year it is imperative that housing construction is able to proceed simultaneously on different parts of the site in order to provide multiple sales outlets. This relies on sales outlets achieving highway access from the start of the housing trajectory period.

As established in the Burgess Hill Town Wide Strategy, the policy and associated plan should clarify broad site access arrangements in order to justify how the delivery phasing can be delivered. It should be made clear that principal access to the site is secured from the A2300 with additional access points onto A273 Jane Murray Way, B2036 Cuckfield Road, A273 Isaacs Lane and Maple Drive. Further reference should be made to the Maple Drive access to indicate that a bus gate will need to be implemented as part of the proposal to restrict the level of residential access, with the quantum of residential access to Maple Drive to be determined in the transport assessment accompanying the planning application. Such references will provide clarity to the public and the developers with regard to development phasing and impact.

It must be reiterated that achieving optimum sales outlets from outset will both maximise site delivery and enable the timely delivery of both community and transportation infrastructure.

Notwithstanding the above we wish to make the following observations on the specific wording of the policy in relation to the relevant bullet points:

- 1) As identified in our representations to Policy DP6 the requirement to provide health facilities within the site will be guided by discussion with the Clinical Commissioning Group. Page 7
- 2) As identified above we consider that the policy requirement to deliver 30 ha of employment is not justified by the evidence base and the previous range of 20-30 ha should be identified.
- 4) The Centre for Community Sport is a Town Wide facility and contributions towards its implementation and maintenance will need to be made by all development in Burgess Hill.
- 5) and 6) The planning application that will come forward for the site will be supported by an Infrastructure Delivery Plan (IDP), overarching Spatial Framework Masterplan and a phasing strategy. A key element of the IDP will be to ensure that the infrastructure identified as required to support the development can be delivered and phased in an acceptable manner which, is consistent with Regulation 122 of the Community Infrastructure Levy regulations i.e. necessary to make the development acceptable in planning terms, directly related to the development and, fairly and reasonably related in scale and kind.
- 8) See our representations to DP37 Biodiversity and DP38 Green Infrastructure
- 13) See comments to proposed gypsy and traveller pitches above

The policy seeks details of how publicly accessible space and facilities would be managed and maintained. These details would be determined through Section 106 discussions or the reserved matters stage.

The final bullet point of the policy refers to a financial viability appraisal being required to support the form and content of the proposals. It is considered that the wording should be amended to be consistent with Policy DP29 in that the appraisal will only be required if the scheme proposes below the threshold set in Policy. This bullet point should be expanded to recognise that contributions associated with the scheme will also be considered in an assessment of financial viability.

It is further considered that the infrastructure associated with Northern Arc should be delivered through Section 106 Agreements as opposed to the Community Infrastructure Levy (CIL) given the need to ensure that infrastructure can be delivered in a consistent manner across the site. Given that the emerging planning applications for the site are likely to be determined before the CIL is in place and hence through Section 106 Agreements, it is essential that all parcels/phases of land within the Northern Arc can be effectively aligned to an over-arching Infrastructure Delivery Plan.

Ensuring the site is CIL zero-rated also avoids the problems that are likely to arise with delivery of site specific strategic infrastructure. For example, the Northern Arc Link Road serves a wider strategic function of the local highway network in and around Burgess Hill although its delivery is also essential to ensure the scheme can come forward. Allowing for its facilitation through a Section 106 Agreement ensures developer led-delivery whereas under CIL there is no guarantee of contributions being spent to deliver the infrastructure.

In summary, whilst we strongly support the general principles of Policy DP9 and are advancing the technical work in support of planning applications for the site, there remain a number of policy constraints that could threaten delivery of the strategic site. These barriers need to be addressed in order to ensure delivery within the short / medium term. Without lifting the barriers the Policy could fail the soundness test on the grounds that certain elements are not justified and the policy is not effective i.e deliverable.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	8	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

It is our view, as set out objections to Policy DP5 that the proposed housing target in the District Plan is likely to be subject to scrutiny. As such it is not yet clear if the Council will need to incorporate further strategic sites to meet housing need. As the distribution strategy for accommodating gypsy and traveller sites appears to be linked to strategic development then an increased need for housing sites would also trigger a re-evaluation of gypsy and traveller pitch distribution.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	9	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

On a more general point of distribution it is noted that the Accommodation Assessment (Update June 2014) shows that the natural growth of households across the District (outside of the National Park) from 2013 – 2031 equates to 22 new pitches. This is roughly equivalent to the entire allocation of pitches to the Northern Arc (24 pitches over two sites).

The Accommodation Assessment (paragraph 15) identifies that this natural growth is assumed to occur both from the current waiting lists and from the 30 households on existing sites. These pitches are spread out across the District therefore, in accommodating this natural household formation growth it is logical to expand existing sites rather than accommodating all new household growth for the District in one location. It is not clear from the evidence base how this distribution strategy takes account of demographics or the likely location preferences associated with household formation in other parts of the District.

An assessment of the accommodation needs of Gypsies, Travellers and Travelling Showpeople has been made through the Mid Sussex Gypsy and Traveller Accommodation Assessment. The Draft Traveller Sites Allocations Document explains that need is calculated by comparing the current supply of pitches available against the current and future needs of households. Page 6 states:

“Much of the requirement for Gypsy and Traveller sites, particularly within the next five years, is to address the backlog of needs for households on the waiting list for public sites (a net total of 8 pitches)”.

The Gypsies, Travellers and Travelling Show People Accommodation Assessment (Update 2014) identifies that the West Sussex County Council waiting list currently shows 19 households requiring accommodation in Mid Sussex. The report assesses the waiting list and concludes at paragraph 9 that unauthorised sites in Brighton may be resultant of a lack of space in Mid Sussex and that: “only counting the needs of households based in Mid Sussex is likely to underestimate the total needs of those who wish to live in the area.”

It therefore appears that part of the need for pitches was based on accommodating overspill into Brighton. It has not been made clear however, the extent to which unauthorised encampments in Brighton are the result of unmet need in Mid Sussex and furthermore, how the proposed pitch provision in the emerging Brighton & Hove City Plan will actually address this need. Paragraphs 3.59 – 3.62 of the 2013 Accommodation Assessment identify the outcome the Council’s engagement with Brighton and Hove City Council although specific details of unauthorised encampments are not evidenced here.

There are a number of questions regarding the waiting list which have not been identified in the Gypsies, Travellers and Travelling Show People Accommodation Assessment (Update 2014). For instance, there is no explanation about whether identification is required as per the affordable housing registers and therefore people could be duplicated on the list if this is the case. It would be interesting to identify if some people are on the waiting list in other authorities and how many people have their needs met at present.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	10	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho
Code:	<input type="checkbox"/>	Policy	<input type="checkbox"/>	Object
		DP31		Sustainability Appraisal? <input type="checkbox"/>

Lastly, it is noted that the Council intend to produce a Site Allocations Local Plan at a later date. This more detailed site specific document should provide the policy mechanism to identify Gypsy and Traveller provision and assess alternative options, such as expansion of existing provision. As such it is considered that policy requirements in this Local Plan are premature.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	11	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho
Code:	<input type="checkbox"/>	Policy	<input type="checkbox"/>	Object
		DP18		Sustainability Appraisal? <input type="checkbox"/>

As referred to in our representations to Policy DP9 it should be recognised that developer funded contributions which, are used to facilitate infrastructure to support development are subject to viability testing where required. This is to ensure that schemes are not unnecessarily encumbered by onerous contributions and that such contributions are sought in accordance with the Community Infrastructure Levy Regulations e.g. fairly related in scale and kind to the development. The policy states that Community Infrastructure Levy (CIL) contributions will normally be spent on infrastructure needs in the locality of the scheme that generated it. In reference to our representations to Policy DP9 it is considered that the Burgess Hill Northern Arc would more effectively deliver infrastructure through a Section 106 Agreement and not the Community Infrastructure Levy hence, the site should be zero rated through CIL. We note that the Preliminary Draft Charging Schedule is anticipated to undergo public consultation for 6 weeks from the end of July to September 2015. We reserve the right to comment in more detail on this issue as part of the CIL consultation.

Proposed change
Add text to the end of the first paragraph to read “...through developer-funded contributions which are subject to viability testing where required”.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	12	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho
Code:	<input type="checkbox"/>	Policy	<input type="checkbox"/>	Object
		DP32		Sustainability Appraisal? <input type="checkbox"/>

It is considered that bullet point 5 of the policy is not consistent with national policy as it does not consider the interaction of development against this objective. We recommend that the bullet point be amended to read: “Special regard is given to protecting the setting of a listed building... to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.” This would be consistent with paragraph 129 of the NPPF and ensure that the determination of development proposal considers measures that have been taken to minimise conflict with development and heritage assets.

Proposed change
We recommend that the bullet point be amended to read: “Special regard is given to protecting the setting of a listed building... to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.”

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	13	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho
Code:		Policy DP36		Sustainability Appraisal? <input type="checkbox"/>

We are supportive of the overall policy to support the protection and enhancement of trees, woodland and hedgerows. However, we object to the wording, "Trees, woodland and hedgerows will be protected and enhanced by ensuring development does not sever ecological corridors created by these assets."

Proposed change

It is considered this policy wording is too restrictive and we therefore recommend that the wording is amended to read: "Trees, woodland and hedgerows will be protected and enhanced by ensuring development seeks to maintain ecological corridors created by these assets."

Furthermore, we object to the wording, "Development should be positioned as far as possible from ancient woodland with a minimum buffer of 15 metres maintained between ancient woodland and the development boundary."

It is considered this is not strictly in accordance with Natural England Standing Advice which requires a buffer area, although states that the appropriate buffer area will depend on the local circumstances and the type of development, citing a planning case in which a 15m buffer was agreed.

Proposed change

We therefore recommend the wording is amended to read: "Development should be positioned as far as possible from ancient woodland with an appropriate buffer maintained between ancient woodland and the development boundary, typically a minimum of 15 metres subject to local circumstances".

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	14	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho
Code:		Policy DP38		Sustainability Appraisal? <input type="checkbox"/>

We object to the specific identification in Policy DP38 and the proposals map (shown as previous Local Plan allocation BH21) of land adjoining Jane Murray Way and Sussex Way (see our comments to the proposals map as below).

The Northern Arc will deliver significant amounts of Green Infrastructure including an extension to the Green Circle network, public open space, and a Centre for Community Sport. The sustainable incorporation of these elements into the masterplan for the site should be brought forward in a holistic manner and provision covered under Policy DP9.

Proposed change

The reference to specific land at Jane Murray Way and Sussex Way for informal open space should therefore be removed from Policy DP38 and the proposals map and, instead general provision of open space and the Green Circle network should be identified at Policy DP9.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	15	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho
Code:	1g	Policy		Sustainability Appraisal? <input type="checkbox"/>

We note that a number of previous Local Plan (2004) saved policies are proposed to be carried over under the District Plan. These are identified on the proposals map along with other designations.

The proposals map identifies some parts of the Northern Arc including land north of Maple Drive and land west of Jane Murray Way as the Local Plan (2004) designation for informal public open space (Policy BH21). We object to the inclusion of land west of Jane Murray Way under this designation given that it is not accessible to the public due to access restrictions and to the fact that the land itself is heavily vegetated and virtually impenetrable.

We object to the proposal map's inclusion of the Hurst A3 policy designation for 'outdoor community sports' on land south of the A2300 given it conflicts with the key diagram supporting Policy DP9 of the District Plan which, shows this area as employment. This inconsistency does not make the plan 'effective'. Notwithstanding this, the extent of the designation is inconsistent with that shown on the Hurstpierpoint and Sayers Common Neighbourhood Plan polices map as it includes the area to the immediate west of Jane Murray Way under Hurst A3 whereas the Neighbourhood Plan does not.

We further object to the identification on the proposals map of 'new amenity space' in the area south of the A2300. This designation does not correspond to any policy in the Local Plan or Neighbourhood Plan and therefore is not 'justified'.

As a final point the 'proposed employment land' also to the south of the A2300 should be identified as indicative given our comments to Policy DP9 regarding the amount of land supported for employment use through the evidence base.

Proposed change

To incorporate changes as identified above.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	16	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho
Code:	SA-b	Policy		Sustainability Appraisal? <input type="checkbox"/>

The SA does not include any assessment of alternative locations for Gypsy and traveller pitches. The District Plan seeks to locate Gypsy and Traveller pitches at the strategic allocations, but has done no SA work to inform this.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
15705	17	Mr L Challenger	Nexus Planning	Gleeson Developments Ltd and Rydon Ho
Code:		Policy DP5	Neutral	Sustainability Appraisal? <input checked="" type="checkbox"/>

We note that the Sustainability Appraisal Pre Submission Report assesses a number of Strategic Site Location Options across the District. We support the overall balance and outcome of the SA in that it scores the Northern Arc consistently higher than any other site option, a conclusion which is consistent with its highly sustainable location and ability to deliver strategic infrastructure.

Objective 8 (Conserve and Enhance Biodiversity) scores '-?' for the Burgess Hill Northern Arc on the basis that it contains several areas of designated ancient woodland and SNCIs. We object to the assessment that this should score negatively as the masterplan as emerging for the site shows how ancient woodland can be retained and protected within the development. The site is of sufficient size to deliver a large amount of housing without the need to impinge on this woodland. Therefore, the site should score more highly against this objective.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16063	1	Mr G Mower	Burgess Hill Action Group	
Code:		Policy		Sustainability Appraisal? <input type="checkbox"/>

DP5, 6, 7, 8, & 9 have chosen Burgess Hill as the location for 70% of the new homes not yet approved for the whole of the Mid Sussex District which will increase the population of Burgess Hill by about 50%. The 'Burgess Hill: A town Wide Strategy; Visioning the Future; Feasibility Study' determined that the development levy from 4000 new homes would be needed to raise the £40 m required to finance the new town centre rather than housing needs of the district. This appears to be unsound and ignores the demand from would be buyers for homes in other locations where prices may become over-inflated due to scarcity of supply. The proposals for the strategic housing developments at Burgess Hill will increase the population of the town by about 50% and this will surely increase traffic flow by a similar amount and cause a severe cumulative impact in terms of road safety and increased traffic congestion unless major road improvements are instituted including a third road bridge across the railway line. Most parts of the development situated in the parish of Ansty and Staplefield will be too far from the centre of Burgess Hill for access by walking,(except for the youngest and fittest) and will therefore be by car or public transport and this will again add to the major traffic problems.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16063	2	Mr G Mower	Burgess Hill Action Group	
Code:	1i	Policy		Sustainability Appraisal? <input type="checkbox"/>

Mid Sussex District Council's consultation exercise failed spectacularly to achieve its intended purpose, only 499 replies were received from a population of about 140,000 which is 0.036% and of those only 42% agreed, with reservations that Burgess Hill was the correct location for the majority of new homes. Clearly most residents were not aware that the consultation exercise was taking place and the feedback from our (BHAG) subsequent leaflet drop and meetings in Burgess Hill confirmed this. Approximately 1000 e-mails and other web communications were received expressing ignorance of the District Plan proposals for Burgess Hill and support for the BHAG opposition to these. It is therefore particularly important that the consultation should have been effective. We believe that the plan has not been positively prepared and justified and did not properly include early and meaningful engagement and collaboration with the neighbourhoods of the district and therefore the duty to co-operate. The NPPF calls on planning authorities to create a shared vision with communities of the residential environment and the facilities they wish to see, the flawed consultation process clearly fails to achieve this. The plan making section requires early and meaningful engagement with neighbourhoods etc., and the ineffective consultation process demonstrates that this was not achieved. The results of the consultation process (however well meaning) demonstrates that the District Council has clearly not achieved a "bottom up" approach as required by the Localism Act and their proposals cannot be said to be effective. There have been many changes to the draft District Plan since it was published for the public consultation exercise that took place in October 2011 to January 2012, and the public has not been consulted on these as they should have been for the plan to be shown as positively prepared and justified. This also appears to be contrary to the spirit of the NPPF and the Localism Act.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16063	3	Mr G Mower	Burgess Hill Action Group	
Code:	3d	Policy		Sustainability Appraisal? <input type="checkbox"/>

Reconsider the distribution of new homes in the district to reflect the needs of the district rather than the funding requirements of the re-development of Burgess Hill Town Centre and hold an effective district consultation process so that the plan can be seen to be positively prepared and justified in accordance with the requirements of the NPPF and the Localism Act

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16063	4	Mr G Mower	Burgess Hill Action Group	
Code:		Policy DP10	Object	Sustainability Appraisal? <input type="checkbox"/>

DP10 stresses the need to protect and enhance the countryside. A large part of the good quality land either side of the A273 and B2036 roads within the strategic housing allocation to the North & Northwest of Burgess Hill is currently (as has been for many years) in agricultural use and in particular producing cattle feed for the local dairy farm and its loss by the housing development appears to be contrary to the principles of DP10. The Food and Agriculture Organisation of the UN estimates that between 1970 and 2050 the amount of arable land per head of the world's population will have decreased by 60%, reflecting population growth. There appears to be other areas of Mid Sussex with land that is fallow or used for equestrian and similar purposes and could have been chosen for DP10 to be considered sustainable. The NPPF "Achieving sustainable development" quotes Resolution 42/187 of the United Nations General Assembly that defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Building on good quality agricultural land when other land may be available would therefore appear to be unsustainable.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16063	5	Mr G Mower	Burgess Hill Action Group	
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

There appears to be no reference in the Draft District Plan to consideration of the proposal by Mayfield Market Towns of a housing development near Sayers Common for 10,000 homes half of which would be in Mid Sussex. This would alleviate many of the problems associated with the Burgess Hill development proposals outlined in this submission and the District Plan cannot have been properly prepared and justified in accordance with the provisions of the NPPF without the council having considered carefully these proposals and noted them in their draft plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16063	6	Mr G Mower	Burgess Hill Action Group	
Code:		Policy DP9	Object	Sustainability Appraisal? <input type="checkbox"/>

DP22 The proposals (DP9) for the strategic development North & Northwest of Burgess Hill makes no reference to retention of the Burgess Hill Golf Course and Driving Range. This unique centre described by Golf Times "as probably the best short course in the UK", is close to the existing residential area of Burgess Hill a town which has surprisingly limited outdoor public leisure facilities, given its population of over 29,000 and is a highly valued and appreciated sporting, leisure and retail facility.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16063	7	Mr G Mower	Burgess Hill Action Group	
Code:		Policy DP17	Object	Sustainability Appraisal? <input type="checkbox"/>

The large covered driving range is one of only three in the area, the others being at Horsham and Pease Pottage. The loss of these amenities to the residential development would be simply unacceptable and contrary to the provisions of DP17 Sustainable Tourism, DP 22 Leisure and Cultural Facilities and Activities and DP23 Community Facilities and Local Services. There are no plans for alternative provision in the immediate vicinity, and should the facility be lost to property development this clearly would be inconsistent with the national policy as set out in the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16063	8	Mr G Mower	Burgess Hill Action Group	
Code:		Policy DP22	Object	Sustainability Appraisal? <input type="checkbox"/>

The large covered driving range is one of only three in the area, the others being at Horsham and Pease Pottage. The loss of these amenities to the residential development would be simply unacceptable and contrary to the provisions of DP17 Sustainable Tourism, DP 22 Leisure and Cultural Facilities and Activities and DP23 Community Facilities and Local Services. There are no plans for alternative provision in the immediate vicinity, and should the facility be lost to property development this clearly would be inconsistent with the national policy as set out in the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16063	9	Mr G Mower	Burgess Hill Action Group	
Code:		Policy DP23	Object	Sustainability Appraisal? <input type="checkbox"/>

The large covered driving range is one of only three in the area, the others being at Horsham and Pease Pottage. The loss of these amenities to the residential development would be simply unacceptable and contrary to the provisions of DP17 Sustainable Tourism, DP 22 Leisure and Cultural Facilities and Activities and DP23 Community Facilities and Local Services. There are no plans for alternative provision in the immediate vicinity, and should the facility be lost to property development this clearly would be inconsistent with the national policy as set out in the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16063	10	Mr G Mower	Burgess Hill Action Group	
Code:		Policy DP11	Object	Sustainability Appraisal? <input type="checkbox"/>

DP11 states it provides the framework to prevent coalescence but the strategic gap between Burgess Hill and Haywards Heath and Burgess Hill and Ansty will be seriously compromised by the strategic housing allocation to the North & Northwest of Burgess Hill and yet one of the strategic objectives of the District Plan is to prevent coalescence. The David Lock 2007 Report concluded that development along the northern edge of Burgess Hill would need careful and more detailed considerations and was in favour of development in other directions. They suggested development should be restricted to redevelopment of the football club and the former sewage works that would confine it to the confines of the original strategic gap boundary.

It is a requirement of the NPPF for the District Council to adopt the most appropriate strategy, when considered against the reasonable alternatives, for it to be seen as positively prepared and justified. But the David Lock 2007 report appears to have been ignored.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	1	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

Jones Homes have an interest in land at No. 88 and to the south of Folders Lane, Burgess Hill (Site Plan at Appendix A) and have submitted a planning application for 74 houses to MSDC. This is still in the process of being determined by MSDC. It is submitted that the site should be included with the Draft District Plan as a housing allocation.

Land at No. 88 and south of Folders Lane, Burgess Hill, as promoted by Jones Homes, is only included within land designed as having a secondary constraint by virtue of its inclusion within an arbitrary 1km zone around the SDNP. However, the Mid Sussex Landscape Capacity Study acknowledges this site (and the vicinity of the site) has a medium capacity for development (the only site having better landscape capacity is to the west of Burgess Hill). The inclusion of a 1km buffer around AONBs and the SDNP does not necessarily reflect the landscape capacity of the site and unnecessarily precludes sites from development.

Sites, such as that under option to Jones Homes at Folders Lane, are capable of accommodating some of BHCC's unmet housing need without detrimental harm to the local environment which can be evidenced. As noted, the Council's own Landscape Capacity considers the site to have medium landscape capacity and the Capacity Study acknowledges that it has no 'primary constraints' and only 1 'secondary constrain' which is simply at arbitrary 1km zone around AONBs and the SDNP. The Council have not considered whether sites, such as this, are capable of accommodating some of the unmet housing needs of BHCC, or other neighbouring authorities in this area, such as Lewes DC.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	2	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

DMH Stallard do not believe that the Draft DP has been prepared in accordance with the legal duty to cooperate set out in the Localism Act 2011 which amends the Planning and Compulsory Purchase Act 2004.

Since this time (previous submission) , it is understood that MSDC have undertake further evidence base to support a new Draft DP. However, there does not appear to be any evidence regarding discussions with neighbouring authorities on strategic cross boundary matters, particularly housing need.

The Duty to Cooperate Statement is not available online within the Draft DP evidence base and the Planning Policy team have advised that this will not be made available until after the Draft DP consultation period. As such, and on this basis, the Draft DP must fail in the legal duty to cooperate.

The Duty to Co-Operate Framework suggests that Mid Sussex will formally agree a 'Memorandum of Understanding' between the necessary authorities, including Lewes, Brighton and Hove, Wealden, Adur, Chichester, Crawley and Horsham District Councils, however, this is not in the public domain and it is not known whether this has been progressed further.

As no evidence has been provided demonstrating how MSDC have cooperated with the neighbouring and relevant authorities the Draft DP must fail the legal Duty to Cooperate.

The neighbouring authorities are severely constrained by their administrative boundaries and by environmental constraints such as the SDNP, flood risk, AONB, Ashdown Forest SPA and Green Belt. It is considered that Mid Sussex, although constrained, benefits from less environmental constraint. Furthermore, it benefits from a good strategic highways and public transport networks and is strategically located close to employment opportunities in Crawley, Brighton and London.

There is no evidence demonstrating why MSDC cannot assist with meeting this housing need nor is there any evidence demonstrating any constructive and active engagement with Crawley Borough Council as to how they could try to accommodate this housing need.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	3	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

it should be considered that the South Coast Housing Market Area (HMA) has an overlap with the Northern West Sussex HMA. There is no evidence that MSDC has addressed this concern and sought to identify the relationship with the South Coast HMA and how it may assist in providing for unmet housing needs. Additionally, the Northern West Sussex HMA is out of date, having been prepared in 2012.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	4	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code:	3b	Policy		Sustainability Appraisal? <input type="checkbox"/>

The NPPF requires that Plans are justified, in that they demonstrate the most appropriate strategy based on the proportionate evidence base. It is considered that in this instance, on the basis of flawed evidence as set out above, Mid Sussex have failed to demonstrate the most appropriate strategy for identifying land which has development potential. The Draft DP, therefore fails to be justified and therefore must be considered unsound.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	5	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code:	3h	Policy		Sustainability Appraisal? <input type="checkbox"/>

Jones Homes supports the Councils economic growth aspirations as set out in paragraphs 3.7-3.9 and within the Housing and Economic Development Needs Assessment (HEDNA) 2015. It is positively prepared and aims to meet the objectively assessed economic development needs of the District. This is considered to be justified (the most appropriate strategy) and is consistent with the NPPF.

The evidence underpinning the MSDC forecasts of economic growth are flawed which is then reflected in the under-estimate of housing need. This lower figure suggests that MSDC's economic growth strategy is being suppressed by the Council's under provision of housing. This results in a Plan which is not positively prepared, or justified and fails to be effective as it fails to plan for sustainable economic growth over the Plan Period.

The HEDNA update states how 650 dpa would generate 278 Full Time Equivalent (FTE) jobs per annum. However the job growth is constrained to the proposed housing growth. FTE is not considered the most appropriate measure of job growth ('workforce jobs' should be the measure being used in line with PAS guidance), and reference to the latest Experian forecasts (the same source used by the Council) shows significantly higher job growth, whether based on FTE jobs (at least 347 FTE jobs) or the more robust measure of 'workforce jobs' (at least 458 jobs per annum)

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	6	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

Barton Willmore consider in their conclusions (paragraph 5.3 – 5.5 of their Report) that the starting point for considering the OAHN is 673 pa, as a starting point this is already above the Councils housing target of 650pa. However, following further adjustments to alleviate housing suppression, alternative migration trends, an uplift to address the worsening market signals identified by the Council and to accommodate economic growth (based on Experian forecasts) and to supply more affordable housing, the true OAHN is likely to be in the region of 1,000 dpa. This would support the Council's economic growth agenda and support 500 new jobs per annum.

Accordingly the Housing Technical Note concludes that the starting point for calculating the OAHN should be at least 662 per annum (for the plan period). However, when adjustments are made to accommodate the above concerns, the true OAHN is likely to be in the order of 1,000 dpa. This would support growth of approximately 500 jobs pa. This would accord with the NPPF aspirations of economic growth and housing provision. Notwithstanding the above, even when using MSDC's housing target of 650 dwellings per annum, the Council fail to identify land capable of accommodating this identified housing need.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	7	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code:	3e	Policy		Sustainability Appraisal? <input type="checkbox"/>

MSDC significantly over-estimate the delivery rate of housing at north and north west Burgess Hill. They estimate that all 3,500 dwellings are able to come forwards within the plan period. The Council's Housing Trajectory shows this to be at a rate of 310 per annum for the first 5 years and then 325 for the final 6 year period. Typically, each developer outlet will deliver between 50-70 units per annum, this is demonstrated in the trajectory for the allocation of land east of Kings Way, Burgess Hill. On strategic sites such as north and north-west Burgess Hill, it is likely that there may be 3-4 developer outlets and that the lead developer will typically restrict output to approximately 200 units pa. Additionally, during the first 0-5 and 6-11 year periods, housing will also be coming forwards on sites at Kings Way and Keymer Tileworks in Burgess Hill. The delivery of these houses to the market will also restrict the ability of north and north west Burgess Hill to deliver over 200 dwellings pa. The estimated delivery of housing at north and north-west Burgess Hill should be adjusted to circa 200 dpa, which would result in 2,200 units coming forwards within the plan period (2014 – 2031). This represents an initial shortfall of 1,200 units against MSDC's housing need.

The Draft DP and its supporting evidence base does not define what level of development should be considered 'strategic' and therefore which sites should be included within the District Plan process. This approach has inherently hindered the ability of mid-range housing sites to be allocated through either the District Plan or Neighbourhood Plan process.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	8	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code:	3g	Policy		Sustainability Appraisal? <input type="checkbox"/>

20 Neighbourhood Plans are being prepared across MSDC, only 6 of these remain at an early stage. Of the remaining Neighbourhood Plan areas, only land for 1046 dwelling is allocated and of these, 547 are already included within the MSDC Commitments as they already have planning permission or are allocated sites (see Appendix F – NP Housing Allocations). This results in only 499 dwellings against MSDC's target of 1,515. There is therefore a deficit in the Neighbourhood Plan housing figures of 1016 dwellings which will need to be met by the remaining Neighbourhood Plans

It is welcomed that at paragraph 3.28, the housing provision figure to come forwards through Neighbourhood Planning should be considered as a floor (minimum) and not a ceiling (maximum). This is considered positively prepared and justified and therefore meets the tests of soundness. However, caution is noted as the Neighbourhood Plan process so far has sought to restrict and not promote housing delivery.

Furthermore, the Neighbourhood Plan area for Burgess Hill is tightly drawn around the settlement boundary and does not allow for allocations of land such as that south of Folders Lane, Burgess Hill much are adjacent to the settlement boundary but outside the NP area. Accordingly, the Plan does not allow for the allocation of nonstrategic development at Burgess Hill.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	9	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code: <input type="checkbox"/> Policy <input type="checkbox"/> DP1 <input type="checkbox"/> Object <input type="checkbox"/> Sustainability Appraisal? <input type="checkbox"/>				

Policy DP1 is unsound as it is not consistent with national planning policy. It suggests that housing must come forwards in locations that are consistent with Policy DP6 – Settlement Hierarchy. However, the Neighbourhood Planning process is resulting in many Category 2 and 3 Settlements allocating no additional housing over and above the MSDC Commitments. At present, the Neighbourhood Plans for all but 1 (Hassocks), Category 2 Settlements have progressed to either a ‘Draft’ or ‘Made’ Neighbourhood Plan. These so far, have resulted in no additional housing to deliver the 1,515 dwellings

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	10	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code: <input type="checkbox"/> Policy <input type="checkbox"/> DP2 <input type="checkbox"/> Object <input type="checkbox"/> Sustainability Appraisal? <input type="checkbox"/>				

It seeks to restrict economic development on the basis of the proposed housing target. As set out in the Barton Willmore Housing Technical Note submitted with our representations, the HEDNA Update 2015 identifies that the Experian ‘workforce jobs’ forecast 521-478 jobs per annum. However, when using the most recent data, this increases to as much as 528 per annum. Furthermore, the Northern West Sussex Growth Assessment April 2014 sets out a baseline of 521 jobs per annum.

This fails to the tests of soundness in that the Policy seeks to restrict economic development. It does not meet the Council’s OAN as set out in the HEDNA Update June 2015 is not consistent with achieving sustainable economic development. It therefore also fails the test of being justified and effective. Nor is it consistent with national policy in that it fails to promote economic development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	11	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code: <input type="checkbox"/> Policy <input type="checkbox"/> DP5 <input type="checkbox"/> Object <input checked="" type="checkbox"/> Sustainability Appraisal? <input checked="" type="checkbox"/>				

In his previous findings (paragraph 39), the Inspector has stated that whilst he acknowledged that consideration had been given to strategic allocations at Sayers Common and Crabbet Park, that there appears to have been no reference to other potential strategic sites, or assessment of them. This is still the case. MSDC have not provided any evidence demonstrating whether additional strategic development sites could be identified and developed.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	12	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code: <input type="checkbox"/> Policy <input type="checkbox"/> DP6 <input type="checkbox"/> Support <input type="checkbox"/> Sustainability Appraisal? <input type="checkbox"/>				

It is considered that the general approach to the settlement hierarchy is sound, in that it seeks to set out an appropriate hierarchy of settlements and direct development towards the highest tiers. Furthermore, it is considered that the designation of the 3 main towns as Category 1 Settlements is sound.

Again, the principle aim behind the settlement hierarchy is supported. However, the policy, as currently worded fails to be positively prepared, justified or effective.

All other development is expected to come forwards through Neighbourhood Plans. However, it is highly unlikely that such allocations will accommodate mid range sites such as 50 units plus.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	13	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code:		Policy DP16 Support	Sustainability Appraisal? <input type="checkbox"/>	

We acknowledge the contents of DP16 and the protection of the SDNP. Furthermore, it is acknowledged that whilst land adjacent to the SDNP may contribute to its setting, that development adjacent to the SDNP does not necessarily have an impact on its setting or adversely affect views into and out of the National Park.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	14	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code:	1h	Policy	Sustainability Appraisal? <input type="checkbox"/>	

the Housing Technical Note concludes that the HEDNA Update June 2015 constraints OAHN due to the supply of housing land and fails to consider the wider HMA, including Horsham and Crawley. The HEDNA Reports therefore do not comply with paragraphs ID2a of the NPPG and paragraph 159 of the NPPF. It therefore fails to be consistent with national policy. The starting point estimate for dwellings is at least 673 dpa once adjustment for vacancy, second homes and shared dwellings are applied (662 dpa, 2011-2031). MSDC's draft Plan dwelling target (650 dpa, 2014 to 2031) The 2012-based CLG household formation rates are suppressed in the 25-44 age groups in MSDC. Alleviating this suppression would increase the 'starting point estimate' above 673 dpa; however the Council have failed to present household formation rate sensitivity scenarios as recommended by ID2a of the PPG; Furthermore the 2012-based ONS SNPP, which underpin the 2012- based CLG household projection, are considered conservative due to being underpinned by net international migration to the UK (165,000 people per annum) significantly lower than the most recently recorded year (298,000 people per annum, 2013/14). This is emphasised by the recent 2014 ONS mid-year estimate for Mid Sussex, which shows net in-migration (1,299 people 2013/14) significantly (+50%) higher than the net in-migration projection (865 people per annum, 2014- 2031) underpinning the 2012-based ONS SNPP. The HEDNA update does not consider the 2014 MYE. It is acknowledged that the Council's SA of Cross-Boundary Options sets out a sustainability matrix of the positive and negative outcomes of assisting with the unmet needs of neighbouring authorities, however, it makes no assessment as to whether proposals, on balance, would deliver sustainable development or not.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	15	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code:	1h	Policy	Sustainability Appraisal? <input type="checkbox"/>	

At paragraph 3.15, MSDC suggest that an assessment of housing sites contained within the Strategic Housing Land Availability Assessment (SHLAA) 2015 identifies land capable of accommodating only 11,700 dwellings. At paragraph 3.16 of the Draft DP, it suggests that not all sites around settlements should be developed and this would not represent sustainable development. The Draft DP therefore suggest that the maximum level of housing which could be delivered within the District is 11,050 over the plan period, or 650 per annum. This does not represent positive planning, it seeks to identify a housing target within the Draft DP that is based on positive assessments within the SHLAA, rather than on the OAHN.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	16	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

As set out in paragraph 4.31 of Barton Willmore's Report, the Council have not sought to meet the housing needs arising from economic growth and job creation and rather have sought to restrict job creation by the available labour. This does not reflect the conclusions of the joint Economic Growth Assessment 2014. Furthermore, the level of job creation estimated within the HEDNA fails to take account of the most up-to-date Experian forecasts (March and June 2015) which suggests that an appropriate estimate of growth is in the region of 347 – 458 FTE jobs per annum, both of which are significantly higher than the HEDNA figure of 249 per annum. The Northern West Sussex HMA was prepared in 2012 and fails to take into account the most recent household projections (2012) and is in effect superseded by the HEDNA report and CRAWLEY BOROUGH COUNCIL and HORSHAM DISTRICT COUNCILS own assessment of their OAHN. Again, this demonstrates how the Draft DP, and paragraphs 3.10-3.17 are not based on proportionate evidence base and therefore cannot be justified. The District Plan therefore must be found unsound on this basis. However, this fails to consider more recently published data on population estimates (June 2015) which show that previous population projections have been seriously underestimated. The ONS 2014 mid year estimates net immigration to Mid Sussex of 1,299 people in the most recently recorded year. This represents an increase of 50% from the net in-migration (865 people per annum) assumed by the 2012 – based ONS SNPP. Additionally, the total population of Mid Sussex is recorded as 144,377 people in 2014: significantly higher than the 142,900 people projected by the 2012 – based ONS SNPP.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	17	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The Capacity Study suggests that the District has only 4% of land available for possible development, however, this is not the case. It is unnecessary to exclude all sites within 1km of the AONBs and SDNP without detailed site specific assessment (unless it has been identified as having low or low/medium landscape capacity in the MSDC Landscape Capacity Study). Furthermore, if land does suffer from a secondary constraint it should not necessarily rule out whether or not it is appropriate for housing or other development. This is also accepted by Mid Sussex who have allocated land north and north-west of Burgess Hill for housing and mixed use development on land identified within the Capacity Study has having a secondary constraint.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	18	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

In the concluding paragraphs of the SA of Cross Boundary Options, Mid Sussex suggests that meeting the unmet needs of local authorities, based on past inward trends of migration would result in 40% additional housing above the withdrawn District Plan and that this would result in major strategic housing allocation. It fails to say whether this would be achievable or why 40% is unidentified as a target. The Report also identifies that Mid Sussex has environmental constraints to development. However, it fails to acknowledge the economic and social benefits of providing for the unmet housing needs of its neighbours and fails to identify why they cannot be met. The SA fails to identify what level of unmet housing need could be accommodated, or when the environmental impacts of development outweigh the benefits. Cross Boundary SA - Report does not identify whether addressing the unmet needs of these authorities would result in environmental harm, which on balance is not outweighed by the benefits of delivering housing.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	19	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

At paragraph 4.2 (Housing Provision Paper) MSDC set out an assessment of un-met needs, however, this is out of date and does not reflect the most recent evidence base of these authorities. In particular, BHCC have an annual need of 1,506as reflected in their June 2015 Report, not 1,200 as set out in the MSDC Housing Provision Paper, this increases their unmet housing need to 16,920 over the 20 year period or 846 per annum.The Housing Provision Paper 2015 attempts to set out how MSDC have considered the need to accommodate the unmet housing needs of neighbouring authorities. However, it does not set out how MSDC have had any constructive or active engagement with neighbouring authorities.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	20	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

A market signals uplift of 10% remains justified based on the evidence submitted in the original HEDNA report. The HEDNA update suggests this uplift should be discounted, entirely contradicting the evidence of the original HEDNA report which the Council maintains remains is relevant and up-to-date. A 10% uplift to the minimum 'starting point estimate' would increase OAN beyond the 'starting point estimate';A significant uplift beyond 740 dpa would therefore be required to accommodate up-to-date economic growth forecasts from Experian (the source used by MSDC). The Council's most recent unconstrained assessment of future growth as set out in the Council's Economic Growth Assessment (2014) indicated economic-led OAN of 843 dwellings per annum.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16209	21	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

MSDC suggest that their committed housing numbers are 5,405. We set out an adjusted version at Appendix ?. MSDC include planning permissions and housing allocations within their commitments. However, some of the housingallocations date back to the MSDC Local Plan 2004 and are not yet forthcoming, it is unlikely therefore, that these will come forward for development. Additionally, MSDC include a lapsed planning permission for 47 units in Turners Hill and a scheme for 25 units in Felbridge where there is no current agreement with a developer or housebuilder to develop the site.DMH Stallard's adjusted figures on this basis show that MSDC Commitments actually total 4,980. This results in a further 425 unit shortfall against MSDC's own housing target.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:	
16209	22	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd	
Code:	<input type="checkbox"/>	Policy	DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

A return to pre-recessionary rates would be in accordance with the principles positively preparing plans (paragraph 182, NPPF) and the need to boost the supply of housing (paragraphs 57 and 47, NPPF).MSDC suggest that they are providing for an adequate level of housing within the Draft DP. However, it is considered, that even against their own housing target, the Draft DP fails to provide for an adequate supply of housing.Policy DP5: Housing sets out the Council's strategic objectives for housing delivery within the Plan Period. It also sets out how this will be delivered through existing completions, commitments, strategic allocations and neighbourhood plans. We have reviewed the evidence underpinning Policy DP5 and find it to be wholly unsound. It fails to meet any of the 4 testsrequires in paragraph 182 of the NPPF.DMH Stallard have reviewed the evidence base which underpins the allocation of land, as above. This identifies an immediate shortfall of 2,463 houses within the plan period.The Draft DP fails to adequately provide for its own housing target (of 650 pa); fails to accommodate any unmet housing needs of adjoining authorities; fails to promote sustainable economic development; and fails to use the appropriate evidence base to calculate an OAHN. As such, it fails to meet these of soundnessIt is not considered to be a positive or effective process to identify at this stage that an alternative sites document may need to be prepared. MSDC have been unable to demonstrate a 5 year housing land supply for a number of years. Furthermore, they have failed to meet their housing need over the past 9 year period (at least). The preparation of a Plan to replace the Local plan 2004 has so far taken approximately 9 years and MSDC have repeatedly demonstrated that they are not able to respond quickly or positively to Plan preparation.[Technical assessment on Housing Numbers attached]

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:	
16209	23	Ms K Lamb	DMH Stallard	Jones Homes Southern Ltd	
Code:	<input type="checkbox"/>	Policy	DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Mid Sussex has failed to meet the housing target for the past 9 years (we have not sought to calculate housing provision prior to 2006/2007), as such, there is historic undersupply of housing within the district which will have affect household formation and would have suppressed the true need.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:	
16436	1	Ms J Jardine	Terence O'Rourke	St Modwen	
Code:	3d	Policy	<input type="checkbox"/>	<input type="checkbox"/>	Sustainability Appraisal? <input type="checkbox"/>

The district council's preference is for the location and nature of additional development to be identified through neighbourhood plans (para 3.21). However no guidance is provided within the plan as to where and how much development would be sustainable in other locations throughout the district, save for the identification of a settlement hierarchy. This is despite the objectively assessed need (OAN) having been identified for each area within the Housing Provision Document 2015. Fails to recognise the sustainability and suitability of locations in the north of the district (north of the AONB), and in particular of Copthorne, as a larger village free from many of the environmental constrains across a large swathe of the district.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16436	2	Ms J Jardine	Terence O'Rourke	St Modwen
Code:	<input type="checkbox"/>	Policy	DP5	Object
			Sustainability Appraisal? <input type="checkbox"/>	

Fails to adequately plan for sustainable growth in the district. Given the environmental sensitivity of the district, St Modwen believes that the plan should provide guidance on the location and scale of housing to be secured through neighbourhood plans in different parts of the district.

Fails to secure the delivery of homes to meet the OAN identified in the Housing Provision Paper, 2015. For example, in Worth Parish an OAN of 804 dwellings is identified, including Crawley Down and Copthorne (para 4.20).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16436	3	Ms J Jardine	Terence O'Rourke	St Modwen
Code:	3h	Policy	<input type="checkbox"/>	<input type="checkbox"/>
			Sustainability Appraisal? <input type="checkbox"/>	

Fails to positively plan for a growing contribution to the Gatwick Diamond, particularly in relation to the northern part of the district.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16436	4	Ms J Jardine	Terence O'Rourke	St Modwen
Code:	3f	Policy	<input type="checkbox"/>	<input type="checkbox"/>
			Sustainability Appraisal? <input type="checkbox"/>	

With respect to the land west of Copthorne (site 38, 2013 SHLAA), the District Council has resolved to grant planning permission for a sustainable mixed-use extension to Copthorne, comprising 500 homes, a primary school, GP surgery, 15,500sqm of employment space, allotments, play spaces and significant informal open space. The consent notice is shortly to be issued, but until this time, the site should be identified as an allocation in the draft district plan. As it stands the site has been removed from the updated SHLAA, is not considered as a potential strategic location for growth in the Sustainability Appraisal, and is identified as a commitment in the Housing Provision Paper, June 2015. The glossary appended to the draft plan defines commitments as "sites already in the planning process which have planning permission for residential development or are allocated in a Development Plan Document". The site should therefore be allocated, reflecting its 'commitment' status.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16436	5	Ms J Jardine	Terence O'Rourke	St Modwen
Code:	<input type="checkbox"/>	Policy	DP5	Object
			Sustainability Appraisal? <input checked="" type="checkbox"/>	

Options for assisting to help meet Crawley's unmet needs (options 11, 12, 13, p62), and options for assisting to help meet Tandridge District's unmet housing needs (options 17, 18, 19, p66), are not overwhelmingly or convincingly negative. There are a number of positive social and economic effects identified, and most the possible environmental effects are recognised as unknown. In respect of the land west of Copthorne the possible environmental effects of development have been identified through the environmental impact assessment process that accompanied the submission of the outline planning application, and the mitigation proposed was deemed to be acceptable, as reflected in the Council's resolution to grant planning permission in July 2014 subject to planning conditions and a S106 legal agreement.

The land west of Copthorne could therefore be available to meet some of the unmet needs in neighbouring authorities, should there be sufficient sites available elsewhere in the district to meet the district's own needs.

Land to the west of Copthorne, which is capable of accommodating up to 500 homes, has not been considered in the review of potential strategic locations.

Crabbet Park, in the vicinity of Copthorne to the east of Crawley has been considered (2,300 dwellings), as have others sites of a similar scale to the St Modwen site eg: land north of Cuckfield Bypass (500 dwellings).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16436	6	Ms J Jardine	Terence O'Rourke	St Modwen
Code:	3g	Policy		Sustainability Appraisal? <input checked="" type="checkbox"/>

There is no option of providing some strategic guidance to neighbourhood plans in terms of the numbers to be provided in various parts of the district. This would have been a credible alternative approach, providing greater certainty and strategic direction for neighbourhood plans. This would ensure that needs are met where they arise and that there is a sustainable distribution of new homes throughout the district. This evidence is available in both the LUC report (2014) and the Settlement Sustainability Review report (2015).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16436	7	Ms J Jardine	Terence O'Rourke	St Modwen
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

The document identifies 500 homes west of Copthorne as a 'commitment' towards meeting this need. However this site has a 'resolution to grant' and not a planning permission, and should be allocated for it to be considered a commitment. Whilst St Modwen is pleased to see that the site is regarded as a 'commitment', reflecting the Council's commitment to seeing its delivery, the site should be allocated until the permission is issued. The site is sustainably located, provides for a more balanced distribution of growth across the district, and will assist to support the economic success of the Gatwick Diamond.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16449	1	Mr E Hanson	Barton Willmore	Glenbeigh Developments Ltd (Hanlye Road)
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

In short, Glenbeigh consider that the housing requirement within the emerging District Plan is incorrect. The perceived housing need has not been derived from the most recent DCLG district-level household projections for the period to 2037. Whilst the principle of using a Strategic Housing Market Assessment (SHMA) to inform the housing requirement is noted, the draft District Plan does not meet the requirements of NPPF, particularly paragraph 159.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16449	2	Mr E Hanson	Barton Willmore	Glenbeigh Developments Ltd (Hanlye Road)
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

Furthermore, MSDC prepared a paper for its Scrutiny Committee for Planning and Economic Development on the 9 July. This reported that the OAN contained within the emerging District Plan is already out of date. The work relied on data and statistics from May 2014, but the most up to date projections published by the Office for National Statistics in July. Whilst Glenbeigh appreciate that population forecasts change, the draft District Plan is already out of date and does not rely on the latest projections, which were reported as being significantly higher than those published last year. Before proceeding to a 'Draft Submission Plan' Glenbeigh suggest that further work is undertaken to reflect the most recent information available.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16449	3	Mr E Hanson	Barton Willmore	Glenbeigh Developments Ltd (Hanlye Road
Code:	3g	Policy		Sustainability Appraisal? <input type="checkbox"/>

MSDC must ensure that those charged with preparing NP's properly plan for the delivery of housing. Given its size, location and sustainable credentials, Cuckfield should be delivering housing. If this does not happen, Glenbeigh question whether the full quantum of housing earmarked in the draft District Plan to the villages will ever be delivered.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16449	4	Mr E Hanson	Barton Willmore	Glenbeigh Developments Ltd (Hanlye Road
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

The HSD states that 'whilst there will only be localised impact upon landscape from the upper field, the southern part of the site would have a greater visual impact on the wider landscape amenity. When considered as a whole site it is not suitable for development.'

In light the above, substantial revisions were made to the proposed scheme, including the removal of the southern part of the site from the proposed development area. It is now proposed that only the northern parcel of land will be developed and the southern section will provide an extensive area of public open space which can be managed and controlled by the Parish in perpetuity. This information has been submitted to both MSDC and Cuckfield Parish Council. The site is therefore now not only achievable and available, but is also considered suitable for development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16449	5	Mr E Hanson	Barton Willmore	Glenbeigh Developments Ltd (Hanlye Road
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

There are clearly further sites in the district that are not constrained by environmental designations. Indeed the Glenbeigh site south of Hanlye Road is included in the MSDC Housing Supply Document and is noted as being deliverable, yet it does not feature in the emerging Cuckfield NP as a deliverable allocation. In summary, Glenbeigh question whether MSDC and the settlements are doing everything they can to allocate the necessary housing. In light of the MSDC's proposed approach to housing distribution, and Cuckfield's status (Category 2) in terms of the wider settlement hierarchy, it is difficult to understand how the Parish Council has reached the conclusion that no housing sites need to be identified in Cuckfield. Indeed, we consider that as a main village with a population of 5,256 (2011 census), falling only second in the hierarchy after the main towns of Burgess Hill, East Grinstead and Haywards Heath, the village and its immediate surroundings should be a key location for the provision of new housing to help meet the housing needsof the District.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16449	6	Mr E Hanson	Barton Willmore	Glenbeigh Developments Ltd (Hanlye Road
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

In terms of backlog, MSDC has historically under provided housing for a number of years (against Local Plan 2003 and RSS 2009 requirements). The revised start date of the plan at 2014 does not mean that past under provision can be ignored. The back log must be made up through the revised plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16449	7	Mr E Hanson	Barton Willmore	Glenbeigh Developments Ltd (Hanlye Road
Code:		Policy	DP5	Object
			Sustainability Appraisal?	<input type="checkbox"/>

A number of submissions have been made by Barton Willmore representing different land owners in the district. As a result, and in the absence of more detailed demographic modelling from the MSDC, Barton Willmore has undertaken high level analysis which demonstrates that the OAN starting point for MSDC is 673 dpa. Furthermore, the North West Sussex Economic Growth Assessment indicates that there would be a need for 843 dpa, which is based on job growth broadly comparable with the most recent Experian forecasts. The true OAN is likely to fall between the two, but it is clear that once prepared properly, the District Plan will need to accommodate additional provision for housing.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	1	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

The assessment of a New Market Town that has been undertaken by MSDC in preparing the PSMSDP does not provide a robust basis not to address the objectively assessed need of the District or seek to address the significant unmet need of neighbouring authorities. Furthermore, the PSMSDP fails to put in place a mechanism to demonstrate how any unmet need will be addressed. This is a significant failing of the Plan.

It is evident that there is notable overlap in the HMAs, particularly within the south of Mid Sussex District. Consequently, the approach being undertaken by neighbouring authorities in terms of meeting future housing and employment needs is an important consideration, particularly with regard to the requirements of the Duty to Co-operate. The approach being undertaken by neighbouring authorities has direct and indirect implications for the proposed approach of MSDC and other authorities in Northern West Sussex. And the wider sub-region.

It is evident that the district plan for Mid Sussex will be expected to assess the extent of un-met needs from adjacent authorities. It will then be necessary to fully take those needs into account when undertaking capacity and sustainability appraisals so that the spatial strategy of the district plan is fully consistent with the NPPF expectation that plans will be positively prepared to meet development requirements up to the point where the adverse effects of doing so significantly outweigh the benefits.

The evidence base produced by MSDC demonstrates an acknowledged shortfall in neighbouring authorities (excluding Horsham and Crawley) of 33,560 dwellings over a 20 year period. This has now increased to 39,480. Added together with the Northern West Sussex deficit, the overall unmet need within the sub-region equates to 2,933 dpa (or 58,660 dwellings over a 20 year period). This represents a significant level of potential unmet housing need and it is in this context the provision of future housing should be considered.

It would appear that there has been some engagement between CBC, MSDC and HDC together with some authorities in the wider sub-region. However, it is not clear that there has been continuous process of engagement with other local authorities, particularly BHCC. For example, whilst the 'Sustainability Assessment of Cross-Boundary Options for the Mid Sussex District Plan' (February 2015) notes that the neighbouring authorities were consulted, it does not appear that there has been any further discussions since the completion of this Study and importantly in light of the approach of the PSMSDP, which not seek to accommodate any of the unmet needs of neighbouring authorities. Indeed, although a Housing Provision Paper has been produced by MSDC in June 2015, the section that addressing the unmet needs of neighbouring authorities is simply based on the findings set out in the earlier February 2015 Sustainability Assessment, which in itself relied on information returned to MSDC in August 2014 – almost 12 months before the PSMSDP is published. Such an approach does not suggest that there has been continued engagement. Indeed, as we have demonstrated in Section 5, the position with regard to unmet needs of neighbouring authorities has changed since August 2014. These changes have not been taken into account by MSDC.

Joint work has been undertaken between HDC, CBC and MSDC. Whilst joint work has been undertaken between the Coastal Authorities themselves, there appears to be no transparent joint working with MSDC and the Coastal Authorities. Although the 2015 Sustainability Assessment of Cross Boundary Option states that MSDC has been in touch with neighbouring authorities however there is no explanation of these discussions in terms of the scope of the discussions and the outcome of them. It would appear from the Cross Boundary Study that these discussions have simply been in request of information in relation to how much housing each authority is seeking to provide, not how the joint work shows how the issues identified can be addressed.

There are also serious documented unmet needs in Brighton and Hove and South Coast towns, which could only be met in Northern West Sussex and which depend upon the effective operation of the Duty to Co-operate. Small scale, piecemeal urban extensions may be necessary but they will not be a sufficient, or the most sustainable solution. The planning system needs to be sufficiently strategic so that more comprehensive, innovative and sustainable solutions to meet local housing and employment needs can be

found, including new market towns.

For example, the recently published Northern West Sussex Authorities Position Statement (Revised March 2015) acknowledges that there will be a shortfall in housing and employment growth. The Position Statement (para. 6.19) goes on to state that appropriate solutions to meet this shortfall 'will continue to be sought' as revisions to the plans are progressed, infrastructure provision is addressed and major issues are resolved. However, there is no conviction in the Statement and no joint working is in place or proposed to actually deliver a meaningful proportion of the unmet needs. It is not evident what this statement actually means and, if it is to mean anything, why is it not more convincingly reflected in the Plan?

The NPPF is clear that the duty is not simply a duty to discuss matters. Paragraph 180 requires authorities to work collaboratively to enable delivery, whilst paragraph 179 makes clear that the purpose of collaboration is to meet development needs. Whilst the authorities, including MSDC, can demonstrate some evidence that they met a number of occasions and undertaken studies to calculate the scale of unmet needs, they cannot show how their joint work has been effective in actually making any meaningful provision. What is absolutely clear, however, is the Duty as set out in paragraph 181 of the NPPF has not been met because no effective provision for the clear unmet needs has been made and no mechanism proposed and committed to which provides any realistic prospect that the needs will be seriously addressed.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	2	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The PSMSDP (para. 3.11) identifies an Objectively Assessed Need (OAN) of 656 dpa, of which 6 dpa is identified to relate to the South Downs National Park which is outside the Plan area. Policy DP5 of the PSMSDP identifies a housing provision figure of 11,050 homes in the period 2014-2031 (650 per annum).

In reviewing the approach adopted in identifying this housing figure, MSDC continue to fail to have undertaken a housing need assessment that complies with national policy. The figure of 650 dpa identified by the PSMSDP is identified to reflect the 'needs and aspirations of Mid Sussex' and does not comply with the NPPF or PPG, consequently does not provide for neighbours' unmet needs.

It is demonstrated that the PSMSDP fails to meet the requirements in the NPPF and the accompanying PPG. Although MSDC and the neighbouring authorities of CBC and HDC, has commissioned extensive evidence on forecast employment growth and the consequent employment land requirements, MSDC has failed to take account of this evidence in preparing the PSMSDP or explained why this evidence is not material.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	3	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.
Code:	<input type="checkbox"/>	Policy	Object	Sustainability Appraisal? <input type="checkbox"/>

The assessment undertaken in Report 1 identifies a minimum annual requirement of 1,014 homes over would be required in Mid Sussex over the plan period (and an OAN in the wider HMA of 2,693 homes per annum). Notably this figure neither makes allowance for the significant backlog of housing provision in Mid Sussex against the requirements of the South East Plan (which exceeds 6,000 homes) nor make an allowance for meeting the housing needs of adjoining authorities, such as Crawley, Brighton & Hove and Lewes, all of whom are on record as stating that they cannot meet their full housing needs within their boundaries. The OAN identified is notably higher than that identified by the Council's evidence base (656dpa) and being planned for by the PSMSDP (650dpa).

Within the wider Northern West Sussex HMA, the assessment undertaken within Report 1 identifies an OAN within the HMA of 2,693 dpa, which is broken down as follows: Horsham – 1,000 dpa; Mid Sussex – 1,014 dpa; and Crawley – 679 dpa. The comprehensive work undertaken by MMT demonstrates that the objectively assessed need within the HMA been underestimated. It is worth noting that the Inspector dealing with the Crawley Local Plan in his initial findings (letter dated 26 May 2015) identifies the OAN of Crawley Borough to be 675 dpa. This is comparable to that identified by the MMT's own evidence (679 dpa) and provides comfort that the approach undertaken for the neighbouring authorities in the Northern West Sussex HMA is robust and can be relied upon. CBC have adopted an OAN of 675 dpa within the proposed modifications to the Local Plan, but cannot meet. In reviewing the respective emerging Plans of each of the three authorities within the Northern West Sussex HMA a housing provision of 1,734 dpa is proposed. Should this be the case this represents a potential shortfall of 959 dpa (or 19,180 dwellings over a 20 year period). The following modifications are considered necessary to ensure that the Plan is sound: An increase in the housing requirement sought by Policy DP5: Housing from 11,050 dwellings per annum between 2014-2031 (650 dpa) to a minimum of 17,240 dwellings between 2014-2031 (1,014 dpa); A New Market Town should also be included as a strategic development in the table accompanying Policy DP5;

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	4	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.
Code:	<input type="checkbox"/>	Policy	Object	Sustainability Appraisal? <input type="checkbox"/>

MMT's evidence identifies that the actual need for affordable housing is likely to be significantly more than 230 units per annum identified in MSDC's evidence base. Such provision would fail to fully address the actual unmet housing requirement in Mid Sussex District. Our assessment identifies that the affordable housing requirement is 707 units per annum.

The need to deliver affordable housing in the District is recognised in the Sustainability Appraisal (para.4.2), which also recognises that house prices in Mid Sussex are high and this causes affordability issues, particularly for young people (para. 4.3). Consequently, the affordability of housing represents a significant issue in Mid Sussex (as recognised by MSDC) that will have an adverse impact on social and economic factors for the sub-region. Despite this, the approach set out in the PSMSDP will fail to address this important issue.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	5	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.
Code:		Policy DP2	Object	Sustainability Appraisal? <input type="checkbox"/>

There are ambitious plans for economic growth within the sub-region and evidence shows that there is demand for more employment space not only to meet Mid Sussex's need but also the unmet needs of neighbouring authorities (in particular Brighton). Mid Sussex has an important role to play in the economic success of the sub-region.

Despite this, the proposed land allocation in the PSMSDP is significantly below the estimated requirements based on the evidence available, including that published by MSDC. The Council does not explain why it chooses not to meet these objectively assessed requirements as set out in the BHES. This is a clear breach of the NPPF requirements.

It is therefore concluded that MSDC is in serious breach of the NPPF in failing to produce a plan which is evidence-led, in not objectively assessing need, and in failing the duty to cooperate.

In this context, it has been demonstrated that the New Market Town being promoted by MMT could make a very significant contribution to Mid Sussex's growth needs and support the wider ambitions of the Gatwick Diamond and Coast to Capital Local Enterprise Partnership. Specifically, Mayfields can support over 11,000 jobs.

Proposed Modification:

A specific reference added to Policy DP2: Sustainable Economic Development to allocate land for employment use in a New Market Town;

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	6	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.
Code:	3h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The three Northern West Sussex authorities are also failing to co-operate to bring forward sufficient employment land to accommodate the forecast full economic potential of the area. This is particularly important given that this area is the heart of the Gatwick Diamond, one of the nation's most significant opportunities for economic growth. However, neither separately, nor together, have the three districts allocated the land necessary to accommodate the baseline forecast growth, not to mention the potential higher growth forecast.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	7	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.
Code:	SA-b	Policy		Sustainability Appraisal? <input type="checkbox"/>

Clearly, by appraising the New Market Town Option as part of the Sustainability Appraisal it must follow that the Council considers that it fits at least two criteria set out in the SHLAA (i.e. suitable, available, achievable). It would therefore appear that the approach being adopted in the SHLAA and Sustainability Appraisal are inconsistent.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	8	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.
Code:		Policy	Object	Sustainability Appraisal? <input checked="" type="checkbox"/>
		DP5		

The Sustainability Appraisal (SA) produced by the Council appraises a limited options in the delivery of housing, with the highest figure assessed (Option E) being 800+ dpa being delivered. This compares to our assessment of the objectively assessed needs is identified to be in excess of 1,000 dpa.

Furthermore, the approach being adopted by MSDC in its SA is a superficial one in that it does not test a full range of locational strategy options, including one that involves a mix of some smaller sites, urban extensions and a new market town. As with the latest SHLAA, there is no indication that the SA has taken account of the evidence base provided by MMT, so that it is not clear what actual survey material, if any, the Council's judgements have been based on. Indeed, the Council's own evidence on environmental capacity shows that there are very few constraints in the broad location of the New Market Town so we question how the Council can conclude that a new settlement will have significant adverse impacts on the environment.

In specifically assessing the New Market Town option being proposed by MMT as a strategic development, the approach in the SA has not been undertaken on a realistic or objective approach. The conclusions reached are flawed being based on unsound and incorrect assumptions with no justification. For example, the SA concludes that a new settlement would be remote from essential services so most journeys will be by private car, however such an approach fails to recognise that new services will be provided within a new settlement with the majority of residents being within five minutes metres of local services together with the fact bus services will operate within the new settlement.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	9	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

A New Market Town in the area between Sayers Common and Henfield is not a new concept. It was suggested as a possibility in Burgess Hill: Visioning the Future (2007) and was looked at as a long term option through the abandoned Mid Sussex Core Strategy process.

A New Market Town was looked at in more detail through the jointly commissioned GL Hearn New Market Town Study (2010). This study was commissioned in light of the housing requirements of the South East Plan. Since this study was undertaken, additional work has been undertaken by MMT on the main constraints identified, namely Sewerage and Flooding / Surface Water. These constraints have been fully addressed and MMT have strategic agreements on these matters with the relevant authorities overcoming any obstacles to delivery. Report 5, submitted with MMT's representations, on delivery and infrastructure and master planning indicates that MMT have consulted on transportation matters, foul and surface water drainage and flooding matters, gas, electricity and telecommunications capacity, and other matters required to service this scale of development. Report 5 indicates that strategic agreement has been reached on infrastructure provision to service a development of up to 10,000 homes and the appendices show the relevant agreements that have been reached to date.

As MMT's evidence demonstrates, the housing shortfall in the sub-region has increased since the Inspector reached this conclusion at the end of 2014 and since Brighton and Hove identified the need to consider the potential for a new settlement in 2013. Furthermore, since the Horsham Inspector reached this position, it is also now acknowledged by Brighton and Hove and other authorities that they have exhausted all venues to find land for housing. As a result it is not a question of whether the option of a new settlement is to be considered in the longer term, but that it should be planned for now given the urgency to meet the housing needs in the sub-region.

A New Market Town is an innovative, sustainable solution to meeting housing needs in the short, medium and long term. Mayfields will provide a new market town of 10,000 dwellings across Horsham and Mid Sussex boundaries. The New Market Town will provide up to 3,000 affordable units as part of the 10,000 dwellings.

It is important to highlight the delivery credentials of a New Market Town. Report 5: Deliverability and Masterplanning Options for a New Market Town sets out in considerable detail the phasing for a New Market Town that would begin to deliver homes in 2018 and would continue to deliver homes over the period to 2031. This demonstrates that a New Market Town could be delivered over the medium and longer term. It also demonstrates that a New Market Town of 5,000 dwellings and all associated uses would be deliverable in full by 2031, i.e. within the plan period of the district plan.

[Technical Reports supporting submission attached: 1) Housing Requirements; 2) Environmental Capacity Assessment; 3) Economic Growth; 4) Alternative Sustainability Appraisal; 5) Deliverability and Masterplanning Options]

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	10	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

MMT has a number of concerns over the current SHLAA as there appear to be fundamental flaws in its preparation, particularly in relation to the consideration of the New Market Town. The SHLAA does not take into account any of the up-to-date information which MSDC had made available (including MMT's previous representations) that shows the site for the New Market Town is suitable, available, achievable and viable. This is despite assurances at the Workshop held in January 2015 all available information would be used, including that submitted by promoters. Indeed, MSDC's own evidence ('Capacity of Mid Sussex District to accommodate development, June 2014') identifies that there are very few environmental constraints within the broad area for the New Market Town, particularly when compared to other areas within the District. We therefore question the Council's position that the site has significant environmental constraints in concluding the site to be undeliverable. Against this background, the current SHLAA is not considered to have been completed in line with the NPPF and PPG.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	11	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

It is evident that that the Cross Boundary SA Study confirms that area south of the AONB/North of South Downs National Park (i.e. where the proposed New Market Town is located) as the most appropriate location in meeting the unmet needs of Adur, Brighton & Hove, Lewes, Worthing and part of the unmet needs of Crawley and Wealden. Although the Study does not recognise the most appropriate location for unmet need of Horsham District, this is due to the Study identifying Horsham to have no unmet need. However, given their proximity and the fact that both authorities fall within the Northern West Sussex Housing Market Area, it would be fully reasonable for Mid Sussex, including the area south of the AONB/North of the South Downs National Park, to also assist in meeting unmet need in Horsham. In light of this the Study confirms that the broad area where the New Market Town is proposed represents an appropriate location for meeting the unmet needs of seven of the eight authorities identified. The Study confirms that the majority of unmet needs of neighbouring authorities would be most appropriately met within the south of the District, rather than the north. Appendix 1 to the Cross Boundary SA assesses 11 broad development locations. In appraising the new settlement option the approach adopted is biased and superficial. For example, the new settlement is identified to have a negative effect due to not having access to existing health services. However, the assessment fails to recognise that high quality health facilities will be provided as part of a new settlement, which will place much less pressure on existing health services, than an extension to an existing settlement where such facilities may not be provided. Similarly, a new settlement is also scored negatively as it is not likely to have easy access to existing schools and those in nearby settlements are under pressure. However, the proposed new settlement will include new schools and will therefore alleviate pressure on existing provision. The issues identified by the Study as potential negative effects of a new settlement are not based on any sound evidence and are considered in more detail in Report 4 and Report 5 submitted as part of our representations. The Study identifies that a new settlement would not be an appropriate location for meeting unmet needs identified in Lewes. There is no robust justification for this position. The Study (para. 4.23) seeks to justify this position by stating that there is no direct route (by train or road) between Lewes District and likely area for a New Settlement, and the distance makes this area less likely to accommodate Lewes' development needs. However, the Study identifies an area around Bolney as being an appropriate location in meeting the unmet needs of Lewes. This is despite Bolney being located a comparable distance from Lewes as the proposed new settlement and with no clear direct route (either by train or road). Indeed, for residents within the Lewes urban area the proposed new settlement is located closer than Bolney. Against this background, by identifying the new settlement as a broad location for development the Study recognises it to be a sustainable location lacking any significant constraints. It is also acknowledges that southern part of the District would be the most appropriate location to meet the bulk of the unmet need of neighbouring authorities. A properly undertaken assessment would have confirmed the suitability of the New Market Town.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	12	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

MMT submitted representations to the district council on 6 August 2014, expressing concerns about the “self-fulfilling prophecy” inherent in the capacity study, i.e. its deliberate preclusion of a new settlement notwithstanding the absence of environmental constraints. No substantive response has been received to those representations.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	13	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The three Northern West Sussex authorities commissioned work on the case for a new market town in acknowledgement of the need but abandoned that work despite the conclusions of the consultants’ report. No robust justification has been provided by MSDC or the other authorities in the HMA to demonstrate why further work was not undertaken. Consequently, the authorities, including MSDC, cannot begin to claim to have ‘left no stone unturned’ (the test set by the Brighton and Hove Inspector and echoed more recently by the Lewes Inspector2) to seek to meet clear needs. It is apparent from the study, for instance, that the area around and to the west of Sayers Common and Hickstead is one of the least constrained areas of the district. For instance, Figure 4.1 of the Study identifies only one secondary constraint: low to medium Landscape Capacity and only one primary constraint, i.e. some limited areas within Flood Zone 3. Detailed work undertaken by MMT and set out in Report 5 demonstrates the limited nature of these constraints and the fact that they would not inhibit the sustainable development of the area. Nevertheless, they are precluded from consideration within the Development Capacity Study because Section 5 of that study provides a requirement for new development to be within walking distance of existing facilities and services. The Study, therefore, presumes only that incremental growth to existing settlements can be acceptable. No consideration is given to the ability of a new market town to comprehensively plan and provide an integrated suite of high quality new facilities. Rather than identifying genuine constraints to development at Mayfields, therefore, the Study confirms its suitability for development, particularly relative to the remainder of the district.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	14	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

MMT's Environmental Capacity Assessment reveals that there is environmental capacity within Mid Sussex and Horsham districts to meet objectively assessed needs of the two authorities and to assist in helping to meet needs of nearby authorities. The Environmental Capacity Assessment (ECA) carried out by MMT is a comprehensive study and should be used to inform the work necessary for the district plan. Having regard to the test set out in paragraph 14 of the NPPF, MSDC has failed to demonstrate harm in this respect. The requirements of the NPPF is for any adverse impacts to ‘significantly’ and ‘demonstrably’ outweigh the benefits – the limited evidence presented on this by the Council is superficial and based on unjustified assumptions.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16451	15	Mr A Fox	Quod	Mayfield Market Towns (MMT) Ltd.
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Report 1 finds that the MSDC's proposed housing requirement of 650 dpa would fall short of providing a sufficient labour force to meet job growth forecasts and MSDC's own economic growth forecasts as set out within the Northern West Sussex Economic Growth Assessment (April 2014). MMT's evidence finds that, irrespective of the implications of the Duty to Co-operate, there is a minimum housing requirement in Mid Sussex for 1,014 dpa in order to meet the economic growth aspirations of the NPPF. Importantly, whilst the three Northern West Sussex authorities jointly commissioned an Economic Growth Assessment (EGA) to understand the implications of employment growth for housing provision, the authorities have not built their local plans on its findings.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16474	1	Ms S Thorpe	Thakeham Homes Ltd	
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

In addition, it is clear that an OAHN of 650 dpa would not be sufficient to provide for the projected jobs growth across Mid Sussex in the plan period. The North West Sussex Economic Growth Assessment, which was published in April 2014, estimated that Mid Sussex could expect growth of between 521 and 671 new jobs per annum in the period 2011-2031. The Council's Housing and Economic Development Needs Assessment (HEDNA), published in February 2015, found that in order to provide for jobs growth of 521 per annum in the District, a housing supply of 843 dpa would be required.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16474	2	Ms S Thorpe	Thakeham Homes Ltd	
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The Sustainability Assessment of Cross Boundary Options for MSDC found that the maximum number of dwellings that MSDC can sustainably support is approximately 650 dpa, and as such the Pre Submission Draft District Plan refers to 650 dpa as a 'tipping point' with regard to sustainability objectives. We would question this, as many of the sites submitted to the SHLAA were excluded on the basis that they are located within the Area of Outstanding Natural Beauty (AONB). The AONB and its landscape qualities are highly varied throughout the District, and we do not consider that sites should be excluded from assessment on the basis that they are located within the AONB. It would therefore be beneficial for MSDC to conduct a full and proper review of the sites submitted to the SHLAA to identify further sites to enable the council to meet its full OAHN.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16474	3	Ms S Thorpe	Thakeham Homes Ltd	
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

The unmet housing need of MSDC's neighbouring authorities is substantial. In the MSDC Housing Provision Paper, which the Council published in June 2015, the total unmet need for the period 2011-2031 was recorded as 37,733 dwellings, with by far the highest unmet need arising in Brighton and Hove, which was estimated at some 10,800 dwellings.

Since this paper was published, Brighton and Hove have put to consultation the Further Proposed Modifications to the City Plan, which is at consultation from 29th June until 10th August 2015. Brighton and Hove estimate in this document that their unmet need is much higher, at some 16,920 dwellings in the plan period 2010-2030 and that they expect this to be met entirely by neighbouring authorities, including Mid Sussex. It is therefore concerning that the Pre Submission Draft District Plan makes no provision for this unmet housing need.

In addition, London is expected to have an unmet need of up to 200,000 dwellings over its current plan period (2015-2025). Research carried out by Nathaniel Lichfield and Partners for the consultation on the Further Alterations to the London Plan in April 2014, indicated that MSDC could be expected to provide up to 4,730 dwellings over this period, based on the constraints within the District. This paper assessed the constraints of authorities throughout the region, and found Mid Sussex to have much greater capacity than many of its neighbouring authorities. At present, there is no indication of making a provision for this wider need within the Pre Submission District Plan

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16474	4	Ms S Thorpe	Thakeham Homes Ltd	
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

In June 2014, MSDC published The Capacity of Mid Sussex to Accommodate Development Study in order to identify and assess any constraints to delivering further housing within the District. The Study found that approximately two thirds of the District is covered by primary constraints and that around 4% of the authority is free of any primary or secondary level constraints which would be restrictive as to the delivery of housing.

Although we appreciate that the District is restricted in part by constraints, it is our view that there is scope for increased housing provision in the least constrained locations to assist with delivering a small amount of the unmet housing need from neighbouring authorities.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16474	5	Ms S Thorpe	Thakeham Homes Ltd	
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The Housing Topic Paper identifies Hurstpierpoint for example, which is one of the more sustainable settlements in MSDC, as having an OAHN of 560 dwellings. The Adopted Neighbourhood Development Plan for the area however only allocates 282-292 dwellings in the settlement for the plan period to 2031. Such settlements are relatively free of primary policy constraint and represent a sustainable solution to assisting in the delivery of unmet housing need across the plan period by proactively supporting planned growth at this sustainable settlement.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16474	6	Ms S Thorpe	Thakeham Homes Ltd	
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP5 <input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?	<input type="checkbox"/>

The Council's Housing Provision Paper, published in June 2015, explains that "an assessment of market signals was undertaken and concluded that it would not be reasonable or sustainable to uplift this figure" (Paragraph 2.5). It is disappointing that this recognition of the importance of market signals has not materialised into any provision as part of the overall housing numbers.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16474	7	Ms S Thorpe	Thakeham Homes Ltd	
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP5 <input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?	<input type="checkbox"/>

In addition to failing to account for jobs growth in the plan period, it is also worth noting that an OAHN of 650 dpa would fall significantly below the previous South East Plan target of 855 dpa, and would therefore not enable the Council to deliver a significant boost in housing supply as required by the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16474	8	Ms S Thorpe	Thakeham Homes Ltd	
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP5 <input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?	<input type="checkbox"/>

We note that following the release of the most recent DCLG Household Projections in February 2015, the Council's OAN baseline was increased from 570 to 656 dpa. Despite this, the housing target of 650 dpa remains unchanged, as the 10% provision for market signals and 23 units for Duty to cooperate have been removed. Taking into account the previous provision for market signals plus the obligations within the duty to cooperate, the target of 650 dpa in the Pre Submission Draft District Plan appears to continue to be short in delivering housing across the plan period, however now by a reduced level, of by circa 90 dpa.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16474	9	Ms S Thorpe	Thakeham Homes Ltd	
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP5 <input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?	<input type="checkbox"/>

It is our view that the housing numbers within the Plan needs to be higher to reflect the Districts OAHN following the most recent DCLG Household Projections. Furthermore, a significant boost to housing land supply is required if the District is to deliver sufficient affordable housing as required by national policy and also to meet economic growth across the plan period.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16530	1	Ms C Ballantine	Rapleys	Hargreaves Management Ltd
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

Our client, Hargreaves, and Sunley jointly own a site at land south of Southway in Burgess Hill ('the Southway Site'). A site location plan (ref: VR_SLP01) identifying the extent of the ownership is enclosed. The site is currently vacant within the built-up area of Burgess Hill, and being jointly promoted by Hargreaves and Sunley for residential development. Therefore, our client wishes to ensure that the site's housing potential is realised through the allocation and appropriate planning policy framework. Our client also has substantial land holdings in the urban area of Burgess Hill. These include industrial and commercial premises within the Victoria Road Industrial Estate at Albert Drive, York Road/Charles Avenue, totalling over 350,000 sq.ft of commercial floorspace. Hargreaves is fully committed to maintaining these existing commercial interests, and therefore wishes to ensure that the appropriate local policy context is provided to protect existing (and future) commercial operations. A site location plan (ref: VR_SLP02) identifies the client's commercial land holdings.

We support the proposed removal of the Southway Site from the playing field allocation, as shown on the draft Proposals Map. As previously stated, the site has never been a playing field or in recreational use, and remains in private ownership. Therefore, the proposed removal would not result in the loss of existing facilities, and allows the site to be brought forward for housing development. As such, we consider that the de-allocation (of playing fields) is justified and sound.

However, for the soundness of the Plan, we consider that the site should be allocated for residential development, as it is a sustainable deliverable site within the urban area of Burgess Hill, which will contribute to the District's housing requirements. Further information regarding site suitability included.

To summarise, whilst we support the de-allocation of the Southway site as playing fields, we consider that the site which is demonstrated to be a deliverable housing site should be allocated in the District Plan in order to ensure that the sustainable site can be brought forward to contribute to meeting the housing requirements. In addition, we objected to a number of development control policies in order to ensure that there is a clear and positive policy framework for delivering sustainable housing development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16530	2	Ms C Ballantine	Rapleys	Hargreaves Management Ltd
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

We object to this policy, as the spatial strategy is not clear as to how the District Plan seeks to ensure that the housing requirements are met in full as it relies on the delivery of one strategic allocation, and smaller sites in Neighbourhood Plans or other unidentified planning documents and identified SHLAA sites. It does not specify how many residential units are capable of being delivered in the Neighbourhood Plans (based on the SHLAA), or whether there is a requirement for more sites to be allocated for residential development in the District Plan (or subsequent Local Plan).

We are concerned that the Council is seeking to deliver non-strategic sites to be delivered through the Neighbourhood Plans. We do not consider this approach to be appropriate, on the basis that:

- It is not flexible and unjustifiably prevents sustainable urban housing development sites, such as our client's site, which are omitted from Neighbourhood Plans, from being delivered.
- The draft District Plan does not provide a housing target for each Neighbourhood Plan. This is not an appropriate spatial strategy, or an appropriate framework for monitoring, thereby giving uncertainty as to whether a Site Allocations Development Plan will be necessary.

There is no justification provided in the District Plan or evidence base for treating 1,515 housing requirements as maximum, and allowing higher levels of development to be promoted only through Neighbourhood Plans. The approach to the strategic policy framework does not planning positively for the development in line with the NPPF Paragraph 157, as it does not provide sufficient flexibility to allow sustainable and suitable residential development sites not allocated in Neighbourhood Plans to be brought forward in line with Policy DP6 which permits development within defined built up area boundaries. It is therefore considered to be unsound.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16530	3	Ms C Ballantine	Rapleys	Hargreaves Management Ltd
Code:		Policy DP6	Object	Sustainability Appraisal? <input type="checkbox"/>

Broadly, we support Policy DP6 which permits development within defined built-up area boundaries, provided that it does not cause harm to the character and function of the settlement. The second paragraph of the policy refers to “the growth of settlements” which will be supported where this (the growth) meets identified local housing, employment and community needs. This followed by a sentence and criteria in relation to development outside defined built-up boundaries. It is unclear whether the second paragraph refers to the growth of settlements outside built-up boundaries only. This should be clarified, and should be expressed clearly that the growth/development within the settlements is the priority over sites outside the defined built-up area, in order to promote a sustainable form and pattern of development and growth of settlements, particularly Burgess Hill, which is identified as Category 1 Settlement.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16530	4	Ms C Ballantine	Rapleys	Hargreaves Management Ltd
Code:		Policy DP20	Object	Sustainability Appraisal? <input type="checkbox"/>

Whilst we do not object to the principle of the policy, we object to the wording of the policy, as the requirement for the provision of a “new resource” (in the event that new development affects a right of way) is vague and could be interpreted to mean an off site provision which may not be feasible due to landownership/availability issues. It is considered that the current wording of the policy could unnecessarily restrict sustainable development sites, such as our client’s site, from being delivered, as an option to divert an existing right of way within the site to be considered as part of the design process appears to be precluded.

As such the policy should be amended as follows with changes shown in bold italics:

“Existing rights of way, Sustrans national cycle and recreational routes will be protected by ensuring development does not result in the loss of, or adversely affect, a right of way or other recreational routes, unless through an appropriate diversion or the provision of a new resource is provided which is of at least an equivalent value and does not sever important routes.”

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16530	5	Ms C Ballantine	Rapleys	Hargreaves Management Ltd
Code:		Policy DP25		Sustainability Appraisal? <input type="checkbox"/>

We support Policy DP25 which allows for flexibility to be applied in terms of meeting nationally described space standards for internal floorspace and storage space for all new residential development, subject to clear evidence being provided.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16530	6	Ms C Ballantine	Rapleys	Hargreaves Management Ltd
Code:	<input type="checkbox"/> Policy	DP28 Neutral	Sustainability Appraisal? <input type="checkbox"/>	

Policy DP28 requires new housing development to provide a mix of dwelling types and sizes, including affordable housing that reflects current and future local needs. We do not object to this approach, which allows for evidence of housing need to be based on the best available evidence. However, for the soundness of the Plan, we consider it necessary to add 'subject to site-specific circumstances, viability and relevance of the scheme being proposed' to the policy in order to ensure that both the deliverability of new housing development and meeting the District's housing need are not undermined.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16530	7	Ms C Ballantine	Rapleys	Hargreaves Management Ltd
Code:	<input type="checkbox"/> Policy	DP29 Support	Sustainability Appraisal? <input type="checkbox"/>	

Policy DP29 requires a minimum of 30% affordable housing provision on all residential development providing a net increase of 11 dwellings or above or a maximum combined gross floorspace of more than 1,000 sq.m, with a mix of tenures. We largely support this policy which allows for a lower level of affordable housing to be provided, subject to viability and delivery assessment and up to date housing needs evidence. We also support this policy, which has now removed reference to Neighbourhood Plans being able to se local policies for affordable housing. We consider this policy to be in conformity with the NPPF, however, the percentage of affordable housing should be expressed as a maximum.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16530	8	Ms C Ballantine	Rapleys	Hargreaves Management Ltd
Code:	<input type="checkbox"/> Policy	DP22 Object	Sustainability Appraisal? <input type="checkbox"/>	

Policy DP22 requires all new development to provide on-site leisure and cultural facilities/equipment, where practicable, planning conditions and/or obligations will be used to secure such facilities. We do not object to the objective of this policy to secure leisure and cultural facilities. However, in the context of paragraph 173 of the NPPF, new development should not be expected to provide a scale of off-site improvements which would be disproportionate to the impact on local facilities, or would make development unviable and undeliverable.

The following amendments should therefore be made to the first sentence of the second paragraph of policy:

"The on-site provision of new leisure and cultural facilities, including the provision of play areas and equipment will be required for all new residential developments, where appropriate to the scale of any impact, potentially including making land available for this purpose, subject to viability and deliverability considerations".

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16530	9	Ms C Ballantine	Rapleys	Hargreaves Management Ltd
Code:	<input type="checkbox"/> Policy	DP18 Object	Sustainability Appraisal? <input type="checkbox"/>	

Support the use of planning conditions and /or planning obligations to secure on-site community facilities and infrastructure, for the same reasons set out in our objection to Policy DP22 (do not object to the objective of this policy to secure infrastructure but in the context of paragraph 173 of the NPPF, new development should not be expected to provide a scale of off-site improvements which would be disproportionate to the impact on local facilities, or would make development unviable and undeliverable), object to Policy DP18 (Securing Infrastructure) which should also be amended accordingly to take into account the scale of impact, and to ensure the viability and deliverability of new development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16530	10	Ms C Ballantine	Rapleys	Hargreaves Management Ltd
Code:		Policy	Object	Sustainability Appraisal? <input type="checkbox"/>
		DP23		

Support the use of planning conditions and /or planning obligations to secure on-site community facilities and infrastructure, for the same reasons set out in our objection to Policy DP22 (do not object to the objective of this policy to secure infrastructure but in the context of paragraph 173 of the NPPF, new development should not be expected to provide a scale of off-site improvements which would be disproportionate to the impact on local facilities, or would make development unviable and undeliverable), object to Policy DP23 (Community Facilities and Local Services) which should also be amended accordingly to take into account the scale of impact, and to ensure the viability and deliverability of new development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16530	11	Ms C Ballantine	Rapleys	Hargreaves Management Ltd
Code:		Policy	Object	Sustainability Appraisal? <input type="checkbox"/>
		DP19		

We object to this policy, which is vague and limiting in the context of paragraph 39 of the NPPF. The policy should be amended to allow consideration to be given to the adopted County Council’s parking standards, as well as to an application’s Transport Assessment and/ or Transport Plan, and a site’s individual circumstance. We consider that the following amendments are necessary to the last sentence of Policy DP19:
 “Neighbourhood Plans can set local standards of car parking provision provided that it is justified by up to date evidence, and does not conflict with strategic policies of the Development Plan”.
 In terms of the requirement for facilities for plug-in and other ultra-low emissions vehicles, the policy should ensure such a requirement does not place an onerous requirement on applicants, or undermine the delivery of housing development, taking into account viability issues. As such, the penultimate paragraph should be amended as follows:
 “Where practical and viable, developments should be located and designed to incorporate facilities for charging plug-in and other ultra-low emission vehicles”.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16530	12	Ms C Ballantine	Rapleys	Hargreaves Management Ltd
Code:		Policy	Support	Sustainability Appraisal? <input type="checkbox"/>
		DP2		

As stated in the previous representations, our client has substantial land holdings within the Victoria Industrial Estate, Burgess Hill, and has no current intention to promote these sites for residential use for the foreseeable future. The Burgess Hill Employment Sites Study (March 2015) confirms that Burgess Hill represents a key component in the District’s employment land supply, with strong occupier demand for additional floorspace and greater quality of employment accommodation (para 8.17).
 As such, we support Policy DP2 which supports existing businesses, protects allocated and existing employment land and premises, and permits appropriate intensification, conversion and redevelopment and/or extension for employment uses, providing they are in accordance with other policies in the Plan. The policy is in conformity with the NPPF paragraphs 19, 21 and 161, and is supported.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
16530	13	Ms C Ballantine	Rapleys	Hargreaves Management Ltd
Code:	<input type="checkbox"/> Policy	DP27	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP27, as drafted, is not adequate to ensure that new residential development will not place undue restrictions on existing commercial/industrial operations, or undermine their growth. We consider that this is the provisions of the NPPF to ensure that the planning system does all it can to support economic growth. We therefore consider that the third paragraph of Policy DP27 should be amended as follows:

“Noise sensitive development, such as residential use, is not permitted in close proximity to existing or proposed development generating high levels of noise, unless adequate sound insulation measures and/or other appropriate mitigation measures, as supported by a Noise Assessment, are incorporated within the development, so as to protect existing or proposed commercial/industrial operations and their growth.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	1	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:	3c	<input type="checkbox"/> Policy	<input type="checkbox"/>	Sustainability Appraisal? <input type="checkbox"/>

In broad terms, Wates supports the allocation of land for residential led development at the BHNA, as Wates has throughout the preparation of the District Plan. Wates wishes to make a number of comments in respect of the detail.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	2	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:	1e	<input type="checkbox"/> Policy	<input type="checkbox"/>	Sustainability Appraisal? <input type="checkbox"/>

The proximity of Mid Sussex to Horsham allows for similarities in planning policy between the Authorities. This has been recognised by both Councils through the creation of shared documents such as the Northern West Sussex Strategic Housing Market Assessment (SHMA) – the previous SHMA evidence base. The Authorities, along with Crawley Borough, and parts of Mole Valley, Reigate & Banstead, and Tandridge Districts all form part of the ‘Gatwick Diamond’. As a result, the published Inspector’s Initial Findings from the Horsham District Planning Framework (HDPF) Examination, December 2014 (and subsequent Proposed Modifications and July Hearing) provide relevant considerations for the Mid Sussex District Plan. Components of these findings, particularly those relating to the objectively assessed needs (OAN) methodology, have been used throughout these comments. In addition, the acknowledged unmet needs arising from Crawley Borough, Brighton City and Reigate & Banstead Borough are of relevance (in addition to London), which must be openly acknowledged and addressed by MSDC.

Paragraph 47 of the NPPF states that Local Plans from Authorities should meet the full needs for affordable housing in the housing market area, and therefore this should be used to create the housing figures for the District Plan.

Subsequent to the Horsham Inspector’s interim findings, it was debated at the July Hearing that the Crawley Borough Unmet needs had increased to in excess of 300dpa. This is clearly documented in the Proposed Modifications on the Crawley Local Plan (also at Examination). These pressures need to be recognised by MSDC.

There are unmet needs arising which need to be accommodated elsewhere. The Boroughs which share similar economic and housing areas must work to absorb this unmet need. This is a crucial outcome of the plan making process in MSDC, notably given the failing on the Duty to Co-operate which occurred during the last production of the District Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	3	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:	1b	Policy		Sustainability Appraisal? <input type="checkbox"/>

An objection continues to be made to the Plan Period of 2014 - 2031. Although these dates originally were to correspond to the intended year of submission, it is recommended that the Plan Period is amended to start in 2011. This is for two reasons.

Firstly, a large amount of the evidence base for the District Plan, as well as other datasets, begins in 2011. For example demographic indices such as the ONS household projections and the most recent Census dataset. Additionally evidence data such as the Northern West Sussex Economic Growth Assessment holds 2011 as a base year for use in projections and comparison. It is acknowledged that the updated Strategic Housing Market Area Assessment (SHMA) has a base date of 2014, this in-itself is questioned, notably given the recommendation of an OAN of 656 dpa, which cannot properly account for under delivery of homes since 2006.

Secondly using a Plan Period starting in 2011 allows for a period of assessment between the start of the plan and adoption, notably in respect of housing monitoring. This has been seen with other Authorities who have a plan period beginning in 2011, such as Guildford, Test Valley and Horsham. 2011 fits, as it is five years from the start date of the former South East Plan (2006), and housing delivery is typically monitored in five year tranches.

It is recommended that Mid Sussex change the Plan Period to 2011-2031, representing a full 20 year plan. The SHMA evidence should be updated accordingly.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	4	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:	2a	Policy		Sustainability Appraisal? <input type="checkbox"/>

Wates broadly supports Chapter 2: Vision and Objectives, as well as the Key Diagram (Figure 5) of the District Plan, particularly paragraphs 2.14 - 2.24 which refer to the Wider Context. It is recognised within this Chapter that Mid Sussex forms part of a wider economic and housing market, including the Gatwick Diamond, the Coast to Capital LEP, the Coastal Partnership, the Northern West Sussex Housing Market Area (HMA) and the Coastal HMA. The section is however simply descriptive. It is the spatial and planning policies of the plan which shall carry weight, and hence Wates requests that full regard to the sub-regional context is had in the planning policies, notably in respect of housing and infrastructure delivery.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	5	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:	3b	Policy		Sustainability Appraisal? <input type="checkbox"/>

Objections are made to paragraphs 3.10 and 3.11 of Chapter 3: Overall Strategy. Wates believes the proposed plan figure of 650 dpa to be below what is necessary in order to support growth within Mid Sussex. This objection is based on the evidence base used by Mid Sussex in the formation of the District Plan. Either way, to deliver 650 dpa, a positive and proactive approach to the BHNA, as the major development site is required.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	6	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

Savills has updated Table 4.1 of the Sustainability Assessment of Cross-Boundary Options (SACBO) for the Mid Sussex District Plan (February 2015) for these representations. It demonstrates that each year there is an unmet need of 2,152 dpa that currently has not been planned for across the housing market areas.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	7	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:		Policy	DP9 Neutral	Sustainability Appraisal? <input type="checkbox"/>

Wates questions the capacity assumption for the BHNA, and also wishes to highlight that the delivery of the BHNA will be via a coordinated phase of outline (or full) planning applications (plural). As outlined throughout these representations, the likely delivery from the Northern Arc is more likely to be around 3,100 dwellings.

Change Sought – Reference needs to be made to applications (plural) and the correct dwelling delivery of around 3,100 dwellings for BHNA.

Strategic infrastructure items are more easily delivered via CIL, or in the short term via pooled Section 106 (within the confines of CIL Regulations 122/123). Both MSDC and WSCC may need to consider the option to lead on the delivery of the proposed Northern link road, though as outlined by policy DP9, there is a requirement for a BHNA Infrastructure Delivery Strategy. This will be funded by fair and reasonable contributions (or CIL) from all of the developers of the Northern Arc (and where appropriate other developers). It is Wates opinion, that the majority, if not all of the proposed infrastructure for BHNA may be delivered via planning condition, or appropriate Section 106/278 agreement. This is because, the majority of the infrastructure in the BHNA is capable of being an infrastructure ‘project’ and hence funded and delivered via appropriate planning condition or Section 106 obligation. This indicates the need for a low (or £ zero) CIL rate for the BHNA. There may well be a need for a level of CIL, where robustly justified by evidence, and to fund infrastructure delivery to enable the delivery of the plan.

Change Sought – reference to the BHNA Infrastructure Delivery Strategy should be made in paragraphs 3.31 – 3.33, notably the appropriate roles of MSDC and WSCC. Recognition of the onward role of Section 106/278 should be made, notably for the BHNA.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	8	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:	3i	Policy		Sustainability Appraisal? <input type="checkbox"/>

A comment is also made by Wates in regard to Meeting Local Infrastructure Needs which can be found in paragraphs 3.31 - 3.33. Paragraph 182 of the NPPF outlines that development and associated infrastructure requirements be “positively prepared”. As a result, and as partially seen within the District Plan paragraph 3.32, MSDC should work with West Sussex County Council (WSCC) to proactively drive infrastructure provision within the District. Infrastructure delivery, in a phased and coordinated manner is of critical importance to enable the delivery of the BHNA. This should be achieved so as to allow for phased housing delivery, in the context of a range of infrastructure ‘projects’ capable of either being funded via Section 106 planning obligation, or in future via Community Infrastructure Levy (CIL).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	9	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP2	<input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?

An objection is made to Policy DP2 Sustainable Economic Development, notably the planned requirement for 278 jobs per annum.

The previous policy (Draft Plan stage) stated “To achieve the required level of economic growth the total number of additional jobs required within the district over the plan period is estimated to be 7,600 jobs”. Even this figure of 7,600 jobs is too low in comparison to the Evidence Base provided by Mid Sussex.

The Northern West Sussex Economic Growth Assessment (EGA), from April 2014, covers the Authorities of Mid Sussex, Horsham and Crawley. The purpose of the study was to consider the current position of the local economy and evaluate the options available for future growth.

The EGA produced two scenarios for Mid Sussex in respect to the number of jobs which will be seen within the District by 2031. This was used to calculate the growth in jobs over the Plan Period 2014 - 2031. The ‘Baseline’ scenario figure was 8,861 jobs and the ‘Higher Growth’ scenario figure was 11,411 jobs.

Both of these figures are higher than the 4,726 jobs stated in the District Plan.

Change Sought: It is suggested that the estimated number of jobs within Policy DP2 is increased to meet the EGA projections, and the housing figures are then adjusted accordingly to achieve this level of economic growth. Due regard to the Gatwick Diamond and Coast to Capital Local Enterprise Partnership is essential.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	10	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP3	<input type="checkbox"/> Neutral	<input type="checkbox"/> Sustainability Appraisal?

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

Change Sought: The policy should exclude local/ neighbourhood centres as proposed within the Burgess Hill Northern Arc (BHNA). The justification for the scale of which can be secured via separate Policy DP9.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:	
17488	11	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc	
Code:	<input type="checkbox"/>	Policy	DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Wates has two concerns with the proposed Housing Policy.

Firstly, whilst supporting the strategic allocation of Burgess Hill Northern Arc (BHNA), the capacity potential for 3,500 dwellings is not supported by the available evidence (certainly for Wates land at Heaselands).

Changes Sought – reference to the delivery of 3,500 dwellings in BHNA should be amended to ‘around 3,100 dwellings’. Amendment to the overall planned level of housing to meet a revised OAN based on updated employment evidence, and evidence of unmet needs. The planned level of housing should be between 2011 - 2031.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:	
17488	12	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc	
Code:	<input type="checkbox"/>	Policy	DP7	Object	Sustainability Appraisal? <input type="checkbox"/>

Support the principle of Burgess Hill allocations however objects as there is ambiguity over which policy (DP7 or DP9) should apply to development in the Northern Arc. It is assumed that both apply.

Bullet 2 should be clarified as it appears to apply only to Kings Way, not Northern Arc. Bullet 6 refers to the A2300 - MSDC and WSCC need to outline the proposed infrastructure projects required.

Unsure why the policy refers to business park developments (plural). Wates understanding is that a single business park is to be masterplanned within the BHNA.

Wates do not see a 'multi-functional route' between Burgess Hill and Haywards Heath as a deliverable aspiration.

Bullet point 12 should be deleted as it is covered by other policies within the plan.

Fundamental objection to bullet point 13 regarding Goddards Green WwTW. The policy wording is too broad as it prohibits any occupation across Burgess Hill. Further work with Southern Water is required.

Bullet 14 should be removed as this is unfeasible with a relatively low density development.

[Policy wording changes (track changes) suggested]

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	13	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:		Policy	DP9	Neutral
			Sustainability Appraisal?	<input type="checkbox"/>

Support the principle but technical objections to the wording of the policy.

Introduction should read "Strategic mixed-use development, as shown on the inset map, is allocated to the north and north-west of Burgess Hill for the #phased development of#:"

Welcome that the policy no longer refers to a land use plan, now only requiring a masterplan and delivery strategy.

As outlined in other representations, Wates primary concern with the Policy is with respect of the 'approximately 3,500 additional homes' allocation. The available evidence, certainly for Heaselands (which Wates controls), demonstrates this and may only accommodate 'around' 1,100 – 1150 dwellings. Wates understands that the Gleeson/ Rydon land may also not deliver the expectations of the present draft policy. Overall, 'around 3,100 dwellings' is the more likely level of planned development.

Wates accepts that other smaller land parcels are included in the BHNA, including land to the east of the allocation (east of Rydon's land holdings). It is not clear at this time whether any of this land is promoted for development. Some of the land is thought to be in the control of MSDC. However, it is considered unlikely that these land parcels combined would be capable of providing above approximately 100 additional dwellings.

In addition, Wates wishes to comment on the proposed housing trajectory contained within Appendix A of the District Plan. A separate request for further detail has been made by MSDC to feedback on this matter in August. Given the stage of wider Masterplanning and infrastructure planning, Wates is presently considering this request and shall respond in due course.

Bullet 2 - not all infrastructure can be directly provided by the development, same principle applies to bullet 3.

Object to bullet 8 - Northern Arc is not a suitable site for the delivery of Gypsy accommodation. It is premature ahead of the Site Allocations DPD. It does not accord with site methodology, is risks jeopardising delivery of the scheme and alternative locations exist.

A Framework Plan is appended. Wates wish to input proactively into the creation of the masterplan, underway with Gleeson and Rydon.

The scheme on the Heaselands land in Wates control is mainly residential, with clearly defined neighbourhood areas, which are separated through the natural topography and landscape features of the site. These are interspersed with a curvilinear street system, which is reflective of the existing Burgess Hill neighbourhoods. Areas of open space, and retained vegetation create visual interest, and acknowledge the countryside surroundings of the development.

Alongside the housing, the Wates element of the scheme will deliver a range of community facilities including some retail, and education facilities (both a primary, and the potential for a secondary school). There will also be a large area of pitches and grounds for sports, though this should not compete with the Centre for Community Sport proposed on the Gleeson/ Rydon land.

Wates note that a significant proportion of infrastructure is site-specific, best secured through planning conditions or s106/278 agreements.

Wates object to the inclusion of a viability appraisal requirement.

[Policy wording changes (track changes) suggested]

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	14	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc

Code: Policy DP10 Object Sustainability Appraisal?

The HDA study identified the land to the north of Burgess Hill as having 'low capacity' to accommodate development, the second (LUC update) increased it to 'low/ medium'. Whilst the background wording of the Policy references both Studies, the Policy itself is not specific and it should clarify if the most recent Study is relevant. Wates suggests the following change (new text underlined): 'Evidence Base: A Landscape Character Assessment for Mid Sussex, A Strategy for the West Sussex Landscape, Mid Sussex Capacity Study Update (2014)'

The second line of the third paragraph should be amended to ensure no ambiguity with respect of allocated land, text to ensure that the paragraph only relates to unallocated land.

Changes Sought: Clarify that the Landscape, Capacity of Mid Sussex District to Accommodate Development Study is the update 2014. Amend the third paragraph of the policy to make clear that only 'unallocated land' of Grade 3a or above will be protected.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	15	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc

Code: Policy DP10 Support Sustainability Appraisal?

The LUC Study and Natural England maps show BHNA land as Grade 3, but does not distinguish between Grade 3 and 3a. Given the importance of the BHNA for the delivery of the District Plan, a wider assessment has been made to release the land for development. Policy DP10 should be clear in this respect. The District Plan has been amended to now make clear the relevance of other Plan policies and Allocations (i.e. BHNA), this is welcomed.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	16	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc

Code: Policy DP18 Object Sustainability Appraisal?

Wates continues to object to Policy DP18 and recommends the following amendment to the wording of the policy: "Development will be permitted where any necessary social, physical and green infrastructure needed to support the proposed development and contribute to sustainable communities exists, or can be provided in a timely manner, [DELETE] through developer-funded contributions". This would then allow for flexibility to accommodate direct on-site provision, financial contributions, CIL payments or other mechanisms.

In order to be effective, the District Plan must reflect the CIL Regulations. Policy DP18 needs to clarify the role of planning obligations after the adoption of CIL by the Council in accordance with CIL Regulation 123. Planning obligations are still possible, but toward a series of defined infrastructure projects, many of which may be bespoke or site-specific to the BHNA. Wates is unsure whether any reference can now be made to 'tariff-style' financial contributions owing to the CIL Regulations.

Changes Sought: Delete reference to 'though developer funded contributions' from the first paragraph of the Policy. Delete reference to 'tariff style contributions'.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	17	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP19 <input type="checkbox"/> Neutral	<input type="checkbox"/> Sustainability Appraisal?	

Wates only wishes to comment on the proposed Policy DP19. Wates notes that Policy DP19 now refers to 'severe cumulative impact in terms of road safety..'. This is consistent with national policy as outlined in the NPPF.

WSSC guidance on Transport Assessment states: "The development will be expected to mitigate road safety problems that would arise from the development or will be worsened by an increase in traffic from the development or where vulnerable road users travelling to and from the development may be endangered". The guidance from WSSC applicable to MSDC will need to be updated to reflect the emerging District Plan and the NPPF. Clearly the test is to maintain road safety, but in the context of the definition of severe impact.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	18	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP25 <input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?	

Wates continues to object to Policy DP25. Wates continues to object to any inclusion of minimum space standards. These impede the operation of the market and market choice, and hence will have an affect on delivery. Should MSDC seek to adopt any nationally prescribed standards, then it should test the viability implications of doing so. Wates questions whether the policy is premature ahead of the final publication of nationally prescribed space standards.

An updated Supplementary Planning Document (SPD) relating to Dwelling Space Standards should be implemented as the 2009 version will be inconsistent with the proposed national standard.

In order to meet with the requirements of NPPF paragraph 182, the requirement of specific space standards should be tested for both economic viability and for the impact on housing delivery.

Change Sought: Delete the policy until such a time as the national space standard is implemented. At which time the matter may be addressed via Policy is SPD, as tested by appropriate viability evidence.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	19	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:	<input type="checkbox"/>	Policy DP28	Object	Sustainability Appraisal? <input type="checkbox"/>

Wates continues to object to Policy DP28 and recommends the policy be amended to read (new text underlined): “To support sustainable communities with regard to good urban design (Policy DP24) housing developments will:”. A rigid approach to housing mix is unlikely to be effective or engender delivery. Due regard must be had for good urban design.

As outlined in separate representations, Wates also objects to the requirement for all strategic sites to provide permanent pitches for Gypsy and Travellers. As expressed within these representations, the inclusion of Gypsy and Traveller sites can jeopardise the delivery of important residential schemes which are vital for meeting the housing requirements for the District. Additionally there are likely to be other, more suitable sites which have been recognised across the District, and the supply of Gypsy and Traveller sites should not be grouped together within the strategic sites, reducing flexibility of location choice for users. As outlined, the appropriate time to test the provision is the Sites Allocations DPD, as required by Policy DP31, at which time all the available options may be appropriately tested. This part of the policy should therefore be removed.

Changes Sought: Amend the first line of the policy to read: “To support sustainable communities with regard to good urban design (Policy DP24) housing developments will:”. Delete the reference (bullet point 3 – to Gypsies and Travellers).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	20	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:	<input type="checkbox"/>	Policy DP29	Object	Sustainability Appraisal? <input type="checkbox"/>

Wates continues to make a technical objection to the wording of Policy DP29.

It is recommended that Bullet 1 be amended to read (new text underlined): “A target of 30% affordable housing provision on all residential development providing a net increase of 11 dwellings and above;”. This is more effective as it has due regard to the NPPF requirements in respect of delivery and competitive developer returns. Affordable Housing is required in the context of scheme delivery and hence viability. It is one cost of many, alongside for example new infrastructure provision.

Additionally the paragraph which follows the bullets and which relates to the tenure mix, should be moved to the supporting text. This allows for flexibility in the delivery of affordable housing, where currently the Policy is too prescriptive.

Changes Sought: Amend the policy to read ‘a target of 30% affordable housing..’

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	21	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP31 <input type="checkbox"/> Object	Sustainability Appraisal?	<input type="checkbox"/>

As outlined in separate representations, Wates wishes to note that MSDC is deferring most of the Gypsy & Traveller allocations to the Sites Allocations DPD. This is the appropriate mechanism to prepare/ test evidence for all the proposed allocations. The proposed allocation within emerging Policies DP7/ DP9 (BHNA) is therefore premature. Gypsy & Traveller provision is neither promoted by Wates, Gleeson or Rydon, or any other landowner within the Northern Arc, which Wates is aware, which includes MSDC. Wates is primarily concerned with the implications of Policy DP31 with Policies DP7/ DP9.

Change Sought: The policy should either be deleted, or amended to simply guide the subsequent Sites Allocations DPD.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	22	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP38 <input type="checkbox"/> Object	Sustainability Appraisal?	<input type="checkbox"/>

Wates objects to the allocation of informal open space on land adjoining Jane Murray Way and Sussex Way, as this is located within the BHNA and therefore subject to both Policies DP7 and DP9.

Additionally, as part of Policies DP7 and DP9, the BHNA will already delivery a significant amount of Green Infrastructure, including an extension to the Green Circle Network, public open space and a Centre for Community Sport.

As a result, it is recommended that specific reference to land adjoining Jane Murray Way and Sussex Way is removed from Policy DP37, and subsequently the Policies Map. General provision for open space and the Green Circle Network can additionally be included within either Policy DP7 or DP9 in replacement if necessary.

Changes Sought: Delete references to Jane Murray Way and Sussex Way from Policy DP38 and the Policies Map.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	23	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP39 <input type="checkbox"/> Object	Sustainability Appraisal?	<input type="checkbox"/>

Wates continues to object to Policy DP39 as the requirements of this policy are already covered by the statutory Building Regulations. As these Building Regulations are a national requirement of all new development, it is unnecessary to repeat these conditions within a District Plan policy. Wates is unaware of any technical evidence on this matter, notably in respect of viability.

In addition, Wates questions the necessity of Policy DP42, notably the requirement to limit to a standard of 110 litres per person per day for residential development. Again, these matters are covered by the Building Regulations.

Changes Sought: Delete Policy DP39. Delete reference within Policy DP42 in respect of 110 litres per person per day for residential development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	24	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:	3k	Policy		Sustainability Appraisal? <input type="checkbox"/>

Wates suggests that the table be amended to best reflect the likely delivery of the BHNA. Notably:

Housing delivery with key infrastructure, i.e. Northern Link Road.

Targets in accord with the wider plan policies, not just Policy DP9, but also DP2 (Sustainable Economic Development), DP5 (Housing), DP7 (General Principles for Strategic Development at Burgess Hill) and DP18 (Securing Infrastructure).

Delivery by developers and other key stakeholders, for example commercial companies and the public sector (MSDC, WSCC and Education Academies for example).

Scope for forward funding of key infrastructure, for example HCA Large Sites Infrastructure Programme for the Link Road.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	25	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:	SA-a	Policy		Sustainability Appraisal? <input type="checkbox"/>

Wates supports many of the assessments within the Sustainability Appraisal relating to the Burgess Hill Northern Arc (BHNA) development, which was named within the document as Option A (for 3,385 dwellings). Along with Option B 'Land to the East of Burgess Hill (East of Kings Way)' Option A was found to be the most sustainable in relation to the plan objectives because of their positive impact on the social and economic objectives.

Wates would like to continue to input in to the SA moving forward. This will help to ensure that it is a robust document at the time of adoption with the District Plan. Wates is party to a range of technical studies as part of the preparation of a more detailed masterplan for the site.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	26	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:		Policy	DP5	Object
				Sustainability Appraisal? <input checked="" type="checkbox"/>

Objective 10 (Protect and Enhance Historic Environment) continues to score '-?' for the BHNA, and Policy DP9, which is highlighted as a red negative within the Sustainability Appraisal. It states that this is due to the Northern Arc's proximity to Listed Buildings, and the development could therefore impact upon its settings. However it is important to recognise that there are only a few number of Listed Buildings in proximity to the site, and therefore the negative score given is overly cautious. The masterplanning and design for the development will make appropriate consideration of Listed Buildings and the impacts on any are capable of being limited with effective mitigation. The score should therefore be raised to a neutral '0'.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	27	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

In addition to the available Evidence Base, Wates recommends the following be created to inform the District Plan: Revisions to the SHMA, in accordance with the employment projections, and wider unmet housing needs. Also consideration to be provided to a re-base of the plan period from 2011 (to 2031). Up to date viability evidence with regards to CIL and Affordable Housing must be produced (potentially also sustainability should a specific policy on this matter be retained). There should be more infrastructure delivery evidence in respect of key infrastructure, notably the BHNA Northern Link Road and delivery mechanisms (perhaps via an update to the Infrastructure Delivery Plan). Wates is working alongside other key development partners Gleeson and Rydon to develop the required Masterplan & Delivery Statement (Policy DP9). This potential to create a 'concept masterplan' (or spatial framework plan) for the Northern Arc development, which would work to guide planning applications. A framework plan for the Heaselands element of the BHNA development is appended to these representations (Appendix 1). Wates is also working to influence the proposed infrastructure planning. Further District-wide evidence on Gypsy and Traveller provision, to support allocations via the future Sites Allocations DPD.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17488	28	Mr C McClea	Savills	Wates - Burgess Hill Northern Arc
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Secondly, the overall planned level of 650 dpa sits below the MSDC identified Objectively Assessed Needs (OAN), and does not have regard to likely employment growth needs, the under delivery of housing since 2006 or wider unmet needs, notably those arising from Crawley and Brighton. Wates wants the District Plan to be sound, and hence the allocation of BHNA to be secured, this has to be based on the available evidence. In addition, as outlined in other representation, MSDC should amend the plan period to start in 2011, to assist with monitoring, and more adequately have regard to the under provision of housing since 2006. The evidence base needs to be updated.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	1	N J Beale	East Grinstead Society	
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

The uncertainty concerning housing numbers and potential sites in this Draft means that we cannot make detailed comments on those aspects of the plan as they affect East Grinstead. Similarly, Policy DP5: Housing should include this housing limitation in East Grinstead's development proposal.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	2	N J Beale	East Grinstead Society	
Code:		Policy DP18	Object	Sustainability Appraisal? <input type="checkbox"/>

Future infrastructural improvements are dependent on Community Infrastructure Levies and section 106 and section 278 contributions from new developments. This ignores the infrastructure deficit which has arisen, particularly in East Grinstead, from housing developments which have outstripped the local infrastructure improvements required to sustain them.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	3	N J Beale	East Grinstead Society	
Code:	3i	Policy		Sustainability Appraisal? <input type="checkbox"/>

There is a brief acknowledgement in the draft plan of the problems along the A264/A22 and the reference to the infrastructure deficits in sewerage and water supply, transport and open space and sports/play provision but no indication how this shortfall will be made up. It is unrealistic to expect that provision for eliminating this deficit will be made by future developments.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	4	N J Beale	East Grinstead Society	
Code:	2b	Policy		Sustainability Appraisal? <input type="checkbox"/>

In view of East Grinstead's particular road congestion problems we suggest this should be addressed in 'The Challenge Facing the District'. The fourth bullet point, second sentence of paragraph 2.9, should be extended to read "East Grinstead in particular has acknowledged congestion problems along the A22/A264 to the extent that future development will be limited to town centre renewal and brown field development unless and until A22/A264 junction improvements have been made".

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	6	N J Beale	East Grinstead Society	
Code:		Policy	DP6	Object Sustainability Appraisal? <input type="checkbox"/>

In view of these ongoing traffic problems without any suggestion within the District Plan as to how the historic infrastructure deficit is to be addressed it seems inappropriate to place East Grinstead in the same Settlement Hierarchy category as Burgess Hill and Haywards Heath as the likely recipient of further housing demands should the District's offering prove insufficient to central government.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	7	N J Beale	East Grinstead Society	
Code:	3l	Policy		Sustainability Appraisal? <input type="checkbox"/>

We note that the draft plan makes no assumptions about the possible expansion of Gatwick Airport other than assuming the current position of no changes until 2019 is maintained. If there were to be changes after that date then obviously the whole plan would have to be reappraised fundamentally.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	8	N J Beale	East Grinstead Society	
Code:		Policy	DP10	Support Sustainability Appraisal? <input type="checkbox"/>

With regard to the specific policies in the document we support the principles of DP10

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	9	N J Beale	East Grinstead Society	
Code:		Policy DP11 Support	Sustainability Appraisal?	<input type="checkbox"/>

With regard to the specific policies in the document we support the principles of DP10 and DP11.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	10	N J Beale	East Grinstead Society	
Code:		Policy DP11 Neutral	Sustainability Appraisal?	<input type="checkbox"/>

The strategic gaps must be maintained so we suggest that DP11 should be amended to confirm that development will only be permitted if it does not contribute to or result in coalescence.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	11	N J Beale	East Grinstead Society	
Code:		Policy DP14 Support	Sustainability Appraisal?	<input type="checkbox"/>

Similarly, policies DP14 and DP15 are of importance to East Grinstead provided the SANGS and SAMM are administered robustly and developers are not allowed to water-down their obligations as have occurred with some section 106 agreements in East Grinstead.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	12	N J Beale	East Grinstead Society	
Code:		Policy DP15 Support	Sustainability Appraisal?	<input type="checkbox"/>

Similarly, policies DP14 and DP15 are of importance to East Grinstead provided the SANGS and SAMM are administered robustly and developers are not allowed to water-down their obligations as have occurred with some section 106 agreements in East Grinstead.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	13	N J Beale	East Grinstead Society	
Code:		Policy DP18 Object	Sustainability Appraisal?	<input type="checkbox"/>

Securing Infrastructure, DP18, should be extended to deal with the existing infrastructure deficit. The constraints on development in East Grinstead because of the closeness to Ashdown Forest and the High Weald Area of Outstanding Natural Beauty mean that likely CIL payments and section 106 agreements will be insufficient to pay for both future infrastructure needs and the deficit brought forward.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	14	N J Beale	East Grinstead Society	
Code:	1j	Policy	Sustainability Appraisal?	<input type="checkbox"/>

DP22 relates Facilities and Activities including, inter alia, informal leisure space. This seems very sensible but when one turns to Appendix C one of the previously saved local policies ,EG18, has now been omitted. This was saved in the 2004 Mid Sussex Local Plan and included the green space at the junction of Blackwell Farm Road and Holtye Road.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	15	N J Beale	East Grinstead Society	
Code:	3a	Policy		Sustainability Appraisal? <input type="checkbox"/>

We support the Council's inclusion of Local Green Spaces (paragraph 3.18) in the allocation of land in the District Plan. We think this initiative could go further to identify in the District Plan green spaces valued by local communities for protection from development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	16	N J Beale	East Grinstead Society	
Code:		Policy DP23	Object	Sustainability Appraisal? <input type="checkbox"/>

We welcome policy DP23 but regret this did not include protection of the Wallis Centre as there is no duplicate facility in the locality. There is insufficient alternative accommodation within East Grinstead to house all the groups and youth project work that used the Wallis Centre.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	17	N J Beale	East Grinstead Society	
Code:		Policy DP24	Support	Sustainability Appraisal? <input type="checkbox"/>

In general we support DP24 to DP30

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	18	N J Beale	East Grinstead Society	
Code:		Policy DP25	Support	Sustainability Appraisal? <input type="checkbox"/>

In general we support DP24 to DP30

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	19	N J Beale	East Grinstead Society	
Code:		Policy DP26	Support	Sustainability Appraisal? <input type="checkbox"/>

In general we support DP24 to DP30

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	20	N J Beale	East Grinstead Society	
Code:		Policy DP27	Support	Sustainability Appraisal? <input type="checkbox"/>

In general we support DP24 to DP30

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	21	N J Beale	East Grinstead Society	
Code:	<input type="checkbox"/>	Policy DP28	Support	Sustainability Appraisal? <input type="checkbox"/>
In general we support DP24 to DP30				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	22	N J Beale	East Grinstead Society	
Code:	<input type="checkbox"/>	Policy DP29	Support	Sustainability Appraisal? <input type="checkbox"/>
We support the 30% affordable housing threshold				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	23	N J Beale	East Grinstead Society	
Code:	<input type="checkbox"/>	Policy DP30	Support	Sustainability Appraisal? <input type="checkbox"/>
In general we support DP24 to DP30				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	24	N J Beale	East Grinstead Society	
Code:	<input type="checkbox"/>	Policy DP31	Object	Sustainability Appraisal? <input type="checkbox"/>
Regarding DP31 we approve the policy but would ask why the proposed scheme at Imberhorne Lane Nurseries is still under discussion when it does not seem to comply with current Government guidelines nor with those which are proposed for the draft plan going forward?				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	25	N J Beale	East Grinstead Society	
Code:	<input type="checkbox"/>	Policy DP33	Support	Sustainability Appraisal? <input type="checkbox"/>
DP33 confirms the protection of Conservation Areas. This is of particular importance to the inhabitants of East Grinstead with its historic High Street and associated portlands.				

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	26	N J Beale	East Grinstead Society	
Code:	1j	Policy		Sustainability Appraisal? <input type="checkbox"/>

We are surprised that EG2 which specifically referred to the Portlands has now been omitted from the local saved policies listed in Appendix C. The saved policy should be reinstated as protection of these areas is of fundamental importance to the Town.

While not a green space as such we would welcome the continuation of the saved policy EG2 brought forward from the 2004 Local Plan. The Portlands form an important part of the Conservation Area of our historic town centre and should remain protected from any form of development in perpetuity. This is currently under threat and is so fundamental to the origins of the town that we think it should be carried forward specifically.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	27	N J Beale	East Grinstead Society	
Code:		Policy DP38	Support	Sustainability Appraisal? <input type="checkbox"/>

We fully support policy DP38 "to create and maintain easily accessible green infrastructure, green corridors and spaces within towns to act as.....recreational routes" but we think that the strategic objective should include, specifically, protection from development green spaces valued by the community. These should be specified in the District Plan in order to protect them from future development for the future of residents.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
17582	28	N J Beale	East Grinstead Society	
Code:		Policy DP42	Support	Sustainability Appraisal? <input type="checkbox"/>

Finally, we emphasise the importance of DP42, Water Infrastructure and Water Environment. Obviously, until housing numbers are known there cannot be any definitive comments but the Council must be certain that sufficient resources are available before proposing any specific housing numbers.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	1	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The Council has not undertaken a Strategic Housing Market Assessment as required by the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	2	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:	Policy	Object	Sustainability Appraisal? <input type="checkbox"/>	
	DP5			

The statement at paragraph 4.23 of the update, in effect restricting the OAN so that a five-year supply can be demonstrated without positive action to allocate additional sites in the district, is incredulous. This runs contrary to the key principles embedded in the NPPF, it is perverse and counter-intuitive, a position entirely inconsistent with the NPPF. In conclusion, the Council's arguments, seeking to restrict the OAN and as presented in the HEDNA, are legally flawed and not supported by the evidence. An OAN of 656 dpa does not represent a significant boost in supply in the terms called for by the NPPF and is an insufficient response to market signals, economic trends and affordability issues – including the recognition that it will not redress the fact that the annual affordable need is greater than the supply. In short, the Council has not identified its OAN. The CLG household projection of 656dpa is not the OAN.

It is evident, from the Government's position on the matter and the previous examining Inspector's report, that the ongoing lack of housing supply, which has continued over recent decades, will be a significant contributory factor in respect of the 'affordability' of homes in the district. Redressing this position by seeking to identify sufficient land to meet the objective assessment of housing need (OAN) is a core principle.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	3	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:	Policy	Object	Sustainability Appraisal? <input type="checkbox"/>	
	1e			

Whilst we note that the Council's approach to the Duty to Cooperate, we would comment that there remains no evidence of collaborative and coordinated working to meet the full and extensive concerns of the previous local plan Inspector as set out in his report dated December 2013.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	4	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:	Policy	Object	Sustainability Appraisal? <input type="checkbox"/>	
	SA-b			

The Housing Provision Paper 2015 provides a summary of the SA and notes that "in order to achieve these levels of growth [700 – 800+ dpa] it would mean allocating less suitable/unsuitable sites to meet housing provision." (paragraph 5.14) This may well be the case and is, arguably an inevitable consequence of the NPPF requirement to meet the OAN in full subject to the presumption in favour of sustainable development as set out at NPPF paragraph 14. The SA fails to provide robust evidence that accommodating the higher OAN would generate a scale of adverse impacts that significantly and demonstrably outweigh the benefits. The approach taken by the Council is not reflective of the radical change in the policy approach (in respect of accommodating housing need) or the cost benefit analysis called for by the NPPF. It fails to consider the solutions outlined at section 11 of the NPPF in terms of conserving and enhancing the natural environment and is, as a consequence, flawed. The draft plan is unsound as a result.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	5	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:	2b	Policy		Sustainability Appraisal? <input type="checkbox"/>

This identifies the key challenges facing the district. Paragraph 2.9 (bullet point 6) acknowledges that house prices in Mid Sussex are high relative to average incomes. This is causing affordability issues, particularly for the young.

It is evident, from the Government's position on the matter and the previous examining Inspector's report, that the ongoing lack of housing supply, which has continued over recent decades, will be a significant contributory factor in respect of the 'affordability' of homes in the district. Redressing this position by seeking to identify sufficient land to meet the objective assessment of housing need (OAN) is a core principle.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	6	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:	3b	Policy		Sustainability Appraisal? <input type="checkbox"/>

It is the Council's proposed strategy to allocate a significant proportion of the proposed development to Burgess Hill, and for the remainder of the development required (which it considers to be of a non-strategic nature) to be delivered by other towns and villages in the district, primarily through allocations in Neighbourhood Plans. In our view this approach fails to respond positively to the conclusions of the previous examining Inspector (paragraphs 38 and 39) which highlight the lack of consideration of additional strategic sites to meet the need as a weakness of the plan.

The Council has not moved from its position. Our position also remains that, for the scale of development required, allocating only two strategic sites, at the same town, Burgess Hill, and relying on neighbourhood planning to deliver the remainder is unrealistic and ineffective. It does not represent an effective or positive approach to plan making and housing delivery.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	7	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:	3g	Policy		Sustainability Appraisal? <input type="checkbox"/>

It is anticipated that Neighbourhood Plans will be required to deliver 1,515 new homes throughout the District during the plan period. The proposed strategy of allocating housing on this scale through Neighbourhood Plans relies on Neighbourhood Plans being adopted across the whole district. It is considered that this approach represents a high-risk strategy for housing delivery given it's success is dependant on a) all of the Neighbourhood Plans being adopted and b) all plans including suitable number of sites capable of delivering required housing numbers.

In any event, it is considered that the Council's approach has the potential to frustrate and undermine the sustainable growth of other larger settlements in the district, particularly that of East Grinstead. This approach will effectively stagnate those settlements, fail to meet local needs, fail to secure social, economic and environmental benefits for these settlements and is, in effect, contrary to the evidence with regards to the settlement hierarchy and the approach to sustainable development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	8	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

Whilst constraints may apply, for example at East Grinstead, there is no reason why such constraints could not be overcome and addressed, as they have elsewhere. For example strategic / major development in the AONB is not unknown and is not, as a matter of fact, contrary to the aims and objectives of sustainable development...the AONB should not be viewed as a showstopper in terms of the allocation of sites and a balance needs to be struck between other factors influencing the extent to which the plan contributes towards sustainable development (as required by s39 of the Planning & Compulsory Purchase Act) and is effective.

East Grinstead is a good sized settlement in its own right, one of only three main settlements within the district. It has a population of approximately 24,000. This is only marginally less than that of Burgess Hill. The town also benefits from good road and mainline rail links to London, Gatwick airport and the south coast. In accordance with the NPPF and NPPG, a positive reconsideration of constraints would be justified to identify land to accommodate strategically scaled development. High quality development, securing net gains across all three strands of sustainable development should not be ruled out as a matter of principle solely because of the AONB designation.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	9	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:		Policy	DP5	Object
				Sustainability Appraisal? <input checked="" type="checkbox"/>

It is therefore considered that a more sustainable strategy, tested against reasonable alternatives, would be to allocate additional strategic allocations in and around the three main towns of Burgess Hill, East Grinstead and Haywards Heath in the draft plan in order to safeguard delivery of new homes across the district and secure the effectiveness of the local plan.

In this context we note that the SA section on 'Distribution of Development', has not considered an option of accommodating strategically scaled development only at Burgess Hill. Instead, the options assume strategically scaled development (focus of development) at all three of the main settlements. It is therefore difficult to see how it can be reasonably argued that the SA supports the strategy set in the Pre-Submission draft of the District Plan.

Given the fact that evidently all strategically scaled housing development in the district will be able to contribute positively to the provision of decent and affordable housing yet the 'preferred sites' are scored positively in this respect and non-preferred sites scored negatively. Equally in terms of issues such as (but not solely related to) access, education, encouragement of town centre regeneration and reduction of road congestion, it would appear that the sites have been treated on an unequal basis, with mitigation being considered in respect of some sites and not others.

The NPPF requires local planning authorities in plan making (paragraphs 150 – 185) to set out opportunities for development, to deliver net gains across all three strands of sustainable development and in so doing consider mitigation, compensatory measures and plan for the provision of infrastructure. The SA fails to follow this approach in respect of all of the reasonable alternatives and the policies that result are therefore inconsistent with the NPPF.

Given the, now well rehearsed, issues with the delivery of homes through the neighbourhood planning process in Mid-Sussex and elsewhere it is unacceptable to place even further reliance on this process. Strategic allocations should be made in the local plan.

The SA used to underpin the Council's preferred approach is flawed as it fails to assess all reasonable alternatives, both in terms of the accommodating the OAN and in terms of strategic site alternatives. Allowing for additional strategic allocations in and around the main towns of Burgess Hill, East Grinstead and Haywards Heath would safeguard delivery of new homes across the district.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	10	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:	3d	Policy		Sustainability Appraisal? <input type="checkbox"/>

The current draft of the East Grinstead Neighbourhood Plan fails to make provision for any development beyond the existing settlement boundaries. Unsurprisingly therefore the draft Neighbourhood Plan opposes the redevelopment of new land outside the settlement boundary for housing. However, given the status of the town it cannot be concluded that this approach will contribute towards the aims and objectives of sustainable development. Whilst the local community may support this position, it fails to properly consider opportunities to deliver sustainable development and to help meet the OAN.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	11	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:		Policy DP1	Object	Sustainability Appraisal? <input type="checkbox"/>

Challenge policy on the basis that it seeks to redefine sustainable development in a way that is inconsistent with the NPPF. Paragraph 10 of the NPPF does not give the Council the authority to redefine sustainable development as set out in national policy, it requires the Council to respond to opportunities for achieving sustainable development. It is particularly notable that the policy makes no reference to the key aim of sustainable development, which is to positively seek opportunities to meet development needs, or to the balanced approach to environmental issues which provide for the achievement of a 'net gain' and, in so doing, accept the ability to mitigate and compensate rather than 'protect'.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	12	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:	3i	Policy		Sustainability Appraisal? <input type="checkbox"/>

Insufficient capacity of the road network is cited as a reason by the Council for discounting East Grinstead as a settlement capable of accommodating housing development on a 'strategic scale'. It is considered that the approach to funding of new road infrastructure policy through CIL and section 278 Agreements may make this feasible, facilitating additional economic and housing growth. Further, and in any event, there are transport schemes within East Grinstead that could be specifically linked to the site/development proposals and therefore continue to be able to be secured through a s106 agreement – further unlocking capacity for development at this main settlement, to the significant benefit of the wider community.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	13	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:		Policy DP6	Support	Sustainability Appraisal? <input type="checkbox"/>

We support the identification of East Grinstead as a Category 1 settlement. We consider that a strategic allocation should be made at East Grinstead, to support its role and help meet the OAN in a sustainable way.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	14	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:		Policy DP6	Object	Sustainability Appraisal? <input type="checkbox"/>

We raise concerns to the position that growth should only be supported if a site is allocated. Clearly there is a significant risk that the plan will fail to deliver and that the Council will not be able to identify a five-year housing land supply. This position should be acknowledged and the potential to bring forward sustainable development through the development management process should be made explicit in this policy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	15	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:		Policy DP10	Object	Sustainability Appraisal? <input type="checkbox"/>

A policy that seeks to protect the countryside for its own sake is inconsistent with the NPPF. Loss of countryside cannot be held to represent significant and demonstrable harm for the purposes of assessing whether a development is sustainable or not.

The policy is inconsistent with NPPF paragraph 113 which calls for criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	16	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:		Policy DP14	Object	Sustainability Appraisal? <input type="checkbox"/>

The policy is inconsistent with the NPPF which facilitates major development in an AONB in exceptional circumstances and where it can be demonstrated that the development is in the public interest.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	17	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:		Policy DP36	Object	Sustainability Appraisal? <input type="checkbox"/>

The policy is inconsistent with the NPPF in that it fails to acknowledge the cost benefit analysis called for by the NPPF. For example, in respect of ancient woodland, it fails to enable a consideration of whether the need for, and benefits of, the development in a designated location clearly outweigh the loss.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	18	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

We note the comments in the 'Housing Provision Paper', in respect of a number of adjacent authorities (such as Adur, Brighton and Hove,) that the Sustainability Appraisal (SA) has not ruled out meeting all or some of the unmet needs of these adjacent authorities. In this context, we cannot reconcile the Council's conclusions that the SA effectively rules out meeting the district's own needs in full. Clearly there is additional capacity. In terms of additional capacity, the evidence base documents reference the SHLAA capacity of 737 dpa3. However, in light of the potential OAN of 800+ dpa, the Council would be justified in a review of the constraints and a more positive approach to identifying solutions to fully accommodate the OAN. The constraints should not just be accepted, This would be in accordance with NPPG ID 3-009-20140306, 3-018- 20140306 & 3-025-20140306 and would increase the capacity. Despite the fact that the NPPF does not rule out major development in the AONB, the Council has not positively considered this option in terms of meeting the OAN. The SA and output from the SHLAA is flawed in this respect.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	19	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The HEDNA, including the update, is clear that the Council's stated OAN of 656dpa is "the new CLG 2012 baseline OAN" (paragraph 3.21 of the update), explicitly meaning that it is the CLG 2012 household projections, based on demographic growth, for the district alone for period 2014 – 2031. Two preliminary points arise: • This fails to identify the OAN for the Housing Market Area of Mid Sussex, Crawley and Horsham. Without identifying an objective assessment of the need through a Strategic Housing Market Assessment the evidence base of the plan is flawed and unsound. • The CLG projections are not an OAN. Whilst the HEDNA acknowledges that the household projections are only the starting point, yet the OAN has not been subject to any uplift to account for other material factors. This is entirely contrary to the requirements of the NPPF and guidance in the NPPG. Following and further exacerbating these preliminary failings, the HEDNA has been confused with policy matters. For example paragraph 4.12 of the update states: "If it is deemed necessary to uplift the OAN to account for market signals (something that in itself is not conclusive), further analysis should be undertaken to ensure that any uplift is still reasonable and sustainable given a significant increase in the baseline OAN." Paragraphs 4.13 – 4.16 goes on to state that the Sustainability Appraisal assessed whether a 10% uplift in the OAN was sustainable and concluded that it would not be (a 10% uplift would provide an OAN of 722dpa). Case law on the matter is clear (Solihull Metropolitan Borough Council and Gallagher Estates Ltd / Lioncourt Homes EWCA Civ 1610 December 2014). The Court of Appeal has reconfirmed the two-step approach. The OAN must be made first. Housing need must be clearly and cleanly ascertained before constraints are applied (in accordance with paragraphs 14 and 47 of the NPPF), identifying the OAN it is a separate and prior exercise. It is only through the second step that constraints should be applied, which might result in a lower housing 'requirement', but identifying the OAN in the first place is a fundamental requirement. In terms of affordability, the fact that Mid Sussex is not a unique case compared to the region is not a positive or effective response to addressing affordability issues. Affordability issues are central to the Government's position on housing supply and its reasoning for the radical change in policy enacted by the introduction of the NPPF. An uplift should be considered as a positive and justified approach. • There has been no NPPG compliant assessment of employment trends and the potential impact of these trends on the need for housing. The plan timescales 2014 – 2031 may be acceptable but in setting a base date of 2014 the Council must also align its requirements to the evidence base. The CLG projections are from 2012. The OAN will be set from 2012. It will be necessary to address in the forward housing 'requirement' any unmet need from previous years in the first five-years of the plan period, in accordance with the provisions of the NPPG.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	20	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:	<input type="text"/>	Policy	DP5	Object
Sustainability Appraisal? <input type="checkbox"/>				

Neighbourhood Plans have the responsibility for delivering 1,515 new homes over the plan period. However, there is no evidence to suggest that the Council's preferred strategy would be effective in delivering the level of housing delivery forecast in the Plan. Indeed, at paragraph 3.29 of the Plan it is recognised that it will be necessary for the District Council to prepare its own housing allocations document should the Neighbourhood Plans fail to deliver sufficient housing..

The OAN is higher, above 800 dpa, and the SA fails to provide robust evidence to support a lower housing requirement. The plan has not met the requirements set within the NPPF. It is unsound.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	21	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:	<input type="text"/>	Policy	DP5	Object
Sustainability Appraisal? <input type="checkbox"/>				

Quite simply, to demonstrate a deliverable and developable supply of land for housing (as is required by the NPPF paragraph 47 and footnotes 11 and 12) more outlets are required – more strategic sites, to confirm the longer term rolling position across the plan period, and more non-strategic sites to provide flexibility and demonstrate supply more significantly in the first five-years.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20080	22	Ms J Mulliner	Terence O'Rourke	Thakeham Homes Ltd
Code:	<input type="text"/>	Policy	DP5	Object
Sustainability Appraisal? <input type="checkbox"/>				

Taking into account the requirements of the NPPF and NPPG, as paragraph 7.17 of the HEDNA update indicates, the OAN is much higher; for example at least 722 dpa from 2012 if including a 10% uplift for market signals¹ or 843 dpa is aligning to economic growth as set out in the Northern West Sussex Economic Growth Assessment (2014)². The Council should undertake a SHMA to identify what the OAN is for the HMA and district.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20081	1	Mr B Ford	Quod	Scotia Gas Networks
Code:	3a	Policy	<input type="text"/>	<input type="text"/>
Sustainability Appraisal? <input type="checkbox"/>				

SGN are highly supportive of the Council's preferred use for residential development at this location and consider that such a use is consistent with development plan policy at both local and strategic levels.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20081	2	Mr B Ford	Quod	Scotia Gas Networks
Code:	1f	Policy		Sustainability Appraisal? <input type="checkbox"/>

Subject to appropriate remediation measures, SGN are currently working to make the site available and brought to the market for redevelopment. As such, we consider that the key aspects pertinent to the redevelopment of a hazardous installation should be recognised within the Mid Sussex proposed Submission Plan. We propose that a policy should be considered within the emerging District Plan, specifically to recognise paragraph 173 of the NPPF.

“Policy Hazardous Installations Hazardous installations will be identified in the adopted Proposal Map. The Council will take into account the need to incentivise and fund decommissioning as part of any redevelopment proposal through higher value land uses.”

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20082	1	Mr E Hanson	Barton Willmore	Reside Developments Ltd (Portsmouth Wo
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP5 (Housing) sets a figure of 11,050 homes to be built in the period 2014 – 2031. This equates to 650 dwellings per annum (dpa). As at 1 April 2015, 630 homes had been built and count towards the overall target. As at 1 April 2015 there were 5,405 commitments within the planning process. This leaves a remaining target of 5,301 to be identified. 3,500 new homes will be delivered as part of the strategic development at Burgess Hill.

In short, Reside consider that the housing requirement within the emerging District Plan is incorrect. The perceived housing need has not been derived from the most recent DCLG district-level household projections for the period to 2037. Whilst the principle of using a Strategic Housing Market Assessment (SHMA) to inform the housing requirement is noted, the draft District Plan does not meet the requirements of NPPF, particularly paragraph 159.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20082	2	Mr E Hanson	Barton Willmore	Reside Developments Ltd (Portsmouth Wo
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

MSDC must discharge this requirement (Duty to Co-operate) properly and look to meet unmet need from elsewhere (where there are genuine supply side constraints). There are clearly further sites in the district that are not constrained by environmental designations. Indeed the Reside site to the east of High Beech Lane is included in the MSDC Housing Supply Document and is noted as being deliverable, yet it does not feature in the emerging LLRNP as a deliverable allocation.

Our client’s land interest comprises 2.24 hectares of agricultural land (plus a new road access from High Beech Lane) adjoining the northern boundary of Lindfield. The site is broadly rectangular in shape and the topography rises gently towards the north. The site is currently undeveloped and surrounded by mature trees with hedges on all sides. Subsequently, the majority of the site cannot be seen from near or far reaching views.

Our initial assessments demonstrates that circa 50 residential units can be accommodated on the site, in addition to internal roads, landscaping and public and private amenity space. The site is included within Mid Sussex’s Housing Supply Document (March 2013) and is identified, under site reference 151 as being suitable, available and achievable. The HSD proposes that the site has capacity to provide circa 55 dwellings at a density of approximately 30 dwellings per hectare.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20082	3	Mr E Hanson	Barton Willmore	Reside Developments Ltd (Portsmouth Wo
Code:	3g	Policy		Sustainability Appraisal? <input type="checkbox"/>

In light of the MSDC's proposed approach to housing distribution, and Lindfield's status as a Larger Village (Category 2 Settlement) in terms of the wider settlement hierarchy, it is difficult to understand how the Parish Council has reached the conclusion that no housing sites need to be identified in Lindfield. Indeed, we consider that as a Larger Village with a population of 6,995 (2011 census), falling only second in the hierarchy after the main towns of Burgess Hill, East Grinstead and Haywards Heath, the village and its immediate surroundings should be a key location for the provision of new housing to help meet the housing needs of the District.

Furthermore, we disagree with the approach within the LLRNP to limit any sites that do come forward to 10 units and on 'Brownfield' land only. This approach will not allow for sufficient housing to come forward through the NP to meet the needs of Lindfield and the wider district. MSDC must ensure that those charged with preparing NP's properly plan for the delivery of housing.

Given its size, location and sustainable credentials, Lindfield should be delivering housing. If this does not happen, Reside question whether the full quantum of housing earmarked in the draft District Plan to the villages will ever be delivered.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20082	4	Mr E Hanson	Barton Willmore	Reside Developments Ltd (Portsmouth Wo
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

MSDC prepared a paper for its Scrutiny Committee for Planning and Economic Development on the 9 July. This reported a revised OAN within the emerging District Plan that is already out of date. The work relied on data and statistics from May 2014, but this is not the most up to date projections, having been superseded by the most recent DCLG district-level household projections for the period to 2037 published by the Office for National Statistics in July. The MSDC Housing and Economic Development Needs Assessment (HEDNA) - Update June 2015 recognises at paragraph 3.42 that "the Household Projections data is the Government's official projection, and is recognised by the NPPG as statistically robust". Furthermore, the NPPG states that "wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up to date".

Whilst Reside appreciate that population forecasts change, the draft District Plan is already out of date and does not rely on the latest projections, which were reported as being significantly higher than those published last year. Before proceeding to a 'Draft Submission Plan' Reside request that further work is undertaken to reflect the most recent information available.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20082	5	Mr E Hanson	Barton Willmore	Reside Developments Ltd (Portsmouth Wo
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

An important aspect of housing supply is the provision of affordable housing. Paragraph 5.1 of the council's Housing and Economic Development Needs Assessment (HEDNA) – Update June 2015 states that an update to the affordable housing needs assessment model was undertaken in the Northern West Sussex Housing Market Area (Affordable Housing Needs Model Update in 2014 (2014 AHNM)) and the results of this formed part of the HEDNA (February 2015). This found that a net annual housing need range of 127 - 230 dwellings per annum. Based on the council's proposed Policy DP11, if developments are to provide 30% affordable housing, 423 – 767 dwellings will be required in order to achieve the affordable housing requirements. Reside therefore believes that the higher end of North West Sussex Economic Growth Assessment figures are needed to be achieved. In terms of backlog, MSDC has historically under-provided housing for a number of years (against Local Plan 2003 and RSS 2009 requirements). The draft plan does not acknowledge or include for this ongoing under-provision. The revised start date of the plan at 2014 does not mean that past under provision can be ignored. The backlog must be included in the housing figures and made up through the revised plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20082	6	Mr E Hanson	Barton Willmore	Reside Developments Ltd (Portsmouth Wo
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Barton Willmore has undertaken high level analysis which demonstrates that the OAN starting point for MSDC is 673 dpa. Furthermore, the North West Sussex Economic Growth Assessment indicates that there would be a need for 843 dpa, which is based on job growth broadly comparable with the most recent Experian forecasts. The true OAN is likely to fall between the two, but it is clear that once prepared properly, the District Plan will need to accommodate additional provision or housing.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20108	1	Ms E Peck	Rydon	Lowlands Farm, Burgess Hill (Northern Arc)
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

We are supportive of the overall strategy of strategic growth to the north / north- west of Burgess Hill, to include Lowlands Farm for a mixed use development. Lowlands Farm is available and subject to achieving third party access from the development of the adjacent site (Freeks Farm), the site is capable of delivering mixed use development proposed with the capacity to provide between 100-150 dwellings, excluding Ancient Woodlands, hedgerows, landscape buffers, formal and informal recreation areas and open space. The adjacent site (Freeks Farm) is also within the control of Rydon Homes. Rydon supports the aspirations of MSDC to include the existing Ancient Woodland within the site (around 15 acres/6 hectares) within the adjacent Bedelands SNCI Nature Reserve.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20108	2	Ms E Peck	Rydon	Lowlands Farm, Burgess Hill (Northern Arc)
Code:		Policy DP9	Object	Sustainability Appraisal? <input type="checkbox"/>

OBJECT to the provision within Policy DP9 to require a total of 24 pitches for gypsies and travellers within the northern arc, to contribute towards the additional need within the District for pitches. We do not support the proposed pitch allocation as well as more fundamental concerns with the distribution strategy of pitches across the District and the lack of more detailed consideration of reasonable alternatives for allocation. The uncertainty regarding delivery is identified by the fact that Policy 28 (Housing Mix) states that any site over 10 hectares should also make provision for pitches.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20108	3	Ms E Peck	Rydon	Lowlands Farm, Burgess Hill (Northern Arc)
Code:	1h	Policy	Sustainability Appraisal? <input type="checkbox"/>	

The evidence supporting the proposed provision of gypsy and traveller pitches is not clearly identified although it is assumed to comprise the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (June 2013) and subsequent update report (May 2014). This identifies the need for a total of 34 pitches across the District comprising 8 pitches from current waiting lists and 26 units of future need (predominantly from new household formation).

On a more general point of distribution it is noted that the Accommodation Assessment (Update June 2014) shows that the natural growth of households across the District (outside of the National Park) from 2013 – 2031 equates to 22 new pitches. This is roughly equivalent to the entire allocation of pitches to the Northern Arc (24 pitches over two sites).

The Accommodation Assessment (paragraph 15) identifies that this natural growth is assumed to occur both from the current waiting lists and from the 30 households on existing sites. These pitches are spread out across the District therefore, in accommodating this natural household formation growth it is logical to expand existing sites rather than accommodating all new household growth for the District in one location.

It is not clear from the evidence base how this distribution strategy takes account of demographics or the likely location preferences associated with household formation in other parts of the District.

Gypsy and Traveller Evidence Base

An assessment of the accommodation needs of Gypsies, Travellers and Travelling Showpeople has been made through the Mid Sussex Gypsy and Traveller Accommodation Assessment. The Draft Traveller Sites Allocations Document explains that need is calculated by comparing the current supply of pitches available against the current and future needs of households. Page 6 states:

“Much of the requirement for Gypsy and Traveller sites, particularly within the next five years, is to address the backlog of needs for households on the waiting list for public sites (a net total of 8 pitches)”.

The Gypsies, Travellers and Travelling Show People Accommodation Assessment (Update 2014) identifies that the West Sussex County Council waiting list currently shows 19 households requiring accommodation in Mid Sussex. The report assesses the waiting list and concludes at paragraph 9 that unauthorised sites in Brighton may be resultant of a lack of space in Mid Sussex and that: “only counting the needs of households based in Mid Sussex is likely to underestimate the total needs of those who wish to live in the area.”

It therefore appears that part of the need for pitches was based on accommodating overspill into Brighton. It has not been made clear however, the extent to which unauthorised encampments in Brighton are the result of unmet need in Mid Sussex and furthermore, how the proposed pitch provision in the emerging Brighton & Hove City Plan will actually address this need. Paragraphs 3.59 – 3.62 of the 2013 Accommodation Assessment identify the outcome the Council’s engagement with Brighton and Hove City Council although specific details of unauthorised encampments are not evidenced here.

There are a number of questions regarding the waiting list which have not been identified in the Gypsies, Travellers and Travelling Show People Accommodation Assessment (Update 2014). For instance, there is no explanation about whether identification is required as per the affordable housing registers and therefore people could be duplicated on the list if this is the case. It would be interesting to identify if some people are on the waiting list in other authorities and how many people have their needs met at present. Lastly, it is noted that the Council intend to produce a Site Allocations Local Plan at a later date. This more detailed site specific document should provide the policy mechanism to identify Gypsy and Traveller provision and assess alternative options, such as expansion of existing provision. As such it is considered that policy requirements in this Local Plan are premature.

It is further considered that the infrastructure associated with Northern Arc should be delivered through Section 106 Agreements as opposed to the Community Infrastructure Levy (CIL) given the need to ensure that infrastructure can be delivered in a consistent manner across the site. Ensuring the site is CIL zero-rated also avoids the problems that are likely to arise with delivery of site specific strategic infrastructure.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	1	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

The draft plan has now identified a level of housing growth of 11,050 dwellings over the plan period (650 per annum). The start date of the Plan in terms of housing delivery is 1st April 2014. 630 new homes were built between 1st April 2014 - 31st March 2015 according to the most recent Annual Monitoring Report (AMR), an under delivery of 20 homes. According to the Draft Plan, approximately 5,405 commitments can be identified. No consideration or mention has taken into account the aforementioned shortfall of 20 dwellings nor any shortfall that has occurred prior to the year 2014/2015.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	2	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

A recent Inspector's findings in relation to Horsham District Council's emerging local plan identified that the housing requirements selected there were insufficient as they did not address unmet needs in the Strategic Housing Market area. This is what MSDC is in effect proposing to do by failing to meet the shortfall which will also result in a finding that the plan is unsound.

Accordingly with a more robust approach to land allocation which include some of the less sensitive areas of district which may or may not include parts of the AONB, MSDC could meet their own housing requirement more sufficiently and potentially undertake some of the other authority's unmet housing needs. Therefore we conclude that the current plan is unsound because it has not been robustly demonstrated why unmet need from neighbouring authorities cannot be accommodated within MSDC. This is likely to result in the need to provide additional housing over and above the figure we have identified in section 2 of these representations.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	3	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The June 2015 HEDNA identifies that although concerns are raised in respect to some of the sensitivity analysis of the 2012 data the NPPG defines that the most up-to-date (i.e. the 2012 data) should be used as the starting point for determining housing requirements. The June 2015 HEDNA confirms this whilst stating that the 2012 figures equate to a housing requirement of 656dpa over the period 2014-2031. Table 1 sets out the data we have taken from the 2012 based live data. This identifies a change in households of 12,000 between 2014 and 2031, which equates to 706 per annum. Therefore the figures currently selected by the council do not reflect this baseline and are therefore unsound.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	4	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group
Code:		Policy DP6	Object	Sustainability Appraisal? <input type="checkbox"/>

No apportionment to various parishes, and hence neighbourhood plans, is identified. Although policy DP6 identifies a 'Settlement Hierarchy' this is not informative enough to distinguish what level of housing growth will be required in each neighbourhood and this should have been identified to avoid a lack of supply in the future; and Without such a direction further work in relation to the assessment of the capacity of each area will not occur which could lead to unsustainable patterns of development occurring, either via the development plan or more likely via development control and appeal process.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	5	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group
Code:	3g	Policy		Sustainability Appraisal? <input type="checkbox"/>

Each of the neighbourhood plan areas will not be expected to deliver an equal number of homes as this may cause unsustainable settlements; without identifying the proportionate number of homes for each area a Neighbourhood Plan team cannot be directed on the amount of growth expected or may allocate zero homes in the process, delaying implementation and reducing the level of available land.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	6	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group
Code:		Policy DP1	Support	Sustainability Appraisal? <input type="checkbox"/>

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

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	7	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group
Code:		Policy DP10	Object	Sustainability Appraisal? <input type="checkbox"/>

4.7 Previously known as policy DP9, this policy is still problematic as drafted this would prevent new housing development in sustainable locations adjacent to existing urban areas which would conflict with policy DP1 and national planning policy. Given the issues we have raised with regards to the identified need and the critical undersupply of housing in the district, this policy would conflict with the requirements of the NPPF.

According to draft policy DP10, only if a certain development is supported by a specific policy reference either elsewhere in the Plan, a Development Plan Document or relevant Neighbourhood Plan will it be considered permitted in the countryside. Without an appropriate objectively assessed need, or proposals to deal with the land supply issues, it is unlikely that Neighbourhood Plans will consider development outside of the built-up area boundaries even in sustainable locations unless they are directed to do so explicitly and consequently this will restrict land supply further.

The inclusion of this policy without a proposal to address the HLS issue in the first five years will unreasonably inhibit the council's ability to 'meet objectively assessed needs, with sufficient flexibility to adapt to rapid change' and hence be in direct conflict with paragraph 14 of the Framework.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	8	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group
Code:		Policy DP11	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP11 Preventing Coalescence still remains flawed because it refers to policy DP10 which is in effect an embargo on new housing development in the countryside, which is required to meet the HLS issue. Therefore as a minimum this policy should remove reference to policy DP10.

Apart from this reference the policy as worded does retain the flexibility to allow development in the countryside to meet the acute need for housing. Our previous request that in order to support the identification of strategic gaps this should be underpinned by clear evidence prepared by landscape architects or similar consultants has been taken into consideration. However the wording of this policy suggests that this evidence will only be necessary if it is demonstrated that local policy cannot provide protection.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	9	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group
Code:		Policy DP13	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP13 is again almost parallel to the previous draft form of the emerging plan and therefore are comments are reiterated here: this policy suggests that large scale housing in the countryside is inappropriate apart from that required for agricultural workers. Given the severe HLS deficit this policy is premature as significant amounts of land currently located in the countryside may be required to address this issue.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	10	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

we recommend that land to the east of Gibbshaven Farm be considered for allocation for 70 dwellings. This land has been subject to a pre-application submission and public consultation has taken place regarding the proposed development. We have made representations to the Crawley Down Neighbourhood Plan regarding the site to ask them to consider this to assist in meeting the objectively assessed need for housing in the District due to its location lying adjacent to the settlement boundary of Felbridge which directly abuts East Grinstead. Development here would also assist in meeting unmet need in adjoin Tandridge, which has been calculated to amount to 329 dwellings according to the June 2015 Housing Provision Paper.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	11	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group
Code:	3c	Policy		Sustainability Appraisal? <input type="checkbox"/>

- The Strategic Allocations will require significant infrastructure to be provided to serve them which will take time to deliver meaning that large scale housing delivery will not occur within the first 2-3 years of any allocation being adopted as part of the local plan;
- The currently envisaged allocation of 3,865 homes for Burgess Hill will only just address the backlog in delivery that equates to over 2,000 dwellings; and
- Once completed two sites would not deliver the same level of housing as a wider portfolio of smaller sites.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	12	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group
Code:	<input type="checkbox"/> Policy	DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

No stakeholders including the neighbourhood planning partnerships have a robust overall level of housing growth for the District that their neighbourhood plans are required to contribute towards.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	13	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group
Code:	<input type="checkbox"/> Policy	DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

No proposals aside from Burgess Hill. As we set out in our January 2015 representations and given what we have said in this report proposals to deal with the acute under supply of housing must be immediate and there are no examples of this in the emerging District Plan. Therefore deferring a site allocations DPD is not an appropriate way of addressing this significant issue in a district that has such a chronic and long term failure of housing delivery.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	14	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group
Code:	<input type="checkbox"/> Policy	DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

In conclusion the baseline housing requirement for the district should be 12,000 plus the shortfall of 1,781 which gives a minimum requirement of 13,781. However there may be other factors (housing market, economic considerations etc.) that we have not assessed which mean that this may need to be increased. It is a common occurrence that some development sites that benefit from planning permission or allocation are not implemented. Therefore in many instances council's apply a non-implementation allowance to their housing supply or requirements to allow for this issue and ensure their future supply is robust and flexible. Normally a 10% allowance is provided in this regard in relation to five year supply but in relation to overall requirements we would suggest a 5% allowance is applied to the figures identified above. Therefore in conclusion we consider that the council should be planning to provide for at least 14,470 dwellings over the identified plan period and this figure should be included in the plan in order to maintain a flexible supply of sites and address the serious deficiency and backlog due to previous under delivery of housing in Mid-Sussex. Without a serious review of the housing backlog in Mid-Sussex and before reasonable policies are put forward as to how to address this the plan is clearly unsound. MSDC has for many years experienced a chronic under delivery in housing as we have identified and a plethora of appeal decisions have clearly identified that this is in effect a record of persistent under delivery which means a 20% buffer must be applied to MSDC's five year requirement. This makes addressing this requirement challenging and requires a complete change in planning policy approach to this issue; This situation has led to a shortfall in delivery occurring over many years. This under delivery is not yet represented in the emerging housing figures as we will go on to explain. Such a shortfall needs to be dealt with via the Sedgfield method for reasons established in various appeal decisions; and In light of this a large step change in housing delivery is needed in the district and urgent action is required in the form of policies that aim to significantly boost the supply of housing in the first five years of the plan. To avoid such an outcome which will seriously undermine confidence in the plan making system we urge the council to adopt a permissive policy to housing development in the first five years of the plan. 5 year supply requirement should be: $12000/17*5 = 3529$ Shortfall (+1781)= 5310 Plus 20% = 6372

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20109	15	Mr M Kendrick	Grass Roots Planning Ltd	Acorn Property Group
Code:	<input type="checkbox"/>	Policy	Object	Sustainability Appraisal? <input type="checkbox"/>

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

Based on previously tested and agreed data in respect to housing requirements the council has a shortfall of 1,781 houses that it needs to address urgently. The March 2015 HEDNA stated that in respect to the shortfall 'it is not appropriate to add any under-supply or backlog to the established OAN of 627dpa where past housing development under delivered RSS targets'. We do not understand the rationale behind this, household formation rates are a historic trend based projection and do not examine under delivery in a specific area in any detail. In light of this it is our position that the plan is unsound because it does not deal with the shortfall and therefore housing need and the related baseline requirement is under represented.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	1	Mr R Brass	GL Hearn	Anstone Development Limited
Code:	<input type="checkbox"/>	Policy	Object	Sustainability Appraisal? <input type="checkbox"/>

The GLH Needs Assessment (Appendix A) makes a strong and robust justification that the OAN figure for MSDC should be at 810 dpa. This figure would provide a new District housing target of 13,770 dwellings for the period 2014 to 2031, and increase the proposed target of 11,050 dwellings by 2,720 dwellings. This unequivocally demonstrates that the District housing target is unsound and not positively prepared as it fails to take full account of objectively assessed development requirements. It must therefore be significantly increase to meet identified need. 2.4 It is recommended that Policy DP5 is amended to state the District housing target is 810 dpa. In addition, any requirement to meet unmet needs from adjoining LPAs under the duty to cooperate should be added to the District housing target.

As a demographic starting point, the latest official (2012-based) household projections suggest a need for 674 homes per year (2014-31). However this projects a rate of population growth which is below past trends, with more detailed interrogation suggesting that migration may have been under-estimated. More recent data from the 2013 and 2014 ONS Mid-Year Population Estimates also indicates that net migration has been higher than was predicted in the 2012-based SNPP. A number of alternative demographic-based scenarios for growth in population and households have been developed. It is concluded that a reasonable demographic-based assessment of housing need would be for 807 dpa. This should be considered as the 'starting point' for considering housing need.

This figure is considered to be realistic in light of the current acknowledge housing target for MSDC which is based upon the South East Plan (2009). This target was tested and subject to sustainability appraisal and sought to provide 855 dpa, which is comparable to the up to date identified need of 810 dpa.

To meet forecast economic growth, based on the baseline forecasts, would require provision of between 785 to 812 dpa. The average of these shows a need for 800 dpa. This economic evidence thus reinforces the need to provide at least 800 dpa in MSDC, to meet its own housing need. It clearly indicates that stronger net in-migration will be required than projected in the 2012- based SNPP.

In conclusion, on the basis of the above analysis, the evidence base provides a clear justification for an OAN of a minimum of 810 dwellings per annum. This is based on our analysis of demographic and economic evidence. The market signals and affordable housing needs evidence could provide a justification for a higher level of provision, and hence this figure should be considered as a minimum. 2.20 It is recommended that Policy DP5 is amended to state the District housing target is 810 dpa (13,770 dwellings over the plan period from 2014 to 2031).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	2	Mr R Brass	GL Hearn	Anstone Development Limited
Code:	<input type="checkbox"/> Policy	DP1	Object	Sustainability Appraisal? <input type="checkbox"/>

The overall strategy set out in Policy DP1: Sustainable Development for Mid Sussex is unsound. It is ineffective and not positively planned because the PSDDLDP is unable to meet identified need.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	3	Mr R Brass	GL Hearn	Anstone Development Limited
Code:	<input type="checkbox"/> Policy	DP2	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP2: Sustainable Economic Development is unsound. It is unjustified and ineffective as the District housing target fails to align housing supply with the jobs target and the housing requirement lacks the flexibility to respond to potentially higher levels of growth.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	4	Mr R Brass	GL Hearn	Anstone Development Limited
Code:	1e	Policy	<input type="checkbox"/> Object	Sustainability Appraisal? <input type="checkbox"/>

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

Fundamentally, the District Plan fails under the duty to cooperate as no evidence is provided in relation to how Mid Sussex might help meet unmet needs from adjoining authorities. There is a shortfall of 2,000 homes to 2030 across the Northern West Sussex HMA, and Mid Sussex must seek to help address this cross-boundary issue under the duty to cooperate.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	5	Mr R Brass	GL Hearn	Anstone Development Limited
Code:	<input type="checkbox"/> Policy	DP29	Object	Sustainability Appraisal? <input type="checkbox"/>

In terms of affordable housing need, the assessment draws two key conclusions in respect of the robustness of the Council's evidence. Firstly, in respect of the current affordable housing need, that the 'reasonable preference' figures do not adequately reflect current housing need. They are a significant under-estimate of the true extent of current unmet needs, most likely reflecting the Council's tenancy policies which seek to manage the allocation of a scarce resource. Our analysis indicates that there are 1,250 households with a current, unmet affordable housing need. This excludes those currently resident in affordable housing. Secondly, figures which the Council has used in the HEDNA Update (June 2015) do not properly calculate gross new household formation, as the PPG requires. Instead they use figures on net growth in households. On this basis, a true reflection of the extent of affordable housing need would be for 500 affordable dpa. This represents the OAN for affordable housing. Policy DP29 in the PSDDLDP seeks a minimum of 30% affordable housing on schemes above identified site size thresholds and subject to viability. Over 1,600 homes would be needed based on this level of provision to meet the affordable housing need in full. Whilst this is clearly unlikely to be realistic, it does provide clear evidence to justify consideration of higher overall housing provision.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	6	Mr R Brass	GL Hearn	Anstone Development Limited
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

In terms of historic under delivery, the Housing Trajectory (PSDDL, Appendix A) sets out past annual completions from 2006/07 and projects housing delivery up to 2030/31. The average annual housing completion rate over the period from 2006/07 to 2013/14) was 457 dpa. Over the last five years (2010/11 to 2014/15) it rose to 523 dpa. Notably, these levels of delivery are significantly below the proposed District target of 650 dpa. Over the last five years the short fall is approximately 20%. As a result, in accordance with the NPPF, it is clear and evident that MSDC has a “record of persistent under delivery of housing” and therefore both a 5% and 20% buffer should be applied to the assessment of 5YHLS.

These representations object to the SHLAA recommendation that the site is not currently developable and consider that the approach adopted in the PSDDL is not flexible or positive in relation to future development opportunities at Bolney.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	7	Mr R Brass	GL Hearn	Anstone Development Limited
Code:		Policy	DP9	Object Sustainability Appraisal? <input type="checkbox"/>

The Strategic Development Site at Burgess Hill represents over one third of the proposed housing land supply to achieve the District housing target. The Housing Trajectory (District Plan, Appendix A) shows that this site is expected to be delivered between 2020/21 and 2030/31 (years 5 to 15) with delivery rates of between 310 dpa and 325 dpa. These completion rates are considered to be overly ambitious, with annual completions likely to be significantly lower. This is based upon professional experience of delivery rates from large strategic urban extension sites; industry knowledge and latest research on delivery rates undertaken by Savills in October 2014 which shows that in 2013 average annual completions on urban extensions was 120 dpa.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	8	Mr R Brass	GL Hearn	Anstone Development Limited
Code:		Policy	DP7	Object Sustainability Appraisal? <input type="checkbox"/>

The potential failure to deliver Strategic Development at Burgess Hill over the plan period (by 2031) would therefore impact the ability of the plan to effectively achieve DP7

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	9	Mr R Brass	GL Hearn	Anstone Development Limited
Code:		Policy	DP8	Object Sustainability Appraisal? <input type="checkbox"/>

The potential failure to deliver Strategic Development at Burgess Hill over the plan period (by 2031) would therefore impact the ability of the plan to effectively achieve DP8

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	10	Mr R Brass	GL Hearn	Anstone Development Limited
Code:	3g	Policy		Sustainability Appraisal? <input type="checkbox"/>

MSDC has placed too much responsibility on the neighbourhood planning process to identify land for future development and deliver change across the District. The decision not to prepare a Site Allocations DPD places responsibility on the Neighbourhood Planning process to deliver effectively to ensure that the Council's housing target is met. It is important to note that the Council is aware that neighbourhood planning may not be a sufficiently certain route to ensure that the strategy of the Local Plan is delivered: Chapter 3 of the Local Plan (Ensuring Housing Delivery), Para. 3.29 states "that if insufficient development is being brought forward through Neighbourhood Plans, then the District Council will be required to produce its own housing allocations document for the District".

GLH analysis of 14 Neighbourhood Plans at draft stage or beyond (July 2015) demonstrates that over 1,500 dwellings are being proposed across the District. This demonstrates that neighbourhood planning offers the potential to provide an effective source of housing.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	11	Mr R Brass	GL Hearn	Anstone Development Limited
Code:		Policy	DP6	Object Sustainability Appraisal? <input type="checkbox"/>

Policy DP6: Settlement Hierarchy allocates each settlement into one of five categories, which relates to each distribution of development option. Notably, the policy requires that development of "an appropriate scale" is delivered at each settlement.

The major issue is that, currently, the PSDDLDP fails to allocate the required level of housing development to Neighbourhood Plans, given the OAN is 810 dpa, and therefore their appropriate scale of development is discussed in detail below within the GLH Settlement Hierarchy Assessment.

Analysis of the villages, in respect of Policy DP6: Settlement Hierarchy demonstrates that Bolney is a mid-ranking settlement and should therefore provide the average figure of 210 dwellings. It is important that this additional guidance is set out to help deliver the social and economic benefits recognised in the MSDC Sustainability Appraisal.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	12	Mr R Brass	GL Hearn	Anstone Development Limited
Code:	SA-a	Policy		Sustainability Appraisal? <input type="checkbox"/>

Option C is supported and this preferred approach to distribution of development is in accordance with the NPPF which seeks "to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities" (paragraph 55). Focusing new housing at existing settlements will deliver benefits to local communities by providing opportunities to retain, strengthen and enhance existing services and facilities and infrastructure in accordance with the NPPF which states that to support economic growth in rural areas planning policies should "promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship" (Para. 28).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	13	Mr R Brass	GL Hearn	Anstone Development Limited
Code:		Policy DP5	Object	Sustainability Appraisal? <input checked="" type="checkbox"/>

The District Plan housing target must increase to at least 13,770 dwellings to be found sound. Option C should remain the preferred option and towns and villages would be expected to deliver increased housing. The key factor in determining the level of increased housing at each settlement relates to “an appropriate scale” of development and therefore the above analysis suggesting a refined hierarchy of settlements helps to gauge what scale of development should come forward at each settlement.

In the context of an increase District housing target, the delivery of which will be critical to the effectiveness of the District Plan, there should be a re-appraisal of the approach to allocation of housing, as a result of which a balanced approach to site selection should be employed. This should provide for the identification of sites where the impact on the landscape and AONB can be reduced or minimised through masterplanning and careful site selection.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	14	Mr R Brass	GL Hearn	Anstone Development Limited
Code:	3d	Policy		Sustainability Appraisal? <input type="checkbox"/>

It is recommended that in order to help find the District Plan sound that the village of Bolney should deliver at least 210 dwellings over the plan period from 2014 to 2031. This target would increase if Mid Sussex is able to meet unmet needs from adjoining LPAs.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	15	Mr R Brass	GL Hearn	Anstone Development Limited
Code:		Policy DP10	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP10: Protection and Enhancement of Countryside and Policy DP14: High Weald Area of Outstanding Natural Beauty rightly seeks to protect and enhance valuable landscapes. Given the need to increase the District housing target to 810 dpa a more flexible approach must be adopted to help ensure the required delivery of development to meet need and to support and strengthen local services and facilities, especially in villages such as Bolney.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	16	Mr R Brass	GL Hearn	Anstone Development Limited
Code:		Policy DP14	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP10: Protection and Enhancement of Countryside and Policy DP14: High Weald Area of Outstanding Natural Beauty rightly seeks to protect and enhance valuable landscapes. Given the need to increase the District housing target to 810 dpa a more flexible approach must be adopted to help ensure the required delivery of development to meet need and to support and strengthen local services and facilities, especially in villages such as Bolney.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	17	Mr R Brass	GL Hearn	Anstone Development Limited
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

This section summarises the Proposals at the Site (Land Adjoining North of Bolney). Full details of the Site and development opportunity are set out at Appendix B in Representations to Bolney Parish Council on the draft Neighbourhood Plan.

The Site is proposed to accommodate up to 150 new dwellings, following a design-led approach to respect the rural character of the village. Proposals have recently been updated based on consultation with the Bolney Neighbourhood Plan Group, and include the following elements to respond to local need and objectives:

- Phased development – option to bring forward the Site in two phases over time;
- Increased proportion of smaller dwellings including 1-2 bed units; and,
- Specialist accommodation for the older population.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	18	Mr R Brass	GL Hearn	Anstone Development Limited
Code:	1b	Policy		Sustainability Appraisal? <input type="checkbox"/>

The Pre-Submission District Plan is unsound because it fails to achieve the four components of a “sound” plan. It is inconsistent with national policy and guidance set out in the National Planning Policy Framework (2012) and the Planning Practice Guidance (2014). Most significantly, it fails to undertake a justifiable and robust assessment of local needs and fails to prepare a positive, effective and deliverable supply of housing to address the identified housing need. A number of recommendations are set out in this submission to address these issues.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	19	Mr R Brass	GL Hearn	Anstone Development Limited
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP5	<input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?

In terms of delivery of development, based upon historic completion rates and recent housing completions on strategic sites, the level of development proposed by the PSDDLDP to come forward as commitments and strategic development during the plan period is ambitious and is unlikely to be completed. Therefore the District Plan is unsound in respect of its effectiveness to identify a deliverable supply of housing development, and is not consistent with national policy. As a result, the knock-on effect of this under delivery is that the quantum of dwellings to be delivered by Neighbourhood Plans should be increased and an increased allowance must come forward in the first five years. It is recommended that the District Plan is amended to include a quantum of housing development across a range of sources of supply that is capable of being able to be fully delivered over the plan period from 2014 to 2031, based upon the District housing target of 810 dpa, in addition to any unmet needs from adjoining LPAs under the duty to cooperate. The knock-on effect of an increase housing target (Section 3) and / or shortfall in housing land supply (Section 4) is that the quantum of dwellings to be delivered by Neighbourhood Plans must be increased and an increased allowance from Neighbourhood Plans must come forward in the first five years. As a step change in future housing delivery is required a positive planning approach is essential to enable the Council, to properly identify sources of housing land supply for future residential development. It is recommended that the District Plan is amended to state that Neighbourhood Plans conform to the adopted District housing target. Any emerging plans which do not adequately contribute towards the District housing target of 810 dpa, in addition to any unmet needs from adjoining LPAs, should be reviewed immediately. To meet additional needs, it is recommended at the quantum of housing to be delivered by Neighbourhood Plans in Policy DP5 is increased to at least 4,200 dwellings. The District Plan must provide clearer guidance to Neighbourhood Plans to ensure that this target can be achieved, including minimum housing targets as part of the Settlement Hierarchy set out in Policy DP6. In order to achieve housing delivery to address need it is recommended that the District Plan is positively planned to sets out minimum housing targets for all settlements deemed appropriate to accommodate growth to ensure that the plan is effective and deliverable. The alternative would be to prepare a Site Allocations DPD and to commit to this within Policy DP5. Whichever route is taken there should be clarity within the District Plan regarding development requirements to be met via the supporting Development Plan Document or Neighbourhood Plans. [Technical Appendix on OAN attached]

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	20	Mr R Brass	GL Hearn	Anstone Development Limited
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP5	<input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?

The SEP sought to provide 17,100 dwellings (855 dpa) at MSDC over the plan period from 2006 to 2026. From 2006 to 2014 (the start of the emerging District Plan) this target equates to 6,840 dwellings. Over this period, MSDC housing completions were 3,658 dwellings, and therefore there is a shortfall of 3,182 dwellings against the accepted District target. As a result, in accordance with the PPG, this undersupply should be dealt with in the first 5 years, and therefore the shortfall is added to the five year District housing target.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	21	Mr R Brass	GL Hearn	Anstone Development Limited
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP5	<input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?

The GLH Supply Assessment demonstrates that MSDC has approximately 2.74 years housing land supply against the GLH identified District target of 810 dpa plus existing housing shortfall from the previous plan period. Number of years of housing land supply then falls to 2.61 years and 2.28 years when 5% and 20% buffers are applied to the total. Any further increase in the District housing target or discounts to sources of supply would reduce the number of years of housing landsupply even further. Overall, when assessed against the current inadequate housing target of 650 dpa and the GLH identified District target of 810 dpa, MSDC is unable to demonstrate sufficiency of supply to achieve soundness. Therefore the PSSDLP is not consistent with national policy. Based upon historic under delivery of approximately 20% against the proposed District housing target (523 dpa vs 650 dpa) it is fair and reasonable that a discount should be applied to the Council's projected delivery rates. Therefore, at least a 10% discount to delivery rates and completions set out in the District Plan is justified. Notably this figure allows for some uplift in future delivery rates. A 10% discount would reduce total commitments from 5,405 dwellings to 4,865 dwellings, and the five year supply as identified by MSDC from 3,964 dwellings to 3,568 dwellings.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	22	Mr R Brass	GL Hearn	Anstone Development Limited
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP5	<input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?

Overall, existing evidence suggests an unmet need from adjoining authorities to Mid Sussex of a minimum of 23,200 homes. Unmet needs for 25,500 homes are identified. This arises from Brighton and Hove (16,900 dwellings); Crawley and Lewes (3,500 dwellings) – all authorities with which there is a strong functional relationship in migration and commuting terms with MSDC. 2.23 Only Horsham District is making provision for contributing to meet unmet needs of other authorities. It is making provision of 2,000 homes to meet Crawley's unmet needs. There is therefore a shortfall of 2,000 homes to 2030 across the Northern West Sussex HMA. 2.24 It is recommended that the District housing target set out in Policy DP5 is amended to make provision to meet unmet needs from adjoining LPAs. It is noted that the Home Builders Federation have noted that at least 100 dpa should be added to the District housing target to help address unmet needs.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20110	23	Mr R Brass	GL Hearn	Anstone Development Limited
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP5	<input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?

These are contrary to Government objectives to increase housing supply and improve affordability. MSDC had previously accepted, in the Draft HEDNA (February 2015), that whilst a number of these issues were common to surrounding areas or influenced by wider supply/demand dynamics, that it would be appropriate to include a 10% uplift to housing provision to contribute to addressing them. It is not clear on what basis, rooted in evidence, this is no longer considered appropriate.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20144	1	Mr C Rance	Clifford Rance Associates	Frost Cars Ltd
Code:	<input type="checkbox"/> Policy	DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy PD5, Housing proposes an over-reliance on Neighbourhood Plans to meet the 5 year housing supply. The policy explanatory text notes that 20 Neighbourhood Plans are proposed, as at June 2015, 4 of the Neighbourhood Plans have been made and 3 are at examination stage. That leaves 13 Neighbourhood Plans yet to be prepared. Those wishing to comment on housing supply are therefore disadvantaged. The actual allocations are largely unknown. The policy explanatory text goes on to explain that 'in the event that Neighbourhood Plans do not deliver the required amount of development, the District Council will prepare a Site Allocations Development Plan Document.'

This clearly shows that the total housing allocations will be determined 'bottom-up' with no certainty that even a 5 year supply will be achieved. The NPPF states that the District Plan should be allocating numbers and be demonstrating that the necessary supply of housing can be achieved. The Plan fails to do this.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20144	2	Mr C Rance	Clifford Rance Associates	Frost Cars Ltd
Code:	<input type="checkbox"/> Policy	DP2	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP 2, employment, includes a sub-policy that allocated employment land and premises will be protect 'unless it can be demonstrated that there is no reasonable prospect of its use or continued use'. The policy does not explain the criteria against which this can be judged. For example, whether a financial appraisal of viability of reuse, or requiring a period of unsuccessful marketing or the period of such marketing or other criterion.

The objectors own or have an interest in an underused employment site. The site could continue to be used but is unlikely to provide other than a basic level of employment accommodation implying a low employment potential. The site would be better used for other purposes. The policy does not provide positive criteria against which to judge such proposals.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20151	1	Mr M Carpenter	Enplan	LAMBS
Code:	<input type="checkbox"/> Policy	DP5	Support	Sustainability Appraisal? <input type="checkbox"/>

LAMBS consider that the housing figures set out in the Plan represent the district's needs in sustainable locations, reflecting the significant landscape constraints including the High Weald Area of Outstanding Natural Beauty (AONB) and the South Downs National Park.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20151	2	Mr M Carpenter	Enplan	LAMBS
Code:	2c	<input type="checkbox"/> Policy	<input type="checkbox"/>	Sustainability Appraisal? <input type="checkbox"/>

With reference to the Plan's Strategic Objectives (para. 2.13) it is considered that further emphasis should be placed on the protection and enhancement of the natural environment in accordance with the Core Planning Principles set out in para. 17 of the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20151	3	Mr M Carpenter	Enplan	LAMBS
Code:	2a	Policy		Sustainability Appraisal? <input type="checkbox"/>

The Plan's Strategic Objectives should be clear that the location of development for new housing (and other needs of the district) should be focused on the principal urban areas namely Burgess Hill, Haywards Heath and East Grinstead together with the larger villages.
Strategic Objective 5 should make clear the importance of sustainable transport in relation to all new development. This objective should also recognise the harmful environmental impacts of constructing new infrastructure to support development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20151	4	Mr M Carpenter	Enplan	LAMBS
Code:	3I	Policy		Sustainability Appraisal? <input type="checkbox"/>

Following the announcement of the Airports Commission in July 2015 and their recommendation that future airport expansion should be at Heathrow, the last sentence at para 3.37 in respect of an early review of the plan (linked to a second runway at Gatwick) should be deleted. We would refer to the 'Response to Airport Commission' May 2014 which confirms that new housing associated with the expansion of Gatwick (if that were to happen) is expected to be delivered across a significant area encompassing some 14 planning authorities within the preferred location of the London Plan 'Opportunity Areas'.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:	
20151	5	Mr M Carpenter	Enplan	LAMBS	
Code:		Policy	DP1	Object	Sustainability Appraisal? <input type="checkbox"/>

The policy should be amended so it expressly recognises the need to locate sustainable new development in areas which benefit from existing public transport infrastructure and in particular the rail network. The policy should also state that strategic new development should be located at existing sustainable settlements which have been implemented already and have the capacity to allow for increased use.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:	
20151	6	Mr M Carpenter	Enplan	LAMBS	
Code:		Policy	DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

The current figure of 11,050 homes in the plan period (2014 – 2031) is considered appropriate for sustainable development. Increasing this figure would place an unnecessary strain on the environment within the Mid Sussex. Para 4 of page 30 states that:
'In the event that Neighbourhood Plans do not deliver the required amount of development, the District Council will prepare a Site Allocations Development Plan. The timing of such a document would depend on the scale of the under-delivery and robustness of the five year supply (monitored through the Monitoring Report).
LAMBS consider this to be a failure of the plan. Development sites should be allocated now to plan for appropriate housing levels rather than plan for failure.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20151	7	Mr M Carpenter	Enplan	LAMBS
Code:	<input type="checkbox"/>	Policy DP6	Object	Sustainability Appraisal? <input type="checkbox"/>

This policy fails to stipulate appropriate conditions to development outside defined built-up area boundaries. LAMBS consider that the three criteria listed should be explicit criteria which are required to be met before any development can occur. Further to this, additional criteria should be added to reflect the number and density of additional dwellings so as to preserve the environment. Policy DP6 should stipulate what development is appropriate in each of the categories of settlement. This policy should direct development away from greenfield sites into areas which are brownfield.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20151	8	Mr M Carpenter	Enplan	LAMBS
Code:	<input type="checkbox"/>	Policy DP10	Neutral	Sustainability Appraisal? <input type="checkbox"/>

The policy should reflect the Core Planning Principles from the NPPF which recognises the intrinsic characteristic and beauty of the countryside.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20151	9	Mr M Carpenter	Enplan	LAMBS
Code:	<input type="checkbox"/>	Policy DP16	Neutral	Sustainability Appraisal? <input type="checkbox"/>

Views out of the National Park from key points are of particular importance and the policy should emphasise such views including from Devil's Dyke and Jack and Jill Windmills.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20151	10	Mr M Carpenter	Enplan	LAMBS
Code:	<input type="checkbox"/>	Policy DP19	Neutral	Sustainability Appraisal? <input type="checkbox"/>

The policy should expressly recognise the existing constraints on the local road network and the potential environmental impacts of constructing new road infrastructure to support such development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20189	1	Mr N Diment	GL Hearn	New River Retail
Code:	3a	Policy <input type="checkbox"/>	<input type="checkbox"/>	Sustainability Appraisal? <input type="checkbox"/>

Overall NRR are supportive of the Plan's aspirations for Burgess Hill and welcome the recognition within the Pre Submission Draft at the:

- importance placed upon regeneration and renewal of the District's town centres (para 3.9 and DP3); and
- desire to facilitate thriving and attractive retail and leisure uses (para 2.9); and
- promotion of strategic development within Burgess Hill (para 3.8); and
- directing of new housing development to Burgess Hill (para 3.18)

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20189	2	Mr N Diment	GL Hearn	New River Retail
Code:		Policy DP3	Object	Sustainability Appraisal? <input type="checkbox"/>

Whilst we acknowledge that it may not be necessary to include specific targets for retail floorspace within Policy DP3, the policy should acknowledge the hierarchy/role of the District's defined town centres, particularly as the focus of the Pre Submission Draft is to focus the majority of development at Burgess Hill.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20189	3	Mr N Diment	GL Hearn	New River Retail
Code:		Policy DP3	Object	Sustainability Appraisal? <input type="checkbox"/>

As proposed DP3 fails to fully acknowledge that town centre devolvement can comprise a mixture of uses which add to the attractiveness of a development and create a critical mass. The range of uses proposed as part of the Martlett's proposal are all 'town centre' uses as defined by the NPPF and will deliver a mixed use development, providing more than just retail floorspace. Furthermore, the proposed redevelopment of the Martletts will open up the frontages of the Centre and provide additional active frontages.

The opportunity to respond to this long term aspiration of the Council is not reflected in the policy or the Draft Policies Map at this time. The policy is considered therefore to be overly perceptive. This could be overcome by recognition that a mechanism be put in place to ensure the review of frontage policies.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20189	4	Mr N Diment	GL Hearn	New River Retail
Code:		Policy DP7	Object	Sustainability Appraisal? <input type="checkbox"/>

Burgess Hill becoming a 21st Century town focused around a high quality, vibrant and accessible town centre is welcomed. To achieve this the supporting text to DP7 sets out a number of objectives for the town including: "New and improved community and cultural facilities".

The requirement for improved community facilities is not justified and as drafted implies that there is a need for such facilities and that existing facilities are inadequate to meet local demand. The policy should recognise that the provision of what is referred to as 'new and improved facilities' does not necessarily need to include the re-provision of surplus facilities. In this regard the Plan should take a holistic approach to the form that such community facilities might take based upon an up-to-date evidence base.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20189	5	Mr N Diment	GL Hearn	New River Retail
Code:		Policy DP23	Object	Sustainability Appraisal? <input type="checkbox"/>

The policy identifies what information will be required to justify the loss of community facilities. In addition to establishing that the existing uses is no longer viable, that there would be duplicate facilities or that replacement facilities will be provided in the locality, it fails to recognise that there may be no identified need for the facilities or that existing facilities are capable of accommodating such a need.

In line with our comments relating to DP7 there appears to be no recognition that the services provided in one such facility could be accommodated across numerous facilities within the District's towns.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20238	1	Miss Z Alrashed	Nathaniel Lichfield & Partners	Friends Life Limited (BMO Real Estate Part
Code:		Policy DP3	Support	Sustainability Appraisal? <input type="checkbox"/>

Our clients support this policy, specifically they:

- welcome the support within Policy DP 3 for the “regeneration and renewal and environmental enhancement of the town centres” including Haywards Heath.
- support the recognition within this policy and supporting text that these town centres should be the focus of investment to meet the needs of the community; and
- agree that it is appropriate for the defined Primary Shopping Frontages to include the demise of the Orchards Shopping Centre.

We now note that a locally set threshold of 500 sqm is proposed by be applied to all applications for out of centre retail proposals. We support the addition of this text within the policy which will allow the impact of proposed retail development to be adequately assessed. There is clear guidance within both the NPPF and Planning Practice Guidance (PPG) on the appropriateness of such a threshold. In this situation the proposed threshold is entirely consistent with the analysis of the Mid Sussex Retail Study (November 2014) which forms part of the Local Plan evidence base. This concludes (paras 10.44 – 10.48) that it is reasonable for the locally set threshold to be 500 sq m for proposals for new comparison floorspace and 500 sq m for proposals for convenience goods floorspace.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20267	1	Mr R Ledbury	Blackthorns Community Association	
Code:		Policy DP41	Support	Sustainability Appraisal? <input type="checkbox"/>

Support '..Land that is considered to be required for current flood management will be safeguarded from development..'

Therefore, fields under threat should be kept free of development for flood attenuation. Lindfield and parts of Haywards Heath are subject to flooding and Birchen Fields are an important part of our protection.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20268	1	Ms N Ernest	Inter Parish Group	
Code:	1a	Policy		Sustainability Appraisal? <input type="checkbox"/>

The Inter Parish Group (namely Albourne, Cowfold, Henfield, Hurstpierpoint & Sayers Common, Pyecombe, Shermanbury, Twineham, West Grinstead and Woodmancote Parish Councils) support the Mid Sussex District Plan 2014 – 2031 and believe it to be sound.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20268	2	Ms N Ernest	Inter Parish Group	
Code:	3a	Policy		Sustainability Appraisal? <input type="checkbox"/>

We support the overall strategy and vision for the district, particularly the focus on sustainable communities, need for appropriate infrastructure, protection and enhancement of the environment and the engagement of Parishes through the neighbourhood planning process.

We support the position of Mid Sussex District Council in rejecting the Mayfield Market Town proposals and we would welcome the opportunity to be invited by Mid Sussex District Council to support them at the Examination Hearing

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	1	Ms H Allen	Barton Willmore	Crest Nicholson South
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

The HEDNA update (June 2015) has not “converted” the projected number of households (656 per annum, 2014-2031) to dwellings by application of an adjustment for vacant, shared, and second homes. A vacancy rate of 2.6% (CLG, CTB 2014- Second Homes); (CLG Live Table 125/615 vacant) should be applied in order to establish the correct “starting point” of dwellings for the PSDP. Application of 2.6% to the latest household projection would equate to 673 dwellings per annum, 2014-2031. The PSDP therefore fails to meet the first step in establishing OAN; the starting point estimate.

When the DCLG household projections are “converted” to actual dwellings, this results in an increased housing target of 673 dpa;-The 2012-based DCLG household projections are considered to be suppressed in younger age groups. Sensitivity analysis would have the potential to increase the ‘starting point estimate’ from 673 dpa, which should be considered a minimum;-When a 10% allowance for Market signals is applied, this this results in a further increased housing target to a minimum of 740 dpa;-When the current backlog is applied, this results in a further increased housing target of 927 dpa. The backlog should be addressed in the first 5 years of the Plan period.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	2	Ms H Allen	Barton Willmore	Crest Nicholson South
Code:	3h	Policy		Sustainability Appraisal? <input type="checkbox"/>

Para 7.9 of the HEDNA confirms that approximately 282 full time equivalent basis (FTE) jobs are predicted per annum. However, the current proposed housing target of 656dpa would provide for only 249 jobs per annum. This demonstrates that the level of housing growth will not support job growth forecasts. Furthermore, the HEDNA has assessed job growth on a FTE basis, whereas a more accurate and robust assessment should be based on workforce jobs. The former assesses jobs based on a full 37.5 hour week (whereby two jobs that equal 37.5 hours are counted as one job), whilst the latter counts the total number of actual jobs (both full and part time). As a result, an FTE assessment does not fully reflect individual job growth and ‘workforce jobs’ are considered a more robust calculation.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	3	Ms H Allen	Barton Willmore	Crest Nicholson South
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The HEDNA (or any subsequent document produced by MSDC) does not include a detailed assessment which considers whether the proposed OAN will meet affordable housing need (i.e. is affordable housing need more than the % of affordable housing which will be delivered within the Plan period going forward). This requires a separate and different calculation to “overall need” (the OAN). The housing target should be adjusted accordingly.

Two recent High Court decisions found that the relevant LPA’s had failed to carry out an objective assessment of whether the plans would meet the areas need for affordable homes. Notably, it was proposed that an increase in the total housing figures should be considered where it could help deliver the required number of affordable homes. MSDC seeks to justify the proposed housing target on the grounds of environmental limitations. However, it is considered that insufficient evidence has been provided to demonstrate that this is the case.

Notably, it is not considered that due regard has been had to Para 14 of the NPPF. This requires Local Plans to meet full OAN, unless other policy factors within the NPPF “significantly and demonstrably” outweigh the benefits of that housing provision, or policy means that development should be restricted (Footnote 9 of the NPPF). In order to undertake a robust planning balance exercise, MSDC must first establish its Full (policy off) OAN, as the judgement as to whether impacts of housing provision “significantly and demonstrably” outweigh the benefits will be determined in part by how large the unconstrained need is in the first place- i.e. the weight to be given to the benefits. Notably, for the Solihull Judgement, the Inspector concluded that “numbers matter, because the larger the need the more pressure will or might be applied”.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	4	Ms H Allen	Barton Willmore	Crest Nicholson South
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

Other than a short, non-descriptive section in the PSDP, no evidence is available as part of the current consultation to demonstrate that MSDC is engaging constructively, actively and on an ongoing basis with neighbouring authorities. Such information should be made readily available.

However, MSDC adopts the position that there is no scope to accommodate any additional housing above its own (incorrect) OAN figure of 656dpa. This conclusion is considered in further detail in section 3 of this report, however it is considered to be fundamentally flawed. On the basis of the above, and the criticisms set out in section 3, MSDC is considered to fail the DTC.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	5	Ms H Allen	Barton Willmore	Crest Nicholson South
Code:	SA-b	Policy		Sustainability Appraisal? <input type="checkbox"/>

Whilst the Sustainability Appraisal does refer to a “weighing up” of impacts versus benefits, it fails to consider whether such impacts would “significantly” outweigh the benefits. Furthermore, the “weighing up” exercise undertaken in the sustainability Appraisal has been misinformed by the incorrect assessment of OAN in HEDNA (2015), the Capacity Assessment (2014) and SHLAA (2015) - and is not therefore robust.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	6	Ms H Allen	Barton Willmore	Crest Nicholson South
Code:	Policy	DP5	Sustainability Appraisal?	<input checked="" type="checkbox"/>

The Sustainability Appraisal considered 4 options for the distribution of development, and concluded that Option C is the preferred option for growth. Option C seeks to focus development within or adjacent to the 3 No. towns, but encourage both larger and small villages to take growth to support the provision of additional services and meet local needs. As above, Policy DP5 provides no such provisions to ensure that the distribution of development meets this objective.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	7	Ms H Allen	Barton Willmore	Crest Nicholson South
Code:	SA-b	Policy	Sustainability Appraisal?	<input type="checkbox"/>

Para 3.28 and Policy DP5 state that the number of units to be delivered “elsewhere in the district” should be seen as a floor (minimum) rather than a ceiling (maximum) figure. Whilst this is supported in principle, it is contradictory to the findings of the Sustainability Appraisal which suggests that the District cannot accommodate more than 656dpa. As above, it is considered that the finding of the Sustainability Appraisal are misinformed by other evidence base documents and needs to be reassessed in context of Para 14 of the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	8	Ms H Allen	Barton Willmore	Crest Nicholson South
Code:	3f	Policy	Sustainability Appraisal?	<input type="checkbox"/>

The site extends to circa 1.13ha, and is located between the old alignment of Rocky Lane, and the new Haywards Heath Relief Road (HHRR). The site forms part of an area subject to planning permission (12/0535/OUT) for the development of 96 dwellings, albeit no built development was proposed on it. This is known as Rocky Lane Phase 1. Crest South was the Applicant for this, and construction has recently started. Crest has also recently achieved resolution to grant outline planning permission for the development of ‘Rocky Lane Phase 2’ (101 units) to the south of Phase 1. The site can accommodate circa 30 units, in the form of flats. This includes the retention of existing trees and an area of open space. Access is achievable from the old alignment of Rocky Lane to the North.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	9	Ms H Allen	Barton Willmore	Crest Nicholson South
Code:	1j	Policy	Sustainability Appraisal?	<input type="checkbox"/>

It is considered that ‘Land south of old Rocky Lane’ is considered suitable for development. In this regard the deletion of Policy HH20 of the existing Local Plan (2014) (which allocates the site as “informal open space”) is supported. It is considered that Policy DP22 of the PSDP does not apply to the site.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	10	Ms H Allen	Barton Willmore	Crest Nicholson South
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

Furthermore, it is considered that a number of “secondary” constraints (and even some “primary” constraints) identified in the Capacity Assessment (2014) and subsequently the SHLAA (2015) have been afforded too much weight when deciding whether the impacts on these secondary constraints are “acceptable”/whether they are outweighed, and whether such adverse impacts (if they do exist) could not be mitigated against. In this regard, it is not considered that the Council is positively seeking opportunities to meet the development needs of the District in accordance with the NPPF (Para 14). The Plan has not been “Positively Prepared” and fails this test of “soundness”. The above criticisms are also applicable to MSDC’s conclusions on its ability to meet unmet needs of neighbouring authorities (Cross Boundary Sustainability Appraisal- 2015). - Notably, when considering the significance of unmet need from neighbouring authorities, further weight should be added to the “benefit” of housing provision when undertaking any planning balance.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	11	Ms H Allen	Barton Willmore	Crest Nicholson South
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

There is no requirement for Neighbourhood Plans to adhere to the above hierarchy or OAN assessment, and therefore there is no guarantee that such Neighbourhood Plans will positively and proactively deliver development in sustainable locations in a planned approach. Notably, there is no guarantee that additional growth will be allocated proportionately to the 3 No. towns (i.e. the more sustainable settlements). Whilst dwellings are allocated to Burgess Hill, no dwellings are allocated to Haywards Heath or East Grinstead. Committed sites that are already accounted for in the Local Plan, are being double counted in the NP. As above, backlog also needs to be considered. There are therefore several instances of “double counting”.- The number of dwellings proposed is not consistent with the settlement hierarchy e.g. some Category 4 settlements are proposing more growth than higher category places;- NPs are coming forward and not meeting their own OAN figure;-The complexity in seeking to understand what is truly being delivered by each NP in the context of the District Plan housing target and Policy DP5.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	12	Ms H Allen	Barton Willmore	Crest Nicholson South
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

The existing housing commitments are being “offset” against the housing requirement for the future Plan period (2014-2031), yet, for the majority, at the time at which they were approved/allocated, they were done so in order to meet housing need for the previous Plan period i.e. prior to 2014. By way of example, the Schedule of Commitments (April 2015) includes Bolnore Village- phases 4a, 4b and 5. There are allocated in the existing Local Plan, to meet housing need to 2006 only. As set out in Section 2 of this report, if MSDC is discounting the housing target on the back of existing commitments approved prior to 2014, it is fundamental that the PSDP includes previous years backlog within its housing target, in order to avoid “double counting” of such sites across two Plan periods. Whilst the proposed distribution of development at higher tier settlements is supported in principle, as is the assessment of need within each Parish/Town, it is considered that as currently drafted, Policy DP5 fails to properly ‘plan’ for and support development in the ranking suggested.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	13	Ms H Allen	Barton Willmore	Crest Nicholson South
Code:	<input type="text"/>	Policy	DP5	Object
Sustainability Appraisal? <input type="checkbox"/>				

The DCLG household projection rates do not reflect unmet housing need (PPG Reference ID: 2a-015-20140306). "Backlog" from the previous Plan period therefore needs to be considered when setting the Local Plan housing target, and carried forward into the new Plan period (PAS Guidance, 06 July 2015). (backlog stated as 3,182 dwellings 2006/07-2013/14).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20273	14	Ms H Allen	Barton Willmore	Crest Nicholson South
Code:	<input type="text"/>	Policy	DP5	Object
Sustainability Appraisal? <input type="checkbox"/>				

The HEDNA Update acknowledges that the principles of the original HEDNA remain valid, yet concludes that the 10% uplift no longer needs to be applied. This position is not considered to be justified. Notably, the original HEDNA acknowledged that there was a clear worsening trend in "affordability", with housing prices being substantially higher than West Sussex and England as a whole. This position has not changed. It can be seen that Median House Prices increased by 52% between 2001-2011, comparative to Crawley (39%) and Horsham (49%). With regards to residential rents, the ratio between lower quartile personal income and lower quartile private rent demonstrate that Mid Sussex (43%) is again somewhat higher than Crawley (39%) and England as a whole (29%). It is clear that there are "worsening" trends in a number of market signals, and therefore at least a 10% uplift should continue to apply. The above approach is fundamentally flawed, and does not comply with National Policy. Notably, the PPG confirms: The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20274	1	Ms K Outterside	Enplan	Cross Stone Regeneration (Hurst Farm)
Code:	3f	Policy	<input type="text"/>	Object
Sustainability Appraisal? <input type="checkbox"/>				

It is considered that the Plan should make positive provision for new housing through the allocation of appropriate sustainable and deliverable sites for development. This would accord with the NPPF which supports sustainable development through the plan making process – para. 157 refers. The site would provide circa 275 new homes (including affordable units) with associated open space including children's play facilities. The site has the benefit of good access to the local highway network and nearby community facilities and the town centre. It is a sustainable location for new housing.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20275	1	Mrs S Tagg	Foxley Tagg Planning	National Custom and Self-Build Association
Code:	1f	Policy	<input type="text"/>	Object
Sustainability Appraisal? <input type="checkbox"/>				

Communiqué from the Department of Communities and Local Government could not be any more explicit in its requirements for LPAs to plan for the needs of those that wish to build their own home.

The Self-build and Custom Housebuilding Bill received Royal Assent on 26 March. The Bill is now an Act of Parliament. This Bill seeks to establish a register of prospective custom builders who are seeking a suitable serviced plot of land and requires LPAs to keep an up to date register of people within the district that wish to build their own home. It is understood that Mid-Sussex District Council have yet to comply with the legislation and keep a register of those in the district that wish to build their own home.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20275	2	Mrs S Tagg	Foxley Tagg Planning	National Custom and Self-Build Association
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The evidence for housing needs within the District Plan evidence base is centred on two documents:

- Housing and Economic Needs Assessment (March 2015; June 2015 Update)
- Housing Provision Paper (June 2015)

Neither paper makes any specific reference to custom- and self-build which indicates that the needs of custom- and self-builders have not been considered as part of the plan production process. Indeed, there is no indication that the council have tried to determine the demand for custom- and self-build in the district. As a consequence it is considered that the plan cannot be said to be justified as there has been no visible attempt to establish the demand for custom or self-build within the district. This is clearly at odds with the March 2015 letter from Brandon Lewis MP.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20275	3	Mrs S Tagg	Foxley Tagg Planning	National Custom and Self-Build Association
Code:		Policy DP28	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP28: Mix of Housing stipulates the size and types of housing that new residential developments should consist of and the types of people whose needs new housing should meet (e.g. older people), but does not include custom-or self-build plots.

Although there is no evidence of demand for custom- and self-build in the district, it is inconceivable that Mid-Sussex District has 0% demand for custom or self-build from its population. The plan cannot therefore be said to be positively prepared or justified. The demand should be assessed, but if it is not it must be assumed that there is some demand there.

A requirement for large developments to include the provision of a percentage of self-build plots (perhaps 5%) should be added to Policy DP28: Mix of Housing to meet the demand for self-build.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20275	4	Mrs S Tagg	Foxley Tagg Planning	National Custom and Self-Build Association
Code:		Policy DP29	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP29: Affordable Housing stipulates that new residential developments should be made up of at least 30% affordable homes, however it does not include the provision of any version of affordable custom- or self-build.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20275	5	Mrs S Tagg	Foxley Tagg Planning	National Custom and Self-Build Association
Code:	<input type="checkbox"/>	Policy	<input type="checkbox"/>	Object
		DP30		
			Sustainability Appraisal? <input type="checkbox"/>	

Policy DP30: Rural Exception Sites does not include affordable Custom or self-build as a form of residential development that would be considered in areas where the development of market housing would not normally be considered appropriate.

The plan does not for example allow custom- or self-build on rural exception sites, which would provide a more affordable route for those that are unable to afford a new home on a new development at market price and who are unable to secure an affordable home. Therefore the plan cannot be said to be positively prepared.

Mid-Sussex District Council have an apparent issue with affordability which is not addressed in the District Plan which means that the plan is not meeting the needs of the population and cannot be said to be positively prepared.

The addition of custom- and self-build developments to Policy DP30: Rural Exception Sites would increase the supply of affordable custom- and self-build and help to meet demand for both affordable homes and custom-and self-build plots in the district.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20275	6	Mrs S Tagg	Foxley Tagg Planning	National Custom and Self-Build Association
Code:	<input type="checkbox"/>	Policy	<input type="checkbox"/>	Object
		DP28		
			Sustainability Appraisal? <input type="checkbox"/>	

It is apparent therefore that while the District Plan does look to address the needs of certain groups of the community such as older people specifically (in Policy DP28), however, it makes no attempt to meet the needs of those that wish to build their own home, despite the NPPF clearly stipulating that new local plans should do just that. As a consequence the plan cannot be said to be positively prepared as there is no attempt to meet the needs of all of the community, specifically those that wish to build their own home, nor can it be said to be consistent with national policy since the NPPF states that local plans 'should look to plan for a mix of housing based on present and future demographics, market trends and the needs of different groups in the community including ... people who wish to build their own homes'.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20275	7	Mrs S Tagg	Foxley Tagg Planning	National Custom and Self-Build Association
Code:	1h	Policy	<input type="checkbox"/>	Object
			Sustainability Appraisal? <input type="checkbox"/>	

The evidence for housing needs within the District Plan evidence base is centred on two documents:- Housing and Economic Needs Assessment (March 2015; June 2015 Update)- Housing Provision Paper (June 2015)Neither paper makes any specific reference to custom- and self-build which indicates that the needs of custom- and self-builders have not been considered as part of the plan production process. Indeed, there is no indication that the council have tried to determine the demand for custom- and self-build in the district. As a consequence it is considered that the plan cannot be said to be justified as there has been no visible attempt to establish the demand for custom or self-build within the district. This is clearly at odds with the March 2015 letter from Brandon Lewis MP.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20285	1	Ms H Trubshaw	Pegasus Group	Sheet Anchor Evolve LTD
Code:		Policy	DP3	Neutral
Sustainability Appraisal? <input type="checkbox"/>				

The importance of East Grinstead Town Centre as a location for development and regeneration has long been recognised in the Mid Sussex District Council Local Plan (2004) and the East Grinstead Town Centre Masterplan (2006) and we welcome the continued support for the regeneration of East Grinstead Town Centre within the draft District Plan.

We note that the Council have identified the primary and secondary shopping frontages in accordance with Paragraph 23 of the National Planning Policy Framework (NPPF). We acknowledge the resistance toward residential uses on the ground floor, however the application of this element of the policy requires careful thought and, in the case of redevelopment, residential entrances should be encouraged. When designed and located appropriately residential development can add significant footfall to a town centre and the location of entrances should not be restricted by the adopted policy.

The redevelopment of Queen's Walk will create the opportunity to provide flexible commercial space which, is adaptable and can respond to the requirements of the needs of the Town Centre and potential occupiers. A flexible approach will promote competitiveness in accordance with Paragraph 23 of the NPPF and the economic role of the Town Centre in accordance with the overall objectives of the Framework.

It is noted, in the draft Policy that the designated shopping frontages 'may be revised through Neighbourhood Plans'. We duly support this approach.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20285	2	Ms H Trubshaw	Pegasus Group	Sheet Anchor Evolve LTD
Code:	3f	Policy		
Sustainability Appraisal? <input type="checkbox"/>				

However, the redevelopment of this site should not be overlooked as it would make a significant contribution to the regeneration of the town centre. It is currently proposed to demolish the existing retail premises on the northern side of Queen's Walk, along with 1 – 4 Normans Gardens and 26 – 38a Queen's Road and to comprehensively redevelop the site for a mix of uses comprising new commercial and residential development.

As advised, the site is within close proximity to public transport and the services and facilities within East Grinstead and should therefore be considered 'suitable' for residential use. The site is also 'available' now and should therefore be considered 'deliverable' and 'developable' in accordance with Paragraph 47 of the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20285	3	Ms H Trubshaw	Pegasus Group	Sheet Anchor Evolve LTD
Code:	1h	Policy		
Sustainability Appraisal? <input type="checkbox"/>				

It is noted that the site is included within the Council's Strategic Housing Land Availability Assessment (SHLAA) 2015 (Site 525) as a suitable site. The SHLAA concluded that the site was not available and achievable in this location. By virtue of this letter, I notify the Council that the site (as identified on the attached location plan) is available and achievable in this location.

A proportion of the site is identified as SHLAA site 525 which is identified as a "highly sustainable central location suitable for residential development". However, the site has been disregarded as a deliverable and developable site within the document.

The SHLAA should also be updated annually to ensure it can inform the relevant Neighbourhood Plans and Site Allocation DPD

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20285	4	Ms H Trubshaw	Pegasus Group	Sheet Anchor Evolve LTD
Code:	<input type="checkbox"/>	Policy	DP5	Object
				Sustainability Appraisal? <input type="checkbox"/>

Supporting text to Policy DP5 Housing notes that the Council are required to apply a 20% buffer in accordance with Para 47 of the NPPF. However, there is no reference to the 20% buffer within the Policy wording. It should also be noted that the buffer will continue to apply until such a time when the Council can demonstrate the delivery of housing in accordance with the housing target and Para 47 of the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20285	5	Ms H Trubshaw	Pegasus Group	Sheet Anchor Evolve LTD
Code:	<input type="checkbox"/>	Policy	DP3	Support
				Sustainability Appraisal? <input type="checkbox"/>

We support the broad aims of 'Policy DP3 Town Centre Development' and advocate the regeneration and renewal of Burgess Hill, East Grinstead and Haywards Heath. We welcome the inclusion of mixed use development within the town centres in accordance with Paragraph 23 of the National Planning Policy Framework. Sheet Anchor Evolve have an invested interest in Queen's Walk and have entered into pre-application discussions with the Council and East Grinstead Town Council to discuss the potential redevelopment of a site along Queen's Walk for residential led-mixed use development. As noted within the 'Retail Study Update 2014 'the redevelopment of Queens Walk represent a significant opportunity to improve the competitive position of the town centre, and help strengthen its overall vitality and viability in accordance with local plan policy and the strategic vision for East Grinstead'. The redevelopment of the site will assist the Council in achieving the aims of Policy DP3 as drafted and the requirements of draft 'Policy DP5 Housing'.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20285	6	Ms H Trubshaw	Pegasus Group	Sheet Anchor Evolve LTD
Code:	<input type="checkbox"/>	Policy	DP5	Object
				Sustainability Appraisal? <input type="checkbox"/>

Furthermore, the Table within Policy DP5 identifies 1,515 dwellings to be delivered "elsewhere in District , as allocated through Neighbourhood Plans or other appropriate planning documents and identified SHLAA sites in years 1-5". It is not the role of the SHLAA to allocate land for housing, the role of the SHLAA is to "establish realistic assumptions about the availability suitability and the likely economic viability of land to meet the identified need for housing over the plan period NPPF 159"

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20285	7	Ms H Trubshaw	Pegasus Group	Sheet Anchor Evolve LTD
Code:	<input type="checkbox"/>	Policy	DP5	Object
				Sustainability Appraisal? <input type="checkbox"/>

The housing figures supplied within the Policy Table rely heavily on existing commitments and a single strategic site. Not clear how long these existing commitments (5,405 homes) have been in the planning process and whether or not they will be delivered. Not clear whether these commitments have planning permission or if these sites are allocated through the District Plan. Policy is inconsistent when compared to the draft proposals map which allocates sites.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	1	Mr J Steele	Savills	Thakeham Homes
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

Thakeham Homes' interests on land east of Brighton Road at Pease Pottage, Crawley ("the site"). The site is being promoted for a mixed use development including up to 600 residential dwellings, provision of land for St Catherine's Hospice, retail and community facilities and open space. The site is known in the Strategic Housing Land Availability Assessment (SHLAA) and Sustainability Appraisal (SA) as Hardriding Farm (Ref. 666)

It is recommended that, considering the benefits of a development at Pease Pottage, and the attached technical document which show the care taken to design a proposal for the sensitive landscape area, the site at Pease Pottage should be allocated within the District Plan. The development would support the housing requirement of the District, and given the site's location close to Crawley, would help to meet Crawley's substantial unmet housing needs. There is an urgent and pressing need for new homes, and importantly the site would contribute to the housing supply within the first five years of the plan period, with housing delivery scheduled from 2017/18.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	2	Mr J Steele	Savills	Thakeham Homes
Code:	1b	Policy		Sustainability Appraisal? <input type="checkbox"/>

There is continued concern over the proposed Plan Period of 2014-2031. Although these dates originally were to correspond to the intended year of submission, it is recommended that the Plan Period is amended to start in 2011. This is for two reasons.

Firstly, a large amount of the evidence base for the District Plan, as well as other datasets, begins in 2011. For example demographic indices such as the ONS household projections and the most recent Census dataset. Additionally evidence data such as the Northern West Sussex Economic Growth Assessment holds 2011 as a base year for use in projections and comparison. It is acknowledged that the updated Strategic Housing Market Area Assessment (SHMA) has a base date of 2014, this in-itself is questioned, notably given the recommendation of an Objectively Assessed Needs (OAN) of 656 dwellings per annum (dpa), which cannot properly account for under delivery of homes since 2006.

Secondly using a Plan Period starting in 2011 allows for a period of assessment between the start of the plan and adoption, notably in respect of housing monitoring. This has been seen with other Authorities who have a plan period beginning in 2011, such as Guildford, Test Valley and Horsham. 2011 fits, as it is five years from the start date of the former South East Plan (2006), and housing delivery is typically monitored in five year tranches.

It is recommended that Mid Sussex change the Plan Period to 2011-2031, representing a full 20 year plan. The SHMA evidence should be updated accordingly.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	3	Mr J Steele	Savills	Thakeham Homes
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

By producing documents jointly with Horsham and Crawley Councils, MSDC have recognised the requirement to work with other authorities who share a housing market area.

However, the West Sussex Strategic Housing Market Assessment (SHMA) was produced in 2009 and therefore cannot justifiably be seen as 'up-to-date'. Although updates to the SHMA were produced in 2012 and 2014, these only relate to affordable housing needs.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	4	Mr J Steele	Savills	Thakeham Homes
Code:	<input type="checkbox"/>	Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

The NPPF sets out the Government’s current and future requirements for boosting significantly the supply of housing (paragraph 47), including meeting OAN for market and affordable housing in the housing market area. The housing target contained in the MSDC Pre-Submission Draft Plan is 650dpa (11,050 dwellings over the plan period). The South East Plan set a previous target of 855 dpa in Mid Sussex, the proposed target of 650dpa reduces the planned supply of housing by 205 dpa (or 3,485 dwellings over the plan period). The proposed target is therefore clearly failing to ‘boosting significantly’ the planned supply of housing in Mid Sussex.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	5	Mr J Steele	Savills	Thakeham Homes
Code:	<input type="checkbox"/>	Policy DP28	Object	Sustainability Appraisal? <input type="checkbox"/>

The aging population of Mid Sussex is important for the planning of housing within the District, not only for population numbers, but also the formation of households, with the majority of elderly persons living in 1 or 2 person households. As a result, both the HEDNA and 2009 Northern West Sussex SHMA state that just providing an uplift to the OAN is not enough to support the needs of older people, and instead there needs to be a specific increase in smaller homes or bungalows, and an increase in supported housing, residential care and assisted living services.

The site provides an opportunity to build a new hospice/care facility as an integral part of the proposal to respond to the growing demands for the elderly and hospice care locally.

Thakeham Homes questions Policy DP28 and recommends the policy be amended to read (new text underlined): “To support sustainable communities with regard to good urban design (Policy DP24) housing developments will:”.

In addition, Thakeham Homes wishes it noted that a rigid approach to housing mix is unlikely to be effective or engender delivery. In addition, due regard must be had for good urban design.

In respect of Gypsy & Traveller provision, the appropriate time to test any provision District-wide is the Sites Allocations DPD, as required by Policy DP31, at which time all the available options may be appropriately tested. This part of the Policy DP28 should therefore be removed.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	6	Mr J Steele	Savills	Thakeham Homes
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

Thakeham Homes questions paragraphs 3.17 and 3.38 within the Overall Strategy of the District Plan. These paragraphs relate to the Duty to Co-operate, and the requirements of housing in neighbouring authorities. The Pre-Submission Draft states that MSDC will not contribute towards unmet need in other authorities in any way, and as a result Thakeham Homes believes the District Plan, in its current form, is not 'positively prepared' and fails to accord with the Duty to Co-operate.

Inspector's considering Local Plans across the housing market areas in which Mid Sussex sits, have largely found Plans unsound initially and have requested further evidence is provided on OAN and additional sites are provided to help meet the Council's own OAN and where possible, unmet need in neighbouring authorities. Of particular relevance for Mid Sussex is the outcome of the Horsham HDPF, in this examination the Inspector identified that "The need to allow for shortfalls in housing provision in neighbouring authorities does indicate a compelling reason to increase housing targets." (para. 13). The Inspector subsequently published a note to the HDC (July 2015), in which the Inspector considered the housing requirement should be increased further to 800 dwellings per year as it "reflects all the evidence...including revised CLG household projections and the updated position regarding unmet needs in the SHMA with particular reference to Crawley" (paragraph 2). The same conclusion should be reached for MSDC, as Mid Sussex covers a large area and it is relatively unconstrained compared to other neighbouring authorities, including Crawley and Brighton & Hove.

In order to evaluate the potential for providing housing to help meet unmet needs, LUC undertook a Sustainability Assessment of Cross-Boundary Options (SACBO) for the Mid Sussex District Plan. However, the Pre-Submission Draft District Plan states: "The consequence of this proposed provision figure and the latest DCLG 2012-based household projections is that Mid Sussex is not able to contribute towards meeting neighbouring authorities' housing needs". This position does not appear to reflect either the NPPF requirement, or the conclusion of the SACBO that Mid Sussex may be able to accommodate some unmet need. It is therefore suggested that, in order to fulfil the duty to co-operate, MSDC should raise the housing target in the District Plan to take into account the requirement to provide for unmet need in a number of constrained neighbouring authorities.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	7	Mr J Steele	Savills	Thakeham Homes
Code:		Policy	DP6	Object Sustainability Appraisal? <input checked="" type="checkbox"/>

The concept of focusing development towards a new settlement was reviewed within the Sustainability Assessment (SA) and was found to have positive or neutral effects on 12 of the 18 objectives. However this appears to have been based on a new town settlement. A new village settlement therefore, due to the smaller size, is likely to achieve more positive results in relation to the objectives for biodiversity, countryside, efficient land use and especially traffic congestion.

A new village settlement would have the ability to be delivered alongside the District Plan strategy of focusing development within both the three towns as well as the larger and smaller villages. As a result, there would be an increase in growth throughout the District, and not just focussed in one area, as well as the creation of a new, sustainable settlement providing relevant services and infrastructure to support the new residents. There is also scope for a new village settlement to help support some of the smaller villages, which the SA found to be heavily reliant on larger villages and towns.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	8	Mr J Steele	Savills	Thakeham Homes
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP6	<input type="checkbox"/> Object	Sustainability Appraisal? <input type="checkbox"/>

Thakeham Homes' site, as well as providing the necessary homes and community facilities for future occupiers, it will improve significantly the sustainability of the existing settlement of Pease Pottage, with extended bus routes and timetables, cycling and walking improvements and provision of a local centre which will contain community facilities and cafe. On this basis Pease Pottage would move from a Category 3 Settlement to a Category 2.

Change Sought: It is recommended that, following the conclusions of the SA, the scope for new village settlements is included within the District Plan to allow for a broad focus of development which supports and enhances the existing village structure of the District.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	9	Mr J Steele	Savills	Thakeham Homes
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP10	<input type="checkbox"/> Object	Sustainability Appraisal? <input type="checkbox"/>

The LUC Study and Natural England maps show the northern part of Thakeham Homes' land as 'non-agricultural' and the southern half as Grade 3. The third paragraph identifies that Agricultural Land of Grade 3a and above will be protected from non-agricultural development proposals. Given the importance of housing delivery in the District Plan, a wider assessment should be made to release the land for development. Policy DP10 should be clear in this respect.

Notwithstanding this position, as part of these representations, Thakeham Homes is promoting land East of Brighton Road as an omission site, for allocation in a revised District Plan. Should the land be allocated to meet pressing housing needs, then the provisions of DP10 would not apply.

Changes Sought: Amend the third paragraph of the policy to make clear that if there is a need for development this takes precedence over Grade 3 Agricultural Land.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	10	Mr J Steele	Savills	Thakeham Homes
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP14	<input type="checkbox"/> Object	Sustainability Appraisal? <input type="checkbox"/>

As MSDC rightly recognises the NPPF gives great weight to the need to conserve the landscape and scenic beauty of the Areas of Outstanding Natural Beauty (AONB). Notwithstanding this, a number of recent appeals in MSDC have been granted in the AONB including Land at Handcross (Appeal Ref: APP/D3830/A/13/2198213) and Standgrove Field, Ardingly (Appeal Ref: APP/D3830/A/14/2211981). These appeals demonstrate that development in AONB can be considered to meet the definition of sustainable development contained within the NPPF.

The Pre-submission Draft District Plan recognises that nearly 50% of the District is designated as AONB and not all of it is of the same value to the landscape. For instance land to east of Brighton Road in Pease Pottage has been heavily influenced by human impacts over the last century, including the construction of the M23 that borders the site to the north and west, and the service station which sits immediately to the west of the site. These aspects have removed the site's sense of remoteness and tranquillity.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	11	Mr J Steele	Savills	Thakeham Homes
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP25 <input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?	

Thakeham Homes questions Policy DP25 in respect of any inclusion of minimum space standards. These impede the operation of the market and market choice, and hence will have an effect on delivery. Should MSDC seek to adopt any nationally prescribed standards, then it should test the viability implications of doing so. Thakeham Homes questions whether the policy is premature ahead of the final publication of nationally prescribed space standards.

An updated Supplementary Planning Document (SPD) relating to Dwelling Space Standards should be implemented as the 2009 version will be inconsistent with the proposed national standard.

In order to meet with the requirements of NPPF paragraph 182, the requirement of specific space standards should be tested for both economic viability and for the impact on housing delivery.

Change Sought: Consider deleting the policy until such a time as the national space standard is implemented. At which time the matter may be addressed via Policy in SPD, as tested by appropriate viability evidence.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	12	Mr J Steele	Savills	Thakeham Homes
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP29 <input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?	

Thakeham Homes questions Policy DP29 on technical grounds.

The provision of affordable housing is an important element of the site promotion. However, Policy DP29 must be effective. It is recommended that Bullet 1 be amended to read (new text underlined): "A target of 30% affordable housing provision on all residential development providing a net increase of 11 dwellings and above;". This is more effective as it has due regard to the NPPF requirements in respect of delivery and competitive developer returns. Affordable Housing is required in the context of scheme delivery and hence viability. It is one cost of many, alongside for example new infrastructure provision.

Additionally the paragraph which follows the bullets and which relates to the tenure mix, should be moved to the supporting text. This allows for flexibility in the delivery of affordable housing, where currently the Policy is too prescriptive.

Changes Sought: Amend the policy to read 'a target of 30% affordable housing.'

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	13	Mr J Steele	Savills	Thakeham Homes
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP39 <input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?	

Thakeham Homes questions the need for Policy DP39 as the requirements of this policy are already covered by the statutory Building Regulations. As these Building Regulations are a national requirement of all new development, it is unnecessary to repeat these conditions within a District Plan Policy. Thakeham Homes is unaware of any technical evidence on this matter, notably in respect of viability.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	14	Mr J Steele	Savills	Thakeham Homes

Code: Policy DP42 Object Sustainability Appraisal?

Thakeham Homes question the necessity of Policy DP42, notably the requirement to limit to a standard of 110 litres per person per day for residential development. Again, these matters are covered by the Building Regulations.

Changes Sought: Delete reference within Policy DP42 in respect of 110 litres per person per day for residential development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	15	Mr J Steele	Savills	Thakeham Homes

Code: SA-b Policy Sustainability Appraisal?

[Sustainability Appraisal - detailed re-assessment of site included]

Changes Sought: It is recommended that, in order to fully comply with the NPPF and to plan positively for the meeting of unmet need from neighbouring authorities, Mid Sussex must review the SA and should look at sites across the whole District, including those within the AONB. This will require a fundamental alteration to the approach within the District Plan. Therefore, Thakeham Homes urges a re-think from MSDC, to avoid submission of the District Plan in its present form.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	16	Mr J Steele	Savills	Thakeham Homes

Code: Policy DP5 Object Sustainability Appraisal?

As previously stated, there is a requirement for Mid Sussex to positively prepare plans in order to meet unmet requirements from neighbouring authorities (NPPF para. 182). Therefore it is important that, prior to the creation of relevant housing policies, all possible opportunities for development are assessed within the SA. Although the Pre-Submission SA assessed two broad locations for development, it appears no areas within the AONB were considered to help meet the unmet needs from neighbouring authorities.

In order to meet the requirement to provide for unmet need, the SA should have looked at the whole District, and then assessed all sites with respect of environmental (including landscape), social and economic impacts. However, the Pre-Submission SA discounted all sites within the AONB prior to a full assessment being made. Therefore, sites within the AONB which had the potential to provide significant positive economic and social benefits were overlooked, regardless of their potential wider benefits. This is a fundamental failing of the evidence base, and renders the District Plan unsound.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	17	Mr J Steele	Savills	Thakeham Homes
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

MSDC refer to the Strategic Housing Land Availability Assessment (SHLAA) (June 2015) and that this document only shows capacity for 723dpa. There were a number of sites that were not considered suitable by MSDC in the SHLAA on the basis that they were in an Area of Outstanding Natural Beauty (AONB), including Thakeham Homes' site. Sites within AONBs should not necessarily be excluded from the SHLAA as the landscape value can vary significantly. Our client's site is heavily influenced by human impacts including the M23 to the north and west, and the service station to the west. Thakeham Homes suggest that MSDC review the SHLAA sites as a greater capacity than 723 dpa could easily be reached. Furthermore, a review of the MSDC Online Planning Register shows that between April 2014 and March 2015 a total of 976 dwellings were consented under the 'Development Types' Smallscale Major Dwellings, Minor Dwellings and Largescale Major Dwellings. Of these approved applications, only five were sites previously assessed within the SHLAA, comprising a total of 123 dwellings. This therefore shows that the SHLAA does not represent a true reflection of the potential for housing development within the District. Firstly, as there are many sites that are excluded from the SHLAA that may be suitable for development, and secondly, as is seen in the 2014/15 permissions, a significant number of sites are likely to come forward for development which have not been put forward or assessed within the SHLAA. Therefore it is suggested the capacity shown in the SHLAA is not an accurate indication of deliverable sites, and therefore should not be used to limit the housing target. Changes Sought: Thakeham Homes suggests a fundamental redraft of the SHMA evidence, and conclusions on Objectively Assessed Housing Needs (OAN). An independent assessment is required, starting from 2011 of the OAN, with due regard to likely levels of employment growth, affordability, and the substantial unmet housing needs of the sub region (Gatwick Diamond area).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	18	Mr J Steele	Savills	Thakeham Homes
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The HEDNA seeks to provide an update; however Thakeham Homes questions the robustness of the evidence, as it does not adequately reflect socio-economic factors, notably employment growth. Thakeham also questions why the evidence date is 2014, and not 2011. Overall, due to the lack of 'up-to-date' SHMA it becomes difficult to ascertain whether a housing target of 650 dwellings per annum (dpa) is sufficient to meet the housing requirements of the District. This issue was raised by Inspector Geoff Salter in the Horsham District Planning Framework (HDPF) Examination in December 2014. The Inspector was concerned that, due to the absence of a SHMA in 'conventional form', Horsham's OAN did not properly reflect recent data (para. 6). The HEDNA and subsequent update were produced by MSDC, and not by an independent consultancy. Therefore the figure can not be seen as fully 'objective' nor reflective of the wider situation in the relevant housing market area (i.e. at least Horsham and Crawley – ideally the Gatwick Diamond Authorities). An updated SHMA should be produced to reflect the new data available, and therefore state a truly 'objective' OAN.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	19	Mr J Steele	Savills	Thakeham Homes
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

Thakeham Homes therefore recommends for more housing to be directly allocated through the District Plan, so there is less reliance on Neighbourhood Plans, which are unlikely to deliver the required 1,515 dwellings through the lifetime of the plan. Changes Sought: Redraft of Policy DP5 to include a higher planned level of housing, and additional strategic development allocations to deliver this level of growth.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	20	Mr J Steele	Savills	Thakeham Homes
Code:	<input type="checkbox"/>	Policy DP5	<input type="checkbox"/>	Object Sustainability Appraisal? <input type="checkbox"/>

There are currently 19 areas within Mid Sussex preparing Neighbourhood Plans, however only 9 plans have currently been adopted. Of these nine plans, only four have allocated specific sites for housing, equating to 548 dwellings. This indicates that Neighbourhood Plans are a very uncertain way for housing to be allocated, and currently less than 50% of the adopted plans have allocated any housing. Therefore there is concern that the 1,515 dwellings allocated by the District Plan through Neighbourhood Planning is not likely to be delivered, and as a result MSDC will not achieve the required housing figure.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	21	Mr J Steele	Savills	Thakeham Homes
Code:	<input type="checkbox"/>	Policy DP5	<input type="checkbox"/>	Object Sustainability Appraisal? <input type="checkbox"/>

In order to deliver this number of affordable dwellings MSDC would need an OAN of between 387 dpa to 1580 dpa (based on the policy compliant 30% affordable as part of 'most' developments, 11+ dwellings). The stated OAN would only provide enough affordable housing for one out of the six scenarios published within the SHMA updates. In the Inspector's Report for Brighton & Hove City Plan Part One (December 2013) the Inspector emphasised the need that in the NPPF the requirement is for local authorities to assess "their full housing needs (my emphasis), including affordable housing..." This demonstrates the importance for LPAs to look at total housing need. MSDC should therefore raise their OAN in order to deliver a more appropriate amount of affordable housing.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	22	Mr J Steele	Savills	Thakeham Homes
Code:	<input type="checkbox"/>	Policy DP5	<input type="checkbox"/>	Object Sustainability Appraisal? <input type="checkbox"/>

The current housing figure of 650 dpa would provide an average of 278 new jobs per annum, which is significantly lower than the baseline recommended by the EGA, and therefore the OAN should be raised to reflect positive planning for new jobs growth.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20293	23	Mr J Steele	Savills	Thakeham Homes
Code:	<input type="checkbox"/>	Policy DP5	<input type="checkbox"/>	Object Sustainability Appraisal? <input type="checkbox"/>

In the February 2015 HEDNA MSDC applied a 10% uplift on the housing target to account for market signals. However in the Housing Provision Paper (June 2015) MSDC did not consider a similar uplift would be appropriate on the basis that an assessment of market signals was undertaken that concluded it would be unreasonable and unsustainable to uplift this figure and that the Sustainability Appraisal demonstrates that a level of housing provision over 700dpa should be ruled out on sustainability grounds (para. 4.17).The OAN should be an unrestricted figure.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20299	1	Mr O Harwood	RH & RW Clutton	Balcombe Estate
Code:		Policy	DP5	Object
			Sustainability Appraisal?	<input type="checkbox"/>

Using the District Plan allocation proportionally to local population is open to challenge, as most commentators do not agree the District Council proposed 10,600 houses are sufficient to the housing needs of the district. We have seen arguments that suggest the number should be at least 14,500 in the plan period. Moreover, averaging development needs across the District negates the assessment of local need which has been made, and which in the opinion of the Balcombe Estate should be accorded the highest importance. If the Neighbourhood plan can do one thing, it should be to secure enough places for local people to live. The example of the draft Balcombe neighbourhood plan, where even with local goodwill the housing need of over 60 has been halved into a delivery plan for just 34 dwellings as a result of Nimby pressure means that the District's reliance on neighbourhood plans to deliver the 1500 houses you suggest will come forward in the draft plan are unsound. Accordingly, as put in our response on behalf of the Balcombe Estate, both Parish and District should allocate more land for housing if supply is to be secured. The best place to do this at Balcombe is Vintens.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20299	2	Mr O Harwood	RH & RW Clutton	Balcombe Estate
Code:	3f	Policy		
			Sustainability Appraisal?	<input type="checkbox"/>

Urge the Village to designate the Vintens site, which we see as far less damaging to the amenity and landscape of the village than the alternative Rectory/ Balcombe House site. Moreover, were the village to be persuaded that the housing number allocation should be at least the 63 identified as necessary to meet housing need, further land at Vintens would be readily made available without harm to the village.

In particular three sites should, in our view, be allocated which lie outside (but are well related to) the village boundary:

a) The area known as Vintens Nursery, which comprises previously developed glasshouses (and still contains the remnants of those structures) for which a plan was developed by Douglas Rule Associates (attached)

b) The area known as the Walled Garden, to the north of the village

c) A further allocation of housing at Vintens field, to the south of the former waste tip which would provide public open space, sufficient to meet the housing needs of the village, and thus avoiding the need to develop the Rectory / Balcombe House field with the attendant damage to the important vista when approaching the village from the north

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20299	3	Mr O Harwood	RH & RW Clutton	Balcombe Estate
Code:		Policy	DP15	Object
			Sustainability Appraisal?	<input type="checkbox"/>

The plan records the zone of influence applied by MSDC without drawing attention to the fact that visitor numbers are determined by isochrones of journey times, not by distance. It is thus illogical to place a 7km cordon around the forest.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20299	4	Mr O Harwood	RH & RW Clutton	Balcombe Estate
Code:	<input type="text"/>	Policy	DP10	Object
			Sustainability Appraisal? <input type="checkbox"/>	

The Balcombe Estate argues that a rigid approach to fixing the boundary of the built up area of the village risks ossification. Balcombe has grown organically over time, as clearly illustrated in the report prepared on behalf of the Estate by Douglas Rule Associates, following the natural shape of the landscape, and should be enabled to continue to do so, not least in order to secure an allocation to meet housing needs, but also to support service provision within the village.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20299	5	Mr O Harwood	RH & RW Clutton	Balcombe Estate
Code:	1e	Policy	<input type="text"/>	Object
			Sustainability Appraisal? <input type="checkbox"/>	

When the demand from neighbouring districts is properly taken into account the Draft District Plan is unsound both in its own projections and in the deliverability of those projections, as set out in more detail in our response in respect of the Western Arc proposal, which can help meet what we see as a critical undersupply in a wholly sustainable location.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20300	1	Mr L Coffey	WYG	Verdant Homes
Code:	<input type="text"/>	Policy	DP6	Object
			Sustainability Appraisal? <input type="checkbox"/>	

Verdant Homes object to draft Policy DP6. Furnace Wood is a well-established residential estate located between Cophorne and East Grinstead, with part of the area falling within the administrative area of Tandridge District. The area has its own distinct character and identity, comprising of around 80 dwellings with a population in excess of 200 persons (based on 2011 Census data). There is no recognition of Furnace Wood in draft Policy DP6 (Settlement Hierarchy) or in its supporting evidence base. The District Plan sets out the overall development strategy for Mid Sussex, identifying strategic allocations for housing and employment requirements at Burgess Hill. The remaining housing and employment development is proposed to be met at the district's other towns and villages. Draft Policy DP6 sets out to guide the distribution of the remaining development in Mid Sussex to ensure that future development takes place in the most sustainable locations in accordance with the settlement hierarchy. The evidence base underpinning draft Policy DP6 is the Settlement Sustainability Review (May 2015) which provides an assessment of the sustainability of each identified settlement within the district. Furnace Wood is not recognised in the evidence base documentation as an identified settlement, irrespective of it having a population in excess of 200 persons, which is of a comparable size to the Category 4 Settlements defined through draft Policy DP6 (i.e. Slaugham with a population of 120 persons). It is noted that Category 4 Settlements (Small Villages) have limited services often only serving the settlements themselves. Furnace Wood is closely related to East Grinstead (Category 1 Settlement) and Cophorne (Category 2 Settlement), being sustainably located within 3 miles of both settlement centres. In view of its size, in terms of its population and land take, and proximity to two large settlements, our Client believes that Furnace Wood should be recognised as a Category 4 Settlement within draft Policy DP6 and have a recognised built up area settlement boundary. Attached is a plan indicating the development boundary appropriate for the settlement.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20300	2	Mr L Coffey	WYG	Verdant Homes
Code:	<input type="checkbox"/> Policy	DP13	Object	Sustainability Appraisal? <input type="checkbox"/>

With regards to draft Policy DP13 and new homes in the countryside, it is noted that the National Planning Policy Framework (2012) seek to significantly boost the supply of housing and actively encourages the effective use of land by reusing land that has been previously developed. General Permitted Developments Rights also allows for the change of use of agricultural buildings to a residential use, subject to certain requirements. In view of current legislative and planning policy framework it is considered that draft Policy DP13 could be positively enhanced through an amendment allowing for replacement buildings in the countryside provided it is in the same use and not materially larger.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20302	1	Mr J Batte	SOFLAG	
Code:	<input type="checkbox"/> Policy	DP6	Object	Sustainability Appraisal? <input type="checkbox"/>

This is too open ended regarding future development in Burgess Hill and will be used by developers for sites not identified within the Plan. Suggest the words "already identified sites in" should be inserted before the words "Burgess Hill" at Line 3 of the policy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20302	2	Mr J Batte	SOFLAG	
Code:	<input type="checkbox"/> Policy	DP11	Object	Sustainability Appraisal? <input type="checkbox"/>

The policy on strategic gaps is too open ended and again will be used by developers for sites not identified within the Plan. The gaps should be more precisely identified.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20302	3	Mr J Batte	SOFLAG	
Code:	<input type="checkbox"/> Policy	DP16	Object	Sustainability Appraisal? <input type="checkbox"/>

Whilst the wording gives good protection to the land within the National Park it fails to identify that poor development on land directly abutting or near to the National Park will also have a detrimental effect on the Park. Suggest inserting the words "and adjacent to" after the word "within" at Line 1 in the policy will address this concern.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20303	1		Boyer Planning	Vortal Developments
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

Mid Sussex does not operate in isolation and sits within a housing market area with Horsham and Crawley and is also affected by the London sub region as well as the Sussex Coastal sub region. The evidence demonstrates that there is significant under-supply in the area around Mid Sussex, amounting to over 1,700 new homes per annum. What is Mid Sussex's response to this? Provide housing that would not even meet their Objective Assessed Housing Need. How has Mid Sussex cooperated with their neighbouring authorities to seek to meet their needs? This is wholly unclear from the Plan. As an authority that failed the test of the duty-to-cooperate once before (only one of a handful of authorities that have done this), you would have thought that Mid Sussex would be well away of their duties in relation to this matter. However, we have no evidence of any of this taking place. The Plan states that (para 3.17) "The consequence of this proposed provision figure and the latest DCLG 2012-based household projections is that Mid Sussex is not able to contribute towards meeting neighbouring authorities' housing needs." This is exactly the problem. Mid Sussex has not cooperated with other authorities. All it has done has asked them for their housing numbers and come up with a way of not providing anything for them. This is not cooperation, but a unilateral decision by Mid Sussex to not meet any neighbouring authorities needs.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20303	2		Boyer Planning	Vortal Developments
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

Moving on the failure of the Plan to meet the soundness tests. It is clear that the Council, even though there have been numerous appeal and court decisions still cannot make the difference between the household projections, the OAN and the housing requirements figure. The NPPF and NPPG are clear about how housing figures in the Local Plan should be developed and the courts have assisted in the interpretation of this

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20303	3		Boyer Planning	Vortal Developments
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

It is clear that the household projects set out an annual increase of 656 households per annum. This is the basis of developing the overall housing requirements figure. This figure should be augmented by the severe failure of the Council to meet its housing requirement over the past few years leading to a current housing land supply figure of less than two years of supply. In addition, the market signals indicate that the housing figure should be increased (not decreased). Mid Sussex indicate that this should be by 10%, however, having regard to the affordable housing data and other data relating to housing delivery and prices, we would argue that this should be much higher.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20303	4		Boyer Planning	Vortal Developments
Code:		Policy	DP5	Object Sustainability Appraisal? <input checked="" type="checkbox"/>

It has not been demonstrated within the SA and the Plan that some additional needs could not be accommodated within the District. The SA, in fact, indicates that up to 800 new homes per annum could be accommodated, although there would be some adverse effects. However, these would not be so substantial so that that this option should be ruled out. Indeed, there are significant benefits from accommodating additional housing.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20303	5		Boyer Planning	Vortal Developments
Code:	<input type="checkbox"/>	Policy DP6	Object	Sustainability Appraisal? <input type="checkbox"/>

Whilst some neighbourhood plans have come forward in advance of the Local Plan, it is clear that these have sought to deliver significantly below the numbers proposed in the Local Plan. For example, Hurstpierpoint and Sayers Common Neighbourhood Plan allocated up to 292 new dwellings, whilst the HEDNA indicated that this area should be looking to deliver 560 new homes. This is the same situation across the District. Upcoming neighbourhood plans for areas such as Albourne have a significant role to play in meeting the housing needs across the District, including meeting the minimum housing numbers set out in the Local Plan. The HEDNA notes that Albourne should contribute a minimum of 50 new homes over the plan period. Whilst the HEDNA cautions against the use of these figures, when considering the higher supply in some areas (Burgess Hill) against the anticipated undersupply in others, we would anticipate that these figures should be used as a minimum for the forthcoming neighbourhood plans. Albourne is identified as a category 3 settlement, yet is envisaged to provide less housing than category 4 settlements such as Ansty and Staplefield (132 dwellings) and Slaugham (220 dwellings). This proposed distribution runs contrary to national policy on sustainable development and would lead to an unsustainable pattern of development in Mid Sussex.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20303	6		Boyer Planning	Vortal Developments
Code:	<input type="checkbox"/>	Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

However, the biggest problem with the so called OAN is that it is constrained by the findings of the Sustainability Appraisal and other constraints that the Council has decided to impose. This is clearly contrary to the approach endorsed by the Court of Appeal in Hunston and government policy and guidance. The figure at this stage should not be constrained in any way. Therefore, having regard to the starting point of 656 new homes per annum and the additional at least 10%, the OAN should be at least 721 new homes per annum.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20305	1	Mr A Ross	The Theatres Trust	
Code:	<input type="checkbox"/>	Policy DP22	Support	Sustainability Appraisal? <input type="checkbox"/>

The Theatres Trust supports the changes made to Policy DP22 Leisure and Cultural Facilities and Activities, particularly the final paragraph, to safeguard cultural facilities. The policy now reflects item 70 of the National Planning Policy Framework which states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20306	1		Tim North & Associates Ltd	APH Ltd
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP5 places an over-reliance on a single strategic development site situated to the north and north west of Burgess Hill to meet the District Council's future housing requirements between 2014 and 2031, representing 70% of what is needed once completions and total housing commitments are taken into account.

The strategy upon which Policy DP5 is based does not provide for a reasonable choice in terms of housing sites, which otherwise are available and deliverable, neither does it comply with the underlying objectives of the Coast to Capital LEPs Strategic Economic Plan, nor does it provide assistance to small builders at a time when the Government has now set aside a cash boost of £100million in recognising and supporting their important role in keeping the country building, nor has any contingency been put in place should the Government decide that a second runway at London Gatwick Airport be provided.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20306	2		Tim North & Associates Ltd	APH Ltd
Code:	3c	Policy	Object	Sustainability Appraisal? <input type="checkbox"/>

The Burgess Hill Strategic Development Site is unlikely to meet, to any significant degree, the unmet housing needs of Crawley Borough Council and Wealden District Council, as becomes evident from Table 4.2 of the Final Report entitled "Sustainability Assessment of Cross-Boundary Options for the Mid Sussex District Plan". It will not meet any of the extrapolated unmet housing needs of Tandridge District Council up to 2031, which the Housing Provision Paper considers amount to a total of 6580 homes, but which more recent, objectively assessed housing needs studies have shown is far greater.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20306	3		Tim North & Associates Ltd	APH Ltd
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP5 states that a figure of 1515 homes are to be allocated through Neighbourhood Plans or other appropriate planning documents over the time period of the District Plan. No mechanism exists in which neighbourhood forums, developers and other interested parties have a clear indication of the degree of housing provision each neighbourhood forum will be expected to meet into the future, even as a minimum figure. The only information available are figures proportioned out to Neighbourhood Plan areas which are to act as a guide of likely future needs, and not as a target. There is no guarantee that the numbers of dwellings indicated to be allocated through neighbourhood plans will actually come to fruition.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20306	4		Tim North & Associates Ltd	APH Ltd
Code:	3g	Policy		Sustainability Appraisal? <input type="checkbox"/>

The fact that four Neighbourhood Plans have been made, and others are approaching examination, will not ensure future housing needs in the District will be met within the foreseeable future. Moreover, as was cited in the High Court decision involving R (on the application of Gladman Developments Ltd) v Aylesbury Vale District Council and Winslow Town Council (2014) EWHC 4323 (Admin) "... If a neighbourhood development plan policy becomes out of date, that may be a material consideration justifying departure from the policy, and the grant of planning permission for development even though the proposed development would not accord with the neighbourhood development plan policy ..." This situation is the antitheses of what is required as part of a plan led system.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20306	5		Tim North & Associates Ltd	APH Ltd
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

Neighbourhood plans will "not necessarily be available to assist in meeting neighbouring authorities' unmet needs" (paragraph 4.19 of the Housing Provision paper). Secondly, considerable doubts exist on whether large scale releases of land, below that of a strategic size ,but still in excess of 150 houses, are likely to come forward through a neighbourhood plan, even in cases where the potential supply of land with the benefit of planning permission is less than the objectively assessed need for the particular neighbourhood plan area. This situation arises in the case of land owned by APH Ltd comprising previously developed land where there is an absence of constraints, and which will soon become surplus to requirements. In this case, and despite a potential deficit in terms of the supply of land when measured against the objectively assessed need for the area around Crawley Down, a deficit of 203 houses is apparent. This set of circumstances arises at a time when the emerging Crawley Down Neighbourhood Development Plan contains no housing allocations in the Submission Version.

These considerations are required to be assessed in the light of the fact that large windfall sites are only likely to deliver housing in the short to medium term, with the numbers from the same source declining into the future.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:	
20306	6		Tim North & Associates Ltd	APH Ltd	
Code:		Policy	DP5	Object	Sustainability Appraisal? <input checked="" type="checkbox"/>

An examination of the Pre Submission Sustainability Appraisal (incorporating Strategic Environmental Assessment) reveals that the Council's preferred option in terms of the most sustainable way to distribute planned development including housing within the Council's administrative area is within or adjacent to Burgess hill, East Grinstead and Haywards Heath, at the same time encouraging both larger villages and smaller villages to take growth to support the provision of additional services and meet local needs. The basis of this preferred option is not challenged. However, it is the manner in which it has been encompassed within the policies of the Pre-Submission Draft Mid Sussex District Plan 2014-2031 which is considered unsound. Policies DP5, DP7 and DP8 all relate to development in terms of housing provision, but it is concentrated solely in Burgess Hill as part of strategic developments north and north west of the town, as well as east of the same settlement at Kings Way.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20306	7		Tim North & Associates Ltd	APH Ltd
Code:		Policy DP7	Object	Sustainability Appraisal? <input checked="" type="checkbox"/>

An examination of the Pre Submission Sustainability Appraisal (incorporating Strategic Environmental Assessment) reveals that the Council's preferred option in terms of the most sustainable way to distribute planned development including housing within the Council's administrative area is within or adjacent to Burgess hill, East Grinstead and Haywards Heath, at the same time encouraging both larger villages and smaller villages to take growth to support the provision of additional services and meet local needs. The basis of this preferred option is not challenged. However, it is the manner in which it has been encompassed within the policies of the Pre-Submission Draft Mid Sussex District Plan 2014-2031 which is considered unsound. Policies DP5, DP7 and DP8 all relate to development in terms of housing provision, but it is concentrated solely in Burgess Hill as part of strategic developments north and north west of the town, as well as east of the same settlement at Kings Way.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20306	8		Tim North & Associates Ltd	APH Ltd
Code:		Policy DP8	Object	Sustainability Appraisal? <input checked="" type="checkbox"/>

An examination of the Pre Submission Sustainability Appraisal (incorporating Strategic Environmental Assessment) reveals that the Council's preferred option in terms of the most sustainable way to distribute planned development including housing within the Council's administrative area is within or adjacent to Burgess hill, East Grinstead and Haywards Heath, at the same time encouraging both larger villages and smaller villages to take growth to support the provision of additional services and meet local needs. The basis of this preferred option is not challenged. However, it is the manner in which it has been encompassed within the policies of the Pre-Submission Draft Mid Sussex District Plan 2014-2031 which is considered unsound. Policies DP5, DP7 and DP8 all relate to development in terms of housing provision, but it is concentrated solely in Burgess Hill as part of strategic developments north and north west of the town, as well as east of the same settlement at Kings Way.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20306	9		Tim North & Associates Ltd	APH Ltd
Code:		Policy DP5	Object	Sustainability Appraisal? <input checked="" type="checkbox"/>

No mechanism is provided within those relevant housing policies in the Pre Submission Version of the District Plan to ensure that neighbourhood plans will provide the necessary future development which is to be focused on East Grinstead and Haywards Heath, as much as it is expected to be concentrated within or adjacent to Burgess Hill. No strategic housing allocations have been afforded to East Grinstead or Haywards Heath, and there is no procedure through any housing policy in the emerging District Plan which ensures that the preferred option in terms of the distribution of development relating to these three towns will be achieved. To this end, the SA/SEA has not been afforded the necessary priority in the preparation of the relevant housing policies in the Pre Submission Version of the District Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20306	10		Tim North & Associates Ltd	APH Ltd
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The Pre-Submission Version of the Mid Sussex District Plan has not carried out the vital first step of assessing fully and objectively the need for market and affordable housing in the SHMA in accordance with the requirements of paragraph 159 of the NPPF.

The manner in which the Council have sought to meet its fully objectively assessed housing needs in the housing market areas covered by the District has not taken into account ONS Mid Year estimates for population for 2014, which provide detailed information about past trends and how the population may change in the future. In this way, they are important for planning and development purposes, if only because they provide the basis for the National and Sub-National Population Projections, and ultimately household projections.

In the case of Mid Sussex District Council's administrative area, the mid year estimates for population in 2014 reveal more people than has been previously projected.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20306	11		Tim North & Associates Ltd	APH Ltd
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

There is a need to carry out a full objective assessment of housing needs in accordance with the provisions of paragraph 159 of the NPPF, starting with the first process of identifying market and affordable housing requirements in an up to date SHMA, and the same time taking into account the latest Mid Year estimates for population for 2014 published by ONS.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20312	1	Mr S Cox	Tim North & Associates Ltd	Sean Cox
Code:		Policy	DP13	Object Sustainability Appraisal? <input type="checkbox"/>

Policy DP13 makes no provision for the replacement of an existing dwelling in in the countryside by a new dwelling, and to this end, it is more restrictive than what would constitute "not inappropriate" development in a Green Belt.

The policy implies that where an existing dwelling is situated in the countryside, it occupies an isolated location, when in reality there are many occasions where dwellings are situated in close proximity to an existing settlement, and thereby could not be said to occupy an isolated location.

The replacement of dwellings in the countryside is more likely to support a prosperous rural economy in accordance with paragraph 28 of the NPPF, at the same time enhancing the character, appearance and biodiversity credentials of the surrounding landscape, in accordance with the requirements of Chapter 11 of the NPPF than the alternative of simply leaving a dwelling to become derelict and take on an unkempt appearance providing no benefits seen in terms of any of the three dimensions of sustainable development. .

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	1	Mr M Evans	Gladman	
Code:	1e	Policy		
Sustainability Appraisal? <input type="checkbox"/>				

Gladman question whether the Council have engaged in an active and effective manner on cross boundary strategic issues. There is no evidence supporting the plan detailing active and ongoing cooperation, specifically with regard to housing issues and the wider housing market area. There is also no evidence to suggest that any engagement has taken place with the Mayor of London, a prescribed body in the PPG.

When the draft plan was previously consulted upon the document did not indicate a draft housing number for Mid Sussex. As a result a large number of the adjoining authorities responded to this consultation confirming that they could not comment at this stage on the housing policies within the plan. The current consultation on the pre submission version of the plan is not accompanied by a duty to cooperate statement, it is difficult therefore to see how the plan can have been prepared with ongoing cooperation with neighbouring authorities throughout the plan process.

Gladman is concerned that it can find no record of engagement between Mid Sussex and the Mayor of London with regard to the Duty to Cooperate. As we will discuss in the Objectively Assessed Housing Needs section of this statement the finding of the Further Alterations to the London Plan will require significant cross boundary working to deal with the level of unmet housing needs beginning to emerge from London.

To first consider the issue of the South Downs National Park, we acknowledge that this forms part of the administrative areas of Mid Sussex but our understanding is that the housing requirement and OAN derived currently divorces any numbers of need for the area of the district within the National Park from that listed within the plan. We would therefore submit that the plan needs to be clear that it is not seeking to provide housing for the portion of the district within the National Park.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	2	Mr M Evans	Gladman	
Code:	SA-b	Policy		
Sustainability Appraisal? <input type="checkbox"/>				

Gladman have concerns about the Sustainability Appraisal (SA) and the documentation which underpins it. We are concerned that certain parts of the appraisal arrive at unjustified conclusions and that the weighting of certain factors is influenced by evidence based documentation which is not fit for purpose. We believe that the SA needs to be revisited and some key assumptions reconsidered.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	3	Mr M Evans	Gladman	
Code:		Policy	DP5	Object
Sustainability Appraisal? <input type="checkbox"/>				

Having considered the Councils evidence on OAN for housing Gladman have concerns that an NPPF and PPG compliant methodology has not been used to derive the OAN for Mid Sussex. In order to consider these issues in more detail Barton Willmore were appointed to undertake a peer review of the work. They have noted a number of flaws in the Councils process in deriving its OAN and believe that the OAN arrived it is a significant under estimation of what the OAN for Mid Sussex actually is.

Part of the considered failing with the OAN for Mid Sussex is that it applies reductions to the OAN on the basis of constraints before properly arriving at a figure. Any such constraints should only be considered in setting the housing requirement, after a robust OAN has been derived. Gladman also believe that the way in which the housing requirement has been arrived it is not clear or robust, we question many of the constraints assumed by the District Plan, through the LUC Capacity Study, and do not consider them to be in conformity with National Policy.

To meet the requirement to provide for a higher level of homes in Mid Sussex and to help with the levels of housing need in the wider and surrounding housing market areas the plan should be focussing a greater level of housing towards a greater range of settlements throughout Mid Sussex.

The objective assessment should identify the full need for housing before the Council consider undertaking any process of assessing the ability to deliver this figure. In addition, \$159 specifically relates to catering for both housing need and housing demand within the authority area.

OAN must be a two stage process, which first identifies an unconstrained OAN and then goes on to consider, robustly, what the housing requirement for a district should be. In the case of Mid Sussex the situation is far from clear given the evidence presented, as such Gladman commissioned Barton Willmore to undertake a review of the work produced by the Council

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	4	Mr M Evans	Gladman	
Code:	3b	Policy		
Sustainability Appraisal? <input type="checkbox"/>				

The housing policies in the plan, and the strategic site allocations, promote a high risk strategy highly dependent on two sites, in one location, to deliver the planned housing numbers. We do not consider this a sound strategy. Not only will such a strategy fail to effectively plan for growth in rural areas but it will also cause problems in the ability of the plan to demonstrate a continuous land supply for housing, given the time that is often taken to bring large extension sites forward. The concept of such sites is supported, but this must be done with a balance of other sites to help meet the needs of all settlements and to provide a responsive supply of housing land.

We do not consider it robust to identify only two allocations, have them derive more than 30% of the plans requirements and to locate them in the same settlement. This is a high risk strategy and the delivery of the plan would be in serious chance of failure should anything negatively influence the development of either site. As well therefore as needing to increase the housing requirement of the plan, we are also of the view that the strategy in terms of the delivery of development on two sites in the same settlement is flawed.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	5	Mr M Evans	Gladman	
Code:	1b	Policy		Sustainability Appraisal? <input type="checkbox"/>

ix. The policies within the plan are also currently written in a negative sense, contrary to the NPPFs desire to see sustainable development come forward without delay. The negative, none NPPF compliant blanket restrictions on development on, for example, agricultural land are a serious failing of the plan and will fundamentally undermine its strategy. Furthermore certain restrictive policies, such as that considering the Ashdown Forrest need to be reconsidered in light of recent legal judgements.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	6	Mr M Evans	Gladman	
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

Furthermore there is no evidence in the submitted documentation that cooperation has been undertaken to identify what the housing market area is for Mid Sussex. We would expect to see this as one of the cornerstones of the duty to cooperate as it is vital in ensuring that the plan helps meet any cross boundary needs for housing.

- a. The starting point estimate used in the HEDNA 2015 is incorrect as it does not factor in the necessary vacancy rates to the demographic projection.
- b. The February 2015 based HEDNA used an indexed approach to household formation, the HEDNA June 2015 makes no such adjustment despite highlighting issues with the 2012 based rates. A return to 2008 based rates for those aged 25-34 and those 35-44 should be considered.
- c. Migration trends are considered, at best, conservative. They significantly under project the actual levels of migration being seen.
- d. The use of FTE as a measure of job growth is not appropriate when seeking to establish the equivalent growth in labour force. The job growth currently used in the HEDNA 2015 does not match with the Councils economic evidence or the latest projections and trends.
- e. The original HEDNA contained a market signals uplift of 10% on top of baseline OAN, the June 2015 HEDNA removes this 10% because it would be unsustainable, this is wholly in contrast to the PPG.
- f. The 650 dwelling per annum would not exceed the assessed affordable housing needs as claimed in the HEDNA if the 'high' scenario of the Affordable Housing Needs Model Update (2014) is considered.
- g. The HEDNA is intended to provide the OAN for Mid Sussex but was undertaken in isolation. The Mid Sussex Housing Provision Paper June 2015 provides the link between OAN and unmet needs of neighbouring authorities to determine the plan number, but does not adequately address the HMA issues.

Whilst we acknowledge that Mid Sussex does have designations which may have some constraining effect on the ability of the plan to deliver is full OAN, we consider the position as stated by LUC, to overly inflate some elements of what it deems to be constraints and consider that the full reflection of what the NPPF says with regard to this subject has not been outlined.

We believe that the Council has not fully demonstrated what scale of development could be suitably delivered throughout the AONB, considering the needs of those settlements washed over by it, and how this could be used to help deliver a high proportion of the OAN for the District. One way in which the Council could remedy this is through a detailed study of the AONB to identify sites which could be released without having significant impact upon the AONB.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	7	Mr M Evans	Gladman	
Code:		Policy	Object	Sustainability Appraisal? <input checked="" type="checkbox"/>

The SA which supports the District Plan is underpinned by a number of studies, most crucially, the Capacity of Mid Sussex District to Accommodate Development document produced by LUC in June 2014. In our comments under DP5 Gladman make comment on the failings of this document in the way it assesses constraints in Mid Sussex. We therefore believe that this document needs to be revised or reconsidered and as a consequence revisions will be required to the SA.

The SA then goes on to appraise the ability of Mid Sussex to accommodate the various levels of unmet need identified in the surrounding districts. Whilst we can understand some of the logic behind this approach, Gladman are of the firm opinion that the Council does not fully or properly identify the OAN for Mid Sussex, part of the failing in doing so is considering the wider unmet needs of the housing market area. Therefore the SA may not be appraising the full OAN for Mid Sussex in any of its options.

Housing options of 500-800+ but not sure which option identifies the OAN for Mid Sussex.

Access to health and education - acknowledges that provision of housing will facilitate improved facilities which Gladman endorse, however the options delivering a higher quantum of housing do not score as well as those delivering the middle range of housing. Why do options D and E score less positively than B and C?

Cohesive communities - Character of a settlement is extremely subjective and we would argue that this is a flawed approach to take. High quality development in accordance with the NPPF should limit negative aspects on this objective.

Objectives 8 and 9 - There are fundamental flaws with the LUC Capacity Study. Once this is revised, the SA will also need to be reconsidered.

Economic factors 15, 16 and 17 - undervalued in the SA process and do not represent a suitable balance of their value in achieving sustainable development. Do not agree with the rating given to D and E for "regeneration of town centres". Do not accept that competition in the form of retail centres would limit footfall. Points 16 and 17 are underscored, should be '++'.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	8	Mr M Evans	Gladman	
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP6	<input type="checkbox"/> Object	<input checked="" type="checkbox"/> Sustainability Appraisal?

Gladman would note that the SA expresses support, in terms of development distribution, for option C which seeks to focus development in the 3 main towns but also encourages development in both the larger and smaller villages. Gladman would agree with the SA in this regard and support this development strategy, however we would strongly question how this translates into the actual strategy within the District Plan, particularly in policies DP5 and DP6.

6.2.26 Gladman consider that as written the policy is overly restrictive with regard to development outside of the settlement boundary. As has been discussed above the level of allocations in the plan is limited to two sites at Burgess Hill, there is therefore nothing within the plan to ensure that the development required to support the needs of the other settlements will be met over the plan period. The plan is absent and silent when it comes to planning to meet the needs of the other communities, particularly those in more rural areas. The plan cannot be seen to be positively prepared given the restrictions currently outlined in the policy, which effectively state that no development will be supported if not within a Neighbourhood Plan or Council allocations document, this policy effectively applies a blanket restriction to development on non-allocated sites with no regard to the sustainable nature of any proposed site as outlined within the NPPF. The restrictions outlined in the policy should be removed and a more proactive approach to sustainable development inserted into the policy to reflect the NPPF.

Furthermore it is unclear if the categorisation of settlements has been considered in light of the restrictions and blanket designations considered in the LUC report. We would consider that given the comments we have outlined earlier in this report, that if some settlements have been lowered down the tier, and some elevated to take account of constraints (particularly the Ashdown Forrest Zone) then they should be reconsidered.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	9	Mr M Evans	Gladman	
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP15	<input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?

6.1.14 In terms of other secondary constraints our primary concern relates to the inclusion of the Ashdown Forest buffer zone. It was our understanding that following the recent judgement, Ashdown Forrest Economic Development LLP and (1) Wealden District Council (2) South Downs National Park Authority , that Wealden has dropped the 7km zone and the requirement for SANGS. In this instance the LUC work and the plan need to be reconsidered to reflect this position and to effectively remove the constraint from the plan. We would consider that this should then indicate an ability for the housing requirement to increase to reflect meeting more of the full OAN for Mid Sussex.

It is our understanding that a recent court case has led to Wealden District Council needing to review the 7km zone around the forest. We therefore submit that this policy will need to be altered in order to reflect this recent judgement.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	10	Mr M Evans	Gladman	
Code:	<input type="checkbox"/> Policy	<input type="checkbox"/> DP5	<input type="checkbox"/> Object	<input type="checkbox"/> Sustainability Appraisal?

The policy contains reference to the preparation of a Site Allocations Plan should neighbourhood plans not come forward, or do not deliver the levels of development envisaged. Gladman would support the Council in having a contingency but would suggest that firm triggers are required in order to ensure delivery. Time periods and criteria should be clearly set within the policy explaining when the production of a Site Allocations document will be triggered.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:	
20317	11	Mr M Evans	Gladman		
Code:	<input type="checkbox"/>	Policy	DP8	Object	Sustainability Appraisal? <input type="checkbox"/>

Gladman acknowledge the role that strategic sites of this nature can make to the delivery of a planned target. However as discussed earlier in this representation we believe it is extremely risky to rely on just two such sites to meet such a large portion of the housing requirement of the area. The delivery of large urban extensions such as these is often fraught with difficulty and can involve a lengthy delay in the delivery of sites. In order to try and fully understand the implications and time delays associated with the delivery of urban extensions Gladman commissioned Hourigan Connolly to produce a report looking at the times lines involved with the delivery of such sites and the issues which can influence delivery. The report is attached as Appendix 2 of this submission. The headline fact from the report is that the delivery of houses from such sites can take as long as 9 years.

For these reasons Gladman consider that the policy of allocating just two strategic sites is not justified or effective. The plan needs to provide a full suite of sites, of various sizes, not only to ensure that the needs of a range of settlements and communities can be met in a plan lead manor, but also in order that sites which are smaller in scale and can come forward and be delivered to ensure that Mid Sussex has a deliverable supply of housing in the short term in accordance with the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:	
20317	12	Mr M Evans	Gladman		
Code:	<input type="checkbox"/>	Policy	DP9	Object	Sustainability Appraisal? <input type="checkbox"/>

Gladman acknowledge the role that strategic sites of this nature can make to the delivery of a planned target. However as discussed earlier in this representation we believe it is extremely risky to rely on just two such sites to meet such a large portion of the housing requirement of the area. The delivery of large urban extensions such as these is often fraught with difficulty and can involve a lengthy delay in the delivery of sites. In order to try and fully understand the implications and time delays associated with the delivery of urban extensions Gladman commissioned Hourigan Connolly to produce a report looking at the times lines involved with the delivery of such sites and the issues which can influence delivery. The report is attached as Appendix 2 of this submission. The headline fact from the report is that the delivery of houses from such sites can take as long as 9 years.

For these reasons Gladman consider that the policy of allocating just two strategic sites is not justified or effective. The plan needs to provide a full suite of sites, of various sizes, not only to ensure that the needs of a range of settlements and communities can be met in a plan lead manor, but also in order that sites which are smaller in scale and can come forward and be delivered to ensure that Mid Sussex has a deliverable supply of housing in the short term in accordance with the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:	
20317	13	Mr M Evans	Gladman		
Code:	<input type="checkbox"/>	Policy	DP10	Object	Sustainability Appraisal? <input type="checkbox"/>

The policy is written and prepared in a negative manor and is contrary to the NPPF. Gladman object to the inclusion of a policy of this nature and do not believe it to be conducive to positively promoting sustainable development. Of major concern is that the policy confirms that the primary aim of the plan is to secure the protection of the countryside, not to provide sustainable development as might be considered the thrust of what positive planning should do in accordance with the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	14	Mr M Evans	Gladman	
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The LUC report confirms that 1% of land within the district would be considered Grade 2 (primary constraint) and 64% of the land would be considered Grade 3 (secondary constraint) . As mentioned above we do not consider these to be robust constraints in accordance with the NPPF, and as can be seen they are applied by LUC as a constraint to a significant portion of the District. We firmly believe that using agricultural land as a blanket constraint is a flawed approach contrary to the NPPF and as such serves to significantly underplay the amount of the full OAN Mid Sussex could meet. The report also considers that public rights of way are a primary constraint in terms of land development. Gladman do not consider this to be a robust or defensible position. We have extensive working knowledge of sites around the country which include public rights of way. It is our experience that public rights of way can be designed into development as part of the process of considering site development options, often with a net positive impact on the quality and usage of the right of way in question. To consider them as constraints to development is to miss the point as to what the purpose of a public right of way is, to allow access into and through land. LUC also consider Conservation Areas to be a secondary constraint to restrict development, this is directly in conflict with para 137 of the NPPF which states:- “Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance.” Again therefore we would question the blanket restriction when well-designed development could aid this objective. Furthermore, as discussed above with regard to other designations, Conversation Areas are not listed within footnote 9 to NPPF para 14.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	15	Mr M Evans	Gladman	
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

Policy DP5 confirms that Mid Sussex is a 20% authority due to persistent under delivery and also explains that the Council does not look to include windfall within their housing requirement. Gladman would support the Council on both of these points.What is clear therefore is that the NPPF highlights that development should be restricted but it does not warn us that no development should take place. In the case of Mid Sussex a significant number of settlements are contained within the AONBGladman maintain that the full OAN for Mid Sussex is significantly above that planned for and that the likelihood is that seeking to meet the OAN in full would require the loss of agricultural land. Para 112 is clear that this is a choice of preference, it is a markedly different classification than those discussed above in relation to Para 14, footnote 9 of the NPPF. We do not therefore believe that agricultural land quality should be used as a constraint to stop Mid Sussex from meeting its full OAN

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20317	16	Mr M Evans	Gladman	
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

It is Gladmans estimation that the OAN for Mid Sussex is significantly higher than the figure put forward in the Council evidence and that it is something closer to the 1,000 dpa figure. The Council has effectively failed to properly follow the 2 stage approach to defining its Housing Requirement at the first hurdle by failing to properly identify what its OAN is. On that basis we consider that the plan as submitted is not positively prepared, justified, effective or consistent with national policy. The work undertaken by Barton Willmore has concluded that the OAN for Mid Sussex is likely to be circa 1,000dpa., the figure of 656 advocated by the HEDNA June 2015 is therefore well below what the actual unconstrained OAN for Mid Sussex is.[Detailed methodology and assessment attached]

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	1	Mr W Cobley	Turley	Countryside Properties
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

Our client has been working with the local community over the last 18 months, which has led to part of the site appearing as an allocation in the recently published Pre-Submission version of the Ansty and Staplefield Neighbourhood Plan. Policy AS6: Land off Bolney Road, Ansty within the Neighbourhood Plan says that the site is considered suitable for approximately 18 dwellings. Our client welcomes this allocation, but considers that the larger site is also suitable for residential development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	2	Mr W Cobley	Turley	Countryside Properties
Code:	3g	Policy		Sustainability Appraisal? <input type="checkbox"/>

Our client supports the plans intention to deliver some housing through Neighbourhood Plans (NP). This approach accords with para. 184 of the National Planning Policy Framework (NPPF)

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	3	Mr W Cobley	Turley	Countryside Properties
Code:	1f	Policy		Sustainability Appraisal? <input type="checkbox"/>

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

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	4	Mr W Cobley	Turley	Countryside Properties
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

Paragraph 159 of the NPPF sets out a requirement for LPAs to prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries (our emphasis). The Council has followed a non-housing market area approach, which we consider will not have been able to fully account for the functional links between the authorities that constitute the housing market, and is therefore deficient in this respect, and contrary to the approach advised in the NPPF and NPG.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	5	Mr W Cobley	Turley	Countryside Properties
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

Paragraph 17 of the NPPF1 requires Council's to take account of market signals as part of their assessment of housing need. The approach taken in the HEDNA (March 2015), applies an uplift of 10% on top of the baseline OAN (paragraph 7.6), but we consider this to be unjustified and contrary to the advice within the PPG. If this approach is appropriate, then the 10% uplift should be applied to the baseline figure in the Update HEDNA (July 2015).

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	6	Mr W Cobley	Turley	Countryside Properties
Code:		Policy DP29	Object	Sustainability Appraisal? <input type="checkbox"/>

We consider that the affordable housing target in the Plan is too low and falls well below the identified need. The policy also lacks flexibility to address the shortfall of affordable housing that will inevitably result from those sites that are not able to deliver the full 30% target.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	7	Mr W Cobley	Turley	Countryside Properties
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

It is unclear from the evidence whether the Council has appropriately engaged with its neighbours regarding their strategic priorities for delivering new homes and jobs in the area, as required by paragraph 156 and 178 of the NPPF. It is unclear how the Council has addressed the shortfall in housing that has occurred against the requirements set out the South East Plan. That aside, it is also important to consider how any shortfall that may emerge across neighbouring authorities will be met in other LPA areas including Mid Sussex.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	8	Mr W Cobley	Turley	Countryside Properties
Code:		Policy DP6	Support	Sustainability Appraisal? <input type="checkbox"/>

Our client supports the principle of the Settlement Hierarchy policy, which seeks to ensure that development is provided in the most sustainable locations. In the case of Mid Sussex this constitutes the Category 1 Towns of Burgess Hill, East Grinstead and Haywards Heath. Whilst this approach can also be applied to the lower tier settlements, greater regard needs to be had to the function of those settlements, and their proximity and reliance on larger settlements for local services and facilities.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	9	Mr W Cobley	Turley	Countryside Properties
Code:		Policy DP6	Support	Sustainability Appraisal? <input type="checkbox"/>

Our assessment of these matters supports the relocation of Ansty village from a category 4 to a category 3 settlement. This assessment is further explained in our comments on the Council's Settlement and Sustainability Review below. Given its proximity to services within nearby settlements and the absence of any overriding environmental constraints, we consider that Ansty's position within the settlement hierarchy should be altered to Category 3 to reflect its potential to provide a significant contribution to the housing needs of the district in a sustainable location.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	10	Mr W Cobley	Turley	Countryside Properties

Code: Policy DP10 Object Sustainability Appraisal?

Our client supports the overriding objectives of this policy to protect the countryside and resist inappropriate development. The policy recognises that some existing areas of countryside adjacent to settlements may be re-classified as part of built-up area boundary reviews undertaken through Neighbourhood Plan or a Site Allocation Development Plan Documents. However, in view of Mid-Sussex's acknowledged record of persistent under delivery of housing and the emphasis of para. 47 of the NPPF for local authorities to take steps to boost significantly the supply of housing, we believe that this text should be strengthened to make clear that applications for housing development on edge of settlement sites may be acceptable, in circumstances where the local authority is unable to demonstrate a five year supply. Amend text to acknowledge that housing development on some edge of settlements sites may be acceptable where the Council is unable to demonstrate sufficient housing supply and the proposals are in general accordance with the other policies in the plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	11	Mr W Cobley	Turley	Countryside Properties
Code:	1h	Policy		
			Sustainability Appraisal?	<input type="checkbox"/>

The methodology takes into account the functional relationship between two or more settlements, by allowing for the scenario where a settlement does not provide a service or facility but where this is provided by a nearby settlement. We believe this methodology is flawed for the following reasons: a. The distance used is inappropriate with no clear guidance or justification presented by the council for the use of the private car or selection of the 5km threshold. b. The methodology presents a conflict with sustainability objective (11) to reduce road congestion and the number of journeys by private car. c. The preferred option within the District Plan will focus more development to the villages where public transport is not as frequent or convenient, so assessment considering other sustainable transport options must be a consideration to reduce private car use and aid the development of priorities for improved infrastructure or transport services in these areas as demand rises. Guidance available from the Chartered Institute of Highways and Transportation (IHT) references maximum distances to key services and facilities of 2km and 5km respectively for walking and cycling to replace short car journeys. We request that the shared services methodology be amended to incorporate the IHT maximum walking and cycling distances in place of the assumption on the use of private car in order to promote the use of sustainable transport in the district. With the exception of Staplefield and Warninglid (which are both within the High Weald AONB), Ansty is the only Limited Local Service Centre classified as a Category 4 settlement. All the others, including those with shared services, are identified as Category 3 settlements within the Review. In addition to Cuckfield, Ansty is also within 5km of two Category 1 Mains Service Centres (Burgess Hill and Haywards Heath) and one other Limited Local Service Centre classified as Category 3 (Bolney), making the Ansty settlement a strong location in terms of service provision and not well defined by the Category 4 settlement description of 'having very few services or facilities' when considered in the context of the settlements nearby. By comparison, Twineham; also classified as a Category 4 settlement; is comparable in size to Ansty but offers less settlement services and is in a significantly less favourable location for the sharing of services within 5km as only Hurstpierpoint (Category 2) and Albourne, Bolney and Sayers Common (Category 3) can serve its location. Based on the above and the further commentary on accessibility and environmental constraints below, we suggest that Ansty's classification within the settlement hierarchy be reconsidered by the Council as its shared service provision as a Limited Local Service Centre and location within the district is better suited to classification as a Category 3 settlement. We also request an amendment to the scoring of Ansty within Table 6 (Settlement Services) as no score has been given for 'significant local employment opportunities within 5km'. Based on the information provided by the Council in Table 2 within the Review appendices (Census 2011 data) 24.7% of those living in Ansty (excluding those who work from home) travel within 5km of home to work. Benchmarked against the "rural settlement mean" of 20%, the Ansty figure then meets the criteria for having significant employment within 5km as would be expected given its proximity to two Main Service Centres. On the basis of transport, services and employment accessibility from the Ansty settlement we request that the definition of Category 3 settlements is reviewed to reflect the potential for accessibility via sustainable transport options such as walking and cycling (where within the maximum distances defined by IHT guidance). Ansty is one of only two settlements within Category 4 that is not wholly within the designated High Weald AONB and therefore likely to be ruled out for development on the basis of overriding environmental constraints. Ansty also has fewer constraints than a number of other settlements identified within Category 3 including those assessed as Limited Local Service Centres with shared services such as Pease Pottage, Sharpthorpe and West Hoathly, which lie at least partly within the High Wealds AONB. Given the absence of any overriding environmental constraints within Ansty it is requested that its position within the settlement hierarchy is altered to Category 3 to reflect its potential to provide a significant contribution to the housing needs of the district in a sustainable location.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	12	Mr W Cobley	Turley	Countryside Properties
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The Northern West Sussex Economic Growth Assessment (EGA) (April 2014) produced by NLP on behalf of the three authorities of Mid Sussex, Crawley and Horsham sets out a joint evidence base to inform the emerging Local Plans for each of these authorities. The EGA provides a means of addressing joint working across a range of planning policy and economic development issues in line with the NPPF duty to cooperate. The Council has failed to take account of the projections within this study to inform their OAN and instead has relied on the locally based Burgess Hill Employment Sites Study (BHES) (March 2015). We consider this information to be less robust as it does not consider the influence of the wider economic area. Countryside Properties fully support the principle of securing sustainable development in the district and therefore wishes to express a number of concerns relating to the methodologies and assessment of Antsy under the three criteria within the Settlement Sustainability Review.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20318	13	Mr W Cobley	Turley	Countryside Properties
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The Planning Practice Guidance advises that the household projections should be the starting point for determining objectively assessed need (Paragraph: 015 Reference ID: 2a-015-20140306). However, as the household projections applied in the HEDA modelling have not taken into account the underestimate in the population projections, there is a concern that this will in effect have artificially deflated the housing requirement figure in the Pre-submission Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	1	Mr A Ross	Nexus	Gleeson Developments Ltd
Code:	1e	Policy		Sustainability Appraisal? <input type="checkbox"/>

Given paragraph 2.18 confirms that Mid Sussex lies with both the Northern West Sussex Housing Market Area and the Coastal Housing Market Area it is unclear why the Pre-Submission District Plan evidence base fails to identify, as required by the National Planning Policy Framework, the full objectively assessed housing needs within the Coastal Housing Market Area; and the Northern West Sussex Housing Market Area; and the extent to which unmet housing need within these HMA's could be met, in part, within Mid Sussex.

Recommended Change

Given this soundness failure the Council must fundamentally review the housing requirement and spatial distribution contained within the pre-Submission District Plan and either withdraw the Plan and Sustainability Appraisal or re-consult on a further revised draft of the Pre-Submission District Plan (which must be underpinned by a new Sustainability Appraisal). It must also engage positively and pro-actively with neighbouring local planning authorities as required by its duty to cooperate.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	2	Mr A Ross	Nexus	Gleeson Developments Ltd
Code:		Policy	Object	Sustainability Appraisal? <input type="checkbox"/>
		DP5		

The District Plan is unsound as it (amongst other things): (i) fails to properly identify the objectively assessed need ("OAN") for market and affordable housing (contrary to paragraph 47 of the National Planning Policy Framework ("NPPF") (2012); and (ii) identifies a housing requirement (650 dwellings per annum) which is far too low to meet its OAN for market and affordable housing in full. Please refer to our supporting report which concludes that the NPPF and Planning Practice Guidance ("PPG") complaint OAN must be at least 855 dwellings per annum.

We object to the proposed District housing requirement of only 11,050 homes in the period 2014-2031 (650 dwellings per annum). This figure is substantially and significantly too low and does not seek to meet the OAN for market and affordable housing in the area, which is identified as at least 855 dwellings per annum in our support report at Appendix 1. This is contrary to Paragraph 47 of the NPPF which requires Councils to "use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area".

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	3	Mr A Ross	Nexus	Gleeson Developments Ltd
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

Contrary to what is stated within paragraph 3.15 and 3.16 of the Pre Submission District Plan the Council has failed to prepare its Strategic Housing Land Availability Assessment ("SHLAA") in accordance with the PPG. It is therefore not possible to robustly conclude on the full extent of the Council's deliverable and developable housing land supply potential.

The Satnam Millennium Ltd and Warrington Borough Council [2015] EWHC 370 High Court Judgement held (paragraph 43, (iv) (b)) that Local Plans should "meet the OAN for affordable housing, subject only to the constraints referred to in the NPPF, paragraphs 14 and 47". The SHLAA makes clear that there is significant housing land supply potential that is not subject to the constraints referred to in the NPPF, paragraphs 14 and 47. Given the PPG asks local councils to change the assumptions made (including physical and policy constraints) when preparing their SHLAA to identify land to meet the OAN for the Pre Submission District Plan to be sound the Council must fundamentally review the SHLAA.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	4	Mr A Ross	Nexus	Gleeson Developments Ltd
Code:		Policy	Object	Sustainability Appraisal? <input type="checkbox"/>
		DP1		

Policy DP1 outlines (amongst other things) that in Mid Sussex, sustainable development in the context of the NPPF's presumption in favour of sustainable development, means that homes will be provided to meet the needs of present and future generations; and create jobs in towns and villages to minimise the need to travel.

However, as set out within our representations to Policy DP5, the District Plan is unsound as it (amongst other things): (i) fails to properly identify the OAN for market and affordable housing (contrary to paragraph 47 of the NPPF (2012); and (ii) identifies a housing requirement (650 dwellings per annum) which is far too low to meet its OAN for market and affordable housing in full. Please refer to our supporting report which concludes that OAN must be at least 855 dwellings per annum.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	5	Mr A Ross	Nexus	Gleeson Developments Ltd
Code:	<input type="checkbox"/>	Policy	DP2	Object
				Sustainability Appraisal? <input type="checkbox"/>

The Pre-Submission District Plan is internally inconsistent in respect of the economic growth strategy being pursued. Policy DP2 states that 278 new jobs per annum will be created over the Plan period. However, the proposed housing strategy will support less than 250 jobs per annum. To support the creation of 278 new jobs per annum a housing figure of at least 720 new dwellings per annum would be required. Moreover, to meet OAN for market and affordable housing in full a housing figure of at least 855 dwellings per annum is required. In addition to meeting identified housing need in full, this level of housing growth would also help support delivery of the Pre-Submission District Plan; Coast to Capital Strategic Economic Plan; the Gatwick Diamond; and the Sustainable Communities Strategy economic growth and regeneration priorities. Please refer to our supporting report for further detail.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	6	Mr A Ross	Nexus	Gleeson Developments Ltd
Code:	3g	Policy	<input type="checkbox"/>	<input type="checkbox"/>
				Sustainability Appraisal? <input type="checkbox"/>

Notwithstanding this, we object fundamentally to the proposed strategy to defer the allocation of 1,515 dwellings to NP's or other appropriate planning documents over the Plan period 2014-2031. This approach is too vague and fails to provide towns and parishes preparing NP's with appropriate and suitable guidance on the level of housing they should be accommodating having regard to the sustainability of the District generally. Such an approach would therefore be contrary to paragraph 151 of the NPPF which states that "Local Plans should set out opportunities for development and clear policies on what will or will not be permitted and where."

Even if Neighbourhood Plans did deliver sufficient housing (which is itself highly unlikely), the lack of any guidance in the District Plan is likely to result in a highly undesirable pattern of growth across the District that may in all likelihood have no regard to the settlement hierarchy (as identified in Policy DP6 of the District Plan). Cuckfield and Hurstpierpoint (both Category 2 Settlements) have also only allocated 28 dwellings and 40 dwellings respectively in their NP's, meaning that three out of the five Category 2 Settlements have collectively allocated only 68 dwellings towards the identified residual target of 1,515 dwellings. This also demonstrably falls well short of the need identified in the Council's HEDNA.

Hassocks is another similar example of a Category 2 settlement which is largely unconstrained. However the emerging NP is proposing to allocate approximately 400 homes here, whereas the Council's HEDNA identifies that it is a settlement which should reasonably accommodate 630 homes i.e. under-provision yet again in a sustainable location. Conversely, significantly less sustainable settlements such as Turner Hill / West Hoathly (Category 3 Settlements) and Twineham (a Category 4 Settlement) propose to allocate 99 dwellings and 20 dwellings respectively.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	7	Mr A Ross	Nexus	Gleeson Developments Ltd
Code:	<input type="checkbox"/>	Policy	DP6	Support
				Sustainability Appraisal? <input type="checkbox"/>

We support the identification of Crawley Down and Hassocks as Category 2 Settlements in the District (Larger Villages). They are both sustainable and relatively unconstrained locations capable of accommodating development providing a range of retail, education, employment and health facilities as well as access to frequent bus services and in the case of Hassocks, a train line.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	8	Mr A Ross	Nexus	Gleeson Developments Ltd
Code:	<input type="checkbox"/> Policy	DP10	Object	Sustainability Appraisal? <input type="checkbox"/>

We support the protection of agricultural land generally, but consider that the wording of the draft policy should more closely reflect the wording at paragraph 112 of the NPPF, namely reference to Local planning authorities taking into account the economic and other benefits of best and most versatile agricultural land in the balancing of decision making.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	9	Mr A Ross	Nexus	Gleeson Developments Ltd
Code:	<input type="checkbox"/> Policy	DP11	Support	Sustainability Appraisal? <input type="checkbox"/>

We support the strategy to allow Local Gaps to be identified in NP's or a Site Allocations DPD, providing the test in Draft Policy remains to ensure that 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".

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	10	Mr A Ross	Nexus	Gleeson Developments Ltd
Code:	<input type="checkbox"/> Policy	DP15	Object	Sustainability Appraisal? <input checked="" type="checkbox"/>

The Court of Appeal decision for Ashdown Forest Economic Development LLP v. Wealden District Council (see Appendix 2) identified that Wealden District Council (WDC) had failed to comply with the requirements of the Strategic Environmental Assessment Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes 2004, because no regard had been given to whether there were reasonable alternatives to the 7km SANGS zone.

The Council's SA shows that three policy options have been considered for Policy DP15, all of which include a 7km zone of influence. Two other options (which did not set a 7km zone of influence) were considered in the SA, but not appraised. However in light of the Court of Appeal decision, such an option should have been appraised. It is therefore considered that Policy DP15 is unsound as the approach cannot reasonably concluded to be the most appropriate strategy, until such time that reasonable alternatives have been considered. Policy DP15 is not therefore justified. Recommended Change

The approach to Policy DP15 is re-appraised, following a thorough assessment of reasonable alternatives to the 7km zone of influence.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	11	Mr A Ross	Nexus	Gleeson Developments Ltd
Code:	<input type="checkbox"/> Policy	DP39	Object	Sustainability Appraisal? <input type="checkbox"/>

We object to the requirement for applicants to demonstrate how their proposals address the national timescale for zero carbon homes, including fabric energy efficiency standards, on-site renewable/low carbon technologies and allowable solutions.

In accordance with the PPG, the Draft Policy should only require compliance with the minimum standards set by Building Regulations. The PPG is clear that local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans. It is not clear this has been done.

For the reasons set out above, we consider that Policy D39 is unsound as it is not consistent with national policy.

Recommended Change

Policy DP39 is amended to only ensure compliance with the minimum standards set by Building Regulations, unless evidence is advanced for additional standards.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	12	Mr A Ross	Nexus	Gleeson Developments Ltd
Code:	SA-f	Policy		Sustainability Appraisal? <input type="checkbox"/>

Within the Pre Submission District Plan Sustainability Appraisal the Council has failed to assess (either properly or at all) all reasonable alternatives. The premise upon which the Sustainability Appraisal has been undertaken is fundamentally flawed because it has not identified the full objectively assessed housing needs within the District; the Coastal Housing Market Area; or the Northern West Sussex Housing Market Area; and the extent to which unmet housing need within these HMA's could be met, in part, within Mid Sussex.

The Sustainability Appraisal is therefore wholly unsound as it has not been positively prepared, nor is it justified. Moreover, by not assessing all reasonable alternatives the Sustainability Appraisal is in clear breach of the SEA Directive and the SEA Regulations. As such, it is unlawful and these breaches are fatal to the legality of the Pre-Submission District Plan.

Recommended Change

Given these issues the Council must fundamentally review the housing requirement and spatial distribution contained within the pre-Submission District Plan and either withdraw the Plan and Sustainability Appraisal or re-consult on a further revised draft of the Pre-Submission District Plan (which must be underpinned by a new Sustainability Appraisal). It must also engage positively and pro-actively with neighbouring local planning authorities as required by its duty to cooperate.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	13	Mr A Ross	Nexus	Gleeson Developments Ltd
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

The Housing Trajectory at Appendix A of the District Plan purports to demonstrate that it would deliver a 5 year land supply. However this is flawed for a variety of reasons. Firstly the Trajectory, even taken at face value, does not deliver a 5 year supply against a genuine OAN, which must be a minimum of 850 dwellings per annum as set out elsewhere in our representations. Secondly, even putting this fundamental issue to one side, the Trajectory shows that allocations from this District Plan make no material contribution to housing supply in the first 5 years after adoption. Instead there is an almost complete reliance on existing commitments. However the District Plan provides no clarity on the commitments included in the Housing Trajectory. As such it is not possible to interrogate its accuracy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	14	Mr A Ross	Nexus	Gleeson Developments Ltd
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

The Council identifies that as a contingency, any residual housing requirement not identified by NP's will be allocated through other appropriate planning documents i.e. a Site Allocations DPD. However, such an approach would only serve to, unnecessarily, delay the delivery of housing as evidenced by the Council's own Local Development Scheme which shows that a Site Allocations DPD would not be adopted until 2018. Furthermore, this contingency provision would serve only to increase the level of allocations made, and would not and could not address issues associated with 'made' NP's either under or over allocating housing relative to their sustainability and constraints.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	15	Mr A Ross	Nexus	Gleeson Developments Ltd
Code:	<input type="checkbox"/>	Policy	<input type="checkbox"/>	Object
		DP5		
			Sustainability Appraisal? <input type="checkbox"/>	

In addition, paragraph 3.18 details that the residual housing figure (1,515 dwellings) will be delivered in various towns and villages and that “The Scale of growth at these settlements will be guided by the Settlement Hierarchy set out in Policy DP6: Settlement Hierarchy”. However, as detailed in our representations to Policy DP5, the District Plan does not provide sufficient guidance on where this housing should be located to ensure that it does have regard to the Settlement Hierarchy and indeed, the evidence from emerging Neighbourhood Plan (NP) is that they are not allocating growth that is consistent with their relative sustainability and constraints (or lack thereof). Crawley Down is a sustainable settlement (identified as a Category 2 Settlement in Policy DP6 of the District Plan) and Figure 4 of the District Plan confirms that with the exception of the SPA (which can be mitigated) it is unconstrained, unlike the majority of the District which is within either the South Downs National Park or the High Weald AONB. However without guidance on the scale of development that should be accommodated there, the emerging NP for Crawley Down proposes not to allocate any sites for housing at all, despite a number of sites being identified as available for residential development. Crawley Down is one of two settlements within Worth Parish with other settlement Copthorne also currently in the process of preparing a NP. It is highly unlikely the Copthorne NP will seek to deliver the 804 dwellings and in all likelihood, may adopt the same strategy as Crawley Down, failing to allocate and sites for housing. All of these issues could be overcome with Policy DP5 providing guidance linking Policies DP5 and DP6 such that the level of housing proposed at the more sustainable settlements, such as Crawley Down and Hassocks by way of example, is clarified. This would make sure that they receive the level of housing appropriate to their position in the Settlement Hierarchy and lack of constraint, and also provide clear guidance to emerging NP’s. Without this change, we consider that Policy DP5 is also contrary to paragraph 153 of the NPPF as it identifies that “Any additional development plan documents should only be used where clearly justified.”

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20319	16	Mr A Ross	Nexus	Gleeson Developments Ltd
Code:	<input type="checkbox"/>	Policy	<input type="checkbox"/>	Object
		DP5		
			Sustainability Appraisal? <input type="checkbox"/>	

Recommended Change Given these issues the Council must fundamentally review HEDNA assessment to follow the process set out within the NPPF and PPG. Following which the Council must then fundamentally review the housing requirement and spatial distribution contained within the Pre-Submission District Plan and either withdraw the District Plan or re-consult on a further revised draft of the Pre-Submission District Plan. It must also engage positively and proactively with neighbouring Local Planning Authorities as required by its Duty to Cooperate. In addressing the current housing shortfall within the Mid Sussex, the District Plan should allocate additional strategic housing allocations. [Detailed report/ methodology for OAN attached] The housing requirement is also contrary to paragraph 14 of the NPPF which is clear that “Local Plans should meet objectively assessed needs... unless any adverse impacts of doing so would be significant and demonstrably outweigh the benefits”. Therefore until such time as the Council have identified their OAN (in accordance with paragraph 47 of the NPPF), the Council cannot fully accord with paragraph 14 of the NPPF. As such, this housing requirement is unsound. On that basis, and given that the District Plan does nothing to materially enhance 5 year land supply, it is evident that there cannot be a 5 year land supply based on OAN or the Council’s proposed housing requirement in the District Plan (650 dpa as opposed to the figure of 855 dpa from the South East Plan). Against that background the housing strategy in the District Plan must be flawed. As such, in addition to the need to increase the housing requirement generally to provide for the genuine OAN, the Council must re-visit the strategy and allocate additional sites that can deliver in the early part of the Plan period, thereby delivering the 5 year land supply required by national policy in order to allow the District Plan to be adopted.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20326	1	Mr C Beaver	Planning Sphere Ltd	Hassocks Golf Club
Code:		Policy	Object	Sustainability Appraisal? <input type="checkbox"/>
		DP5		

The Council's approach of relying wholly upon Neighbourhood Plans to deliver the non-strategic element of its housing requirement of circa 1,500 homes is unsound: it carries a high degree of risk in terms of housing delivery; and constitutes a derogation of its strategic planning function to meet and plan for objectively assessed housing need. The fallback of a subsequent District-Wide Site Allocation Plan in the event that Neighbourhood Plans are unable to meet the non-strategic element of the housing requirement is an insufficient remedy given the likely lead in time to prepare such a plan. In order to maximise the prospect of Neighbourhood Plans delivering the residual housing requirement, and meet local affordable housing need, we consider that Policy DP5 should include minimum housing growth targets for all Category 2 Settlements over the plan period, e.g. Hassocks should have a minimum housing requirement. This should not be left to local communities to determine.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20326	2	Mr C Beaver	Planning Sphere Ltd	Hassocks Golf Club
Code:		Policy	Object	Sustainability Appraisal? <input type="checkbox"/>
		DP11		

Policy DP11 is not necessary and the creation of Local Gaps is an unjustified quasi 'Green Belt' restraint policy in countryside areas which could prevent the release of accessible potential development sites for housing and community facilities in those parts of the district that lie outside the AONB and National Park. The issue of coalescence can be more effectively controlled through the development management process on a case by case basis.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20326	3	Mr C Beaver	Planning Sphere Ltd	Hassocks Golf Club
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

The SHLAA for Hassocks Golf Club undertaken by LUC is not sound. We enclose a copy of a letter sent to the Hassocks PC dated 19th April 2015 which sets out our comments on the assessment. Following the dismissal of the appeal relating to the Land at London Road site (PINS Ref: 2226987) we submit that circa. 210 housing units should be included in the potential supply for Hassocks in the table of sites not currently in the planning process, p.22 of the Housing Provision Paper.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20327	1	Mr A Bateson	AB Planning & Development Ltd	Mr David Crowther
Code:	1g	Policy		Sustainability Appraisal? <input type="checkbox"/>

The Key Diagram (page 13) and Paragraph 3.6 are inconsistent with one another.

Draft proposals map should be modified to enable development of the SHLAA sites identified around the edges of the category 1 and 2 settlements, especially at Haywards Heath. Without such modification the plan will be unable to fully accommodate the OAN across the HMA.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20327	2	Mr A Bateson	AB Planning & Development Ltd	Mr David Crowther
Code:	3b	Policy		Sustainability Appraisal? <input type="checkbox"/>

Concentrating virtually all new development at Burgess Hill, refusing to allocate any land for development at Haywards Heath, East Grinstead and other service centres and not revising settlement boundaries will inevitably result in greater traffic movements and resultant pollution increases; not less. A greater proportion of residents will be forced to commute from their communities to find work and services, contrary to the laudable aims referred to at 3.6.

The plan acknowledges that the DCLG projections for February 2015 identify a starting point need of 656dpa. It also acknowledges 6/8 neighbouring authorities have unmet housing requirements that they would like to see accommodated in Mid Sussex. Despite these acknowledgments simply by applying the same old development strategies and artificial constraints to development that were previously applied and which have consistently failed to meet identified development needs in the District have led to Council to erroneously conclude that they could accommodate 11,050 new dwellings. This demonstrates an unsoundness in the Plan's strategy.

Haywards Heath is virtually the same size as Burgess Hill where the Council propose almost 4,000 new dwellings. East Grinstead is almost as large. It is simply not sustainable for the Local Plan not to seek to allocate even a single development at either. This suggests that only about 1500 further new dwellings should be accommodated right across the remainder of the District over the course of the next 17 years.

The Councils past development plans have consistently failed to deliver sufficient houses to meet identified local needs and the artificial constraints to new development on the edge of sustainable settlements such as main towns and service centres has been a critical factor in that failure. This new Local plan review ought to assess where the boundaries should be redrawn to in order to lift that constraint and enable development necessary to enhance the vitality and viability of sustainable settlements.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20327	3	Mr A Bateson	AB Planning & Development Ltd	Mr David Crowther
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

Given years of consistent failure to provide sufficient land necessary to accommodate identified housing needs in Mid Sussex, the Council ought to have taken the CLG figure of 656dpa then added a 20% buffer in accordance with the NPPF guidance and also added the additional unmet requirements from more heavily constrained neighbouring authorities. That would then have given the Council a far more realistic quantum of the total land of new development need actually required in Mid Sussex and would have necessitated a fundamental review of settlement/countryside boundaries needed to facilitate such growth. Plan is in conflict with paras 47 and 156 of the NPPF.

When applying the old South East Plan target of 855dpa as a simple litmus test, this should have sent alarm bells ringing. The assessment of need is simply not robust or fully and objectively assessed. Rather than co-operate with neighbouring LPAs Mid Sussex have asked and then simply ignored the results of these consultation and have arbitrarily determined that their own imposed constraints will simply not allow for more development to be accommodated.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20327	4	Mr A Bateson	AB Planning & Development Ltd	Mr David Crowther
Code:	3g	Policy		Sustainability Appraisal? <input type="checkbox"/>

To abdicate their strategic responsibilities and suggest that all the remaining needs can be dealt with through Neighbourhood Plan process is farcical and contrary to NPPF guidance. Strategic allocations need to be made at all principal settlements, particularly Haywards Heath.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20327	5	Mr A Bateson	AB Planning & Development Ltd	Mr David Crowther
Code:	Policy	DP1	Object	Sustainability Appraisal? <input type="checkbox"/>

This draft policy is not in fact a policy but instead merely a list of aims and objectives. It is not SMART in any way and should be amended to address specific development allocations and new development proposals and be measurable in terms of deliverables and compliance.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20327	6	Mr A Bateson	AB Planning & Development Ltd	Mr David Crowther
Code:	Policy	DP6	Object	Sustainability Appraisal? <input type="checkbox"/>

In order to sustainably accommodate the full and objectively assessed needs of new development in Mid Sussex policy DP6 needs to positively accommodate new development allocations at all of its most sustainable settlements, particularly those in Category 1 but also probably in Category 2 and 3. To facilitate this the boundaries of the defined built up areas should be modified to at very least accommodate the edge of settlements SHLAA sites, which can then be positively promoted through the emerging Neighbourhood Plan.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20327	7	Mr A Bateson	AB Planning & Development Ltd	Mr David Crowther
Code:	Policy	DP10	Object	Sustainability Appraisal? <input type="checkbox"/>

Identifying all the remaining 40% undeveloped land in Mid Sussex as a Countryside Area of Development Restraint effectively raises the protection afforded to that land to a level virtually equivalent to that of the National Park and AONB which cannot be right or sustainable. By failing to carry out any strategic review of these boundaries, the Council is unable to fully accommodate the development needs arising in Mid Sussex and neighbouring more constrained Districts. The policy needs to be far more flexible in the way that it approaches open countryside and land on the edges of settlements. Also in the protection afforded to grade 1 and 2 agricultural land above class 3a.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20327	8	Mr A Bateson	AB Planning & Development Ltd	Mr David Crowther
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

Client wishes to promote land at Sunte House for development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20328	1		Robinson Escott Planning	Crest Nicholson Operations Ltd
Code:	Policy	DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP5 sets out housing requirement of 11,050 dwellings over 17 year period to 2031. Inconsistent with housing trajectory at Appendix A of District Plan which shows annualised requirement of 780 dwellings per annum (650+20%). The table in Policy DP5 therefore should incorporate the 20%. If 20% buffer applies across the plan period, this would give a District Plan requirement of 13,260 dwellings (780 per annum). If completions, total housing commitments and the strategic allocations at Burgess Hill are deducted, this leaves a residual requirement for the remainder of the District of 3,725 dwellings, not 1,515.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20328	2		Robinson Escott Planning	Crest Nicholson Operations Ltd
Code:	3g	Policy		Sustainability Appraisal? <input type="checkbox"/>

The strategy of housing provision in the Plan needs to be amended in order that the plan can demonstrate compliance with the soundness test so far as delivery of housing over the plan period is concerned. The promise of Neighbourhood Plan bringing forward the required amount of housing to meet the District's needs is not consistent with national policy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20328	3		Robinson Escott Planning	Crest Nicholson Operations Ltd
Code:		Policy	DP10	Object
				Sustainability Appraisal? <input type="checkbox"/>

The preamble to Policy DP10 states that 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. However, Policy DP10 then seeks to protect all land that is outside of existing defined settlement boundaries from development other than where, inter alia, it is on sites supported by a specific policy reference either elsewhere in the Plan, a Development Plan Document or relevant Neighbourhood Plan. As indicated in the preamble to and in Policy DP5, such sites that come forward through Neighbourhood Plans will be on land that is currently defined as land within the countryside and which will remain so in accordance with Policy DP10 if settlement boundaries remain unchanged. It would seem more sensible for such sites to be allocated at this stage and for settlement boundaries to be adjusted accordingly. The countryside to which Policy DP10 (refers) would have greater protection and the policy would be more robust if those areas of countryside needed for development are already identified. It may also be the case that in the short to medium term absence of the Council being able to demonstrate a five year supply of housing land if settlement boundaries remain unchanged then Policy DP10 as a policy which seeks to restrain housing supply may be out of date as per paragraph 14 of the NPPF immediately upon its adoption. Settlement boundaries should be amended firstly to recognise development that has already taken place around the boundaries of existing towns for example to the south of Rocky Lane, Haywards Heath, and also to sites where development has been proposed to which no objection has been raised on countryside restraint grounds, for example, land to the north of Birchen Lane, Haywards Heath. There are numerous other examples of recent development proposals that have been permitted by the Council or allowed on appeal which necessitate a full review of settlement boundaries and those areas to which Policy Dp10 should properly apply.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20328	4		Robinson Escott Planning	Crest Nicholson Operations Ltd
Code:		Policy	DP5	Object
				Sustainability Appraisal? <input type="checkbox"/>

As indicated in the preamble to and in Policy DP5, such sites that come forward through Neighbourhood Plans will be on land that is currently defined as land within the countryside and which will remain so in accordance with Policy DP10 if settlement boundaries remain unchanged. It would seem more sensible for such sites to be allocated at this stage and for settlement boundaries to be adjusted accordingly. The countryside to which Policy DP10 (refers) would have greater protection and the policy would be more robust if those areas of countryside needed for development are already identified.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20328	5		Robinson Escott Planning	Crest Nicholson Operations Ltd
Code:		Policy	Object	Sustainability Appraisal? <input type="checkbox"/>
		DP5		

The SHLAA has identified sites that are capable of being allocated and Policy DP5 therefore should set out these allocations rather than leaving the matter uncertain in the hope that Neighbourhood Plans will make the necessary provision.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20328	6		Robinson Escott Planning	Crest Nicholson Operations Ltd
Code:		Policy	Object	Sustainability Appraisal? <input type="checkbox"/>
		DP5		

Policy DP5 is inconsistent with national policy in that it does (not) identify those sites which will provide five years' worth of housing. It aspires to the delivery of such housing through Neighbourhood Plans or other appropriate planning documents. This provides no certainty of delivery of the required amount of housing land. This will remain the position all the while that the Council is unable to demonstrate that it has a five year supply of housing sites that are allocated in a Local Plan as sites that are suitable, deliverable and achievable as established through the SHLAA.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20329	1		RH & RW Clutton	Western Arc Consortium
Code:		Policy	Object	Sustainability Appraisal? <input type="checkbox"/>
		DP5		

The proposed housing delivery of 650 dpa (11,050 over the plan period) is significantly short of the OAHN for the District and signifies a significant decline in supply when compared against the previous South East Plan target of 855 dpa. This is clearly inconsistent with national policy, which states that local planning authorities should use their local plans to significant boost housing land supply.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20329	2		RH & RW Clutton	Western Arc Consortium
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

In the MSDC Housing Provision Paper, the total unmet need from its neighbours in the period 2010-2031 is identified as some 37,733 dwellings. This however includes 10,800 from Brighton and Hove and 4,173 from Crawley, which indicates that even the figure of 37,733 dwellings of unmet need is likely a significant under-estimate of the scale of the problem.

First and foremost, the overwhelming majority of consented developments in MSDC in the year 2014/15 were on sites that were not included in the SHLAA. This demonstrates that although a useful tool, the SHLAA is not the only tool for identifying sustainable housing sites throughout the District. It is therefore likely that a substantial number of sites will become available throughout the plan period that have not been assessed as part of the SHLAA, and it is therefore unjustified to use the capacity indicated by the SHLAA to limit the OAHN.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20329	3		RH & RW Clutton	Western Arc Consortium
Code:	3f	Policy		Sustainability Appraisal? <input type="checkbox"/>

The proposed employment land allocation, and existing roads provide boundaries to the proposed Western Arc, a natural extension of the Northern Arc, which is sustainably located close to the town with excellent linkages.

The Western Arc is equal to or better than the alternative allocations made in DP8 and DP9, and can offer the town additional facilities beyond those planned for.

In particular, the development might be the catalyst for opening up the Western Crescent (incidentally releasing funds to Mid Sussex District Council from development of some of the land it owns) for public access and enjoyment, linked to a waterside feature based on the stream that flows through the site.

The Western Arc is closer to the town centre and rail station than other allocated sites, and better located for access to the new employment allocation. It avoids traffic problems by having direct access to the Jane Murray way and thence to the A23.

Landscape studies (previously provided to the Council in respect of part of the Western Arc) have demonstrated that the area is capable of adsorbing significant housing numbers without substantial harm to the wider countryside, being well enclosed and relatively low compared to the surrounding land.

The existing woods and hedges can be secured as features in a master planned development.

Strategic development, as shown on the plan attached at Annex B, is allocated to the west of Burgess Hill for approximately 1,500 additional homes and any necessary new neighbourhood centre areas, including retail, education, health, employment, leisure and community uses as agreed with the Council;

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20329	4		RH & RW Clutton	Western Arc Consortium
Code:	1h	Policy		Sustainability Appraisal? <input type="checkbox"/>

Secondly, the SHLAA document underestimates the number of developable sites as it automatically excluded all the sites falling within the AONB. The AONB covers a substantial portion of MSDC administrative area and varies considerably in quality, features and character, with many sites located within the AONB lying adjacent to settlements and having a more urban character. We do not consider that limiting the OAHN without fully assessing the capacity of the sites throughout the District constitutes positive planning as required by the NPPF.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20329	5		RH & RW Clutton	Western Arc Consortium
Code:		Policy	DP5	Object Sustainability Appraisal? <input type="checkbox"/>

The OAHN for the District must make some provision for the unmet need of neighbouring authorities where it would be sustainable to do so, as required by the NPPF. DP5 should be amended in order for the District to meet its OAHN as required by national planning policy. Proposed draft policy DP5 provided that sets a District housing requirement of 14,050 homes between 2014 – 2031, at an average of 878 homes per annum. This will comprise: District Plan Requirement - 12,500 Completions 2014/15 - 630 Total Housing Commitments - 5,405 Strategic development north and north-west of Burgess Hill - 3,500 Strategic development west of Burgess Hill - 1500 Strategic development on other sites in the District - 1500 Elsewhere in the District, as allocated through Neighbourhood Plans or other appropriate planning documents - 1,000 Windfall sites - 515 This requirement may be exceeded if either communities wish to promote higher levels of development to fund additional local infrastructure improvements or support local facilities and services or if suitable sites are identified which contribute to meeting housing need in sustainable locations. Higher levels of development will be acceptable provided they have regard to the Sustainability Hierarchy in DP6 and do not conflict with the other policies, vision and objectives of this District Plan or the policies in National Planning Policy Framework.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20329	6		RH & RW Clutton	Western Arc Consortium
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

The OAHN for the District must be increased to support the jobs growth anticipated in the EGA. This would require provision for at least 843 dpa in order to be considered positively planned by NPPF standards

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20329	7		RH & RW Clutton	Western Arc Consortium
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

Policy DP5 in the plan states that of the total 11,050 units to be delivered in the plan period, some 1,515 will need to be delivered through Neighbourhood Plans, with a total of twenty Plans either in preparation or Adopted. At this point, nine Neighbourhood Plans have been adopted in Mid Sussex, with five making no housing allocations whatsoever. Emerging neighbourhood plans are undershooting housing need allocations by around 50%. There is therefore no guarantee that housing need allocations will be delivered through the neighbourhood planning process, and indeed it is highly questionable that 1,515 dwellings could be delivered in this way.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20329	8		RH & RW Clutton	Western Arc Consortium
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

The NPPF states that Local Plans must be realistic and clearly set out the opportunities for development. Specifically, the NPPF states that plans “should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency” (NPPF, Paragraph 17)

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20329	9		RH & RW Clutton	Western Arc Consortium
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

The Northern West Sussex Economic Growth Assessment (EGA), published in April 2014, estimated that Mid Sussex would see total jobs growth of between 10,425 and 13,425 (521 and 671 jobs per annum) in the plan period 2011-2031. The February 2015 HEDNA states that in order to deliver sufficient homes to support the baseline jobs growth of 521 per annum, some 843 dpa would be required. The current OAHN of 650 dpa is therefore unsound because it is unjustified and does not constitute positive planning as required by national planning policy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20329	10		RH & RW Clutton	Western Arc Consortium
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

It is concerning that the previous provision of 10% for market signals, as recommended in the Council’s February 2015 Housing and Economic Development Needs Assessment (HEDNA), has been completely removed from the housing provisions in the current plan. It is imperative that the housing numbers in the plan are adjusted to take full account for market signals, as required by national planning policy.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20337	1	Mr R Gossage	JLL	
Code:	3i	Policy		Sustainability Appraisal? <input type="checkbox"/>

There will be an increase of traffic that is not acceptable. We live on Scaynes hill road, the proposed Walstead development according to Wates will increase traffic movements by around 1800 – 2000 times a day. This is unacceptable for a low density / low populated area.
The local area of Haywards heath has a deficit of sewerage, local outdoor play areas, sport facilities, parking, supermarkets, schools, hospital spaces and police man power. This infrastructure problem needs to be seriously addressed prior to any development.

Ref#	Comment#	Respondent:	Organisation:	Behalf Of:
20337	2	Mr R Gossage	JLL	
Code:		Policy DP5	Object	Sustainability Appraisal? <input type="checkbox"/>

The local areas of the district will have an estimated increase of 20% in population. This is huge increase and there is no requirement to increase a local area beyond it means and by such an amount. There is already an opportunity to provide a large amount of housing throughout the district, required over the next 20 years, so there is no reason to push for more immediately.

Submission District Plan 2015 - Consultation Responses: Standard Forms

Ref# 245	Respondent: Ms G Kennedy	Organisation: Lindfield Preservation Society	Standard Response: Lindfield
Ref# 726	Respondent: Mrs A O Jones	Organisation: 	Standard Response: PRC
Ref# 801	Respondent: Mr D Foster	Organisation: 	Standard Response: Lindfield
Ref# 1077	Respondent: Mrs B Johnson	Organisation: 	Standard Response: Lindfield
Ref# 1223	Respondent: Mr AEB Rose	Organisation: 	Standard Response: PRC
Ref# 1385	Respondent: Mr and Mrs L J Robinson	Organisation: 	Standard Response: PRC
Ref# 1410	Respondent: Mrs G Godman	Organisation: 	Standard Response: Lindfield
Ref# 1411	Respondent: Mr B Godman	Organisation: 	Standard Response: Lindfield
Ref# 1454	Respondent: Mr D G MacMillan	Organisation: 	Standard Response: Lindfield
Ref# 1569	Respondent: Mrs S Huggett	Organisation: 	Standard Response: Lindfield
Ref# 1575	Respondent: Mr M Huggett	Organisation: 	Standard Response: Lindfield
Ref# 1580	Respondent: Mr C S Balaam	Organisation: 	Standard Response: PRC
Ref# 1581	Respondent: Mrs M T Balaam	Organisation: 	Standard Response: PRC
Ref# 1598	Respondent: Mrs M A Nicolle	Organisation: 	Standard Response: Lindfield

Ref# 1780	Respondent: BS Gullen	Organisation: 	Standard Response: Lindfield
Ref# 1974	Respondent: Mr S Burrell	Organisation: 	Standard Response: Lindfield
Ref# 2064	Respondent: Mr M Higgins	Organisation: 	Standard Response: Lindfield
Ref# 2072	Respondent: Mr P Sear	Organisation: 	Standard Response: Lindfield
Ref# 2130	Respondent: Dr M Vickers	Organisation: 	Standard Response: PRC
Ref# 2142	Respondent: Mr R Barnby	Organisation: 	Standard Response: PRC
Ref# 2217	Respondent: Mrs D Fleetwood	Organisation: 	Standard Response: Lindfield
Ref# 2272	Respondent: Mr J E A Benstead	Organisation: The Old Convent Estate Resident Limited	Standard Response: PRC
Ref# 2273	Respondent: Mrs C E Benstead	Organisation: 	Standard Response: PRC
Ref# 2342	Respondent: Mr PM Tindley	Organisation: 	Standard Response: PRC
Ref# 2418	Respondent: Mr and Mrs Bridgman	Organisation: 	Standard Response: Lindfield
Ref# 2508	Respondent: Mr P Smith	Organisation: Brook Manor Management Ltd	Standard Response: PRC
Ref# 2509	Respondent: Mr M Sutton	Organisation: 	Standard Response: PRC
Ref# 2655	Respondent: Mr A Blacker	Organisation: 	Standard Response: PRC

Ref# 2829	Respondent: Mr S Fishburn	Organisation: 	Standard Response: PRC
Ref# 2836	Respondent: Mr J Lowe	Organisation: Portsmouth Wood Residents Association	Standard Response: Lindfield
Ref# 2883	Respondent: Mr SNP Kitson-Harris	Organisation: 	Standard Response: PRC
Ref# 3118	Respondent: Mr D Townsend	Organisation: 	Standard Response: PRC
Ref# 3141	Respondent: Mr J Turk	Organisation: 	Standard Response: PRC
Ref# 3233	Respondent: C Blacker	Organisation: 	Standard Response: PRC
Ref# 3235	Respondent: Mr S Blacker	Organisation: 	Standard Response: PRC
Ref# 3267	Respondent: S Gibson	Organisation: 	Standard Response: PRC
Ref# 3386	Respondent: Mr J Mepham	Organisation: 	Standard Response: PRC
Ref# 3536	Respondent: Mrs M R Dawson	Organisation: 	Standard Response: PRC
Ref# 3541	Respondent: Mr D Blacker	Organisation: 	Standard Response: PRC
Ref# 3647	Respondent: Mr G Thomas	Organisation: 	Standard Response: PRC
Ref# 3878	Respondent: Mr TLI Dawson	Organisation: 	Standard Response: PRC
Ref# 4005	Respondent: Mrs L Abbott	Organisation: 	Standard Response: PRC

Ref# 4231	Respondent: Mrs M Peters	Organisation: 	Standard Response: PRC
Ref# 4245	Respondent: Dr M Pavier	Organisation: 	Standard Response: PRC
Ref# 4318	Respondent: Mrs E Eades	Organisation: 	Standard Response: PRC
Ref# 4485	Respondent: Ms D Whyte	Organisation: 	Standard Response: PRC
Ref# 4586	Respondent: Mr N Eades	Organisation: 	Standard Response: PRC
Ref# 4590	Respondent: Mrs J Latham	Organisation: 	Standard Response: PRC
Ref# 4626	Respondent: Mr H Latham	Organisation: 	Standard Response: PRC
Ref# 5311	Respondent: Ms E Glenister	Organisation: 	Standard Response: PRC
Ref# 5330	Respondent: Ms W Whalley	Organisation: 	Standard Response: PRC
Ref# 5642	Respondent: Ms T O'Donovan	Organisation: 	Standard Response: PRC
Ref# 5706	Respondent: Mr D R Adamson	Organisation: 	Standard Response: PRC
Ref# 5851	Respondent: Mrs S Cole	Organisation: 	Standard Response: PRC
Ref# 6703	Respondent: Mr R Whalley	Organisation: 	Standard Response: PRC
Ref# 6705	Respondent: D W H Townsend	Organisation: 	Standard Response: PRC

Ref# 7149	Respondent: Mr D Peters	Organisation: 	Standard Response: PRC
Ref# 7549	Respondent: Mr R Gibbs	Organisation: 	Standard Response: PRC
Ref# 7821	Respondent: Mr A Diss	Organisation: 	Standard Response: PRC
Ref# 7825	Respondent: Mr A Butler	Organisation: 	Standard Response: PRC
Ref# 7934	Respondent: Mr A Bartlett	Organisation: 	Standard Response: PRC
Ref# 8191	Respondent: Mrs L Berry	Organisation: 	Standard Response: PRC
Ref# 8226	Respondent: Mr T Salmon	Organisation: 	Standard Response: PRC
Ref# 8364	Respondent: Mr J Clarke	Organisation: 	Standard Response: PRC
Ref# 8743	Respondent: Mrs B Stovold	Organisation: 	Standard Response: PRC
Ref# 8787	Respondent: Mr R Tarling	Organisation: 	Standard Response: PRC
Ref# 9041	Respondent: Mr R Dewing	Organisation: 	Standard Response: PRC
Ref# 9067	Respondent: Mr P Sagoo	Organisation: 	Standard Response: PRC
Ref# 9201	Respondent: Mr W Glenister	Organisation: 	Standard Response: PRC
Ref# 9380	Respondent: Mr J Ablett	Organisation: 	Standard Response: PRC

Ref# 9556	Respondent: Mr G Stanley	Organisation: 	Standard Response: Lindfield
Ref# 9681	Respondent: Mrs M Lucas	Organisation: 	Standard Response: Lindfield
Ref# 9765	Respondent: Mr J Usher	Organisation: 	Standard Response: Lindfield
Ref# 9925	Respondent: Mr R Drake	Organisation: 	Standard Response: Lindfield
Ref# 9975	Respondent: Mr B Lucas	Organisation: 	Standard Response: Lindfield
Ref# 10665	Respondent: Mr & Mrs R E Scofield	Organisation: 	Standard Response: Lindfield
Ref# 10808	Respondent: Mr B Goddard	Organisation: 	Standard Response: Lindfield
Ref# 11087	Respondent: Mr P Brown	Organisation: 	Standard Response: Lindfield
Ref# 11088	Respondent: Mrs B Brown	Organisation: 	Standard Response: Lindfield
Ref# 11151	Respondent: Mr M Streeter	Organisation: 	Standard Response: Lindfield
Ref# 12380	Respondent: Mr M Palmos	Organisation: 	Standard Response: PRC
Ref# 12653	Respondent: Mr and Mrs B Hollingsworth	Organisation: 	Standard Response: PRC
Ref# 12692	Respondent: Mr GK Andrews	Organisation: 	Standard Response: PRC
Ref# 13371	Respondent: Miss G Gill	Organisation: 	Standard Response: PRC

Ref# 13419	Respondent: Mr R Waller	Organisation: 	Standard Response: PRC
Ref# 14167	Respondent: R and P Hershkowitz	Organisation: 	Standard Response: Lindfield
Ref# 14321	Respondent: Ms S Bellamy	Organisation: 	Standard Response: PRC
Ref# 14363	Respondent: A Williamson	Organisation: 	Standard Response: PRC
Ref# 14591	Respondent: Mr J French-Brooks	Organisation: 	Standard Response: PRC
Ref# 15268	Respondent: Mrs P Bloomfield	Organisation: 	Standard Response: Lindfield
Ref# 15864	Respondent: Mrs C Bennett	Organisation: 	Standard Response: PRC
Ref# 15880	Respondent: Mr J Bennett	Organisation: 	Standard Response: PRC
Ref# 15912	Respondent: Mr & Mrs R & P Davies	Organisation: 	Standard Response: PRC
Ref# 16023	Respondent: S Lee	Organisation: 	Standard Response: PRC
Ref# 16024	Respondent: Mr D Benstead	Organisation: 	Standard Response: PRC
Ref# 16090	Respondent: Mr G Franklin	Organisation: 	Standard Response: PRC
Ref# 16093	Respondent: Ms C Franklin	Organisation: 	Standard Response: PRC
Ref# 16195	Respondent: Mr DM Gunn	Organisation: 	Standard Response: PRC

Ref# 16239	Respondent: MS S Morrison	Organisation: 	Standard Response: PRC
Ref# 16340	Respondent: Mrs V Barrett	Organisation: 	Standard Response: PRC
Ref# 16442	Respondent: Mr AP Crossley	Organisation: 	Standard Response: PRC
Ref# 16801	Respondent: Mr J R Gamble	Organisation: 	Standard Response: PRC
Ref# 17045	Respondent: Mr M Blacker	Organisation: 	Standard Response: PRC
Ref# 17433	Respondent: S Prangnell	Organisation: 	Standard Response: PRC
Ref# 17481	Respondent: Mrs A Baskerville	Organisation: 	Standard Response: PRC
Ref# 17551	Respondent: Mr G Newitt	Organisation: 	Standard Response: PRC
Ref# 17578	Respondent: Mr P Cooper	Organisation: 	Standard Response: PRC
Ref# 17583	Respondent: Mrs M Bartlett	Organisation: 	Standard Response: PRC
Ref# 17686	Respondent: J Johnson	Organisation: 	Standard Response: PRC
Ref# 17727	Respondent: Mrs J Hepburn	Organisation: 	Standard Response: PRC
Ref# 18130	Respondent: Mr D Holmes	Organisation: 	Standard Response: PRC
Ref# 18695	Respondent: Ms K Knight	Organisation: 	Standard Response: PRC

Ref# 18860	Respondent: Mrs N B Smith	Organisation: 	Standard Response: PRC
Ref# 19497	Respondent: Ms C Boughton-Tucker	Organisation: 	Standard Response: PRC
Ref# 19498	Respondent: P Tucker	Organisation: 	Standard Response: PRC
Ref# 19750	Respondent: G Hepburn	Organisation: 	Standard Response: PRC
Ref# 19985	Respondent: J Groom	Organisation: 	Standard Response: PRC
Ref# 20099	Respondent: Ms A Warrener	Organisation: 	Standard Response: PRC
Ref# 20131	Respondent: Mr B Warrener	Organisation: 	Standard Response: PRC
Ref# 20132	Respondent: Ms R Warrener	Organisation: 	Standard Response: PRC
Ref# 20246	Respondent: GE Taylor	Organisation: 	Standard Response: Lindfield
Ref# 20247	Respondent: Mr & Mrs J & M Damsell	Organisation: 	Standard Response: Lindfield
Ref# 20248	Respondent: Mr & Mrs C & N Smith	Organisation: 	Standard Response: Lindfield
Ref# 20250	Respondent: Mr & Mrs D & D Calvert	Organisation: 	Standard Response: Lindfield
Ref# 20251	Respondent: Mrs M.J.E Smith	Organisation: 	Standard Response: Lindfield
Ref# 20252	Respondent: Mrs M Samuel	Organisation: 	Standard Response: PRC

Ref# 20253	Respondent: Mrs M Heaver	Organisation: 	Standard Response: Lindfield
Ref# 20255	Respondent: C Cross	Organisation: 	Standard Response: PRC
Ref# 20256	Respondent: Mr C Tyler	Organisation: 	Standard Response: Lindfield
Ref# 20263	Respondent: Mrs L Ahmed	Organisation: 	Standard Response: Lindfield
Ref# 20265	Respondent: Mr & Mrs P & S Hatch	Organisation: 	Standard Response: Lindfield
Ref# 20266	Respondent: J Brown	Organisation: 	Standard Response: Lindfield
Ref# 20270	Respondent: Mr D Edwards	Organisation: 	Standard Response: Lindfield
Ref# 20276	Respondent: Mrs C Russell	Organisation: 	Standard Response: PRC
Ref# 20277	Respondent: Mr C Russell	Organisation: 	Standard Response: PRC
Ref# 20278	Respondent: Mr S Sole	Organisation: 	Standard Response: PRC
Ref# 20280	Respondent: Mr and Mrs S Abbott	Organisation: 	Standard Response: PRC
Ref# 20281	Respondent: Ms R Bartlett	Organisation: 	Standard Response: PRC
Ref# 20283	Respondent: Dr S Choubersky	Organisation: 	Standard Response: PRC
Ref# 20284	Respondent: Mr D Lall	Organisation: 	Standard Response: PRC

Ref# 20287	Respondent: Ms R Pascale	Organisation: 	Standard Response: PRC
Ref# 20289	Respondent: Mr + Ms D + M Mulhall and Povedano	Organisation: 	Standard Response: PRC
Ref# 20290	Respondent: MR R Lall	Organisation: 	Standard Response: PRC
Ref# 20291	Respondent: Mr J Mepham	Organisation: 	Standard Response: PRC
Ref# 20292	Respondent: Mrs C Mepham	Organisation: 	Standard Response: PRC
Ref# 20295	Respondent: Mr CB Hepburn	Organisation: 	Standard Response: PRC
Ref# 20296	Respondent: Mr RJ Hepburn	Organisation: 	Standard Response: PRC
Ref# 20298	Respondent: Mr A Webb	Organisation: 	Standard Response: PRC
Ref# 20301	Respondent: Mr M Davidson	Organisation: 	Standard Response: PRC
Ref# 20307	Respondent: Mr N FitzGerald	Organisation: 	Standard Response: Lindfield
Ref# 20308	Respondent: Mrs D Nisbett	Organisation: 	Standard Response: Lindfield
Ref# 20309	Respondent: Mr S Nisbett	Organisation: 	Standard Response: Lindfield
Ref# 20310	Respondent: Mr J Tanner	Organisation: Okapi Holding Investments Corporation	Standard Response: PRC
Ref# 20311	Respondent: Mr C Johnson	Organisation: 	Standard Response: PRC

Ref# 20315	Respondent: Mr J Reid	Organisation: 	Standard Response: PRC
Ref# 20316	Respondent: Mrs H Reid	Organisation: 	Standard Response: PRC
Ref# 20320	Respondent: Miss E Lomax	Organisation: Think Ahead	Standard Response: Lindfield
Ref# 20321	Respondent: Mr S Dore	Organisation: 	Standard Response: Lindfield
Ref# 20322	Respondent: Mrs N Geddie	Organisation: 	Standard Response: Lindfield
Ref# 20325	Respondent: Ms C Diamond	Organisation: 	Standard Response: Lindfield
Ref# 20330	Respondent: Mr & Mrs S & C Brickell	Organisation: 	Standard Response: Lindfield
Ref# 20333	Respondent: Mr and Mrs Lucas	Organisation: 	Standard Response: Lindfield
Ref# 20334	Respondent: D+E Roberts	Organisation: 	Standard Response: Lindfield
Ref# 20336	Respondent: Mr S Wigzell	Organisation: 	Standard Response: PRC