

From: Issy Fateh [<mailto:issy.fateh@quod.com>] **On Behalf Of** John Rhodes
Sent: 23 January 2017 16:28
To: ldfprogrammeofficer@tiscali.co.uk
Cc: Chris.Tunnell@midsussex.gov.uk; leenewlyn@gmail.com; Adrian Fox; John Rhodes
Subject: MSDC5: Comments from Mayfields

Pauline,

At the examination last week the Inspector provided the opportunity for comments to be submitted on the Council's document MSDC5. Mayfields comments are set out below.

1. MSDC5 is based on the "*working assumption... that any further housing provision is distributed amongst settlements in accordance with a settlement hierarchy*". The document does not, therefore, contemplate the potential for a new settlement.
2. Similarly, the document is predicated on the assumption that no further strategic sites could be allocated in the plan (page 1), which appears to be based on conclusions drawn previously by the Council in the SHLAA and the Sustainability Appraisal;
3. The examination has already discussed the treatment of Mayfields within the SHLAA. In summary:-
 - the assessment of Mayfields is superficial in the extreme. As site 678 Mayfields is assessed in half a side of A4 without any reference to the detailed evidence submitted by MMT. The constraints identified in the assessment contradict the previous Market Town Study, the evidence provided by Mayfields and the conclusions of the Horsham Local Plan Inspector;
 - as MSDC2 advises (para 8.1.13) "*sites are excluded from detailed analysis in the SHLAA if they are unrelated to existing settlement boundaries*".
4. This is consistent with the 'Capacity of Mid Sussex' document produced by LUC which identified Mayfields as one of the least constrained part of the district (with only 1 secondary constraint (Figures 4.1 and 4.2)) but then excluded Mayfield from further examination because of remoteness to services (Figure 5.3), notwithstanding that those services would obviously be provided within the new settlement.
5. The Sustainability Appraisal is equally unsatisfactory. For example:-
 - the new settlement option was considered as a single standalone option rather than as part of a suite of allocations (page 102);
 - a new settlement option was scored against in terms of health, education, retail, community etc., without consideration of the potential for mitigation – i.e. that these facilities would be provided as part of the development (page 107).
6. The assessment in the Strategic Sites paper was equally superficial. Although Mayfields scored relatively well, the methodology of attaching equal weight to every criteria severely limits the value of the exercise.

The premise on which MSDC5 is based, therefore, is not accepted and an exclusion of the contribution which a new settlement, such as Mayfields, could make to District Plan housing requirements could not be justified based on the Council's evidence base.

As the Inspector considers the weight to attach to MSDC5, I would be grateful if these observations are taken into account.

Regards

John



John Rhodes
Director
john.rhodes@quod.com

Main: 020 3597 1000
Mobile: 07831251386
Direct: 020 3597 1016
www.quod.com

Ingeni Building
17 Broadwick Street
London
W1F 0AX

