

# Consultation Statement

## Hassocks Neighbourhood Plan



**June 2019**

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## 1. INTRODUCTION

- 1.1. This Consultation Statement has been prepared by DOWSETTMAYHEW Planning Partnership for, and on behalf of, Hassocks Parish Council (HPC). It is in support of the preparation of the Hassocks Neighbourhood Plan (HNP).
- 1.2. This Statement contains a chronology of the stakeholder engagement that has taken place as part of the preparation of the HNP, the main issues that have emerged through this process, and how they have been addressed. It sets out how preparation of the HNP accords with the Neighbourhood Planning (General) Regulations 2012.
- 1.3. This Statement sets out a summary of the legislative background (Section 2); the overarching principles and process of stakeholder engagement followed in the preparation of the HNP (Section 3); a chronology of the consultation process (Section 4); a summary of the main issues raised through the process and how these have shaped the Pre-submission HNP (Regulation 14) (Section 5); how the HNP and SA have been prepared (Section 6) and a summary of the main issues raised through the Regulation 14 consultation exercise, and how these have been addressed in the Submission Version (Regulation 16) HNP (Section 7 and 8), Matters raised during Regulation 14 consultation and how these have been addressed (Section 9); and a summary is provided at Section 10.
- 1.4. This Statement illustrates the level of public engagement undertaken at every stage of the process and how stakeholder consultation has been key to, and positively shaped, the HNP and its preparation.

## 2. LEGISLATIVE BACKGROUND

- 2.1. The requirement for a Consultation Statement to accompany the Submission Version (Regulation 16) HNP is set out in the Neighbourhood Planning (General) Regulations 2012.
- 2.2. Regulation 15(1) states that *“Where a qualifying body submits a plan proposal to the local planning authority, it must include...”* amongst other things 15(1)(b) *“a consultation statement”*.
- 2.3. Regulation 15(2) states that a consultation statement means a document which:

- (a) *“contains details of the people and bodies consulted about the proposed neighbourhood development plan;*
- (b) *explains how they were consulted;*
- (c) *summarises the main issues and concerns raised by those consulted; and*
- (d) *describes how these issues and concerns have been considered and where relevant addressed in the proposed neighbourhood development plan.”*

- 2.4. This Statement includes a summary of the consultation exercise as part of the preparation of the HNP, undertaken in accordance with Regulation 14 of the Neighbourhood Plan (General) Planning Regulations 2012.
- 2.5. Before submitting a plan proposal to the local planning authority, a qualifying body must-

- (a) publicise, in a manner that is likely to bring to the attention of people who live, work or carry on a business in the neighbourhood area -*
- (i) details of the proposals for a neighbourhood development plan;*
  - (ii) details of where and when the proposals for a neighbourhood development plan may be inspected;*
  - (iii) details of how to make representations; and*
  - (iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;*
- (b) consult any consultation body referred to in Paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for neighbourhood development plan;*
- (c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.”*

- 2.6. The preparation of the HNP has been undertaken in accordance with these regulatory requirements.

### **3. BACKGROUND TO HASSOCKS NEIGHBOURHOOD PLAN**

- 3.1. HPC resolved to prepare a Neighbourhood Plan in 2012. MSDC subsequently approved the designation of the Neighbourhood Plan Area on 16 July 2012. Given part of the Parish lies within the South Downs National Park (SDNP), the South Downs National Park Authority (SDNPA) also designated the Parish in September 2012.
- 3.2. HPC prepared and consulted on an initial Pre-submission Plan (Regulation 14) in January 2016 and submitted the Plan to Mid Sussex District Council (MSDC) (Regulation 16 Plan) in June 2016. The Submission Plan underwent further public consultation in July 2016-September 2016. However, the Submission HNP was not progressed to Examination.
- 3.3. In light of feedback from the ongoing Examination of the Mid Sussex District Plan (MSDP), in particular with respect to the overall level of housing need, MSDC determined that the SHNP

should not proceed to Examination. Progress of the HNP was paused, pending the final adoption of the MSDP, which occurred in March 2018.

- 3.4. Following the adoption of the MSDP, a meeting was held with MSDC Officers and Members of the NPWG to discuss the HNP and future options.
- 3.5. These options were subsequently discussed at a meeting of the NPWG on the 27 June 2018 where it was agreed the NPWG would progress a 'light touch' review of the HNP.
- 3.6. It was resolved that the principles of engagement agreed in 2012 when designated would continue through the 2018-2019 plan preparation period. It was therefore resolved preparation of the HNP would be undertaken in a transparent and inclusive manner.
- 3.7. It was recognised that key to a successful HNP would be the support of local residents and other stakeholders. Intrinsic to securing such support would be to ensure engagement with these stakeholders throughout the plan preparation process.
- 3.8. It was therefore agreed that meetings of the NPWG would be primarily undertaken in public, with the subsequent publication of minutes on the HPC website.
- 3.9. Separate dedicated meetings and discussions have also taken place with representatives of the NPWG and MSDC.
- 3.10. Throughout the plan preparation process, the NPWG have sought to ensure that local residents, their representatives, local businesses, interest groups and wider interested parties including statutory and regulatory bodies have been actively consulted and their views sought.
- 3.11. Agendas, key reports and updates have been regularly provided online on the HPC website.
- 3.12. The overarching principles of the stakeholder engagement process has been to engage in a manner that is extensive, effective, inclusive, fair, transparent and proportionate.

#### **4. CHRONOLOGY OF CONSULTATION PROCESS: 2012- 2015**

- 4.1. This section provides a chronological overview of the consultation stages undertaken as part of the production of the HNP.

##### **Initial Consultation: November 2012**

- 4.2. Early in the process, through the use of a questionnaire, local stakeholders were asked "What should be in our Neighbourhood Plan?". They were also asked "What should be the Vision for the future? What should be our Objective?".
- 4.3. Residents views were sought on how the NPWG should consult the community on the HNP. Contact details in order to provide updates etc were also invited at this point.

## Questionnaire May-July 2014

- 4.4. Following this, a further questionnaire was prepared in Spring 2014. This was distributed to local residents primarily by inclusion in the local “Hassocks and Keymer Talk About”. This set out further detail on the background to the HNP and its purpose. The questionnaire included a “proposed vision” and “proposed objectives” and sought feedback on whether these were appropriate. It set out a proposed range of topics for the HNP and asked whether these were appropriate.
- 4.5. It also set out that the HNP would be expected to facilitate the delivery of some housing and noted preliminary estimates indicated this ought to be in the range of 150 - 400 over the Plan period. It noted recent completions/permissions and asked for comments on areas that should be considered for future development.
- 4.6. In addition it invited contact details of local stakeholders to enable ongoing information dissemination.
- 4.7. Initially responses were requested on, or before 31st May 2014, but this was subsequently extended to 31st July 2014 to enable the submission of further responses. Confirmation of this extension was detailed on the HPC website.
- 4.8. There was a wide range of responses to this questionnaire and the NPWG used feedback to inform the Plan-making.

## Public Consultation: 19 And 20 September 2014

- 4.9. The NPWG undertook its first (significant) public consultation meeting on the 19th and 20th September 2014.
- 4.10. This event provided an opportunity to: talk to members of the NPWG/HPC; find out what a Plan can achieve; discuss the issues that Hassocks Parish faces; and give views on what the HNP should aim to achieve and the policies it should contain.
- 4.11. The event was widely publicised locally. Flyers and posters in key locations (Pubs, Sport facilities, Shops, Church, Notice Boards, Schools, and Doctors Surgery) promoted the event. The event was also noted in the Mid Sussex Times (Thursday 18 September 2014, edition) and social media (Facebook and Twitter) was also used to highlight the event.
- 4.12. The event was held in Adastra Park on Friday 19 September 2014 from 6pm-9pm and on Saturday 20 September 2014 from 10am - 4pm.
- 4.13. Exhibition boards presented the information on the key issues which came out of questionnaires distributed in the summer months.
- 4.14. An information booklet was available to help residents understand the neighbourhood planning process and what the HNP can achieve.
- 4.15. The events were well attended and visitors were encouraged to leave comments on topic areas.

- 4.16. Following the event the information that was presented at the event was made available online and comments were invited by email by 31 October 2014.

#### **Housing Needs Document: November 2014**

- 4.17. The NPWG produced a Housing Needs Assessment paper in November 2014 which set out a range of methodologies to calculate the housing need of the Parish. This included calculations based on household formation, demographic changes and economic changes.

#### **Public Consultation: January 2015**

- 4.18. In January 2015, a public consultation event was held for local stakeholders. This provided the opportunity for interested parties to “Have Your Say on Potential New Housing Sites”.
- 4.19. The event was widely publicised locally. Posters in key locations (Pubs, Sport facilities, Shops, Church, Notice Boards, Schools, and Doctors Surgery) promoted the event. The event was also promoted on the HPC website and on social media. Local councillors, officers at MSDC, local parish council and residents were notified of the event via email.
- 4.20. The event was held at Downlands Community School on Friday 30th January 2015 from 7.30pm-9.30 and on Saturday 31 January 2015 from 10.30am-12.30pm.
- 4.21. The events included a presentation on the key aspects of producing a Neighbourhood Plan followed by an interactive workshop where residents had the opportunity to share views on potential development sites in the Parish.
- 4.22. Stakeholders were provided with details of potential housing sites. This comprised a combination of sites proposed by owners/agents or suggested by members of the public following the public consultation exercises in Spring 2014 and September 2014; and those sites included within the MSDC Strategic Housing Land Availability Assessment (SHLAA).
- 4.23. Potential development sites comprised:

- Land East of Lodge Lane;
- Land to N West of Clayton Mills;
- Hassocks Post Delivery Office;
- Hassocks Golf Club;
- Land North of Friar’s Oak;
- Russell’s Nursery;
- Infants School;
- Tate’s Garden Centre;
- Undeveloped Land South of Clayton Mills.



- Land opposite Standford Avenue;
- Land at the Ham;
- Station Goodsyrd;
- Land North of Mackie Avenue/Clayton Mills;
- Land at Southdown Farm;
- Land to West of Lodge lane;
- Pattendens;
- Land to East of Ockley Lane;
- Land to North of Shepherd's Walk;
- National Tyre Centre; and
- Telephone Exchange.

4.24. Attendees were provided with a number of documents to assist in their consideration on these potential housing sites. These documents comprised:

- Housing needs documents;
- Housing Potential Sites Map;
- Site Assessments for each candidate site;
- Explanation Form of the Site Assessments;
- Hassocks Constraints Map; and
- Hassocks Historical Flood Events Map.

4.25. The events were well attended with over 200 people attending on Friday (30th January) and 260 people on Saturday (31 January).

4.26. At the event, stakeholders were asked to complete a feedback form detailing their views on the potential housing sites.

4.27. Material was made available after the event and there was an opportunity to submit the questionnaire feedback form up to Friday 13 February 2015.

4.28. The NPWG subsequently assessed the feedback. An analysis of responses was published on the HPC website.

### **Young Person Survey For Hassocks Neighbourhood Plan**

4.29. A survey of 108 boys and girls from Downlands School, local guides and scout group was undertaken. The survey sought to understand the needs of young people in the Parish, and how this could be facilitated to be improved through the HNP.



### Scoping Report For The Sustainability Appraisal: March 2015

4.30. The Scoping Report for the Sustainability Appraisal (SA) to accompany the HNP was the subject of formal consultation with the statutory consultees in February and March 2015. Feedback was received in accordance with the regulatory timetable.

### Business And Tourism Questionnaire: April 2015

4.31. A questionnaire was issued in March 2015 to local businesses, seeking details of existing businesses based in the Parish, and requesting information on future growth and facilities that may need to be facilitated through the HNP to support the growth of these businesses.

### Public Consultation: July 2015

4.32. In July 2015 a further public consultation event took place to enable local stakeholders to “Have Your Say on Selection of Housing Sites.”

4.33. The event was widely publicised locally. Flyers and posters in key locations (Pubs, Sport facilities, Shops, Church, Notice Boards, Schools, Doctors Surgery and the Parish Council website) promoted the event. The event was also promoted on social media.

4.34. The events were held in Downlands Community School on Friday 10 July 2015 from 7.30pm-9.30pm and on Saturday 11 July 2015 from 10.30am-12.30pm.

4.35. Attendees were provided with a ‘Consultation Booklet’; ‘Potential Sites Map’; and ‘Coding Grid’. Collectively these explained the preference order and views that stakeholders had expressed at the January 2015 consultation event, and the extensive further work that had been undertaken to confirm the availability of sites, and consider the potential impact of sites on matters such as traffic, the Stonepound Air Quality Management Area (AQMA), biodiversity, cultural heritage and landscape and townscape sensitivity. These were supported by a range of evidence base documents, including:

- Traffic effects of Housing Development;
- Hassocks Parish Landscape Character Assessment;
- Hassocks Parish Landscape Character Area Maps;
- Hassocks Strategic Viewpoints Document;
- Hassocks Environmental Constraints Map;
- Hassocks Village Townscape Appraisal;
- Hassocks Town Centre Townscape Analysis Map;
- Hassocks Local Townscape Character Areas Map;
- Hassocks Green Infrastructure Report;
- Hassocks Green Infrastructure Plan;

- Hassocks Parish Wildlife Asset Identification;
- Hassocks Parish Key Habitats Plan;
- Sussex Biodiversity Records Centre Desktop Biodiversity Report 2014;
- Hassocks Parish Cultural Heritage Report;
- Hassocks Parish Cultural Heritage Map;
- Letter from DMP to WSCC Education Department 29/04/2015;
- Letter to NHS England 29/04/2015;
- Historic Characterisation Maps;
- Historic Characterisation Summary Report; and
- Heritage Assets Notification Reports and Map.

4.36. Attendees were asked to identify their preference for the order of sites for potential allocation for housing development.

#### **Extra Ordinary General Meeting Of The Parish Council: September 2015**

4.37. On 22nd September 2015, HPC held an Extraordinary General Meeting (EGM) of the Parish Council to discuss and resolve the extent of housing need in the Parish to be contained within the HNP, and the selection of housing sites to facilitate delivery of these housing numbers.

4.38. The meeting also considered and made resolutions on the allocation of Local Green Space (LGS) sites to be contained within the HNP.

4.39. The papers distributed to HPC Councillors in support of the considerations at the meeting comprised:

- Recommendations of the Neighbourhood Plan Working Group (NPWG) on Housing Need; Allocation of sites; Allocation of Local Green Spaces within the Hassocks Neighbourhood Plan;
- Hassocks Parish Council; Neighbourhood Plan Working Group paper on Housing Need - August 2015;
- Neighbourhood Plan Working Group paper on Proposed Local Green Space and Enhanced Footpaths;
- Hassocks Neighbourhood Plan 3rd Consultation Event Analysis of Preference Data;
- Summary of Site Suitability Appraisals;
- Sustainability Appraisal of candidate housing sites (including summary table);
- Plan of candidate housing sites assessed as part of the Neighbourhood Plan process;

- Hassocks Neighbourhood Plan All Constraints Map;
- Map of potential Local Green Space candidate sites; and
- Hassocks Parish Housing Land Availability Assessment (including Appendices of assessment of each candidate site).

4.40. The HNP was prepared mindful of the issues raised as part of the public consultation exercises.

## 5. MAIN ISSUES ARISING FROM ENGAGEMENT: 2012-2015

5.1. The extensive stakeholder engagement helped inform the key issues addressed in the initial HNP and the policies that flow from the Vision and Objectives.

5.2. The main issues that arose during the stakeholder engagement exercise in the lead up to the preparation of the initial Pre-submission HNP and its subsequent statutory consultation can be summarised as;

- Protect the rural character of the Parish and maintain Gaps to neighbouring towns and villages.
- Protect heritage assets and the conservation areas of the Parish.
- Have regard to the proximity of the Parish to the South Downs National Park.
- Delivery of appropriately sized, affordable and sustainable housing.
- Ensure local residents have access to key local services including education, health and community services.
- Local Green Space.
- Reduce the impact of traffic in terms of congestion, pollution and parking.

5.3. How these issues were addressed within the initial Pre-submission HNP is set out below.

### Protect The Rural Character Of The Parish And Maintain Gaps To Neighbouring Towns And Villages

5.4. The Parish's high landscape and townscape quality, which includes the scarp slopes of the South Downs in the south, merging with the Low Weald in the north are key features which local residents wished to have preserved and protected through the HNP.

- 5.5. The important role of the undeveloped land, which lies between the built up area of Hassocks and Keymer and Burgess Hill, Ditchling and Hurstpierpoint, plays was also acknowledged in maintaining the visual separation of these settlements. Residents wished to maintain the Parish's individual identity and prevent coalescence.
- 5.6. This feedback was taken into account when drafting the Strategic Objectives. The HNP included an objective to "preserve and enhance the rural character and biodiversity of the Parish and its historic buildings, maintaining Gaps to neighbouring towns and villages and having regard to the proximity of the Parish to the South Downs National Park and its biodiversity.
- 5.7. Flowing from this Strategic Objective the HNP included Policy 1: Hassocks- Burgess Hill Gap (Burgess Hill Gap), Policy 2: Hassocks - Ditchling Gap (Ditchling Gap) & Hassocks- Hurstpierpoint Gap (Hurstpierpoint Gap), Policy 4: Green Infrastructure, Policy 8: Character and Design, Policy 14: Hassocks Golf Club, Policy 15: Land to the north of Clayton Mills and Mackie Avenue.

### **Protect Heritage Assets And The Conservation Areas Of The Parish**

- 5.8. The Parish is rich in heritage assets and has two Conservation Areas; the historic core of Keymer, focussed around Keymer Road, The Crescent and Lodge Lane; and the historic core of Clayton, focussed around Underhill Lane. Both include a number of Listed Buildings.
- 5.9. Feedback at consultation events highlighted local people recognised the importance of heritage assets and the contribution they make to the quality of the area, in terms of local character and distinctiveness and wish for them to continue to be protected.
- 5.10. This feedback was taken into account when drafting the Strategic Objectives and the HNP includes an objective to "preserve and enhance the rural character and biodiversity of the Parish and its historic buildings....".
- 5.11. Flowing from this Strategic Objective the HNP included Policy 6: Conservation Areas and Policy 20: Reuse of Rural Buildings for Residential Use.

### **Have Regard To The Proximity Of The Parish To The South Downs National Park**

- 5.12. The southern part of the Parish is within the South Downs National Park (SDNP). The iconic 'Jack and Jill' Clayton windmills are also within the Parish and are visible from the east-west South Downs Way, located a short way to the south.
- 5.13. Local residents identified the SDNP and its setting as a key feature of the Parish and wish to see it protected. They also wished Hassocks to support tourism activities and help meet the demand for over-night accommodation in and around the SDNP.
- 5.14. This feedback was taken into account when drafting the Strategic Objectives and the HNP includesdan objective to "preserve and enhance the rural character and biodiversity of the Parish and its historic buildings, maintaining Gaps to neighbouring towns and villages and having regard to the proximity of the Parish to the South Downs National Park and its biodiversity" and "ensure the village is safe, accessible and attractive to all, acting as a gateway to the South Downs National Park, encouraging tourism, and supporting healthy lifestyles and wellbeing".

- 5.15. The Plan recognised the importance of the SDNP and sought to positively support the purposes of the Park and the duty of the Park Authority in discharging its functions with respect to land use through Policy 5: South Downs National Park and Policy 21: Tourism.

### **Delivery Of Appropriately Sized, Affordable And Sustainable Housing**

- 5.16. The population of the Parish increased between the 2001 and 2011 census by 12.4% (846). Within the then emerging District Plan, Hassocks was identified as a 'Larger Village' in relation to others within the District. HPC therefore accepted that it was a location where some further additional housing would need to be delivered over the Plan period to meet its needs; but this should have regard to environmental and character constraints of the area.
- 5.17. As an intrinsic part of the preparation of the initial HNP a detailed assessment was been undertaken of housing need. A parish housing need assessment was first prepared in November 2014. This applied different methodologies to calculate housing need reliant upon data from a variety of sources, including the Office for National Statistics.
- 5.18. The document used 3 different approaches, comprising household formation, demographic changes and economic changes. These were then blended to create 18 different housing need scenarios, providing a range of housing need figures. Aligned to this assessment, HPC had regard to the over-arching spatial strategy to the delivery of housing contained within the emerging District Plan. Integral to this was the delivery of a significant quantum of new housing in and around Burgess Hill, located immediately to the north of the Parish boundary.
- 5.19. Given this, the NPWG recommended to the Parish Council at the EGM of 22nd September 2015, that this should temper the need for housing within Hassocks Parish; and recommended that the housing need over the Plan period up to 2031 to be 210 - 270 dwellings. This range complied with most of the housing need scenarios in the Housing Need paper. Cognisant of the NPPF guidance on the need to plan positively, it was resolved to seek for the HNP to identify sites within the Parish capable of delivering the upper limit of this figure, subject to acceptable environmental impact.
- 5.20. In parallel to considerations of housing need, HPC assessed the potential of a wide number of candidate housing sites to meet this need. This process commenced with a "Call for Sites" contained within the questionnaire published in May 2014.
- 5.21. Following this, coupled with a search of other known data sources, such as the MSDC SHLAA, the NPWG undertook a series of public consultation exercises, to obtain the view of local stakeholders on their preferred sites for delivery of housing. This included presentations and workshops in January 2015 and July 2015.
- 5.22. At these events detailed information was prepared to identify potential opportunities and constraints affecting sites. This sought to enable stakeholders to make informed opinions on their site preferences.
- 5.23. Following the January 2015 consultation event further appraisals were undertaken including in respect of the availability of the site, transport impact and environmental and visual impact. This culminated in the preparation of a Parish Housing Land Availability Assessment (PHLAA) and

associated SA of candidate sites, that was published ahead of the EGM in September 2015, that resolved both the housing need in the Parish over the Plan period, but also the sites that would be allocated in the HNP.

- 5.24. Flowing from this work and HPC's resolution, the initial HNP included housing policies in Chapter 6.

### **Ensure Local Residents Have Access To Key Local Services Including Education, Health And Community Services**

- 5.25. The community facilities of the Parish are predominantly focussed within the built up area of Hassocks and Keymer. State education provision is contained with 3 schools; Hassocks Infants, Windmills Junior and Downlands Community School (Secondary). These facilities were all noted to have expanded in recent years but it was acknowledged there were capacity constraints for meeting current and future local need at primary level. There is a health-centre in Windmill Avenue. Recreation and public open space is provided throughout the Parish.
- 5.26. Residents viewed having access to community facilities as critical to the well-being of the Parish. Feedback expressed at consultation events sought for the HNP to ensure adequate provision of community facilities in locations that are readily accessible to the community.
- 5.27. This feedback was taken into account when drafting the Strategic Objectives and the initial HNP included an objective to "ensure all sections of the community have access to key local services including education, health, community services, sporting, cultural, religious, performing and social clubs, groups and shops".
- 5.28. A significant element of stakeholder engagement related to concerns regarding the pressure and provision of adequate school places, in particular at primary (infant and junior) level. As a result of this, a meeting was arranged with WSCC Education Department on 20th April 2015. This sought to establish WSCC's view and intentions on existing and planned school place need and provision within the Parish area.
- 5.29. Following the meeting requests were made in writing (letter dated 18th May 2015) to confirm details that could be used as part of the background evidence base in the preparation of the HNP. This included seeking confirmation of WSCC's view on the need for a new primary school within the Parish over the plan period, and any work that had been undertaken to find and secure a site. Despite repeated requests a response was not received until 30th September 2015. This indicated there was a need for a 2-Form Entry primary school (420 place school), but that no significant work had been undertaken to identify a site.
- 5.30. Further correspondence took place with WSCC during October 2015 which confirmed that no detailed appraisal had been undertaken of potential housing sites, and that this was not likely to take place immediately. Notwithstanding this, WSCC made clear they would not recommend a "phasing" approach to control the delivery of additional housing in the HNP in relation to the timely delivery of a new school.
- 5.31. Based on the feedback from WSCC, HPC concluded the HNP should support the provision of a new 2-Form Entry primary school in the Parish over the plan period. In light of the necessary further

work to identify and consider potential sites for a school, it was concluded that such policy support should be determined on a criteria-based approach. The criteria should include requirements expressed by WSCC to the Parish Council, and be subject to a feasibility study to be conducted by the Local Education Authority (LEA).

- 5.32. Flowing from this work, and the Strategic Objective the initial HNP included; Policy 4: Green Infrastructure; Policy 9: Open Space; Policy 10: Outdoor Play Space; Policy 11: Community Facilities; Policy 12: Education Provision; Aim 1: Education Facilities; Aim 2: Healthcare Facilities; Policy 14: Hassocks Golf Club; Policy 15: Land to the north of Clayton Mills and Mackie Avenue; Policy 16: National Tyre Centre; Aim 3: Village Centre; Aim 11: Footpaths and Accessibility; and Aim 12: Cycleways and Bridleways.

### **Local Green Space**

- 5.33. During early stakeholder engagement requests were made to consider the allocation of LGS as part of the process of preparing the HNP.
- 5.34. The NPWG undertook a detailed analysis of potential candidate sites, having regard to the guidance contained in (at that time) paragraphs 76 -78 of the National Planning Policy Framework (NPPF) and associated guidance in the National Planning Policy Guidance (NPPG). This work was prepared by a sub-group of the NPWG that included qualified landscape architects.
- 5.35. As part of the assessment, landowners and/or their agents were contacted and invited to submit comments on the potential LGS designations. Their responses were carefully considered, together with the submissions of stakeholders advocating LGS allocations. In undertaking this work the NPWG were cognisant of the NPPG guidance that states, amongst other things, that LGS designation would need to be consistent with local planning for sustainable development and plans must identify sufficient land in suitable locations to meet identified development needs (see ref 1037.007.20140306).
- 5.36. On this basis, HPC considered the allocation of LGS within the HNP at their EGM on 22nd September 2015, only after resolutions had been made regarding housing need and the identification of sites to meet this need. On this basis a number of sites, having been identified (at least in part) for housing, were not considered for designation.
- 5.37. Flowing from the work of the NPWG, and HPC's resolution, the initial HNP included Policy 3: Local Green Spaces.

### **Reduce The Impact Of Traffic In Terms Of Congestion, Pollution And Parking**

- 5.38. Stonepound Crossroads is an AQMA, due to the high levels of nitrogen dioxide in the area, caused by the volume of traffic and the start stop routine of driving conditions at peak times. During peak hours there are significant queues on the approaches to Stonepound Crossroads.
- 5.39. Feedback at public consultation events highlighted residents would not support development that would either have an unacceptable adverse effect on the AQMA, or if a proposed use or users would be unacceptably adversely effected by the air quality.



- 5.40. Public consultation highlighted concern regarding congestion and safety within the centre of the village, particularly on Keymer Road between Dale Avenue and Woodland Road.
- 5.41. Residents also highlighted support for improvements to station car parking.
- 5.42. In response to this feedback, a meeting was arranged with WSCC Highway Authority on 20th April 2015. At this meeting, discussions took place on a range of transport issues identified by HPC and/or stakeholders to be considered within the preparation of the HNP. The principal issues were:

- Congestion and pollution at Stonepound Crossroads;
- Parking by commuters on streets close to Hassocks Train Station; and
- Safety issues associated with excessive speeds and narrow footways.

- 5.43. Support was offered for the inclusion of ‘aims’ for transport related matters in the HNP, in circumstances where policies would not be appropriate. WSCC also confirmed that potential housing sites in proximity to Stonepound Crossroads should not be excluded on air quality grounds, as they may be relatively more sustainable (in relation to proximity to local services) than other more remote options.
- 5.44. It was acknowledged that the Stonepound AQMA is a strategic level issue with no clear solutions. In light of this, and cognisant of AQMA concerns, considerations of air quality, were duly considered as part of the preparation of the HNP, including with respect to the identification and selection of housing sites.
- 5.45. Flowing from this work the initial HNP included an objective to “reduce the impact of traffic in terms of congestion, pollution and parking through the management of parking and speeds, accessibility of public transport and improvements in pedestrian and cycle safety; encouraging people to walk, cycle and ride in and around Hassocks”.
- 5.46. Flowing from this Strategic Objective the HNP included Policy 7: Air Quality Management, Aim 8: Pollution, Aim 4: Roads, Traffic and Congestion, Aim 5: Speed and Speed Limits, Aim 6: Parking, and Aim 7: Safety.

## **6. PRE-SUBMISSION HNP & SUBMISSION HNP: JANUARY 2016-JUNE 2016**

- 6.1. A draft HNP and the Sustainability Appraisal (SA) was provided to MSDC in December 2015 for informal review. Comments were received and the HNP and SA were subsequently updated.
- 6.2. The initial Pre-submission HNP (Regulation 14) and accompanying SA were formally published for consultation between 05 January 2016 and 16 February 2016.
- 6.3. The Submission Documents were subsequently prepared and submitted to MSDC in June 2016. The Submission Plan and associated documents underwent further public consultation in July 2016-September 2016.

- 6.4. In light of feedback from the ongoing Examination of the Mid Sussex District Plan (MSDP), in particular with respect to the overall level of housing need, by letter dated 19th April 2017, the Local Planning Authority advised that the District Council considered that the Neighbourhood Plan should not proceed to Examination at that time.
- 6.5. The District Council advised that progress should be paused to *'wait for the [District] Council to arrive at agreed [housing] figures for the overall requirement and for individual Neighbourhood Plan areas.'*
- 6.6. Progress of the HNP was paused, pending the final adoption of the MSDP, which occurred in March 2018.

## **7. MID SUSSEX DISTRICT PLAN EXAMINATION: AUGUST 2016-MARCH 2018**

- 7.1. The District Plan was submitted to the Secretary of State for independent Examination in August 2016. Hearings were held toward the end of 2016 and in early 2017. This culminated in a letter from the Inspector dated 20th February 2017, which set out interim conclusions on the housing requirement for the district and required an increase of some 20% over the figures contained within the Submission District Plan.
- 7.2. Furthermore, the Inspector required greater clarity on the spatial strategy within the District Plan *'by establishing the approximate number of dwellings expected in each settlement or groups of settlements [and as drafted the Plan] provides inadequate guidance to Neighbourhood Plans ... on the amounts of housing development they should aim to accommodate. Up to now, Neighbourhood Plans have been produced without sufficient guidance of this sort and indeed without the knowledge of the objectively assessed need and housing requirement. Future Plans ... must take account of both the housing requirement and the numbers of new homes expected in each settlement otherwise they could well be at variance with the district's spatial strategy and be unsound themselves.'*
- 7.3. In response to this, the District Council prepared a 'Main Modifications' District Plan which was the subject of consultation in October-November 2017. This included the addition of a 'strategic' housing allocation on land north of Clayton Mills, for some 500 dwellings and associated infrastructure.
- 7.4. A significant quantum of objection was submitted to this proposed allocation, including by Hassocks Parish Council. This culminated in a re-opening of the Hearing into the District Plan on Monday 5th February 2018, where representations were made to the Inspector for, and on behalf of, Hassocks Parish Council.
- 7.5. Notwithstanding the objection to this allocation, the Inspector concluded in his report on the Examination of the District Plan dated 12th March 2018 that the proposed allocation was 'sound.'
- 7.6. On this basis, the Mid Sussex District Plan 2014-2031 was adopted on 28th March 2018.

## 8. DECISION TO PREPARE A REVISED HASSOCKS NEIGHBOURHOOD PLAN: JUNE 2018

- 8.1. Following the adopting of the MSDP, a meeting was held with MSDC Officers on 16 May 2018 to discuss options for proceeding with a revised Neighbourhood Plan.
- 8.2. At the meeting, MSDC made clear that they would now support progress of the Neighbourhood Plan in principle.
- 8.3. Following the meeting, it was considered that there were three main options in determining if, and how, to proceed with the preparation and adoption of the HNP. Options comprised:

- Cease preparation of a Neighbourhood Plan (the 'do nothing' scenario);
- Resurrect the June 2016 Submission Version Plan and amend where necessary and progress (the 'light touch' review scenario); and
- Produce a wholly new Neighbourhood Plan (the 'comprehensive' review scenario).

- 8.4. The Options were discussed at a meeting of the NPWG on 27 June 2018. It was agreed the NPWG would progress a 'light touch' review of the HNP (See Appendix 1).
- 8.5. Under this option, it was agreed the evidence base and Plan would be reviewed, and policies that remain relevant, or could be updated with relatively modest additional evidence gathering/ amendment would be identified to enable the expedient production of a further iteration of the HNP.
- 8.6. Under this option, it was agreed the housing need of the Parish would not be reviewed. Instead, reliance would be wholly placed upon the policies for housing contained at a district level.
- 8.7. Under this option, it was noted that a revised HNP would need to be the subject of further statutory consultation for two, six week periods (the Regulation 14 and Regulation 16 consultations). There would also need to be additional evidence gathering, and this would be determined through a review of the existing evidence base, set against changes in circumstances since these were prepared.

## 9. PREPARATION OF THE REVISED HASSOCKS NEIGHBOURHOOD PLAN: JUNE 2018-JUNE 2019

- 9.1. The NPWG met on a regular basis between June 2018-May 2019 to progress the revised HNP.
- 9.2. In preparing the revised HNP, the NPWG undertook a detailed review and update of the evidence base. Integral to this approach was a review and update of the Vision and Strategic Objectives of the Submission HNP (June 2016).
- 9.3. In addition, the planning policies and aims of the Submission HNP (June 2016) were also reviewed to determine whether policies and aims required: removal, substantial amendment, or

could be carried forward without amendment. This work was informed by new and revised Background Papers on: Housing; Local Gap; and Local Green Space.

- 9.4. In addition a revised Sustainability Appraisal (SA) Scoping Report was prepared and the subject of statutory consultation with the requisite statutory bodies for comment.

### Scoping Report: August 2018

- 9.5. The SA Scoping Report was prepared in August 2018 and consultation with the requisite statutory bodies was undertaken between August-September 2018.
- 9.6. A standard response was received from the Environment Agency; no comments were received from Historic England; and detailed comments were received from Natural England.

### Regulation 14 Pre-Submission: Plan Preparation And Consultation

- 9.7. The HNP was prepared mindful of the issues raised as part of public consultation exercises undertaken between 2012-2015. It was also prepared cognisant of the adoption of the MSDP which, amongst other matters, allocates a strategic site for 500 homes on land to the north of Clayton Mills. As set out above a significant quantum of objection was submitted to this proposed allocation, including by Hassocks Parish Council.
- 9.8. In light of the following, key issues to be addressed in the HNP were identified by the NPWG:

- **HNP to reflect the housing requirements of the MSDP for the Parish;**
- **Protect the rural character of the Parish and maintain local gaps to neighbouring settlements; and**
- **Identify Local Green Space.**

- 9.9. The revised draft HNP and SA were prepared on this basis.
- 9.10. A revised draft HNP and SA was provided to MSDC for informal review in November 2018 prior to public consultation. Comments on the HNP were received on 23 November 2018 (See Appendix 2).
- 9.11. A meeting was held on 03 December 2018 to discuss MSDC comments on the HNP. Written comments on the SA were subsequently received on 06 December 2018 (See Appendix 2).
- 9.12. The Pre-submission HNP (Regulation 14) and accompanying SA were formally published for a six week period commencing 07 January 2019.
- 9.13. The HNP (and SA) was published in accordance with Regulation 14(a), (b) and (c) of the Neighbourhood Planning (General) Regulations 2012.

- 9.14. The consultation documents were available to view online on the dedicated HNP webpage. A hard copy of the documents were made available for inspection at the Parish Centre. Comments were invited by email and/or by post.
- 9.15. Stakeholders were alerted to the consultation via email alerts. Locally in the Parish, notices alerting residents and stakeholders to the consultation were placed on Parish notice boards. In addition, a notice was placed on the Parish Council website.
- 9.16. The consultation closed on the 18 February 2019.

## **10. MAIN ISSUES ARISING THROUGH CONSULTATION ON THE PRE-SUBMISSION NEIGHBOURHOOD PLAN (REGULATION 14)**

- 10.1. A total of 63 representations were received in response to the Regulation 14 Pre-submission consultation, comprising:

- 41 representations from local residents;
- 8 representations from statutory consultees; and
- 14 representations from developers/agents acting on behalf of landowners.

- 10.2. The majority of representations received were in respect of:

- **Policy 2: Local Green Space** which set out support for the proposed designation of Local Green Space and in particular, Land to the north of Shepherds Walk (LGS1). A number of these representations advised that it was considered that no further housing was needed in Hassocks.
- **Policy 1: Local Gap**; and
- **Housing Matters**.

- 10.3. Given the majority of responses focussed on 3 topic areas the NPWG resolved to undertake new and revised background papers on these matters.

### **Policy 1: Local Gap**

- 10.4. In response to feedback on Policy 1: Local Gap, a review of the local gap policy, and its extent was undertaken as part of the appraisal of the Regulation 14 comments and consideration of amendments to the Plan prior to the preparation of a Regulation 16 Submission Version.
- 10.5. The scope of the review comprised the following:

- Appraisal of higher tier guidance (national and strategic) on the use of gap policies;
- Appraisal of other examples of Neighbourhood Plan gap policies and feedback from relevant Examinations;
- Appraisal of relevant decisions, in particular Appeal and Secretary of State decisions in, and around Hassocks with respect to consideration of matters relating to the pre-existing gap designation;
- Review of submissions by interested parties with respect to proposed Local Gap designation; and
- Review a number of individual land parcels in respect of their contribution to the purpose of their identification as part of the local gap.

- 10.6. This resulted in land being identified for removal from the Local Gap. No recommended changes were proposed to the associated wording of Policy 1: Local Gaps .
- 10.7. Recommended changes were considered and agreed by the NPWG prior to the preparation of the Submission HNP.<sup>1</sup>

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<sup>1</sup> Neighbourhood Plan Working Group meeting, 23 May 2019

## Policy 2: Local Green Space

10.8. In response to feedback on Policy 2: Local Green Spaces, a review of the LGS policy, and the areas proposed was undertaken as part of the appraisal of the Regulation 14 comments and consideration of amendments to the Plan prior to the preparation of a Regulation 16 Submission Version.

10.9. The scope of the review comprised the following:

- Appraisal of higher tier guidance on the use of Local Green Space (LGS) designations, including by reference to advice contained in the NPPF and NPPG and whether it is:
  - In reasonably close proximity to the community it serves;
  - Is demonstrably special to a local community and holds a particular local significance; and
  - Is local in character and not an extensive tract of land.
- Provide an appraisal of other examples of Neighbourhood Plan Local Green Space designation policies and feedback from relevant Examinations;
- Provide an appraisal of any relevant decisions in particular, Appeal and Secretary of State decisions in and around Hassocks with respect to considerations of matters relating to Local Green Space designation;
- Review of submissions by interested parties with respect to proposed Local Green Space designation; and
- Review of each proposed Local Green Space with regard to the principle of its designation, and its physical extent.

10.10. This resulted in the following recommended changes to Policy 2: Local Green Spaces:



- LGS1: Land to the North of Shepherds Walk - no changes proposed.
- LGS2: Land at the Ham - no changes proposed.
- LGS3: Land to the south of Clayton Mills - no changes proposed.
- LGS4: Land to the East of Ockley Lane - proposed amendment to include the western parcel only.
- LGS5: Land at South of Downlands - no changes proposed.
- LGS6: Land to the west of the railway line - no changes proposed.
- LGS7: Land at Pheasant Field - no changes proposed.
- LGS8: Land at Clayton Mills - no changes proposed.

10.11. Recommended changes were considered and agreed by the NPWG prior to the preparation of the Submission HNP.<sup>2</sup>

## Housing Matters

10.12. In response to representations received with respect to housing matters, a Background Housing Paper was prepared. Advice was prepared in respect of representations received; and to set out any recommended changes to Chapter 6: Housing of the HNP, including planning policies and/or aims in light of representations received.

10.13. The recommended changes were considered by the Neighbourhood Plan Working Group (NPWG) prior to the preparation of the Submission HNP.

10.14. A copy of "Response to Regulation 14 Pre-submission Representations in Respect of Housing Matters, May 2019, forms part of the evidence base of the HNP.

10.15. With respect to housing matters, in light of representations received the Background Housing Papers was updated to provide a summary of representations received in respect of housing matters; and recommended changes to Chapter 6: Housing of the HNP, including planning policies and/or aims in light of representations received.

10.16. Representations received in respect of housing matters, representations were summarised under the following key themes:

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<sup>2</sup> Neighbourhood Plan Working Group meeting, 23 May 2019

- **Policy 2: Local Green Spaces - Proposed Designation of Land to the North of Shepherds Walk (LGS1);**
- **Policy 14: Residential Development Within and Adjoining the Built-Up Area Boundary of Hassocks;**
- **Absence of housing allocation(s);**
- **Promotion of additional housing site(s);**
- **Other Housing Policies: Policy 17: Land to the West of London Road and Policy 18: Affordable Housing; and**
- **Sustainability Appraisal.**

10.17. A response to each representation was considered and recommended changes to the Housing Chapter of the Submission version HNP to be considered by the NPWG prior to the preparation of a Regulation 16 Submission Version.

10.18. This resulted in recommended changes to the policies of the Housing Chapter as follows:

<b>Pre-submission HNP Policy</b>	<b>Recommended Changes</b>	<b>Submission Versions Policy Wording</b>
Policy 14: Residential Development Within and Adjoining the Built-Up Area Boundary of Hassocks	No changes recommended.	No changes recommended.
Policy 15: Hassocks Golf Club	No changes recommended.	No changes recommended.
Policy 16: Land to the North of Clayton Mills and Mackie Avenue	No changes recommended.	No changes recommended.
Policy 17: Land to the West of London Road	Recommend policy is deleted.	Policy recommended for deletion.

Pre-submission HNP Policy	Recommended Changes	Submission Versions Policy Wording
Policy 18: Affordable Housing	Recommend MSDC suggestions are incorporated into Submission version HNP.	<p>Recommend policy is updated to read:</p> <p>Policy 18: Affordable Housing</p> <p>Residential development proposals should provide a mix of affordable housing sizes, types and tenures aligned to meet the needs of the Parish.</p> <p>When allocating the first letting of a home within a new development of general needs housing, priority will be given to bids from applicants who have a Local Connection to the parish of Hassocks.</p> <p>In order to establish a local connection, the applicant(s) must meet one of the following criteria:</p> <ol style="list-style-type: none"> <li>1. Resides the Parish of Hassocks as their only or principal home and has done so for the previous 2 years; or</li> <li>2. Has resided in the Parish of Hassocks as their only or principal home for a period of at least 3 years in aggregate out of the preceding 5 years; or</li> <li>3. Is in paid employment in the Parish of Hassocks (working 16 hours or more a week) and has been for the previous 2 years; or</li> <li>4. Has close relatives who reside in the Parish of Hassocks as their only or principal home and have done so for at least the previous 5 years, or the previous 2 years if the Applicant is aged 65 or over.</li> </ol> <p>Larger new developments containing 250 homes or more in total are intended to meet the housing needs of the whole District and are therefore exempt from the local connection criteria above.</p>
Aim 4: Housing Mix	No changes recommended.	No changes recommended.

10.19. Recommended changes were considered and agreed by the NPWG prior to the preparation of the Submission HNP.<sup>3</sup>

### Other Matters

10.20. Table 1 summarises all responses received (including the above) and for completeness is set out below.

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<sup>3</sup> Neighbourhood Plan Working Group meeting, 23 May 2019

# TABLE 1 STAKEHOLDER FEEDBACK

Stakeholders/General	
Ref No.	Summary of Comments
1	<p>Request aim 5 of HNP is strengthened to mention "multi-functional" crossing.</p> <p>Improving railway crossing featured in planning apps for development of land at Friars Oak and 500 houses land north of Mackie Ave . Based on these applications it seems that a bridge with steps is only possibility being considered. It seems MSDC is only considering in light of individual applications and not a long-term view. Note a bridge will be difficult to cross due to height necessary to clear railway on high embankment. Options such as bridge with ramps, pedestrian tunnel or use of existing tunnel to north have not been considered. Believe this to be relevant especially with proposal for new school.</p> <p>Request HPC push MSDC to take comprehensive approach dealing with this matter as only dealing with issue of railway crossing within context of individual planning applications rather than what's best for Hassocks as a whole.</p>
2	<p>Support</p> <ul style="list-style-type: none"> <li>• Regrettable 2 x major housing sites imposed (Ham Fields, Oakley Lane) but HNP does reflect no need to allocate any more land for development.</li> <li>• Welcome the associated community improvements set out forming part of developer's obligations.</li> <li>• Must ensure infrastructure is enhanced to sustain increased population.</li> <li>• Pleased Plan updated on provision of Local Green Space. Agree with the 9 sites identified, only concern most appear to be dependent on goodwill of landowner and question who is responsible for maintaining these.</li> <li>• Not sure HNP addresses issue of parking (not sure if it should address this?) And that commuter parking is a blight on community. Think HNP could identify longer term solutions that would meet the increasing demand for parking in the area.</li> </ul>
3	<p>Support HNP. Thanks to HPC.</p>
4	<p>Support HNP</p> <p>Believes Hassocks has now reached saturation point and agrees there should be no further residential development in this period.</p>
5	<p>Congratulate Team for diligent services in what has been a long and difficult process.</p> <p>Fully appreciate dedication.</p> <p>Support the reports.</p>
6	<p>Identified 3 points, which need clarification in the supporting LGS document, page 3.</p> <p><b>Point 1 - Site and Location</b> - believes there is an anomaly with wording.</p> <p><b>Site and Location</b>  (Original wording) This is an area comprising two fields to the north of Shepherds Walk and an adjoining area of public open space to the west of Shepherds Walk. The open space is an informal area adjacent to the Herring Stream. Local residents put forward a written case for designation of the fields as a LGS in 2014.  (Suggested amendment) This is an area of two fields to the north of Shepherds Walk with the Herring stream located to the west. Local residents put forward a written case for designation of the fields as local green space in November 2014.</p> <p><b>Point 2 - Public Access</b> - no reference to well-used stile that allows access from green to Shepherd Walk to footpath in fields. Believe description needs to be more explicit and include reference to stile.</p> <p><b>Public Access</b>  (Original wording) A public footpath crosses the area from west to east and the fields have been used by local residents as informal access for many years. It is recognised that apart from the public right of way across the area the current open access is at the discretion of the landowner.  (Suggested amendment) There are three access points to the fields which have been used by local residents as informal access for many years. A public footpath crosses the area from west to east. There is access to this footpath from the south via a stile. It is recognised that apart from the public right of way across the area the current open access is at the discretion of the landowner.</p> <p>Point 3 - Criteria for Designation as LGS - they consider the area to be in close proximity to local community due to direct access from south via stile on the green.</p> <p><b>Reasonable Proximity to a local Community</b>  (Original wording) The land lies on the northern edge of Hassocks and adjoins an area of housing to the south. There is access to the land via a footpath. It is, therefore, considered to be in reasonable proximity to a local community.  (Suggested amendment) The land lies on the northern edge of Hassocks, immediately adjoining an area of housing to the south. There is access to the land via a west to east public footpath. An adjoining area of public open space (the green) to the south of the fields and within the Shepherds Walk estate, allows direct access to the fields via a stile. It is, therefore, considered to be in close proximity to a local community.</p>
7	<p>Support.</p> <p>Pleased Friar Oak Fields are shown as LGS.</p> <p>Believes gap between Hassocks and Burgess Hill is shrinking daily and wishes for no more building.</p>
8	<p>Support.</p> <p>Notes: the Plan has accommodated and satisfied housing need; proposed designation of Friars Oak; development are underway in Parish.</p> <p>Thanks to everyone involved.</p>

9	<p>Support.</p> <p>Especially inclusion of Friars Oak Fields as LGS.</p> <p>Believes the sites already designated for development ensure there's no need to allocate further land for development in plan period.</p> <p>Believes Amenity Plan will safeguard aspects of Hassocks' identity and character and help prevent coalescence.</p>
10	<p>Support.</p> <p>Especially Friars Oak as green space.</p>
11	<p>Support.</p> <p>Especially Friars Oak as green space.</p>
12	<p>Support.</p> <p>Especially Friars Oak as green space.</p>
13	<p>Support.</p> <p>Concerned about level of development in Hassocks without thought to strain on local roads - pollution levels rising which is only going to get worse over time.</p> <p>Particularly supports naming of Friars Oak Fields as LGS.</p>
14	<p>Support.</p> <p>Strikes good balance between the present day and future needs for housing in Hassocks and yet protects the village and its wildlife from over-development.</p>
15	<p>Support. Believes there is merit in proceeding with revised HNP.</p> <p>Pleased plan recognises development sites already identified in Hassocks meaning housing obligations have been fulfilled without the need for anymore land to be allocated for development.</p> <p>Pleased LGS1 is included as local green space. Informal recreation space, important habitat and is unsuitable for development due to flood risk around Herring Stream. Hope being designated as LGS in NP will protect the fields from development.</p>
16	<p>Support.</p> <p>Support LGS allocations /LGS at Friars Oak, particularly important to them.</p>
17	<p>Support.</p> <p>Sites designated for development ensure HPC has fully met their housing requirement without the need to allocate any more land in plan period.</p> <p>Crucial to ensure Friars Oak Fields is not developed.</p>
18	<p>Support.</p> <p>Particularly allocation of Friar Oaks Field as LGS and plans for all weather accessible paths around the village.</p>
19	<p>Support.</p> <p>Particularly support allocation of Friar Oaks Field as LGS.</p> <p>Believes stated objectives meet increased needs for housing with Hassocks contributing substantial number whilst preserving the surrounding green spaces and character of the village.</p>
20	<p>Support.</p> <p>Believes Hassocks has been generous in surrender of several major sites for housing development.</p> <p>Vital to keep remaining green space in particular Friars Oak Fields - this area of 3 x fields important to keep as buffer between Hassocks and Burgess Hill.</p>
21	<p>Support.</p>
22	<p>Support.</p> <p>Pleased to see Friars Oak Field as designated LGS.</p> <p>Hoping Plan will go through providing Hassocks residents confidence they won't automatically be swamped with more houses.</p>



23	Representation in relation to the proposed building plans for the land behind Friars Oak Pub. Consider already agreed to the houses requested and don't want anymore as Hassocks will no longer be a village. Proposed land is boggy and unsuitable for building and the area is in local green space. - No more house building.
24	Support. Thanks to Parish Council. Approval for Plan.
25	Support. Especially in regard to Friars Oak fields as LGS.
26	Support. Comment PC for the amount of effort and consideration put into the revised HNP. Particularly keen that Friars Oak Fields development should not go ahead even though developer has put in another appeal Considers it seems District Plan would not now support it as its a green field site - also not needed because Hassocks taking generous fair share of housing requirement. On flat map may look like gap between new housing on golf course site to west of London Road and 500 houses to North of Clayton Mills, but physically there is no connection across Clayton Mills because of high tree-lined railway embankment which effectively isolates two sides of the village. Endorse idea to improve bus services to the village. Glad to see provision for new primary school and putting it amongst 500 news homes is where it needs to be to prevent unnecessary traffic movement and to create a sense of community.
27	Support. Pleased that Friars Oak Fields is proposed as open space and this would be an enormous benefit to the community. Thanks to PC.
28	Husband and wife support HNP, particularly Friars Oak Fields as LGS.
29	<b>New Development - Parking Provisions</b> Concerned no policy or consideration of compliance has been considered for parking for new homes, and considers the submission document in this area weak and susceptible to abuse (example: development at Clayton Mills) and is aware of other Parish Councils who have made it Neighbourhood Plan Policy to include binding parking requirements (included example of Turners Hill PC Neighbourhood Plan provision for parking wording). Would also like consideration to be made to future parking protection i.e. where additional habitable rooms/spaces are provided - a development of 30 houses with 50% loft conversion rate will generate 15 extra bedrooms without no further parking provision. Queries how does Hassocks NHP provide for such events? <b>Development Design</b> Disappointing no specific reference made to new development design as part of submission document - this should be considered to cover all new development, particular reference to land to north of Clayton Mills and Mackie Avenue in light of public objection. Believes consideration should be made at this stage to determine some basic design criteria reflecting the character of the village and includes some suggestions in his response road and footpaths, frontage. <b>Housing Numbers</b> Considers it interesting the aspirational housing numbers over plan period and appears to keep the requirement at zero, all of the housing numbers will be met. Considers it would be beneficial for community and District Council to see how the delivery of the housing numbers suggested is achieved. Advises evidence of the delivery profile being tested as part of the NHP would be beneficial to ensure plan doesn't come under unwarranted pressure for non-delivery in future years. <b>Summary</b> They don't wish their comments to appear to be obstructive in respect of their own home, but believe there are significant flaws in the proposals made, particularly as they are policy non-compliant. They are open to work with Hassocks Parish Council NPIWG to discuss their concerns and enter into more detailed discussion over the other village wide proposals they have suggested.
30	Support Thanks to PC.
31	Support Particularly wish to see Friars Oak and Ham Fields green space allocations come to fruition as adopted green space. Proposal to manage traffic better to create east-west cycleway strongly supported. Believe the village cannot take any more housing than the 800+ that has been identified.
32	Support. Particularly inclusion of Friars Oak Fields as LGS.
33	Support. Note that the identified development sites ensure the housing obligations are fulfilled without the need for further land to be allocated for development. Pleased Friars Oak Fields is included as LGS - its a cherished and much used habitat and local wildlife haven that the local community has fought to protect from developers. Hope this designation will afford Friars Oak Fields the protection from developers it needs.

34	<p>Support. Thanks to PC.</p> <p>Urge documentation to be submitted as soon as possible to the village can be protected from further speculative developer interference.</p> <p>Pleased LGS1 - Friars Oak Fields remains in the NHP as this was applied for by local people at the start of the process and it is a valued natural area for many Hassocks residents.</p>
35	<p>Husband and Wife support the HNP.</p> <p>Particularly Friars Oak Fields as LGS. Feel strongly Friars Oak Fields needs to be kept as LGS.</p> <p>Hassocks had more than fair share of new houses and village cannot take anymore as schools/doctors over subscribed.</p> <p>Pollution levels at Stone Pound extremely high and new houses will only push this higher. Village needs to stay as it is and the HNP should be adhered to.</p> <p>Do not want or need any new houses being built on Friars Oak Fields and wish for it to remain as LGS for benefit of village and wildlife/fauna and flora.</p>
36	<p>Support.</p> <p>Particularly Friars Oak Fields as LGS. Feel losing too much of their countryside and wildlife but understands there was no choice but hopes this will be it for good for a few years and our wildlife can return and settle.</p>
37	<p>Support the HNP. Do not see any reason why it should be changed.</p>
38	<p>Support the HNP</p> <p>Pleased the region will meet its requirement for additional housing whilst maintaining important green spaces and strategic gaps.</p> <p>Pleased Friars Oak Fields has been given the protection it deserves. This area is a flood zone that protects other properties and is an area of importance for flora and fauna in the area. Protecting this area from development will protect the integrity of Herring Stream.</p> <p>Believes its important to construct new housing but also important to protect our countryside from type of development driven by profit. Believes as a country need to pay more attention to utilise more brownfield sites and properties that have fallen into disuse.</p>
39	<p>Support HNP</p> <p>Understands it is the only sustainable, democratic way forward for the village. Particularly support preserving Friar Oaks Fields as green open space for village.</p>
40	<p>Support</p> <p>Pleased it meets its requirement for additional housing and also protects important green spaces.</p> <p>Pleased Friar Oak Fields has been designated as a green space - an area not only a flood zone protecting other properties but an area of importance for flora and fauna in the area. Protecting this area from development will also protect the integrity of the Herring Stream. It's important to construct new housing but also protect the countryside from type of development driven by profit.</p>
41	<p>Support - Plan takes into account new housing but identifies where this would be best placed in way reflects best interests of the village.</p>

Agents/Landowners Comments on LGS	
Ref No.	Summary of Comments
42	<p>Comments made on behalf of the owner of LGS1 (Friar Oaks), strongly objects to green space designation - see further representations submitted by Rydon who have contractual obligation to promote land for residential development.</p> <p>Representations seek to present an assessment of the site showing it does not satisfy the criteria for LGS designation.</p> <ul style="list-style-type: none"> <li>Land privately owned, used for agricultural purposes until 2006. Land left unmanaged as grass land. Actively promoted for residential development.</li> <li>Limited public access to the land by means of public footpath that runs along southern boundary. With/without designation as LGS there would be no change to ability of residents using PRow. All other claimed access to land is unauthorised without landowners consent.</li> </ul> <p>Friars Oak Fields - subject of pending appeal for 130 units. Evident client's intention to seek planning for residential use. If site not released for housing following appeal, intention is to continue to promote land through emerging Site Allocation Development Plan document and Local Plan Review. During this time land will be used for horse pasture. Landowner will erect fence along public footpath to stop dogs mixing with livestock.</p> <p>Site recognised as lying within sustainable location with good accessibility and transport connections without restrictive policy designations. Reasonable to conclude the land is capable of accommodating new development to meet current and future need..</p> <p>Do not propose to make land available for use by public in future - will strongly resist attempts to appropriate it for such a use.</p> <p>Believe plenty of other open areas of land to be enjoyed Rydon proposals include dedication of land alongside Herring Stream for recreational use. In better interests of the Parish Council and residents to support that scheme if they think there is need for new recreational area in this location.</p> <p>Landowner LGS2 (West of London Road, Hassocks), objects to designation - will prejudice them from obtaining planning permission for following:</p> <ul style="list-style-type: none"> <li>Erection of stables to house horses kept in the field;</li> <li>Erection of agricultural barns - to shelter animals in the field;</li> <li>Erection of agricultural barns for dry storage for machinery used for agricultural purposes of field;</li> <li>Erection of barn for dry storage of materials and feeding stuff; and</li> <li>Reduce value of the field.</li> </ul>
43	<p><b>Landowner of LGS4</b> (western most parcel).</p> <p>Made representations to original NHP in 2015/2016. Summary of what has happened in planning policy terms provided.</p> <p><b>1) Recap and update on the development proposals for Site 8 (LGS4 previously called Site 8):</b></p> <ul style="list-style-type: none"> <li>Original proposals for the site were: mixed development of 50-60 homes with range of affordability - build density 20-30dph;</li> <li>Purpose built, 2 year intake primary school fully funded by developer as part of development scheme;</li> <li>Subject to dialogue with PC school development could incorporate proviso of multi-use community facilities - note this has been identified as a requirement within Neighbour</li> </ul> <p>Considers the proposals are in line with discussions that took place at meeting between landowner, development partner and PC on 15/04/2015. Record of the meeting previously supplied.</p> <p><b>2) Requirement and Deliverability of additional primary/secondary school places</b>  Requirement for additional schools places in Hassocks is understood and documented. Strategic allocation makes provisions for school, however not clear from the Plan if it would provide sufficient capacity over the life of the plan. Queries the deliverability of school at Clayton Mills.</p> <p>Considers in the absence of well-defined and economically viable plan for the delivery of the immediate requirement for additional primary and secondary school places as well as the inevitable requirement for increased secondary school places on the back of the increased primary school places, considers its premature to preclude the site from further consideration for future development due to allocation as LGS.</p> <p><b>Planning Policy and delivery of school places:</b> Representation includes letter of 22 September 2015 referred to relevant policy regarding schools' provision and is included for ease of reference.</p> <p><b>3) Object to allocation of LGS4 as LGS</b></p> <p>Opposed to allocation and ask that this is not taken forward to the next stage of HNP.</p> <p>Concerned requirements for allocation of site as LGS set out in NPPF haven't been met and NHP does not meet these concerns.</p> <p>Local Green Space  Challenge assertion recorded in Working Group document site meets criteria in Para 77 of NPPF which is required for allocation as an LGS. Respond to arguments presented in Working Group document with following:</p> <p><b>Recreational Value</b> - single official footpath across field - footpath is statutory right of way protected under legislation and is not merit in itself for designating as LGS (ref para 18 NPPF). Other informal paths and circular walks described in NPWG in relation to LGS are not authorised right of way or recognised by landowner. Make reference to "open access" at discretion of landlord. Landowner assets there is no "open access" formerly granted across this land.</p> <p><b>Historic Significance/Row</b> - Developer confirmed mixed development of homes and primary school proposed can easily incorporate the official Row running through the site and maintain historic link between villages of Keymer and Ditchling. Archaeological surveys would be carried out to check for presence of archaeological/historic interest - specifically to route Roman Road that runs south of site. With this information proposed scheme would be moved forward with regard to mitigation measure in place to protect/enhance them.</p>
44	

	<p><b>Richness of Wildlife</b> - Site comprising western most parcel of LGS4 is cropped by landowner as part of arable rotation - routinely tilled, fertilised, sprayed and harvested. Land is bordered to west by road beyond lie residential developments Aadastra Avenue, Grand Avenue and Oldlands Ave &amp; pub with Darnian Way development to south. Footpath running across field heavily used by dog walkers - given land use and proximity to existing development and regular pedestrian/dog access - feel its hard to argue parcel is rich in wildlife. Mature oak and ash trees on field boundaries - no plans as part of development proposals to disturb these.</p> <p><b>National Park Designation</b> - Land lies within National Park Boundary challenge whether there is any additional local benefit to be gained by LGS designation of the site (ref para 15). Definition of extensive tract of land is not precise, Area of LGS4 as proposed extends to 25 acres. Assert this is substantial area in context of LGS designation.</p> <p><b>4) Relationship between emerging Hassocks NHP and SDNP LP</b></p> <p>Site falls within SDNP. Planning issues in relation to site will be determined with reference to emerging SDNP LP. Hassocks NP needs to accord with MSDC LP now finalised and adopted and SDNP LP.</p> <p>Concerned extent of LGS designations within draft plan and lack of flexibility in terms of future planning that this represents.</p> <p><b>Summary</b> Concerned plan as drafted doesn't provide sufficient flexibility to allow for development beyond plan period so doesn't meet the basic conditions required of NHP.</p> <p><b>Landowner LGS4 (eastern parcel)</b></p> <p>Refer to their representations of 09/09/2015 and 08/02/2016 and 25/08/2016 to Planning Policy and Economic Development Department of MSDC and would like these considered to addition to latest response of 14/02/2019.</p> <p>Raised in letter of 25/08/2016 that there had been no consultation on this matter - disappointed that apart from letter to their clients on 04/01/2019 re statutory public consultation period will close 18/02/2019 there's been no attempt to consult with them. Considers there has been a failure to observe guidance</p> <p>Greater concern is NPWG response in paper of 2016. NPWG set out in detail a response "to individual objections and representations against each site" - and that a representation has been made by Agri-Matters representing the western landowners but Batcheller Monkhouse's objection/comments of 08/02/2016 is not mentioned and has been ignored - denying clients a voice in the process.</p> <p>In response to the requirements of the NPPF, paras 99/100, representations access the site is physically close to the community. Unclear of meaning of "it serves" no other community function but is an important grassland field for agricultural business.</p> <p>Do not accept that informal parish have been used unchallenged for over 20 years (as stated in the Response Paper).</p> <p>No attempt by Working Group to demonstrate the land is special.</p> <p>Field has no special beauty over above other areas.</p> <p>Historic Significance - have challenged there is anything of historical interest associated with the land - NPWG referred to Roman Road but acknowledges it passes just to south of this area - so not at this site. Assume reference to archaeological mitigation strategy refers to land to the west so believe comment is not relevant to their client's land. NPWG mention public footpath may be historic link to Ditchling - they advise this is unlikely as there were far more convenient routes in historic times.</p> <p>Recreational Value - believe refers to public footpath - believe no reason to support contention the land is demonstrably special. NPWG cited there are "valued views" - they do not consider this is a recreational value and the views are no better than others in the Parish.</p> <p>Richness of Wildlife/tranquility - Response says the objection does not challenge this - they advise their objections most certainly did challenge this and repeat heavy use of public right of way by walkers/dogs precludes tranquility and wildlife. Believe NPWG have failed to identify any wildlife of "particular local significance".</p> <p>Local in character and not extensive tract of land - unclear what "local in character" means in practice. Believe client's land is typical of farmland in the area and suggest that undermines any claim it's "demonstrably special". No guidance on what constitutes "extensive tract" - notes this site is one of the larger sites being proposed. Believe taking all LGS sites together they constitute large tract which appear to be designed as "green belt" around Hassocks - they submit this is not the purpose LGS designation was intended.</p> <p>Failure of NPWG to properly consult landowner and not complied with its own Consultation Statement. Previous concerns have not been addressed and have been ignored.</p> <p>NPWG not demonstrated client's land is "demonstrably special to local community". Believe this is a high bar suggesting some characteristic that makes it distinct when compared with other land in Parish. Query what the designation will achieve for the community. Public has right to use footpath and no more and advises this won't change.</p> <p>Land is in SDNP - NPWG suggested designation is needed beyond that as it "would service a different purpose providing accessible green space for local community" - they believe this is fundamentally wrong. Public Footpath is protected in any event - beyond that any access to "green space" is at discretion of landowner.</p> <p>Representations note para 6.17 states "HPC wishes to support further windfall development... outside of built-up area boundary". Representations advise its difficult to see where even small windfall sites might be found in the Plan is adopted.</p>
45	<p><b>LGS4 Landowner (follow up comment below also)</b> - Can't consider proposed allocation of LGS of their land as the documents referred to are not up to date on Hassocks PC website. Latest information appears to date back over 4 years.</p> <p>Questioning why their land has been included as proposed LGS when original documents did not include it.</p> <p>Believe any designation on their land will be resisted and will be instructed DMH Stallard to present them although they believe there is case law which does not allow designation of LGS without both landowner consent and overriding importance - and advise neither is appropriate in this instance.</p> <p>They have no desire to seek development on land at their family home - but propose to submit plans in 2019 to amend design of the house and its surroundings and therefore unlikely they will allow LGS designation at this time.</p>
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47	<p><b>Local Gap</b> - Surprised their land (within their private residential curtilage) is in an area defined as a local gap. Clear their home doesn't meet criteria for the land to be included. Their land and home is next to built up area of Keymer with their boundary the extent of the Parish. "This easterly boundary is the closest point to Ditchling and it is considered the boundary of the Local Gap should extend from the rear of the properties in Silverdale to follow the Parish Boundary around our home <b>including</b> the area of LGS identified as LG4 as noted in the Local Green Space Policy Review document."</p> <p>No supporting evidence for Local Gap to have such an unjustified, oblique inclusion and is in contradiction with wording under 4.9 setting out MSDC's policy namely: 'robust evidence that development within the gap would individually or cumulatively result in coalescence and the loss of separate identity and amenity of nearby settlements'</p> <p>Believes the photographic evidence on Page 21 of Local Gap submission documents strengthens this view as it's clear the gap as seen from the evidence doesn't include the land in their ownership and only really includes land identified as LGS4 - believes there is no evidence in PC submission documents which demonstrably supports the inclusion.</p> <p>Believes plan referred to in document under 4.10 as 'underpinning' the HNP is in conflict with the plan submission.</p> <p>As information in plan submission and associated supporting submission document doesn't conform to MSDP Policy 13, request the boundary to be adjusted in line with Hassocks Parish boundary whilst including LGS4 or request in line with text noted in 4.9 'robust evidence' is provided which concludes the land is in line with policy requirements.</p> <p><b>Local Green Spaces</b> Representation consider Hassocks NHP Reg 14 Pre-Submission Jan 2019 document and Background Paper, Revised Hassocks NHP - Local Green Space Policy Review Oct 2018 have conflicting maps representing LGS4. It is not clear whether conflicting plans undermines the validity of the consultation. The consultant appointed by HPC not been able to confirm which plan is correct.</p> <p>Text in Revised Hassocks NHP LGS Policy Review relates to plan submitted as part of June 2016 submission (referenced LGS5 in that submission), representations agree with the Statements made in relation to this submission in the LGS Policy review and criteria which has been deemed to be met.</p> <p>No justification or evidence to support additional inclusion of land to East of Church Mead (as included on the Hassocks NHP Reg 14 Pre-Sub Jan 2019 document) has been provided and so it's not agreed the extension of LGS4 on conflicting plan should be included.</p> <p>The land is within private residential curtilage and is highly unlikely that this land will ever be delivered. Protection being sought by its classification is unclear.</p> <p>No evidence has been provided to demonstrate the extension of the LGS4 in this area meets any criteria set out in the policy for designation of LGS's.</p> <p>If it's Council's proposal to arbitrarily include additional parcels of land as LGS it needs to be demonstrated by assessment the submission consultation is valid - this specific element should be reconsulted if unsound.</p> <p>In other docs (Revised Hassocks NHP Review of Policy 1: Burgess Hill Gap and Policy 2: Ditchling and Hurstpierpoint Gap) a specific section has been allocated to demonstrate 'changes since 2016' - there is no evidence to identify change for this LGS.</p> <p>Consider it should be recognised that their home and land is constrained from a future development perspective and there would be little to no prospect of pursuing development.</p>
48	<p><b>LGS5:</b> WSCC have concerns over this designation as it is part of a school playing field at Downbrook Community College.</p> <p>School field is an operational school playing field under ownership of WSCC. There is existing public access and right of way. Field is integral and functional part of the school.</p> <p>WSCC has statutory obligation to ensure every child in West Sussex can access a mainstream school in the county. If there are future requirements to create additional spaces at any schools in the planning area this would be in accordance with statutory obligations and a LGS designation would serve to compromise the Council's ability to meet this need.</p> <p>Therefore WSCC have concerns that the school fields are included as LGS - namely they are already protected due to their status and there may be future requirement to increase capacity of the school to accommodate additional children.</p> <p>Suggested Amendment - To reconsider the school field being included in the proposed list of designated areas of LGS.</p>



Statutory / Local Government Consultees	
Ref No.	Summary of Comments
49	<p><b>Gatwick Airport Ltd</b></p> <p>Parish is around 24km South of Gatwick Airport, therefore it is outside of our 'physical' 15km safeguarding area. At this distance only need to be consulted if there were any wind turbines proposed.</p>
50	<p><b>Highways England</b></p> <p>MSDC Plan requires Hassocks delivers min of 882 dwellings over plan period 2014-2031. Plan allocates strategic site within Hassocks Neighbourhood area, north of Clayton Mills for 500 dwellings. They note total of existing commitments and completions in Hassocks, including the strategic site, meets requirement of 882 dwellings with no mention to allocate further housing. On this basis, they have no concerns on the Hassocks Neighbourhood Development Plan.</p> <p>Wish to be consulted if any additional 'windfall' housing sites are proposed as the cumulative effect of further development could impact the strategic road network.</p>
51	<p><b>Historic England</b></p> <p>In general content that the Plan has few potential impacts for historic environment or Heritage Assets.</p> <p>Note with concern in response to previous Presubmission version of the Neighbourhood Plan that development of the site at Land to the North of Clayton Mills and Mackie Avenue, would potentially affect the identified Archaeological Notification Area DWS6608, which lies in the north of this area and represents a dispersed multi-period landscape of Prehistoric and Roman period occupation and settlement.</p> <p>Note Draft policy 16 refers to the need to protect a nearby Heritage Asset. If this refers to the archaeological notification area, suggest more robust wording is used to draw potential developer's attention to potential for presence of archaeological remains of importance and their need to provide an informed response to their presence through the design of development.</p> <p>Similar wording has been used in the adopted Haywards Heath Neighbourhood Plan and several other examples and NE endorse this approach.</p> <p>Note the potential impact to the Parish's Heritage Assets is not noted in the Sustainability Appraisal which appears to have been prepared without reference to the County Historic Environment Record. Consider this problematic and suggests an incomplete and unreliable assessment.</p>
52	<p><b>MSDC</b></p> <p>Welcome the preparation of a new NP for Hassocks that takes into account the revised housing requirement for Hassocks Village, makes reference to Clayton Mills Strategic Housing allocation as well as acknowledging the planning permissions that have recently been granted.</p> <p>For Hassocks NP to be successful at Examination, it will need to meet Basic Conditions. MSDC provided informal comments on draft Reg 14 NP in Nov 2018 and they are pleased to see many of their comments have been taken into account in the Plan - in particular those relating to Local Gap Policy criteria as well as allowing for 'windfall' development up to 10 dwellings to come forward outside the settlement boundary.</p> <p>There are still some outstanding issues needing to be addressed for the NP to meet Basic Conditions test and be successful at Examination. These are:</p> <p><b>Hassocks Neighbourhood Plan Proposals Map – Policy 1 – Local Gaps</b></p> <p>MSDC notes that the Local Gap boundary designation is, essentially, contiguous with the settlement boundary and includes some land that is surrounded by development or has been identified in the recent appeal decision at Friars Oak as not necessary to preserve settlement identity and prevent coalescence.</p> <p>MSDC consider the Background Paper 'Review of Policy 1 Burgess Hill Gap and Policy 2 Ditchling Gap and Hurspierpoint Gap' provides general assessment of the character and sensitivity of the landscape that is proposed to be included in the Local Gap. The detail of where the boundary should be drawn in light of this work has not been clearly justified, i.e. Background Paper explains some land is well contained and views are enclosed.</p> <p>In order for this policy designation to be robust and have credibility in its application, MSDC recommends that further assessment is carried out or conclusions provided to identify the areas of land that are entirely necessary to preserve the integrity of the Local Gap and maintain the separate identity of settlements. MSDC consider this can then be used to support where the Local Gap Boundary should be drawn.</p> <p><b>Local Green Space (LGS) designation: LGS 1, LGS 2, and LGS 4</b></p> <p>MSDC notes that land proposed for designation as LGS1, LGS2 and LGS4 comprise fields of pasture and are part of the wider countryside adjacent to the built up area boundary, all in private ownership. Public footpaths run across or close to the sites; however there is no statutory public access to the proposed LGS areas. The sites appear to be used unofficially, mostly by local dog walkers. MSDC notes that LGS 1, 2 and 4 cover fairly large areas of countryside surrounding Hassocks.</p> <p>MSDC confirm they have considered the supporting Local Green Space Policy Review Background Paper and do not judge that this sufficiently demonstrates why LGS 1, 2 and 4 are particularly special over and above other areas of countryside in the vicinity, nor does it judge that they are the type of green space the Government had in mind that should be protected when introducing this designation.</p> <p>MSDC consider these particular LGS designations are therefore not in general conformity with the Government's policies in the NPPF nor the advice set out in the NPPG and they should be removed.</p> <p><b>Policy 7 - Development in Conservation Areas</b></p> <p>MSDC previously provided advice that in order to make this policy more locally distinctive. MSDC confirm this advice has been taken on board. However as a result of the way the policy is drafted, MSDC consider the could be read that development is encouraged in these areas. MSDC therefore suggest that the policy is redrafted to identify the special features of the conservation area first and then follow this with a sentence that says "any development in the conservation area must conserve and enhance these features."</p>

	<p><b>Policy 15 – Hassocks Golf Club</b> MSDC advise the residential application is predicated on the relocation of some of the golf facilities. MSDC note that criterion 1 states that the proposal should not extend into land in the Local Gap. MSDC recommend for clarity, that this criterion specifically refers to the residential development not extending into the Gap.</p> <p><b>Policy 17 – Land west of London Road (Saxon Mills)</b> Planning permission for this site has been granted and development has already commenced. MSDC consider Policy 18 is not required as it has no statutory planning control over this site. MSDC consider the identification of this area should also be deleted from the Proposals Map.</p> <p><b>Policy 18 – Affordable Housing</b> MSDC acknowledge the policy has been revised to take into account the Mid Sussex Housing Allocation Scheme. MSDC consider there are inconsistencies as the local connection criteria on the Council's Allocation Scheme only relate to first lettings and also they do not apply to strategic allocations. MSDC recommend the following changes to the policy: The second paragraph should be amended to say: "When allocating the first letting of a home within a new development of general needs housing, priority will be given to bids from applicants who have a Local Connection to the parish of Hassocks. In order to establish a local connection, the applicant(s) must meet one of the following criteria: After the fourth criterion, the following sentence should be added: "Larger new developments containing 250 homes or more in total are intended to meet the housing needs of the whole District and are therefore exempt from the local connection criteria above." MSDC would urge HPC to reflect the aforementioned comments in the Submission Version of the Neighbourhood Plan. Reps confirms MSDC works proactively with Neighbourhood Planning groups to give Neighbourhood Plans the best chance of success at examination.</p>
53	<p><b>Natural England</b></p> <p><b>Policy 3: Green Infrastructure</b> Support the inclusion of a policy on green infrastructure.</p> <p><b>Policies 15/16/17: Housing</b> Housing allocations allocated in the MSDP- no further comments to make</p> <p><b>Sustainability Appraisal</b> NE Commented on the SA Scoping Report -note their comments on 'Stage A3 – Identify Sustainability Issues and Problems', have been acknowledged, but unclear how the comments will be implemented into the HNP. Pleased the majority of comments on 'Stage A4 - Developing the sustainability appraisal framework' have been incorporated into the objectives.</p>
54	<p><b>SDNPA</b> Clarify the South Downs National Park Authority (SDNPA) is the Local Planning Authority for those areas of Hassocks in the SDNP. Plans to make reference to the emerging South Downs Local Plan being used for decisions to determine planning applications.</p> <p><b>Foreword</b> Suggest amending the first paragraph to state: "... following the refusal of Mid Sussex District Council (MSDC), the Local Planning Authority for those areas of Hassocks Parish outside the South Downs National Park, to allow the..."</p> <p><b>Page 2</b> Amend paragraph 1.2 by adding the following to the end of the paragraph: "South Downs National Park Authority is the Local Planning Authority for those areas of the Parish within the South Downs National Park as shown on Figure 2."</p> <p><b>Page 4</b> amend paragraph 1.10 to reflect the updated status of the South Downs Local Plan. From the fourth sentence suggest deleting the remainder of the paragraph and update with the following: "However the SDNPA submitted the South Downs Local Plan to the Secretary of State for examination in April 2018. The Planning Inspector conducted the examination including public hearings on the South Downs Local Plan in November and December 2018. The consultation on the main modifications will run for 8 weeks between 1/2/19 and 28/3/19. It is anticipated the South Downs Local Plan will be adopted in summer 2019."</p> <p><b>Policy 1: Local Gap</b> Suggest the policy is reworded to cover Local Gaps within the South Downs National Park. Happy to discuss a possible wording for Policy 1 with the Parish Council if that would be helpful. Point 2) of the Policy refers to the Mid Sussex Local Plan which does not apply in the South Downs National Park. Therefore only part 1) can apply to development within the Local Gaps in the South Downs National Park as shown on the Proposals Map. In itself part 1) would restrict development to agriculture or other uses which have to be located in the countryside. Suggest the policy is reworded to allow for the possibility for other forms of development in the Local Gaps within the South Downs National Park, other than those defined by part 1). Any such development would need to comply with Policy 6 of the Neighbourhood Plan along with Policy SD25: Development Strategy of the emerging South Downs Local Plan.</p>



	<p><b>Policy 6: Development Proposals Affecting the South Downs National Park</b> Support for the policy, particularly second part of policy.</p> <p><b>Chapter 8: Transport</b></p> <p>Overall support the strategic objectives</p> <p><b>Aim 5</b> - in principle support objectives, some terms could be clarified i.e "repair and upgrade" of PROw - this is sometimes interpreted as upgrade to bridleway and would therefore be useful to clarify what is meant.</p> <p>Point 5 - route linking Hassocks to Clayton, if the aspiration, where states non-car routes, is for shared use paths open to cyclists and equestrians, it would be helpful to say this explicitly. The route will eventually allow connection to South Downs Way National Trail and link to Hassocks could be promoted as a benefit to tourism.</p> <p>Suggest clarifying term "all weather" - PROw in countryside not generally tarmac and any upgrade to sealed surface may be classed as development. Method used in SDNP is a year round permeable, self binding limestone dust surface which sits well in rural surroundings.</p> <p>Public Transport Section - s. SDNPA would welcome promotion of the railway station in this section as a gateway, providing connectivity into the South Downs National Park for public transport users.</p> <p><b>Southern Water</b></p> <p><b>Policy 2: Local Green Spaces</b></p> <p>Unable to support the current wording of this policy as it could create a barrier to statutory utility providers such as Southern Water, from delivering its essential infrastructure required to serve existing and planned development.</p> <p>Recommend policy is updated to read:</p> <p><i>Development proposals which conflict with the purpose of this designation will be resisted in these areas, except in very special circumstances, for example where it is essential to meet specific necessary utility infrastructure needs and no feasible alternative site is available.</i></p>
55	<p><b>WSSC</b></p> <p><b>Policy 10: Protection Of Open Space</b></p> <p>WSSC wish to highlight the aspiration to provide education facilities west of the railway to cater for potential future growth in Hassocks and Hurspierpoint. Request Policy 10 make reference to education uses in point 5, which supports Policy 13 and Aim 2 of the plan.</p> <p><b>Policy 13: Education Provision</b></p> <p>WSSC welcome the support of Hassocks Parish for the provision of a primary school site as part of the Land North of Clayton Mills development. Land is also being requested for an Early Years facility and Special Educational Needs and Disability (SEND) unit on the site which would be incorporated into the primary school building. Recommends the provision of these services alongside the primary school could be incorporated into the supporting text for this policy and also into the policy itself.</p> <p><b>Policy 15: Hassocks Golf Course</b></p> <p>Understood proposed allocation already benefits from a current planning permission. Recommends policy could further recognise the existing public bridleways around the golf course and the value these could have to achieve the Plan's ambition through their improvement – safe and convenient links into Hurspierpoint and towards Burgess Hill could be realised.</p> <p><b>Policy 16: Land to the north of Clayton Mills and Mackie Avenue</b></p> <p>Policy supports protection of existing PROW but does not explicitly seek to enhance/ expand local PROW. Considers there are opportunities to deliver safe connections to Burgess Hill, into Hassocks Village, to link to existing bridleways east of Ockley Lane, and to provide a bridleway connection through to the Friar's Oak development west of the railway.</p> <p><b>Policy 17: Land west of London Road</b></p> <p>Understood proposed allocation already benefits from a current planning permission. This policy seeks to maximise opportunities to use alternative means of transport to private vehicles. Considers improving the surface of the public footpath through the site and to Belmont Lane could deliver a safe and convenient, year-round useable route. Considers if the existing footpath was upgraded for cycling then potentially more people would use it as an alternative to vehicle use.</p> <p><b>Aim 5: Non-car route ways</b></p> <p>Recognises there are often 'missing links' in the parish PROW network and that use could be encouraged through improved repair and upgrade. Acknowledges to achieve this, requires various parties to work together. Considers it could be helpful if HPC participated to secure the necessary funding. WSSC PROW service can provide guidance on the legal mechanisms and standards for new paths.</p> <p><b>Aim 7: Traffic and Accessibility</b></p> <p>Concern over the mention of specific junction and/or safety improvements in this Aim. It is suggested that the Aim is changed to be less specific; to support safety improvements within the Parish.</p> <p><b>Community Infrastructure Levy</b></p> <p>Under section 5 'Community Infrastructure' the plan refers to CIL payments from development. It should be noted that no mechanism currently exists for prioritising infrastructure needs across different public services and allocating funds to priority projects.</p> <p>The County Council is working with MSDC and other LPAs to develop a robust mechanism and establish appropriate governance arrangements to oversee the prioritisation of infrastructure across different services. This will be important to secure delivery of priority projects and the County Council would welcome the Council's support for establishing appropriate decision-making arrangements.</p>
56	

Ref No.	Developers/Agents Summary of Comments
57	<p data-bbox="178 250 215 1968">Evison &amp; Company</p> <p data-bbox="215 250 311 1968">Representations on behalf of the owner of land at London Road, Hassocks. The land is contiguous with the Built-Up Area Boundary. The PCC is in discussions with the adjoining landowner to the south, who submitted a planning application for 25 dwellings on the joint site in 2018. The PCC has no objection in principle to joint development of the land but, having charitable status which carries certain legal and regulatory restrictions on the disposal of property, it must make its representations independently, while supporting those of the adjoining landowner</p> <p data-bbox="311 250 343 1968"><b>Policy 1: Local Gap</b></p> <p data-bbox="343 250 406 1968">The boundary has been drawn too widely by including the land between the Barratts site and the rear of houses at Stone Pound. This land which comprises the PCC land and the adjoining owner's land referred to above, adjoins the built-up area of Hassocks on three sides and does not fulfil the principal criterion of District Plan Policy DP13/The land in question is an infill site between two parts of Hassocks. The Proposals Map should be redrawn to omit the site from the defined Local Gap.</p> <p data-bbox="406 250 438 1968"><b>Policy 14: Residential development within and adjoining the built-up area boundary of Hassocks</b></p> <p data-bbox="438 250 502 1968">Principle of Policy 14 welcomed but the HNP has missed the opportunity to allocate small sites to contribute to housing need, add to the diversity of development and to contrast with the relative uniformity of large estate development on the three allocated sites.</p> <p data-bbox="502 250 534 1968"><b>Policy 17: Land west of London Road</b></p> <p data-bbox="534 250 598 1968">The Barratts site (Land West of London Road) is under construction and is likely to be completed before the adoption of the neighbourhood plan. Consider such sites should not be included as allocations in development plans. Policy 17 should be deleted.</p> <p data-bbox="598 250 630 1968"><b>Site Allocation Policy</b></p> <p data-bbox="630 250 694 1968">The Sustainability Appraisal fails to consider reasonable alternatives to the allocated sites. The only consideration of alternatives is under three very broad options one of which would be a strategy to allocate additional sites. There is reference to the SHELAA sites and they are identified on a plan at the end of the report but there is no consideration of the individual merits or otherwise of these sites.</p> <p data-bbox="694 250 758 1968">This site is adjacent to the Barratts site (Policy 17) and has essentially the same environmental characteristics. Consider that had land been assessed according to the same criteria as those used for the Barratts site, it appears likely that it too would have been assessed favourably. The failure to undertake this assessment is a fundamental flaw in the NP's site selection procedure.</p> <p data-bbox="758 250 821 1968">The HNP should reasonably be expected to contribute to the district requirement through the allocation of additional sites to those already committed. There is a strong case that further site allocations should be made and that they should be for small sites of less than 50 dwellings.</p> <p data-bbox="821 250 853 1968"><b>Suitability of PCC land for Residential Development</b></p> <p data-bbox="853 250 981 1968">The 2018 planning application (Ref: DM/18/0010), which was for 25 dwellings on the joint PCC and adjoining land, was refused for housing supply policy reasons. There were also three other reasons of detail all of which can be addressed. Clients have commissioned professional highway consultancy advice which demonstrates that satisfactory access to their land and the joint site can be achieved. The archaeological reason for refusal could be addressed by suitable condition, if necessary, and the requirement for affordable housing can be addressed depending on the scale of development on the land. The land is considered suitable for development</p> <p data-bbox="981 250 1045 1968">The Parish Council will contribute to meeting those Basic Conditions if it embraces to opportunity to go further to meeting housing need by allocating one or more small additional sites. The PCC land and the adjoining Globe Homes land is a sustainable and suitable site for such allocation.</p> <p data-bbox="1045 250 1077 1968">Gladman:</p> <p data-bbox="1077 250 1141 1968">Essential that the HNP contains sufficient flexibility so as to ensure that it is not rendered out of date upon the adoption of Local Plan Review.</p> <p data-bbox="1141 250 1173 1968"><b>Policy 1: Local Gap</b></p> <p data-bbox="1173 250 1236 1968">Gladman note that the Policy does allow for development within the defined Gaps, if said development would not compromise the objectives of the Gaps.</p> <p data-bbox="1236 250 1300 1968">Consider this a strategic policy beyond the remit of neighbourhood plans that would have the effect of imposing an almost blanket restriction on development around Hassocks. It would effectively offer the same level of protection as Green Belt land without undertaking the necessary exceptional circumstances test for the designation of new areas of Green Belt.</p> <p data-bbox="1300 250 1364 1968">Gladman submit that new development can often be delivered on the edge of settlements without leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character. Question whether the purpose of the proposed gap designations, particularly if this would prevent the delivery of otherwise sustainable and deliverable housing sites from coming forward.</p> <p data-bbox="1364 250 1396 1968">Consider blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence</p> <p data-bbox="1396 250 1428 1968"><b>Policy 2: Local Green Spaces</b></p> <p data-bbox="1428 250 1460 1968">Policy 2 identifies 8 parcels of land that are proposed for Local Green Space designation- consider that LGS1, LGS2M LGS4 and LGS8 represent extensive tracts of land and as such do not meet the requirements for LGS designation.</p>
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	<p><b>Policy 14: Residential development within and adjoining the built-up area boundary of Hassocks</b></p> <p>Gladman not consider the use of built-up boundaries to be an effective response to future development proposals if it would act to preclude the delivery of otherwise sustainable development opportunities, as indicated in the policy.</p> <p>The use of settlement limits to arbitrarily restrict suitable development or apply a limit to the number of dwellings coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework and is contrary to basic condition (a).</p>
59	<p>Lewis &amp; Co Planning</p> <p>Representations on behalf of Globe Homes who are promoting a site comprised of land to the rear of 2 Hurst Road, which lies to the west of London Road and immediately to the south of the allocated site 'Land to the west of London Road. Site ownership is shared with Clayton with Keymer Parochial Church Council (PCC).</p> <p>Consider that the draft Plan in its current form does not sufficiently consider, evaluate or support other opportunities for sustainable development within the parish and, unfortunately, fails to take a positive approach in considering these opportunities.</p> <p>Client's site at 2 Hurst Road provides a more sustainable location for residential development than the three sites allocated within the draft Neighbourhood Plan. The site offers excellent access to local shops, services and facilities (including the railway station) and provides an opportunity to deliver a complementary development</p> <p><b>Sustainability Appraisal</b></p> <p>There are significant shortcomings in the existing SA. Consider it does not identify how reasonable alternatives to the allocated sites. We consider that the Plan in its current form does not meet the prescriptive requirements of European Directive 2001/42/EC and therefore fails to meet the basic conditions.</p> <p>SA vaguely refers to the appraisal having "consideration" to sites within the Mid Sussex Strategic Housing and Economic Land Availability Assessment but contains no actual assessment of these sites. The SA therefore clearly fails to meet the requirements of the SEA Directive in this regard. A number of Neighbourhood Plans have failed on this basis. Local examples include Slaughtam Neighbourhood Plan and Storrington, Sulmton and Washington Parish Council Neighbourhood Plan. In both of the cases quoted above representers believe the site selection process was significantly more robust and better evidenced than that undertaken for the HNP.</p> <p>Can find no description of the site selection process for allocations within the draft Neighbourhood Plan or the methodology used when considering reasonable development sites such as that promoted by our client at 2 Hurst Road.</p> <p>Note that the Sustainability Appraisal lacks a Non-Technical Summary which is a specific requirement of the SEA.</p> <p><b>Land to the rear of 2 Hurst Road</b></p> <p>Site is well located, contiguous with the existing built-up area boundary, and has no significant development constraints. Site has been assessed through the SHELAA (Site Ref. 210) and this assessment finds the site to be suitable, available and achievable. Site has progressed to a Stage 2 assessment in the preparation of a District-wide Site Allocations Document.</p> <p>Proposals for 25 new homes on the site were refused last year due to its location of the site outside the defined built-up area boundary. However, when compared to the allocated sites to the north the site clearly has a less significant impact on the countryside. Support through a specific Plan policy would make the proposals an exception to District Plan Policy DP12 and allow that development to proceed in principle.</p> <p>The site has excellent access to local services. The allocation of this site would create a coherent overall approach to the growth and development of Hassocks. Site would create a defensible western boundary to the village and would serve to reinforce other policy objectives within the Plan such as Policy 1.</p> <p>Policy 14 does not preclude residential development of the site, provided the development was for fewer than 10 dwellings. However, it is our opinion that a windfall-type development of nine homes or less would be a less efficient use of a sustainably located, unconstrained site.</p> <p>The site is unaffected by flood risk, would not affect any designated heritage assets, ancient woodland, SSSIs, local nature reserves, or other notable constraints. Further work is being undertaken to fully assess the site's archaeological potential and ensure any impacts on any identified archaeological assets are appropriately mitigated. Experts have concluded that any adverse impacts on TPO trees within and surrounding the site can be avoided or appropriately mitigated. Development of the site would not result in severe impacts to the highway network</p> <p>Request that further consideration is given to the potential allocation of the site as the Neighbourhood Plan progresses.</p> <p>R, reside: Representations on behalf of landowners</p> <p>Land to the east of Lodge Lane has previously been submitted as a proposed allocation and assessed. The PHLAA assess the site area (all of Site 12) as 4.7ha. The site being promoted is s2.3ha. The site therefore appears to have been mis-assessed- not capable of delivering 88 homes as the PHLAA predicts.</p> <p>Consider a development of between 20 and 30 homes is much more appropriate for this site and for the village</p> <p>Fundamentally disagree with the landscape assessment of the site. Whilst within the National Park, the site is heavily influenced by its surrounding built form, where there are only small/limited views of the wider National Park. Views into the site from the National Park are also few and far between and are all with the backdrop of the existing built form of Hassock/Keymer.</p> <p>Unclear why the site has been assessed as being within a Local Gap, when no formal designation exists.</p> <p>Consider there is a clear and manifest need for housing in the South Downs National Park (SDNP) area.</p> <p>Consider this is a modest sized site and certainly would not be considered 'major development' by the NPPF. Most of the site is not visible due to its visual and physical containment.</p> <p>The site abuts the settlement boundary along most of its northern and southern boundary and all of its western boundary. Consider the existing built form of Hassocks all but wraps around this site.</p>
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	<p>The development of the site would not, and could not, adversely affect the proposed Local Gap and SDNP nor does it perform the requirements of a gap, due to the surrounding development.</p> <p>Site will provide opportunities for landscape improvements. Consider development would go some way to repairing the historic canvas of hedgerow, trees and woodland.</p> <p>Scheme would provide a softer edge to the Green Gap and therefore strengthen its purposes.</p> <p>The allocation of the land in the SDNP would also help protect the parish from further future allocations from others.</p> <p>From the South Downs National Park perspective, a development on this site would deliver much needed market and affordable housing. It would also deliver on one of two key aims, namely access and education to the SDNP via a new area of woodland/open space. The woodland and planting will also help enhance and protect enhance the national park, as required by the NPPF, by repairing and restoring the historic landscape. Finally, the scheme will deliver biodiversity enhancements.</p> <p>In respect of HNP, the site will strengthen the proposed local gap, where the planting of a woodland will act a physical boundary to Hassocks as well as delivering a high-quality housing scheme and other local benefits.</p> <p>The site provides the opportunity for a small, high quality and sustainable development for circa 20-30 dwellings, close to the village centre and well- integrated within its landscape context.</p> <p>Savills: Savills writing in our capacity as planning consultants, operating in Surrey, Sussex and Kent from the Guildford and Sevenoaks team.</p> <p>Consider the emerging plan must be more positive and seek to make some housing allocations. This is because the figures provided by MSDC for the delivery of housing, not only in Hassocks, but in the District more generally, are a <u>minimum</u> requirement.</p> <p>Hassocks is a tier 2 settlement, consider it can therefore be regarded as one of the more sustainable locations in the District.</p> <p>Reps highlight NPPF, and NPPG and Ministerial Statement (12 December 2016). It advises the degree of weight to be afforded to these policies is clearly one for the decision maker. However, by assisting the delivery of much needed new homes in this sustainable district location, over and above the minimum required for the area, the Neighbourhood Plan would help to ensure that MSDC does not fall below its 5 year housing land supply requirements or below the minimum housing delivery test requirements. This would assist in safeguarding the area from future speculative applications whilst ensure that suitable development can come forward.</p> <p>Notes the Plan does not seek to promote less development than the District Plan, it does only seek to provide the minimum requirement. Considers there is no contingency and this is likely to be a more risky approach. Considers the Neighbourhood Plan would become more robust in the longer term if a higher number of homes were allocated.</p> <p>Notes that the Plan seeks to protect Public Open Space through policy 10, through the creation of buffer zones on the outer edge of all of the allocated sites. Considers the creation of such buffers appears to be a rather restrictive policy, which will hinder further development.</p> <p>Considers it also be appropriate to include a policy enabling the proper and appropriate release of land, including public open space, to allow for the delivery of sustainable development. Considers this option could be incorporated into draft Policy 14 which seeks to make some allowance for windfall sites but appears to be somewhat limited in its scope.</p> <p>Considers an amendment to Policy 14 should also be made to ensure that windfall sites coming forward are not be limited to only 10 new homes to ensure that the HNP positively plans for the future of the area throughout the Plan period.</p>
61	<p>Sigma on behalf of Rydon</p> <p><b>Policy 1: Local Gap</b></p> <p>No substantial evidence supports the Neighbourhood Plan in its allocation of this gap and as such the proposed policy should be deleted or at least the boundaries of the Gap, as shown on the proposals map require to be properly assessed and redrawn.</p> <p>Land at Friars Oak currently makes no material contribution to the actual or perceived separation between Burgess Hill and Hassocks. The Strategic Gap Policy should therefore be redrawn to allow the land lying to the west of the railway and east of London Road to be excluded from the Gap designation to reflect a new allocation for housing or at least to allow for reasonable settlement expansion in the future to meet housing need and to make the Gap policy if it is considered to be justified, more credible, flexible, reasonable and less likely to be overridden on appeal.</p> <p><b>Policy 2: Local Green Space</b></p> <p>Acknowledges the Policy is supported by the Neighbourhood Plan Revised Local Green Space Policy Review, which refers to the guidance set out in the National Planning Policy Framework at Paragraphs 99-101 to identify and designate LGS.</p> <p>Rydon seek to demonstrate, why LGS 1 does not meet all of the criteria above and consequently should be deleted.</p> <p>Future Housing Requirement: Firstly, and most critically the Review fails to have appropriate regard to Para 99 of the NPPF, which states that “Designating land as Local Green Space should be consistent with local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services”. It should also be “capable of enduring beyond the plan period.”</p> <p>It is concluded that the assessment was lightweight, had been unduly influenced by objections to a development proposal on the land and the evidence base falls considerably short of the standard required for such an important designation which the Framework says will not be appropriate for most green areas or open space.</p> <p>Is Friars Oak Field in reasonable close proximity to the community it serves? Very little community use at present, the only authorised public access being limited to use of the recreational footpath along is southern boundary.</p> <p>Surveys of the use of the public footpath that runs along the southern edge of the land were carried out to assess the level of usage of the unmanned crossing of the railway line in the north-east corner of the site.</p> <p>Is Friars Oak Fields demonstrably special to the local community and holds a particular significance? This assessment does not identify any special or unusual qualities nor has the NP process showed that the Site is demonstrably more special to the community which would set it apart from any of the other surrounding areas of countryside outside the settlement boundary.</p> <p>Is Friars Oak Fields in Character and not an Extensive Tract of Land? Land at Friars Oak fields measures approximately 7.43 hectares. There is no recognised change of character or physical boundary to the north and the site is of similar character to the entire area up to Burgess Hill to the north. As such it forms part of an extensive tract of land from which it is not obviously distinguishable</p>
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63	<p>Allocations of LGS in a Neighbourhood Plan must complement investment in sufficient homes and are to be seen as enduring beyond the end of the plan period (NPPF Paragraph 99). The designation of the Friars Oak Field site as an LGS would conflict with this Government guidance because :</p> <ul style="list-style-type: none"> <li>• Hassocks is a sustainable settlement and is a Category 2 settlement. It is therefore an important focus for new strategic housing provision across the District.</li> <li>• The submission NP only aims to accommodate the minimum housing numbers set out in the recently adopted Local Plan but further housing is needed now and in the future. Hassocks ability to provide for further housing growth should not be unjustifiably constrained.</li> <li>• The fundamental suitability of the appeal site for housing has been repeatedly demonstrated in the SHLAA, Officer reports, Council decision and Secretary of State's appeal decision.</li> <li>• National Planning Practice Guidance confirms that the LGS designation should not be used in a way that undermines meeting identified development needs.</li> <li>• The interests of local recreation and enjoyment of the best attributes of the site are better served by Rydon's proposal to provide a Country Park with access to the area adjoining the Herring Stream and authorised public access for informal recreation over a wider area associated with their residential development.</li> </ul> <p>An LGS designation should only be used where it meets all of the criteria set out in Paragraph 100 of the NPPF. The Friars Oak Fields site meets none .</p> <p><b>Section 6: Housing</b></p> <p>The HNP is anticipating that Hassocks will not be required to release any further land either assist Mid Sussex in delivering the remaining 2,500 which is to be distributed across the whole of the District in the emerging Site Allocation DPD nor any additional land required through the review. Consequently everything outside the settlement boundary is either allocated as a Local Green Space, Local Gaps and or within the South Downs National Park. These are not reasonable assumptions because:</p> <ul style="list-style-type: none"> <li>- The Housing figures presented in DP6 are minimum residual amounts, and by its very definition these are not a cap on development and</li> <li>- It is likely that Hassocks will continue to play an important role to help meet the remaining 2,500 units that the District need to allocate into emerging Site Allocation DPD and in the future beyond the current Local Plan period.</li> </ul> <p>In this regard, the NP contravenes basic condition (a) and (e) because the NP is not positively prepared and the LGS designations will undermine the ability of Hassocks to provide necessary housing growth, now and in the future.</p> <p>Land at Friars Oak has been submitted for 130 dwellings in response to the SHLAA Review. There is no reason to anticipate that the Council will not come to the same conclusion this time as evidenced by the Council's consideration of recent planning applications for residential development on the site.</p> <p>The policies contained within the NP will need to be modified in order to allow for a significant degree of flexibility to allow for the delivery of future sustainable growth opportunities at Hassocks in order to assist Mid Sussex Council in maintaining a flexible, responsive and continuously rolling 5 year housing land supply.</p> <p><b>Section 8 Transport</b></p> <p><b>Aim 5: Non- car route ways</b></p> <p>There is no clarity as to how the NP aims to address local concerns re crossing of railway line. Does not promote any specific proposals to address the issue. There is no meaningful prospect of improvements being carried out unilaterally by Network Rail.</p> <p>The policies of the NP should be both justified and effective. To be regarded as being more than a simple token gesture the Aim should associate itself with positive action such as supporting development proposals that will deliver the necessary safety enhancement and working with developers to secure them. Unless this type of positive support can be offered then the relevant Aim should be deleted due to the lack of any specific means of implementation.</p> <p>Terence O'Rourke on behalf of Gleeson Strategic Land</p> <p>Client controls land on the northern edge of the village, which is identified as a strategic allocation. Outline planning application was submitted to MSDC in December 2018. It is anticipated that the Council will determine this application in Spring 2019.</p> <p><b>Policy 16: Land to the north of Clayton Mills and Mackie Avenue</b></p> <p>Welcomes the recognition of the strategic allocation in the HNP and the stated aspirations to ensure a high-quality development.</p> <p>Client's proposals form a significant component of Hassock's commitment (500 homes) and are therefore integral to helping the village meet its identified needs and control the location of future development in and around Hassocks.</p> <p><b>Policy 2: Local Green Space</b></p> <p>Supports the identification of Local Green Spaces (LGS).</p> <p>LGS8: Land at Clayton Mills, which is located directly south of client's site and is also referenced in Policy 10: Protection of Open Space. Client does not control this area of open space but is keen to see it improved for the benefit of existing and future residents. Currently in discussion with MSDC, HPC and local residents to see how this might be achieved.</p> <p><b>Policy 13: Education Provision</b></p> <p>Proposals include land for a two-form entry primary school and follow a series of positive discussions with West Sussex County Council as Education Authority. Consider client's proposals will therefore help the plan to fulfil the objectives of this policy.</p>
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## **11. HOW THE MAIN ISSUES HAVE BEEN CONSIDERED**

- 11.1. Paragraph 15(2)(d) requires the Consultation Statement to describe how these issues and concerns have been considered and, where relevant addressed in the proposed Neighbourhood Plan.
- 11.2. Section 10 detailed the stakeholder feedback, separated between those of the statutory consultation/public bodies, those of local residents and their representatives, and developers/site promoters or their representative .
- 11.3. Table 2 includes a summary of how all comments have been addressed within the Submission Version HNP (Regulation 16).

# TABLE 2

## STAKEHOLDER FEEDBACK WITH COMMENTS

Stakeholders/General		
Ref No.	Summary of Comments	DMP Recommendations
1	Request aim 5 of HNP is strengthened to mention "multi-functional" crossing. Improving railway crossing featured in planning apps for development of land at Friars Oak and 500 houses land north of Mackie Ave. Based on these applications it seems that a bridge with steps is only possibility being considered. It seems MSDC is only considering in light of individual applications and not a long-term view. Note a bridge will be difficult to cross due to height necessary to clear railway on high embankment. Options such as bridge with ramps, pedestrian tunnel or use of existing tunnel to north have not been considered. Believe this to be relevant especially with proposal for new school. Request HPC push MSDC to take comprehensive approach dealing with this matter as only dealing with issue of railway crossing within context of individual planning applications rather than what's best for Hassocks as a whole.	Comments noted. No action required.
2	fj	Comments noted. No action required.
3	Support HNP. Thanks to HPC.	Comments noted. No action required.
4	Support HNP Believes Hassocks has now reached saturation point and agrees there should be no further residential development in this period.	Comments noted. No action required.
5	Congratulate Team for diligent services in what has been a long and difficult process. Fully appreciate dedication. Support the reports.	Comments noted. No action required.
	Identified 3 points, which need clarification in the supporting LGS document, page 3. <b>Point 1</b> - Site and Location - believes there is an anomaly with wording. <b>Site and Location</b> (Original wording) This is an area comprising two fields to the north of Shepherds Walk and an adjoining area of public open space to the west of Shepherds Walk. The open space is an informal area adjacent to the Herring Stream. Local residents put forward a written case for designation of the fields as a LGS in 2014. (Suggested amendment) This is an area of two fields to the north of Shepherds Walk with the Herring stream located to the west. Local residents put forward a written case for designation of the fields as local green space in November 2014. <b>Point 2</b> - Public Access - no reference to well-used stile that allows access from green to Shepherd Walk to footpath in fields. Believe description needs to be more explicit and include reference to stile. <b>Public Access</b> (Original wording) A public footpath crosses the area from west to east and the fields have been used by local residents as informal access for many years. It is recognised that apart from the public right of way across the area the current open access is at the discretion of the landowner. (Suggested amendment) There are three access points to the fields which have been used by local residents as informal access for many years. A public footpath crosses the area from west to east. There is access to this footpath from the south via a stile. It is recognised that apart from the public right of way across the area the current open access is at the discretion of the landowner. Point 3 - Criteria for Designation as LGS- they consider the area to be in close proximity to local community due to direct access from south via stile on the green. <b>Reasonable Proximity to a local Community</b> (Original wording) The land lies on the northern edge of Hassocks and adjoins an area of housing to the south. There is access to the land via a footpath. It is, therefore, considered to be in reasonable proximity to a local community. (Suggested amendment) The land lies on the northern edge of Hassocks, immediately adjoining an area of housing to the south. There is access to the land via a west to east public footpath. An adjoining area of public open space (the green) to the south of the fields and within the Shepherds Walk estate, allows direct access to the fields via a stile. It is, therefore, considered to be in close proximity to a local community.	See Review of Policy 2: Local Green Spaces & Regulation 14 Pre-submission Representation, June 2019
6	Support.	Comments noted. No action required.
7	Pleased Friar Oak Fields are shown as LGS. Believes gap between Hassocks and Burgess Hill is shrinking daily and wishes for no more building.	Comments noted. No action required.
8	Support. Notes: the Plan has accommodated and satisfied housing need; proposed designation of Friars Oak; development are underway in Parish. Thanks to everyone involved.	Comments noted. No action required.



9	<p>Support.</p> <p>Especially inclusion of Friars Oak Fields as LGS.</p> <p>Believes the sites already designated for development ensure there's no need to allocate further land for development in plan period.</p> <p>Believes Amenity Plan will safeguard aspects of Hassocks' identity and character and help prevent coalescence.</p>	<p>Comments noted.</p> <p>No action required.</p>
10	<p>Support.</p> <p>Especially Friars Oak as green space.</p>	<p>Comments noted.</p> <p>No action required.</p>
11	<p>Support.</p> <p>Especially Friars Oak as green space.</p>	<p>Comments noted.</p> <p>No action required.</p>
12	<p>Support.</p> <p>Especially Friars Oak as green space.</p>	<p>Comments noted.</p> <p>No action required.</p>
13	<p>Support.</p> <p>Concerned about level of development in Hassocks without thought to strain on local roads - pollution levels rising which is only going to get worse over time.</p> <p>Particularly supports naming of Friars Oak Fields as LGS.</p>	<p>Comments noted.</p> <p>No action required.</p>
14	<p>Support.</p> <p>Strikes good balance between the present day and future needs for housing in Hassocks and yet protects the village and its wildlife from over-development.</p>	<p>Comments noted.</p> <p>No action required.</p>
15	<p>Support. Believes there is merit in proceeding with revised HNP.</p> <p>Pleased plan recognises development sites already identified in Hassocks meaning housing obligations have been fulfilled without the need for anymore land to be allocated for development.</p> <p>Pleased LGS1 is included as local green space. Informal recreation space, important habitat and is unsuitable for development due to flood risk around Herring Stream. Hope being designated as LGS in NP will protect the fields from development.</p>	<p>Comments noted.</p> <p>No action required.</p>
16	<p>Support.</p> <p>Support LGS allocations /LGS at Friars Oak, particularly important to them.</p>	<p>Comments noted.</p> <p>No action required.</p>
17	<p>Support.</p> <p>Sites designated for development ensure HPC has fully met their housing requirement without the need to allocate any more land in plan period.</p> <p>Crucial to ensure Friars Oak Fields is not developed.</p>	<p>Comments noted.</p> <p>No action required.</p>
18	<p>Support.</p> <p>Particularly allocation of Friar Oaks Field as LGS and plans for all weather accessible paths around the village.</p>	<p>Comments noted.</p> <p>No action required.</p>
19	<p>Support.</p> <p>Particularly support allocation of Friar Oaks Field as LGS.</p> <p>Believes stated objectives meet increased needs for housing with Hassocks contributing substantial number whilst preserving the surrounding green spaces and character of the village.</p>	<p>Comments noted.</p> <p>No action required.</p>
20	<p>Support.</p> <p>Believes Hassocks has been generous in surrender of several major sites for housing development.</p> <p>Vital to keep remaining green space in particular Friars Oak Fields - this area of 3 x fields important to keep as buffer between Hassocks and Burgess Hill.</p>	<p>Comments noted.</p> <p>No action required.</p>
21	<p>Support.</p>	<p>Comments noted.</p> <p>No action required.</p>

22	<p>Support.</p> <p>Pleased to see Friars Oak Field as designated LGS.</p> <p>Hoping Plan will go through providing Hassocks residents confidence they won't automatically be swamped with more houses.</p>	Comments noted. No action required.
23	<p>Representation in relation to the proposed building plans for the land behind Friars Oak Pub. Consider already agreed to the houses requested and don't want anymore as Hassocks will no longer be a village.</p> <p>Proposed land is boggy and unsuitable for building and the area is in local green space. - No more house building.</p>	Comments noted. No action required.
24	<p>Support. Thanks to Parish Council. Approval for Plan.</p>	Comments noted. No action required.
25	<p>Support. Especially in regard to Friars Oak fields as LGS.</p>	Comments noted. No action required.
26	<p>Support. Commend PC for the amount of effort and consideration put into the revised HNP.</p> <p>Particularly keen that Friars Oak Fields development should not go ahead even though developer has put in another appeal</p> <p>Considers it seems District Plan would not now support it as its a green field site - also not needed because Hassocks taking generous fair share of housing requirement. On flat map may look like gap between new housing on golf course site to west of London Road and 500 houses to North of Clayton Mills, but physically there is no connection across Clayton Mills because of high tree-lined railway embankment which effectively isolates two sides of the village.</p> <p>Endorse idea to improve bus services to the village.</p> <p>Glad to see provision for new primary school and putting it amongst 500 news homes is where it needs to be to prevent unnecessary traffic movement and to create a sense of community.</p>	Comments noted. No action required.
27	<p>Support.</p> <p>Pleased that Friars Oak Fields is proposed as open space and this would be an enormous benefit to the community.</p> <p>Thanks to PC.</p>	Comments noted. No action required.
28	<p>Husband and wife support HNP, particularly Friars Oak Fields as LGS.</p>	Comments noted. No action required.
29	<p><b>New Development - Parking Provisions</b> Concerned no policy or consideration of compliance has been considered for parking for new homes, and considers the submission document in this area weak and susceptible to abuse (example: development at Clayton Mills) and is aware of other Parish Councils who have made it Neighbourhood Plan Policy to include binding parking requirements for new new developments (included example of Turners Hill PC Neighbourhood Plan provision for parking wording).</p> <p>Would also like consideration to be made to future parking protection i.e. where additional habitable rooms/spaces are provided - a development of 30 houses with 50% loft conversion rate will generate 15 extra bedrooms without no further parking provision. Queries how does Hassocks NHP provide for such events?</p> <p><b>Development Design</b> Disappointing no specific reference made to new development design as part of submission document - this should be considered to cover all new development, particular reference to land to north of Clayton Mills and Mackie Avenue in light of public objection.</p> <p>Believes consideration should be made at this stage to determine some basic design criteria reflecting the character of the village and includes some suggestions in his response road and footpaths, frontage.</p> <p><b>Housing Numbers</b> Considers it interesting the aspirational housing numbers over plan period and appears to keep the requirement at zero, all of the housing numbers will be met. Considers it would be beneficial for community and District Council to see how the delivery of the housing numbers suggested is achieved. Advises evidence of the delivery profile being tested as part of the NHP would be beneficial to ensure plan doesn't come under unwarranted pressure for non-delivery in future years.</p> <p><b>Summary</b> They don't wish their comments to appear to be obstructive in respect of their own home, but believe there are significant flaws in the proposals made, particularly as they are policy non-compliant. They are open to work with Hassocks Parish Council NPWG to discuss their concerns land under their own ownership and enter into more detailed discussion over the other village wide proposals they have suggested.</p>	Comments noted. No action required.
30	<p>Support</p> <p>Thanks to PC.</p>	Comments noted. No action required.

		Comments noted
31	<p>Support</p> <p>Particularly wish to see Friars Oak and Ham Fields green space allocations come to fruition as adopted green space.</p> <p>Proposal to manage traffic better to create east-west cycleway strongly supported.</p> <p>Believe the village cannot take any more housing than the 800+ that has been identified.</p>	No action required.
32	<p>Support.</p> <p>Particularly inclusion of Friars Oak Fields as LGS.</p>	Comments noted. No action required.
33	<p>Support.</p> <p>Note that the identified development sites ensure the housing obligations are fulfilled without the need for further land to be allocated for development.</p> <p>Pleased Friars Oak Fields is included as LGS - its a cherished and much used habitat and local wildlife haven that the local community has fought to protect from developers. Hope this designation will afford Friars Oak Fields the protection from developers it needs.</p>	Comments noted. No action required.
34	<p>Support. Thanks to PC.</p> <p>Urge documentation to be submitted as soon as possible to the village can be protected from further speculative developer interference.</p> <p>Pleased LGS1 - Friars Oak Fields remains in the NHP as this was applied for by local people at the start of the process and it is a valued natural area for many Hassocks residents.</p>	Comments noted. No action required.
35	<p>Husband and Wife support the HNP.</p> <p>Particularly Friars Oak Fields as LGS. Feel strongly Friars Oak Fields needs to be kept as LGS.</p> <p>Hassocks had more than fair share of new houses and village cannot take anymore as schools/doctors over subscribed.</p> <p>Pollution levels at Stone Pound extremely high and new houses will only push this higher. Village needs to stay as it is and the HNP should be adhered to.</p> <p>Do not want or need any new houses being built on Friars Oak Fields and wish for it to remain as LGS for benefit of village and wildlife/fauna and flora.</p>	Comments noted. No action required.
36	<p>Support.</p> <p>Particularly Friars Oak Fields as LGS. Feel losing too much of their countryside and wildlife but understands there was no choice but hopes this will be it for good for a few years and our wildlife can return and settle.</p>	Comments noted. No action required.
37	<p>Support the HNP. Do not see any reason why it should be changed.</p>	Comments noted. No action required.
38	<p>Support the HNP</p> <p>Pleased the region will meet its requirement for additional housing whilst maintaining important green spaces and strategic gaps.</p> <p>Pleased Friars Oak Fields has been given the protection it deserves. This area is a flood zone that protects other properties and is an area of importance for flora and fauna in the area. Protecting this area from development will protect the integrity of Herring Stream.</p> <p>Believes its important to construct new housing but also important to protect our countryside from type of development driven by profit. Believes as a country need to pay more attention to utilise more brownfield sites and properties that have fallen into disuse.</p>	Comments noted. No action required.
39	<p>Support HNP</p> <p>Understands it is the only sustainable, democratic way forward for the village. Particularly support preserving Friar Oaks Fields as green open space for village.</p>	Comments noted. No action required.
40	<p>Support</p> <p>Pleased it meets its requirement for additional housing and also protects important green spaces.</p> <p>Pleased Friar Oak Fields has been designated as a green space - an area not only a flood zone protecting other properties but an area of importance for flora and fauna in the area. Protecting this area from development will also protect the integrity of the Herring Stream. Its important to construct new housing but also protect the countryside from type of development driven by profit.</p>	Comments noted. No action required.
41	<p>Support - Plan takes into account new housing but identifies where this would be best placed in way reflects best interests of the village.</p>	Comments noted. No action required.

Agents/Landowners Comments on LGS		DMP Recommendations
Ref No.	Summary of Comments	See Review of Policy 2: Local Green Spaces & Regulation 14 Pre-submission Representation, June 2019
42	<p>Comments made on behalf of the owner of LGS1 (Friar Oaks), strongly objects to green space designation - see further representations submitted by Rydon who have contractual obligation to promote land for residential development.</p> <p>Representations seek to present an assessment of the site showing it does not satisfy the criteria for LGS designation.</p> <ul style="list-style-type: none"> <li>Land privately owned, used for agricultural purposes until 2006. Land left unmanaged as grass land. Actively promoted for residential development.</li> <li>Limited public access to the land by means of public footpath that runs along southern boundary. With/without designation as LGS there would be no change to ability of residents using PRoW. All other claimed access to land is unauthorised without landowners consent.</li> </ul> <p>Friars Oak Fields - subject of pending appeal for 130 units. Evident client's intention to seek planning for residential use. If site not released for housing following appeal, intention is to continue to promote land through emerging Site Allocation Development Plan document and Local Plan Review. During this time land will be used for horse pasture. Landowner will erect fence along public footpath to stop dogs mixing with livestock.</p> <p>Site recognised as lying within sustainable location with good accessibility and transport connections without restrictive policy designations. Reasonable to conclude the land is capable of accommodating new development to meet current and future need...</p> <p>Do not propose to make land available for use by public in future - will strongly resist attempts to appropriate it for such a use.</p> <p>Believe plenty of other open areas of land to be enjoyed Rydon proposals include dedication of land alongside Herring Stream for recreational use. In better interests of the Parish Council and residents to support that scheme if they think there is need for new recreational area in this location.</p> <p>Landowner LGS2 (West of London Road, Hassocks), objects to designation - will prejudice them from obtaining planning permission for following:</p> <ul style="list-style-type: none"> <li>Erection of stables to house horses kept in the field;</li> <li>Erection of agricultural barns - to shelter animals in the field;</li> <li>Erection of agricultural barns for dry storage for machinery used for agricultural purposes of field;</li> <li>Erection of barn for dry storage of materials and feeding stuff; and</li> <li>Reduce value of the field.</li> </ul>	See Review of Policy 2: Local Green Spaces & Regulation 14 Pre-submission Representation, June 2019
43	<p><b>Landowner of LGS4</b> (western most parcel).</p> <p>Made representations to original NHP in 2015/2016. Summary of what has happened in planning policy terms provided.</p> <p><b>1) Recap and update on the development proposals for Site 8 (LGS4 previously called Site 8):</b></p> <ul style="list-style-type: none"> <li>Original proposals for the site were: mixed development of 50-60 homes with range of affordability - build density 20-30dph;</li> <li>Purpose built, 2 year intake primary school fully funded by developer as part of development scheme;</li> <li>Subject to dialogue with PC school development could incorporate prov/iso of multi-use community facilities - note this has been identified as a requirement within Neighbour</li> </ul> <p>Considers the proposals are in line with discussions that took place at meeting between landowner, development partner and PC on 15/04/2015. Record of the meeting previously supplied.</p> <p><b>2) Requirement and Deliverability of additional primary/secondary school places</b> Requirement for additional school's places in Hassocks is understood and documented. Strategic allocation makes provisions for school, however not clear from the Plan if it would provide sufficient capacity over the life of the plan. Queries the deliverability of school at Clayton Mills.</p> <p>Considers in the absence of well-defined and economically viable plan for the delivery of the immediate requirement for additional primary and secondary school places as well as the inevitable requirement for increased secondary school places on the back of the increased primary school places, considers its premature to preclude the site from further consideration for future development due to allocation as LGS.</p> <p><b>Planning Policy and delivery of school places:</b> Representation includes letter of 22 September 2015 referred to relevant policy regarding schools' provision and is included for ease of reference.</p> <p><b>3) Object to allocation of LGS4 as LGS</b></p> <p>Opposed to allocation and ask that this is not taken forward to the next stage of HNP.</p> <p>Concerned requirements for allocation of site as LGS set out in NPPF haven't been met and NHP does not meet these concerns.</p> <p><b>Local Green Space</b> - Challenge assertion recorded in Working Group document site meets criteria in Para 77 of NPPF which is required for allocation as an LGS. Respond to arguments presented in Working Group document with following:</p> <p><b>Recreational Value</b> - single official footpath across field - footpath is statutory right of way protected under legislation and is not merit in itself for designating as LGS (ref para 18 NPPG). Other informal paths and circular walks described in NPWG in relation to LGS are not authorised right of way or recognised by landowner. Make reference to "open access" at discretion of landlor. Landowner asserts there is no "open access" formerly granted across this land.</p>	See Review of Policy 2: Local Green Spaces & Regulation 14 Pre-submission Representation, June 2019
44	<p><b>Landowner of LGS4</b> (western most parcel).</p> <p>Made representations to original NHP in 2015/2016. Summary of what has happened in planning policy terms provided.</p> <p><b>1) Recap and update on the development proposals for Site 8 (LGS4 previously called Site 8):</b></p> <ul style="list-style-type: none"> <li>Original proposals for the site were: mixed development of 50-60 homes with range of affordability - build density 20-30dph;</li> <li>Purpose built, 2 year intake primary school fully funded by developer as part of development scheme;</li> <li>Subject to dialogue with PC school development could incorporate prov/iso of multi-use community facilities - note this has been identified as a requirement within Neighbour</li> </ul> <p>Considers the proposals are in line with discussions that took place at meeting between landowner, development partner and PC on 15/04/2015. Record of the meeting previously supplied.</p> <p><b>2) Requirement and Deliverability of additional primary/secondary school places</b> Requirement for additional school's places in Hassocks is understood and documented. Strategic allocation makes provisions for school, however not clear from the Plan if it would provide sufficient capacity over the life of the plan. Queries the deliverability of school at Clayton Mills.</p> <p>Considers in the absence of well-defined and economically viable plan for the delivery of the immediate requirement for additional primary and secondary school places as well as the inevitable requirement for increased secondary school places on the back of the increased primary school places, considers its premature to preclude the site from further consideration for future development due to allocation as LGS.</p> <p><b>Planning Policy and delivery of school places:</b> Representation includes letter of 22 September 2015 referred to relevant policy regarding schools' provision and is included for ease of reference.</p> <p><b>3) Object to allocation of LGS4 as LGS</b></p> <p>Opposed to allocation and ask that this is not taken forward to the next stage of HNP.</p> <p>Concerned requirements for allocation of site as LGS set out in NPPF haven't been met and NHP does not meet these concerns.</p> <p><b>Local Green Space</b> - Challenge assertion recorded in Working Group document site meets criteria in Para 77 of NPPF which is required for allocation as an LGS. Respond to arguments presented in Working Group document with following:</p> <p><b>Recreational Value</b> - single official footpath across field - footpath is statutory right of way protected under legislation and is not merit in itself for designating as LGS (ref para 18 NPPG). Other informal paths and circular walks described in NPWG in relation to LGS are not authorised right of way or recognised by landowner. Make reference to "open access" at discretion of landlor. Landowner asserts there is no "open access" formerly granted across this land.</p>	See Review of Policy 2: Local Green Spaces & Regulation 14 Pre-submission Representation, June 2019

<p>45</p>	<p><b>Historic Significance/RoW</b> - Developer confirmed mixed development of homes and primary school proposed can easily incorporate the official RoW running through the site and maintain historic link between villages of Keymer and Ditchling. Archaeological surveys would be carried out to check for presence of archaeological/historic interest - specifically to route Roman Road that runs south of site. With this information proposed scheme would be moved forward with regard to mitigation measure in place to protect/enhance them.</p> <p><b>Richness of Wildlife</b> - Site comprising western most parcel of LGS4 is cropped by landowner as part of arable rotation - routinely tilled, fertilised, sprayed and harvested. Land is bordered to west by road beyond lie residential developments Adastral Avenue, Grand Avenue and Oldlands Ave &amp; pub with Damian Way development to south. Footpath running across field heavily used by dog walkers - given land use and proximity to existing development and regular pedestrian/dog access - feel its hard to argue parcel is rich in wildlife. Mature oak and ash trees on field boundaries - no plans as part of development proposals to disturb these.</p> <p><b>National Park Designation</b> - Land lies within National Park Boundary challenge whether there is any additional local benefit to be gained by LGS designation of the site (ref para 15). Definition of extensive tract of land is not precise, Area of LGS4 as proposed extends to 25 acres. Assert this is substantial area in context of LGS designation.</p> <p><b>4) Relationship between emerging Hassocks NHP and SDNP LP</b></p> <p>Site falls within SDNP. Planning issues in relation to site will be determined with reference to emerging SDNP LP. Hassocks NP needs to accord with MSDC LP now finalised and adopted and SDNP LP.</p> <p>Concerned extent of LGS designations within draft plan and lack of flexibility in terms of future planning that this represents.</p> <p><b>Summary</b> - Concerned plan as drafted doesn't provide sufficient flexibility to allow for development beyond plan period so doesn't meet the basic conditions required of NHP.</p> <p><b>Landowner LGS4 (eastern parcel)</b></p> <p>Refer to their representations of 09/09/2015 and 08/02/2016 and 25/08/2016 to Planning Policy and Economic Development Department of MSDC and would like these considered to addition to latest response of 14/02/2019.</p> <p>Raised in letter of 25/08/2016 that there had been no consultation on this matter - disappointed that apart from letter to their clients on 04/01/2019 re statutory public consultation period will close 18/02/2019 there's been no attempt to consult with them. Considers there has been a failure to observe guidance</p> <p>Greater concern is NPWG response in paper of 2016. NPWG set out in detail a response "to individual objections and representations against each site" - and that a representation has been made by Agri-Matters representing the western landowners but Batcheller Monkhouse's objection/comments of 08/02/2016 is not mentioned and has been ignored - denying clients a voice in the process.</p> <p>In response to the requirements of the NPPF, paras 99/100, representations access the site is physically close to the community. Unclear of meaning of "it serves. Considers the land "serves" no other community function but is an important grassland field for agricultural business.</p> <p>Do not accept that informal parish have been used unchallenged for over 20 years (as stated in the Response Paper).</p> <p>No attempt by Working Group to demonstrate the land is special.</p> <p>Field has no special beauty over above other areas.</p> <p>Historic Significance - have challenged there is anything of historical interest associated with the land - NPWG referred to Roman Road but acknowledges it passes just to south of this area - so not at this site. Assume reference to archaeological mitigation strategy refers to land to the west so believe comment is not relevant to their client's land. NPWG mention public footpath may be historic link to Ditchling - they advise this is unlikely as there were far more convenient routes in historic times.</p> <p>Recreational Value - believe refers to public footpath - believe no reason to support contention the land is demonstrably special. NPWG cited there are "valued views" - they do not consider this is a recreational value and the views are no better than others in the Parish.</p> <p>Richness of Wildlife/tranquility - Response says the objection does not challenge this - they advise their objections most certainly did challenge this and repeat heavy use of public right of way by walkers/dogs precludes tranquility and wildlife. Believe NPWG have failed to identify any wildlife of "particular local significance".</p> <p>Local in character and not extensive tract of land - unclear what "local in character" means in practice. Believe client's land is typical of farmland in the area and suggest that undermines any claim it's "demonstrably special". No guidance on what constitutes "extensive tract" - notes this site is one of the larger sites being proposed. Believe taking all LGS sites together they constitute large tract which appear to be designed as "green belt" around Hassocks - they submit this is not the purpose LGS designation was intended.</p> <p>Failure of NPWG to properly consult landowner and not complied with its own Consultation Statement. Previous concerns have not been addressed and have been ignored.</p> <p>NPWG not demonstrated client's land is "demonstrably special to local community". Believe this is a high bar suggesting some characteristic that makes it distinct when compared with other land in Parish. Query what the designation will achieve for the community. Public has right to use footpath and no more and advises this won't change.</p> <p>Land is in SDNP - NPWG suggested designation is needed beyond that as it "would service a different purpose providing accessible green space for local community" - they believe this is fundamentally wrong. Public Footpath is protected in any event - beyond that any access to "green space" is at discretion of landowner.</p> <p>Representations note para 6.17 states "HPC wishes to support further windfall development... outside of built-up area boundary". Representations advise its difficult to see where even small windfall sites might be found is the Plan is adopted.</p>	<p>See Review of Policy 2: Local Green Spaces &amp; Regulation 14 Pre-submission Representation, June 2019</p>
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46	<p><b>LGS4 Landowner (follow up comment below also)</b> - Can't consider proposed allocation of LGS of their land as the documents referred to are not up to date on Hassocks PC website. Latest information appears to date back over 4 years.</p> <p>Questioning why their land has been included as proposed LGS when original documents did not include it.</p> <p>Believe any designation on their land will be resisted and will be instructed DMH Stalard to present them although they believe there is case law which does not allow designation of LGS without both landowner consent and overriding importance - and advise neither is appropriate in this instance.</p> <p>They have no desire to seek development on land at their family home - but propose to submit plans in 2019 to amend design of the house and its surroundings and therefore unlikely they will allow LGS designation at this time.</p>	See Review of Policy 2: Local Green Spaces & Regulation 14 Pre-submission Representation, June 2019
47	<p><b>Local Gap</b> - Surprised their land (within their private residential curtilage) is in an area defined as a local gap. Clear their home doesn't meet criteria for the land to be included.</p> <p>Their land and home is next to built up area of Keymer with their boundary the extent of the Parish. "This easterly boundary is the closest point to Ditchling and it is considered the boundary of the Local Gap should extend from the rear of the properties in Silverdale to follow the Parish Boundary around our home <b>including</b> the area of LGS identified as LG4 as noted in the Local Green Space Policy Review document."</p> <p>No supporting evidence for Local Gap to have such an unjustified, oblique inclusion and is in contradiction with wording under 4.9 setting out MSDC's policy namely: 'robust evidence that development within the gap would individually or cumulatively result in coalescence and the loss of separate identity and amenity of nearby settlements'</p> <p>Believes the photographic evidence on Page 21 of Local Gap submission documents strengthens this view as it's clear the gap as seen from the evidence doesn't include the land in their ownership and only really includes land identified as LGS4 - believes there is no evidence in PC submission documents which demonstrably supports the inclusion.</p> <p>Believes plan referred to in document under 4.10 as 'underpinning' the NHP is in conflict with the plan submission.</p> <p>As information in plan submission and associated supporting submission document doesn't conform to MSDP Policy 13, request the boundary to be adjusted in line with Hassocks Parish boundary whilst including LGS4 or request in line with text noted in 4.9 'robust evidence' is provided which concludes the land is in line with policy requirements.</p> <p><b>Local Green Spaces</b></p> <p>Representation consider Hassocks NHP Reg 14 Pre-Submission Jan 2019 document and Background Paper, Revised Hassocks NHP - Local Green Space Policy Review Oct 2018 have conflicting maps representing LGS4. It is not clear whether conflicting plans undermines the validity of the consultation. The consultant appointed by HPC not been able to confirm which plan is correct.</p> <p>Text in Revised Hassocks NHP LGS Policy Review relates to plan submitted as part of June 2016 submission (referenced LGS5 in that submission), representations agree with the Statements made in relation to this submission in the LGS Policy review and criteria which has been deemed to be met.</p> <p>No justification or evidence to support additional inclusion of land to East of Church Mead (as included on the Hassocks NHP Reg 14 Pre-Sub Jan 2019 document) has been provided and so it's not agreed the extension of LGS4 on conflicting plan should be included.</p> <p>The land is within private residential curtilage and is highly unlikely that this land will ever be delivered. Protection being sought by its classification is unclear.</p> <p>No evidence has been provided to demonstrate the extension of the LGS4 in this area meets any criteria set out in the policy for designation of LGS's.</p> <p>If it's Council's proposal to arbitrarily include additional parcels of land as LGS it needs to be demonstrated by assessment the submission consultation is valid - this specific element should be reconsulted if unsound.</p> <p>In other docs (Revised Hassocks NHP Review of Policy 1: Burgess Hill Gap and Policy 2: Ditchling and Hurstpierpoint Gap) a specific section has been allocated to demonstrate 'changes since 2016' - there is no evidence to identify change for this LGS.</p> <p>Consider it should be recognised that their home and land is constrained from a future development perspective and there would be little to no prospect of pursuing development.</p> <p>LGS5 : WSSCC have concerns over this designation as it is part of a school playing field at Downsbrook Community College.</p>	See Review of Policy 2: Local Green Spaces & Regulation 14 Pre-submission Representation, June 2019
48	<p>School field is an operational school playing field under ownership of WSSC. There is existing public access and right of way. Field is integral and functional part of the school.</p> <p>WSSC has statutory obligation to ensure every child in West Sussex can access a mainstream school in the county. If there are future requirements to create additional spaces at any schools in the planning area this would be in accordance with statutory obligations and a LGS designation would serve to compromise the Council's ability to meet this need.</p> <p>Therefore WSSC have concerns that the school fields are included as LGS - namely they are already protected due to their status and there may be future requirement to increase capacity of the school to accommodate additional children.</p> <p>Suggested Amendment - To reconsider the school field being included in the proposed list of designated areas of LGS.</p>	See Review of Policy 2: Local Green Spaces & Regulation 14 Pre-submission Representation, June 2019



Statutory / Local Government Consultees		DMP Recommendations ( <del>to be deleted</del> /bold=additional wording)
Ref No.	Summary of Comments	
49	<p><b>Gatwick Airport Ltd</b></p> <p>Parish is around 24km South of Gatwick Airport, therefore it is outside of our 'physical' 15km safeguarding area. At this distance only need to be consulted if there were any wind turbines proposed.</p> <p><b>Highways England</b></p> <p>MSDC Plan requires Hassocks delivers min of 882 dwellings over plan period 2014-2031. Plan allocates strategic site within Hassocks Neighbourhood area, north of Clayton Mills for 500 dwellings. They note total of existing commitments and completions in Hassocks, including the strategic site, meets requirement of 882 dwellings with no intention to allocate further housing. On this basis, they have no concerns on the Hassocks Neighbourhood Development Plan.</p> <p>Wish to be consulted if any additional 'windfall' housing sites are proposed as the cumulative effect of further development could impact the strategic road network.</p> <p><b>Historic England</b></p> <p>In general content that the Plan has few potential impacts for historic environment or Heritage Assets.</p> <p>Note with concern in response to previous Presubmission version of the Neighbourhood Plan that development of the site at Land to the North of Clayton Mills and Mackie Avenue, would potentially affect the identified Archaeological Notification Area DWS8608, which lies in the north of this area and represents a dispersed multi-period landscape of Prehistoric and Roman period occupation and settlement.</p> <p>Note Draft policy 16 refers to the need to protect a nearby Heritage Asset. If this refers to the archaeological notification area, suggest more robust wording is used to draw potential developer's attention to potential for presence of archaeological remains of importance and their need to provide an informed response to their presence through the design of development.</p> <p>Similar wording has been used in the adopted Haywards Heath Neighbourhood Plan and several other examples and NE endorse this approach.</p> <p>Note the potential impact to the Parish's Heritage Assets is not noted in the Sustainability Appraisal which appears to have been prepared without reference to the County Historic Environment Record. Consider this problematic and suggests an incomplete and unreliable assessment.</p>	<p>Comments noted. No action required.</p> <p>Comments noted. No action required.</p> <p>Comments noted. No action required.</p> <p>MSDP DP11: Strategic allocation does not include specific criteria relating to the archaeological area. Where required this information will form part of the planning application.</p> <p>The SA includes Objective 3: Heritage. The strategy, policies and aims of the HNP have been assessed against this objective.</p>
50	<p><b>MSDC</b></p> <p>Welcome the preparation of a new NP for Hassocks that takes into account the revised housing requirement for Hassocks Village, makes reference to Clayton Mills Strategic Housing allocation as well as acknowledging the planning permissions that have recently been granted.</p> <p>For Hassocks NP to be successful at Examination, it will need to meet Basic Conditions. MSDC provided informal comments on draft Reg 14 NP in Nov 2018 and they are pleased to see many of their comments have been taken into account in the Plan - in particular those relating to Local Gap Policy criteria as well as allowing for 'windfall' development up to 10 dwellings to come forward outside the settlement boundary.</p> <p>There are still some outstanding issues needing to be addressed for the NP to meet Basic Conditions test and be successful at Examination. These are:</p> <p><b>Hassocks Neighbourhood Plan Proposals Map – Policy 1 – Local Gaps</b></p> <p>MSDC notes that the Local Gap boundary designation is, essentially, contiguous with the settlement boundary and includes some land that is surrounded by development or has been identified in the recent appeal decision at Friars Oak as not necessary to preserve settlement identity and prevent coalescence.</p> <p>MSDC consider the Background Paper 'Review of Policy 1 Burgess Hill Gap and Policy 2 Ditchling Gap and Hurstpierpoint Gap' provides general assessment of the character and sensitivity of the landscape that is proposed to be included in the Local Gap, the detail of where the boundary should be drawn in light of this work has not been clearly justified, i.e. Background Paper explains some land is well contained and views are enclosed.</p> <p>In order for this policy designation to be robust and have credibility in its application, MSDC recommends that further assessment is carried out or conclusions provided to identify the areas of land that are entirely necessary to preserve the integrity of the Local Gap and maintain the separate identity of settlements. MSDC consider this can then be used to support where the Local Gap Boundary should be drawn.</p> <p><b>Local Green Space (LGS) designation: LGS 1, LGS 2, and LGS 4</b></p> <p>MSDC notes that land proposed for designation as LGS1, LGS2 and LGS4 comprise fields of pasture and are part of the wider countryside adjacent to the built up area boundary, all in private ownership. Public footpaths run across or close to the sites; however there is no statutory public access to the proposed LGS areas. The sites appear to be used unofficially, mostly by local dog walkers. MSDC notes that LGS 1, 2 and 4 cover fairly large areas of countryside surrounding Hassocks.</p> <p>MSDC confirm they have considered the supporting Local Green Space Policy Review Background Paper and do not judge that this sufficiently demonstrates why LGS 1, 2 and 4 are particularly special over and above other areas of countryside in the vicinity, nor does it judge that they are the type of green space the Government had in mind that should be protected when introducing this designation.</p> <p>MSDC consider these particular LGS designations are therefore not in general conformity with the Government's policies in the NPPF nor the advice set out in the NPPG and they should be removed.</p> <p><b>Policy 7 - Development in Conservation Areas</b></p> <p>MSDC previously provided advice that in order to make this policy more locally distinctive, MSDC confirm this advice has been taken on board. However as a result of the way the policy is drafted, MSDC consider the could be read that development is encouraged in these areas. MSDC therefore suggest that the policy is redrafted to identify the special features of the conservation area first and then follow this with a sentence that says "any development in the conservation area must conserve and enhance these features."</p>	<p>Comments noted.</p> <p><b>Policy 1: Local Gap</b> See Review of Policy 1: Local Gaps &amp; Regulation 14 Pre-submission Representations, May 2019</p> <p><b>Policy 2: Local Green Spaces</b> See Review of Policy 2: Local Green Spaces &amp; Regulation 14 Pre-submission Representation, June 2019</p> <p><b>Policy 7: Development in Conservation Areas</b> Policy updated to reflect advice received.</p> <p><b>Policy 15: Hassocks Golf Club</b> Policy updated to reflect advice received.</p> <p><b>Policy 17: Land west of London Road</b> Policy removed from Submission HNP.</p> <p><b>Policy 18: Affordable Housing</b> Policy updated to reflect advice received.</p>
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	<p><b>Policy 15 – Hassocks Golf Club</b> MSDC advise the residential application is predicated on the relocation of some of the golf facilities. MSDC note that criterion 1 states that the proposal should not extend into land in the Local Gap. MSDC recommend for clarity, that this criterion specifically refers to the residential development not extending into the Gap.</p> <p><b>Policy 17 – Land west of London Road (Saxon Mills)</b> Planning permission for this site has been granted and development has already commenced. MSDC consider Policy 18 is not required as it has no statutory planning control over this site. MSDC consider the identification of this area should also be deleted from the Proposals Map.</p> <p><b>Policy 18 – Affordable Housing</b> MSDC acknowledge the policy has been revised to take into account the Mid Sussex Housing Allocation Scheme. MSDC consider there are inconsistencies as the local connection criteria on the Council's Allocation Scheme only relate to first lettings and also they do not apply to strategic allocations. MSDC recommend the following changes to the policy: The second paragraph should be amended to say: "When allocating the first letting of a home within a new development of general needs housing, priority will be given to bids from applicants who have a Local Connection to the parish of Hassocks. In order to establish a local connection, the applicant(s) must meet one of the following criteria: After the fourth criterion, the following sentence should be added: "Larger new developments containing 250 homes or more in total are intended to meet the housing needs of the whole District and are therefore exempt from the local connection criteria above." MSDC would urge HPC to reflect the aforementioned comments in the Submission Version of the Neighbourhood Plan. Reps confirms MSDC works proactively with Neighbourhood Planning groups to give Neighbourhood Plans the best chance of success at examination.</p>	
53	<p><b>Natural England</b></p> <p><b>Policy 3: Green Infrastructure</b> Support the inclusion of a policy on green infrastructure.</p> <p><b>Policies 15/16/17: Housing</b> Housing allocations allocated in the MSDP- no further comments to make</p> <p><b>Sustainability Appraisal</b> NE Commented on the SA Scoping Report -note their comments on 'Stage A3 – Identify Sustainability Issues and Problems', have been acknowledged, but unclear how the comments will be implemented into the HNP. Pleased the majority of comments on 'Stage A4 - Developing the sustainability appraisal framework' have been incorporated into the objectives.</p>	Comments noted. No action required.
54	<p><b>SDNPA</b> Clarify the South Downs National Park Authority (SDNPA) is the Local Planning Authority for those areas of Hassocks in the SDNP. Plans to make reference to the emerging South Downs Local Plan being used for decisions to determine planning applications.</p> <p><b>Foreword</b> Suggest amending the first paragraph to state: "... following the refusal of Mid Sussex District Council (MSDC), the Local Planning Authority for those areas of Hassocks Parish outside the South Downs National Park, to allow the..."</p> <p><b>Page 2</b> Amend paragraph 1.2 by adding the following to the end of the paragraph: "South Downs National Park Authority is the Local Planning Authority for those areas of the Parish within the South Downs National Park as shown on Figure 2." <b>Page 4</b> amend paragraph 1.10 to reflect the updated status of the South Downs Local Plan. From the fourth sentence suggest deleting the remainder of the paragraph and update with the following: "However the SDNPA submitted the South Downs Local Plan to the Secretary of State for examination in April 2018. The Planning Inspector conducted the examination including public hearings on the South Downs Local Plan in November and December 2018. The consultation on the main modifications will run for 8 weeks between 1/2/19 and 28/3/19. It is anticipated the South Downs Local Plan will be adopted in summer 2019." <b>Policy 1: Local Gap</b> Suggest the policy is reworded to cover Local Gaps within the South Downs National Park. Happy to discuss a possible wording for Policy 1 with the Parish Council if that would be helpful. Point 2) of the Policy refers to the Mid Sussex Local Plan which does not apply in the South Downs National Park. Therefore only part 1) can apply to development within the Local Gaps in the South Downs National Park as shown on the Proposals Map. In itself part 1) would restrict development to agriculture or other uses which have to be located in the countryside. Suggest the policy is reworded to allow for the possibility for other forms of development in the Local Gaps within the South Downs National Park, other than those defined by part 1). Any such development would need</p>	<p><b>Foreword</b> Updated to reflect advise received.</p> <p><b>Page 2 &amp; 4</b> Updated to reflect advise received.</p> <p><b>Policy 1: Local Gaps</b> Comments discussed with SDNP and subsequently withdrawn.</p> <p><b>Aim 5: Non-car route ways</b> Updated to reflect advise received.</p>



	<p>to comply with Policy 6 of the Neighbourhood Plan along with Policy SD25: Development Strategy of the emerging South Downs Local Plan.</p> <p><b>Policy 6: Development Proposals Affecting the South Downs National Park</b></p> <p>Support for the policy, particularly second part of policy.</p> <p><b>Chapter 8: Transport</b></p> <p>Overall support the strategic objectives.</p> <p><b>Aim 5</b> - in principle support objectives, some terms could be clarified i.e. "repair and upgrade" of PPRoW - this is sometimes interpreted as upgrade to bridleway and would therefore be useful to clarify what is meant.</p> <p>Point 5 - route linking Hassocks to Clayton. If the aspiration, where states non-car routes, is for shared use paths open to cyclists and equestrians, it would be helpful to say this explicitly. The route will eventually allow connection to South Downs Way National Trail and link to Hassocks could be promoted as a benefit to tourism.</p> <p>Suggest clarifying term "all weather" - PPRoW in countryside not generally tarmac and any upgrade to sealed surface may be classed as development. Method used in SDNP is a year round permeable, self binding limestone dust surface which sits well in rural surroundings.</p> <p>Public Transport Section - s. SDNPA would welcome promotion of the railway station in this section as a gateway, providing connectivity into the South Downs National Park for public transport users.</p>	
55	<p><b>Southern Water</b></p> <p><b>Policy 2: Local Green Spaces</b></p> <p>Unable to support the current wording of this policy as it could create a barrier to statutory utility providers such as Southern Water, from delivering its essential infrastructure required to serve existing and planned development.</p> <p>Recommend policy is updated to read:</p> <p><i>Development proposals which conflict with the purpose of this designation will be resisted in these areas, except in very special circumstances, for example where it is essential to meet specific necessary utility infrastructure needs and no feasible alternative site is available.</i></p>	<p>Comments noted. No action required.</p>
56	<p><b>WSCC</b></p> <p><b>Policy 10: Protection Of Open Space</b></p> <p>WSCC wish to highlight the aspiration to provide education facilities west of the railway to cater for potential future growth in Hassocks and Hurslipierpoint. Request Policy 10 make reference to education uses in point 5, which supports Policy 13 and Aim 2 of the plan.</p> <p><b>Policy 13: Education Provision</b></p> <p>WSCC welcome the support of Hassocks Parish for the provision of a primary school site as part of the Land North of Clayton Mills development. Land is also being requested for an Early Years facility and Special Educational Needs and Disability (SEND) unit on the site which would be incorporated into the primary school building. Recommends the provision of these services alongside the primary school could be incorporated into the supporting text for this policy and also into the policy itself.</p> <p><b>Policy 15: Hassocks Golf Course</b></p> <p>Understood proposed allocation already benefits from a current planning permission. Recommends policy could further recognise the existing public bridleways around the golf course and the value these could have to achieve the Plan's ambition through their improvement – safe and convenient links into Hurslipierpoint and towards Burgess Hill could be realised.</p> <p><b>Policy 16: Land to the north of Clayton Mills and Mackie Avenue</b></p> <p>Policy supports protection of existing PROW but does not explicitly seek to enhance/ expand local PROW. Considers there are opportunities to deliver safe connections to Burgess Hill, into Hassocks Village, to link to existing bridleways east of Ockley Lane, and to provide a bridleway connection through to the Friar's Oak development west of the railway.</p>	<p>Comments noted.</p> <p><b>Policy 10: Protection Of Open Space:</b> Comments noted.</p> <p><b>Policy 13: Education Provision:</b> Comments noted.</p> <p><b>Policy 15: Hassocks Golf Course:</b> Comments noted.</p> <p><b>Policy 16: Land to the north of Clayton Mills and Mackie Avenue:</b> Policy updated to reflect advise.</p> <p><b>Policy 17: Land west of London Road</b> Policy removed from Submission HNP.</p> <p><b>Aim 5: Non-car route ways</b> Comments noted.</p> <p><b>Aim 7: Traffic and Accessibility</b> Comments noted.</p> <p><b>Community Infrastructure Levy</b> No comment</p>

**Policy 17: Land west of London Road**

Understood proposed allocation already benefits from a current planning permission. This policy seeks to maximise opportunities to use alternative means of transport to private vehicles. Considers improving the surface of the public footpath through the site and to Belmont Lane could deliver a safe and convenient, year-round useable route. Considers if the existing footpath was upgraded for cycling then potentially more people would use it as an alternative to vehicle use.

**Aim 5: Non-car route ways**

Recognises there are often 'missing links' in the parish PROW network and that use could be encouraged through improved repair and upgrade. Acknowledges to achieve this, requires various parties to work together. Considers it could be helpful if HPC participated to secure the necessary funding; WSCC PROW service can provide guidance on the legal mechanisms and standards for new paths.

**Aim 7: Traffic and Accessibility**

Concern over the mention of specific junction and/or safety improvements in this Aim. It is suggested that the Aim is changed to be less specific; to support safety improvements within the Parish.

**Community Infrastructure Levy**

Under section 5 'Community Infrastructure' the plan refers to CIL payments from development. It should be noted that no mechanism currently exists for prioritising infrastructure needs across different public services and allocating funds to priority projects.

The County Council is working with MSDC and other LPAs to develop a robust mechanism and establish appropriate governance arrangements to oversee the prioritisation of infrastructure across different services.

Developers/Agents		DMP Recommendations
Ref No.	Summary of Comments	
57	<p>Evison &amp; Company</p> <p>Representations on behalf of the owner of land at London Road, Hassocks. The land is contiguous with the Built-Up Area Boundary.</p> <p>The PCC is in discussions with the adjoining landowner to the south, who submitted a planning application for 25 dwellings on the joint site in 2018. The PCC has no objection in principle to joint development of the land but, having charitable status which carries certain legal and regulatory restrictions on the disposal of property, it must make its representations independently, while supporting those of the adjoining landowner</p> <p><b>Policy 1: Local Gap</b></p> <p>The boundary has been drawn too widely by including the land between the Barratts site and the rear of houses at Stone Pound. This land which comprises the PCC land and the adjoining owners' land referred to above, adjoins the built-up area of Hassocks on three sides and does not fulfil the principal criterion of District Plan Policy DP13/The land in question is an infill site between two parts of Hassocks. The Proposals Map should be redrawn to omit the site from the defined Local Gap.</p> <p><b>Policy 14: Residential development within and adjoining the built-up area boundary of Hassocks</b></p> <p>Principle of Policy 14 welcomed but the HNP has missed the opportunity to allocate small sites to contribute to housing need, add to the diversity of development and to contrast with the relative uniformity of large estate development on the three allocated sites.</p> <p><b>Policy 17: : Land west of London Road</b></p> <p>The Barratts site (Land West of London Road) is under construction and is likely to be completed before the adoption of the neighbourhood plan. Consider such sites should not be included as allocations in development plans. Policy 17 should be deleted.</p> <p><b>Site Allocation Policy</b></p> <p>The Sustainability Appraisal fails to consider reasonable alternatives to the allocated sites. The only consideration of alternatives is under three very broad options one of which would be a strategy to allocate additional sites.</p> <p>There is reference to the SHELAA sites and they are identified on a plan at the end of the report but there is no consideration of the individual merits or otherwise of these sites.</p> <p>This site is adjacent to the Barratts site (Policy 17) and has essentially the same environmental characteristics. Consider that had land been assessed according to the same criteria as those used for the Barratts site, it appears likely that it too would have been assessed favourably. The failure to undertake this assessment is a fundamental flaw in the NP's site selection procedure.</p> <p>The HNP should reasonably be expected to contribute to the district requirement through the allocation of additional sites to those already committed. There is a strong case that further site allocations should be made and that they should be for small sites of less than 50 dwellings.</p> <p><b>Suitability of PCC land for Residential Development</b></p> <p>The 2018 planning application (Ref: DM/18/0010), which was for 25 dwellings on the joint PCC and adjoining land, was refused for housing supply policy reasons. There were also three other reasons of detail all of which can be addressed. Clients have commissioned professional highway consultancy advice which demonstrates that satisfactory access to their land and the joint site can be achieved. The archaeological reason for refusal could be addressed by suitable condition, if necessary, and the requirement for affordable housing can be addressed depending on the scale of development on the land. The land is considered suitable for development</p> <p>The Parish Council will contribute to meeting those Basic Conditions if it embraces to opportunity to go further to meeting housing need by allocating one or more small additional sites. The PCC land and the adjoining Globe Homes land is a sustainable and suitable site for such allocation.</p>	<p><b>Policy 1: Local Gap</b> See Review of Policy 1: Local Gaps &amp; Regulation 14 Pre-submission Representations, May 2019</p> <p><b>Policy 14: Residential development within and adjoining the built-up area boundary of Hassocks.</b> See Response to Regulation 14 Pre-submission Representations in respect of Housing Matters, May 2019</p> <p><b>Policy 17: Land west of London Road</b> Policy removed from Submission HNP.</p> <p><b>Suitability of PCC land for Residential Development</b> See Response to Regulation 14 Pre-submission Representations in respect of Housing Matters, May 2019</p>
58	<p>Gladman:</p> <p>Essential that the HNP contains sufficient flexibility so as to ensure that it is not rendered out of date upon the adoption of Local Plan Review.</p> <p><b>Policy 1: Local Gap</b></p> <p>Gladman note that the Policy does allow for development within the defined Gaps, if said development would not compromise the objectives of the Gaps.</p> <p>Consider this a strategic policy beyond the remit of neighbourhood plans that would have the effect of imposing an almost blanket restriction on development around Hassocks. It would effectively offer the same level of protection as Green Belt land without undertaking the necessary exceptional circumstances test for the designation of new areas of Green Belt.</p> <p>Gladman submit that new development can often be delivered on the edge of settlements without leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character.</p> <p>Question whether the purpose of the proposed gap designations, particularly if this would prevent the delivery of otherwise sustainable and deliverable housing sites from coming forward.</p> <p>Consider blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.</p>	<p><b>Policy 1: Local Gap</b> See Review of Policy 1: Local Gaps &amp; Regulation 14 Pre-submission Representations, May 2019</p> <p><b>Policy 2: Local Green Spaces</b> See Review of Policy 2: Local Green Spaces &amp; Regulation 14 Pre-submission Representation, June 2019</p> <p><b>Policy 14: Residential development within and adjoining the built-up area boundary of Hassocks.</b> See Response to Regulation 14 Pre-submission Representations in respect of Housing Matters, May 2019</p>

	<p><b>Policy 2: Local Green Spaces</b></p> <p>Policy 2 identifies 8 parcels of land that are proposed for Local Green Space designation- consider that LGS1, LGS2MLGS4 and LGS8 represent extensive tracts of land and as such do not meet the requirements for LGS designation.</p> <p><b>Policy 14: Residential development within and adjoining the built-up area boundary of Hassocks</b></p> <p>Glaxman not consider the use of built-up boundaries to be an effective response to future development proposals if it would act to preclude the delivery of otherwise sustainable development opportunities, as indicated in the policy.</p> <p>The use of settlement limits to arbitrarily restrict suitable development or apply a limit to the number of dwellings coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework and is contrary to basic condition (a).</p>	
59	<p>Lewis &amp; Co Planning</p> <p>Representations on behalf of Globe Homes who are promoting a site comprised of land to the rear of 2 Hurst Road, which lies to the west of London Road and immediately to the south of the allocated site 'Land to the west of London Road. Site ownership is shared with Clayton with Keymer Parochial Church Council (PCC).</p> <p>Consider that the draft Plan in its current form does not sufficiently consider, evaluate or support other opportunities for sustainable development within the parish and, unfortunately, fails to take a positive approach in considering these opportunities.</p> <p>Client's site at 2 Hurst Road provides a more sustainable location for residential development than the three sites allocated within the draft Neighbourhood Plan. The site offers excellent access to local shops, services and facilities (including the railway station) and provides an opportunity to deliver a complementary development</p> <p><b>Sustainability Appraisal</b></p> <p>There are significant shortcomings in the existing SA. Consider it does not identify how reasonable alternatives to the allocated sites. We consider that the Plan in its current form does not meet the prescriptive requirements of European Directive 2001/42/EC and therefore fails to meet the basic conditions.</p> <p>SA vaguely refers to the appraisal having "consideration" to sites within the Mid Sussex Strategic Housing and Economic Land Availability Assessment but contains no actual assessment of these sites. The SA therefore clearly fails to meet the requirements of the SEA Directive in this regard. A number of Neighbourhood Plans have failed on this basis. Local examples include Slaugham Neighbourhood Plan and Storrington, Sulington and Washington Parish Council Neighbourhood Plan. In both of the cases quoted above the representative believe the site selection process was significantly more robust and better evidenced than that undertaken for the HNP.</p> <p>Can find no description of the site selection process for allocations within the draft Neighbourhood Plan or the methodology used when considering reasonable development sites such as that promoted by our client at 2 Hurst Road.</p> <p>Note that the Sustainability Appraisal lacks a Non-Technical Summary which is a specific requirement of the SEA.</p> <p><b>Land to the rear of 2 Hurst Road</b></p> <p>Site is well located, contiguous with the existing built-up area boundary, and has no significant development constraints. Site has been assessed through the SHELAA (Site Ref. 210) and this assessment finds the site to be suitable, available and achievable. Site has progressed to a Stage 2 assessment in the preparation of a District-wide Site Allocations Document.</p> <p>Proposals for 25 new homes on the site were refused last year due to its location of the site outside the defined built-up area boundary. However, when compared to the allocated sites to the north the site clearly has a less significant impact on the wider countryside. Support through a specific Plan policy would make the proposals an exception to District Plan Policy DPT12 and allow that development to proceed in principle.</p> <p>The site has excellent access to local services. The allocation of this site would create a coherent overall approach to the growth and development of Hassocks. Site would create a defensible western boundary to the village and would serve to reinforce other policy objectives within the Plan such as Policy 1.</p> <p>Policy 14 does not preclude residential development of the site, provided the development was for fewer than 10 dwellings. However, it is our opinion that a windfall-type development of nine homes or less would be a less efficient use of a sustainably located, unconstrained site.</p> <p>The site is unaffected by flood risk, would not affect any designated heritage assets, ancient woodland, SSSIs, local nature reserves, or other notable constraints. Further work is being undertaken to fully assess the site's archaeological potential and ensure any impacts on any identified archaeological assets are appropriately mitigated. Experts have concluded that any adverse impacts on TPO trees within and surrounding the site can be avoided or appropriately mitigated. Development of the site would not result in severe impacts to the highway network.</p> <p>Request that further consideration is given to the potential allocation of the site as the Neighbourhood Plan progresses.</p>	<p><b>Sustainability Appraisal</b></p> <p>Section 5 of the SA to clarify the approach taken to the assessment of the strategy of the HNP and approach to assessment of sites.</p> <p><b>Land to the rear of 2 Hurst Road</b></p> <p>See Response to Regulation 14 Pre-submission Representations in respect of Housing Matters, May 2019</p>

60	<p>R.reside: Representations on behalf of landowners</p> <p>Land to the east of Lodge Lane has previously been submitted as a proposed allocation and assessed. The PHLAA assess the site area (all of Site 12) as 4.7ha. The site being promoted is s2.3ha. The site therefore appears to have been mis-assessed - not capable of delivering 88 homes as the PHLAA predicts.</p> <p>Consider a development of between 20 and 30 homes is much more appropriate for this site and for the village</p> <p>Fundamentally disagree with the landscape assessment of the site. Whilst within the National Park, the site is heavily influenced by its surrounding built form, where there are only small/limited views of the wider National Park. Views into the site from the National Park are also few and far between and are all with the backdrop of the existing built form of Hassocks/Keymer.</p> <p>Unclear why the site has been assessed as being within a Local Gap, when no formal designation exists.</p> <p>Consider there is a clear and manifest need for housing in the South Downs National Park (SDNP) area.</p> <p>Consider this is a modest sized site and certainly would not be considered 'major development' by the NPPF. Most of the site is not visible due to its visual and physical containment.</p> <p>The site abuts the settlement boundary along most of its northern and southern boundary and all of its western boundary. Consider the existing built form of Hassocks all but wraps around this site.</p> <p>The development of the site would not, and could not, adversely affect the proposed Local Gap and SDNP nor does it perform the requirements of a gap, due to the surrounding development.</p> <p>Site will provide opportunities for landscape improvements. Consider development would go some way to repairing the historic canvas of hedgerow, trees and woodland.</p> <p>Scheme would provide a softer edge to the Green Gap and therefore strengthen its purposes.</p> <p>The allocation of the land in the SDNP would also help protect the parish from further future allocations from others.</p> <p>From the South Downs National Park perspective, a development on this site would deliver much needed market and affordable housing. It would also deliver on one of two key aims, namely access and education to the SDNP via a new area of woodland/open space. The woodland and planting will also help enhance and protect enhance the national park, as required by the NPPF, by repairing and restoring the historic landscape. Finally, the scheme will deliver biodiversity enhancements.</p> <p>In respect of HNP, the site will strengthen the proposed local gap, where the planting of a woodland will act a physical boundary to Hassocks as well as delivering a high-quality housing scheme and other local benefits.</p> <p>The site provides the opportunity for a small, high quality and sustainable development for circa 20-30 dwellings, close to the village centre and well- integrated within its landscape context.</p>	See Response to Regulation 14 Pre-submission Representations in respect of Housing Matters, May 2019
61	<p>Savills: Savills writing in our capacity as planning consultants, operating in Surrey, Sussex and Kent from the Guildford and Sevenoaks team.</p> <p>Consider the emerging plan must be more positive and seek to make some housing allocations. This is because the figures provided by MSDC for the delivery of housing, not only in Hassocks, but in the District more generally, are a minimum requirement.</p> <p>Hassocks is a tier 2 settlement, consider it can therefore be regarded as one of the more sustainable locations in the District.</p> <p>Reps highlight NPPF and NPPG and Ministerial Statement (12 December 2016). It advises the degree of weight to be afforded to those policies is clearly one for the decision maker. However, by assisting the delivery of much needed new homes in this sustainable district location, over and above the minimum required for the area, the Neighbourhood Plan would help to ensure that MSDC does not fall below its 5 year housing land supply requirements or below the minimum housing delivery test requirements. This would assist in safeguarding the area from future speculative applications whilst ensure that suitable development can come forward.</p> <p>Notes the Plan does not seek to promote less development that the District Plan, it does only seek to provide the minimum requirement. Considers there is no contingency and this is likely to be a more risky approach. Considers the Neighbourhood Plan would become more robust in the longer term if a higher number of homes were allocated.</p> <p>Notes that the Plan seeks to protect Public Open Space through policy 10, through the creation of buffer zones on the outer edge of all of the allocated sites. Considers the creation of such buffers appears to be a rather restrictive policy, which will hinder further development.</p> <p>Considers it also be appropriate to include a policy enabling the proper and appropriate release of land, including public open space, to allow for the delivery of sustainable development.</p> <p>Considers this option could be incorporated into draft Policy 14 which seeks to make some allowance for windfall sites but appears to be somewhat limited in its scope.</p> <p>Considers an amendment to Policy 14 should also be made to ensure that windfall sites coming forward are not be limited to only 10 new homes to ensure that the HNP positively plans for the future of the area throughout the Plan period.</p>	See Response to Regulation 14 Pre-submission Representations in respect of Housing Matters, May 2019

<p><b>Policy 1: Local Gap</b> See Review of Policy 1: Local Gaps &amp; Regulation 14 Pre-submission Representations, May 2019</p> <p><b>Policy 2: Local Green Spaces</b> See Review of Policy 2: Local Green Spaces &amp; Regulation 14 Pre-submission Representation, June 2019</p> <p><b>Housing</b> See Response to Regulation 14 Pre-submission Representations in respect of Housing Matters, May 2019</p> <p><b>Aims</b> Delivering improvement to the existing infrastructure network and associated public transport services, generally lies outside the scope of a Neighbourhood Plan, and is reliant on other organisations. Transport measures to improve existing deficiencies is supported by HPC and are therefore included within the HNP as Aims.</p>	<p>Sigma on behalf of Rydon</p> <p><b>Policy 1: Local Gap</b></p> <p>No substantial evidence supports the Neighbourhood Plan in its allocation of this gap and as such the proposed policy should be deleted or at least the boundaries of the Gap, as shown on the proposals map require to be properly assessed and re-drawn.</p> <p>Land at Friars Oak currently makes no material contribution to the actual or perceived separation between Burgess Hill and Hassocks. The Strategic Gap Policy should therefore be redrawn to allow the land lying to the west of the railway and east of London Road to be excluded from the Gap designation to reflect a new allocation for housing or at least to allow for reasonable settlement expansion in the future to meet housing need and to make the Gap policy if it is considered to be justified, more credible, flexible, reasonable and less likely to be overridden on appeal.</p> <p><b>Policy 2: Local Green Space</b></p> <p>Acknowledges the Policy is supported by the Neighbourhood Plan Revised Local Green Space Policy Review, which refers to the guidance set out in the National Planning Policy Framework at Paragraphs 99-101 to identify and designate LGS.</p> <p>Rydon seek to demonstrate, why LGS 1 does not meet all of the criteria above and consequently should be deleted.</p> <p>Future Housing Requirement: Firstly, and most critically the Review fails to have appropriate regard to Para 99 of the NPPF, which states that "Designating land as Local Green Space should be consistent with local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services". It should also be "capable of enduring beyond the plan period.</p> <p>It is concluded that the assessment was lightweight, had been unduly influenced by objections to a development proposal on the land and the evidence base falls considerably short of the standard required for such an important designation which the Framework says will not be appropriate for most green areas or open space.</p> <p>Is Friars Oak Field in reasonable close proximity to the community it serves? Very little community use at present, the only authorised public access being limited to use of the recreational footpath along its southern boundary.</p> <p>Surveys of the use of the public footpath that runs along the southern edge of the land were carried out to assess the level of usage of the unmanned crossing of the railway line in the north-east corner of the site.</p> <p>Is Friars Oak Fields demonstrably special to the local community and holds a particular significance? This assessment does not identify any special or unusual qualities nor has the NP process showed that the Site is demonstrably more special to the community which would set it apart from any of the other surrounding areas of countryside outside the settlement boundary.</p> <p>Is Friars Oak Fields in Character and not an Extensive Tract of Land? Land at Friars Oak fields measures approximately 7.43 hectares. There is no recognised change of character or physical boundary to the north and the site is of similar character to the entire area up to Burgess Hill to the north. As such it forms part of an extensive tract of land from which it is not obviously distinguishable</p> <p>Allocations of LGS in a Neighbourhood Plan must complement investment in sufficient homes and are to be seen as enduring beyond the end of the plan period (NPPF Paragraph 99). The designation of the Friars Oak Field site as an LGS would conflict with this Government guidance because:</p> <ul style="list-style-type: none"> <li>Hassocks is a sustainable settlement and is a Category 2 settlement. It is therefore an important focus for new strategic housing provision across the District.</li> <li>The submission NP only aims to accommodate the minimum housing numbers set out in the recently adopted Local Plan but further housing is needed now and in the future. Hassocks ability to provide for further housing growth should not be unjustifiably constrained.</li> <li>The fundamental suitability of the appeal site for housing has been repeatedly demonstrated in the SHLAA, Officer reports, Council decision and Secretary of State's appeal decision.</li> <li>National Planning Practice Guidance confirms that the LGS designation should not be used in a way that undermines meeting identified development needs.</li> <li>The interests of local recreation and enjoyment of the best attributes of the site are better served by Rydon's proposal to provide a Country Park with access to the area adjoining the Herring Stream and authorised public access for informal recreation over a wider area associated with their residential development.</li> </ul> <p>An LGS designation should only be used where it meets all of the criteria set out in Paragraph 100 of the NPPF. The Friars Oak Fields site meets none.</p> <p><b>Section 6: Housing</b></p> <p>The HNP is anticipating that Hassocks will not be required to release any further land either assist Mid Sussex in delivering the remaining 2,500 which is to be distributed across the whole of the District in the emerging Site Allocation DPD nor any additional land required through the review. Consequently everything outside the settlement boundary is either allocated as a Local Green Space, Local Gaps and or within the South Downs National Park. These are not reasonable assumptions because:</p> <ul style="list-style-type: none"> <li>The Housing figures presented in DP6 are minimum residual amounts, and by its very definition these are not a cap on development and</li> <li>It is likely that Hassocks will continue to play an important role to help meet the remaining 2,500 units that the District need to allocate into emerging Site Allocation DPD and in the future beyond the current Local Plan period.</li> </ul> <p>In this regard, the NP contravenes basic condition (a) and (e) because the NP is not positively prepared and the LGS designations will undermine the ability of Hassocks to provide necessary housing growth, now and in the future.</p> <p>Land at Friars Oak has been submitted for 130 dwellings in response to the SHELAA Review. There is no reason to anticipate that the Council will not come to the same conclusion this time as evidenced by the Council's consideration of recent planning applications for residential development on the site.</p> <p>The policies contained within the NP will need to be modified in order to allow for a significant degree of flexibility to allow for the delivery of future sustainable growth opportunities at Hassocks in order to assist Mid Sussex Council in maintaining a flexible, responsive and continuously rolling 5 year housing land supply.</p>
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63	<p><b>Section 8 Transport</b>  <b>Aim 5: Non- car route ways</b></p> <p>There is no clarity as to how the NP aims to address local concerns re crossing of railway line. Does not promote any specific proposals to address the issue. There is no meaningful prospect of improvements being carried out unilaterally by Network Rail.</p> <p>The policies of the NP should be both justified and effective. To be regarded as being more than a simple token gesture the Aim should associate itself with positive action such as supporting development proposals that will deliver the necessary safety enhancement and working with developers to secure them. Unless this type of positive support can be offered then the relevant Aim should be deleted due to the lack of any specific means of implementation.</p>	
	<p>Terence o Rourke on behalf of Gleeson Strategic Land</p> <p>Client controls land on the northern edge of the village, which is identified as a strategic allocation, was submitted to MSDC in December 2018. It is anticipated that the Council will determine this application in Spring 2019.</p> <p><b>Policy 16: Land to the north of Clayton Mills and Mackie Avenue</b></p> <p>Welcomes the recognition of the strategic allocation in the HNP and the stated aspirations to ensure a high-quality development.</p> <p>Client's proposals form a significant component of Hassock's commitment (500 homes) and are therefore integral to helping the village meet its identified needs and control the location of future development in and around Hassocks.</p> <p><b>Policy 2: Local Green Space</b></p> <p>Supports the identification of Local Green Spaces (LGS).</p> <p>LGS8: Land at Clayton Mills, which is located directly south of client's site and is also referenced in Policy 10: Protection of Open Space. Client does not control this area of open space but is keen to see it improved for the benefit of existing and future residents. Currently in discussion with MSDC, HPC and local residents to see how this might be achieved.</p> <p><b>Policy 13: Education Provision</b></p> <p>Proposals include land for a two-form entry primary school and follow a series of positive discussions with West Sussex County Council as Education Authority. Consider client's proposals will therefore help the plan to fulfil the objectives of this policy.</p>	<p>Comments noted.</p> <p>No action required.</p>



## **12. PREPARATION OF SUBMISSION DOCUMENTS**

- 12.1. The Submission Documents were prepared in May 2019 and subsequently discussed and agreed by the NPWG at a meeting on 23 May 2019.
- 12.2. Following this, draft documents were submitted to MSDC for review and comment. Comments were received on the draft HNP and draft SA on the 10 June 2019 (See Appendix 3).
- 12.3. HPC considered MSDC's comments at their meeting on 11 June 2019. It was agreed in light of comments received, minor amendments would be made to the draft submission documents.
- 12.4. The Submission documents were subsequently finalised in week beginning 17 June 2019.

## **13. SUMMARY**

- 13.1. This Consultation Statement sets out how stakeholder engagement has been undertaken in accordance with Regulation 14 and 15 of the Neighbourhood Planning (General) Regulations 2012.
- 13.2. The NPWG have throughout the plan-making process sought to engage with local residents and stakeholders.
- 13.3. Key issues that have been identified through the engagement process since 2012 have influenced and shaped the Vision, Strategic Objectives, Policies and Aims of the initial and revised HNP, both in the Pre-submission (Regulation 14) and Submission Version (Regulation 16) documents.
- 13.4. In line with Regulation 15(2)(a) and (b) this Statement summarises all stakeholder responses received as part of the consultation and stakeholder engagement exercises; and how the HNP has changed and evolved in response to consultation feedback. Where the HNP has not been changed as a result of comments made at Regulation 14 stage, an explanation for this has been provided.
- 13.5. This Statement demonstrates that the HNP has been the subject of robust consultation and satisfactorily meets the requirements of the Regulations.

## **APPENDIX 1**

**(MINUTES OF THE NEIGHBOURHOOD PLAN  
WORKING GROUP MEETING: 27 JUNE 2018)**

**Hassocks Neighbourhood Plan Working Group Meeting Wednesday 27th June 2018**  
**Options for progressing production of the**  
**Hassocks Neighbourhood Plan**

**Purpose**

The purpose of this report is to set out options for progressing the Hassocks Neighbourhood Plan, for consideration by the Neighbourhood Plan Working Group (NPWG). The report has been prepared in light of the pause on progress of the Neighbourhood Plan in late 2016 by Mid Sussex District Council; the more recent adoption of the Mid Sussex District Plan 2014 - 2031 in March 2018; and following a meeting with Officers of Mid Sussex District Council on 16th May 2018.

The report sets out three potential options. These are (1) cease preparation of a Neighbourhood Plan (the 'do nothing' scenario); (2) resurrect the June 2016 Submission Version Plan and amend where necessary (the 'light touch' review scenario); and (3) produce a wholly new Neighbourhood Plan (the 'comprehensive' review scenario).

**Background to the Preparation of the Neighbourhood Plan**

As Members will recall, preparation of the Hassocks Neighbourhood Plan commenced in earnest in Spring 2014 via the distribution of a questionnaire to local residents which detailed a proposed vision and set of proposed objectives. This was followed by a public exhibition which took place in September 2014. A further public consultation took place in January 2015 where residents were invited to offer views on a range of potential new housing sites. A similar further public consultation took place in July 2015. This led to an Extraordinary General Meeting of the Parish Council in September 2015 where decisions were made on housing need, housing site allocations, and designation of Local Green Space. A subsequent Regulation 14 'Pre-Submission' Hassocks Neighbourhood Plan was the subject of formal consultation in early 2016. Following feedback, a Regulation 16 Submission Version Plan was submitted to Mid Sussex District Council in June 2016; whom undertook statutory consultation between July - September 2016.

The Neighbourhood Plan noted the Parish Council's resolution that there was need for additional housing over the Plan period up to 2031 of some 210 - 270 dwellings. Reflecting this, the Neighbourhood Plan contained housing allocations for three sites comprising Hassocks Golf Club (up to 130 dwellings); land north of Clayton Mills (up to 140 dwellings); and the National Tyre Centre (up to 20 dwellings). In addition to this, the Plan set out support for windfall development on unidentified sites within the built-up area of the parish and noted that this form of development had delivered a strong supply of housing over recent years, equating to an average of some 10 dwellings per annum.

By letter dated 19th April 2017, the Local Planning Authority advised that the District Council considered that the Neighbourhood Plan should not proceed to Examination at that time. The District Council advised that progress should be paused to *'wait for the [District] Council to arrive at agreed [housing] figures for the overall requirement and for individual Neighbourhood Plan areas.'*

## **The Emerging Mid Sussex District Plan**

The pause in the District Council's progress of the Hassocks Neighbourhood Plan was substantively due to matters arising from the preparation of the then emerging Mid Sussex District Plan 2014 - 2031.

The District Plan had been submitted to the Secretary of State for independent Examination in August 2016. Hearings were held toward the end of 2016 and in early 2017. This culminated in a letter from the Inspector dated 20th February 2017, which set out interim conclusions on the housing requirement for the district and required an increase of some 20% over the figures contained within the Submission District Plan.

Furthermore, the Inspector required greater clarity on the spatial strategy within the District Plan *'by establishing the approximate number of dwellings expected in each settlement or groups of settlements [and as drafted the Plan] provides inadequate guidance to Neighbourhood Plans ... on the amounts of housing development they should aim to accommodate. Up to now, Neighbourhood Plans have been produced without sufficient guidance of this sort and indeed without the knowledge of the objectively assessed need and housing requirement. Future Plans ... must take account of both the housing requirement and the numbers of new homes expected in each settlement otherwise they could well be at variance with the district's spatial strategy and be unsound themselves.'*

In response to this, the District Council prepared a 'Main Modifications' District Plan which was the subject of consultation in October - November 2017. This included the addition of a 'strategic' housing allocation on land north of Clayton Mills, for some 500 dwellings and associated infrastructure.

A significant quantum of objection was submitted to this proposed allocation, including by Hassocks Parish Council. This culminated in a re-opening of the Hearing into the District Plan on Monday 5th February 2018, where representations were made to the Inspector for, and on behalf of, Hassocks Parish Council.

Notwithstanding this objection to the allocation, the Inspector concluded in his report on the Examination of the District Plan dated 12th March 2018 that the proposed allocation was 'sound.'

On this basis, the Mid Sussex District Plan 2014 - 2031 was adopted on 28th March 2018.

This sets an objectively assessed need for housing within the district over the Plan period of 14,892 dwellings together with a requirement of 1,498 dwellings to contribute to the unmet need of Crawley's housing requirements. This provides an overall minimum district housing requirement over the Plan period of 16,390 dwellings. This requires that the Plan delivers an average of 876 dwellings per annum (DPA) until 2023/2024, and thereafter an average of 1,090 DPA up to 2030/2031, subject to there being no further harm to the integrity of the European Habitat Sites in Ashdown Forest.

Taking account of completions and commitments (including land north of Clayton Mills for 500 dwellings) together with an allowance for windfall, Policy DP4 of the Plan notes there is a requirement to allocate a further 2,439 dwellings through future Neighbourhood Plans and Site Allocations Development Plan Documents.

The spatial distribution of the housing requirement is made by reference to settlement category. The Plan identifies five categories of which Burgess Hill, East Grinstead and Haywards Heath fall within Settlement Category 1 and are required to deliver the majority of the housing requirement over the Plan period. Hassocks and Keymer fall within Settlement Category 2 (together with Copthorne, Crawley Down, Cuckfield, Hurstpierpoint and Lindfield). Collectively Policy DP4 identifies a minimum requirement over the Plan period for these settlements to provide 3,005 dwellings, with the minimum residual from 2017 onwards (i.e. accounting for existing completions and commitments) of 838 dwellings.

The Table that follows Policy DP6 *'gives clarity between the district housing requirement and the role of individual Neighbourhood Plans in meeting this ... [and] ... shows the minimum residual amount of development for each settlement over the rest of the Plan period, as at April 2017.'* This notes that the minimum requirement over the Plan period for Hassocks is 882 dwellings with a minimum requirement up to 2023/2024 of 519 dwellings. The Table notes that having regard to commitments and completions as at 1st April 2017, Hassocks has identified land for 882 dwellings. This results in the absence of any additional minimum residual requirement from 2017 onwards.

### **Strategic Housing and Economic Land Availability Assessment**

In April 2018, the District Council published its latest Strategic Housing and Economic Land Availability Assessment (SHELAA). This identifies a number of potential candidate housing sites within Hassocks. It includes sites over and above those already 'committed' for housing and notes that a number of these may be suitable for development in the short, medium and long term.

### **Meeting with Mid Sussex District Council**

Following the adoption of the District Plan, a meeting took place between representatives of the Parish Council and Officers of the District Council on 16th May 2018 to discuss options for proceeding with the Neighbourhood Plan. The District Council made clear that they would now support progress of the Neighbourhood Plan in principle.

The District Council also made clear that they are committed to the preparation of a district wide Site Allocations Development Plan Document. This will seek to identify additional housing land in order to meet the residual housing need for the Plan period, and not yet identified through completions or commitments. At this stage, their intention is for this Plan to be adopted in circa two years. This would include an assessment of a wide range of potential housing sites, focussing on those identified within the SHELAA, in order to meet the housing need in compliance with the spatial distribution set out in Policy DP4 of the District Plan.

### **Options for the Hassocks Neighbourhood Plan**

In light of the above, it is considered that there are three main options in determining if, and how, to proceed with the preparation and adoption of the Hassocks Neighbourhood Plan. These are:

- Cease preparation of a Neighbourhood Plan (the 'do nothing' scenario);
- Resurrect the June 2016 Submission Version Plan and amend where necessary and progress (the 'light touch' review scenario); and
- Produce a wholly new Neighbourhood Plan (the 'comprehensive' review scenario).

Each of these is considered below.

### **Option 1 - The 'Do Nothing' Scenario**

Whilst work on preparing a Hassocks Neighbourhood Plan has progressed through its statutory regulatory processes culminating in the submission of a 'Regulation 16' version of the Plan to the District Council in June 2016, this cannot now progress to Examination. The level of housing need contained within this Plan is significantly below that which has been identified, and been committed to, within the now adopted District Plan. On this basis, the Plan would not comply with one of the Basic Conditions in that it would not be in 'general conformity' with the higher tier District Plan.

Notwithstanding this, there is no obligation on the Parish Council to progress a revised/new Plan. In this 'do nothing' scenario, future planning applications would be determined against the policies of the existing Development Plan. Existing completions, grants of extant planning permission, and the allocation of land for 500 homes north of Clayton Mills, meets the minimum housing requirement within the parish of Hassocks as set out in the District Plan.

It is possible, that through the preparation of the district wide Site Allocations Development Plan Document that additional housing may be considered to be allocated within the parish. Representations to such an emerging Plan or future planning applications would be determined against the district wide Plan (and future Site Allocations DPD).

The Parish Council would be able to make representations to such a draft Development Plan/ application at the relevant time. However, aspirations for the vision of the parish, for example such as gaps, contained within the draft Neighbourhood Plan, would have no statutory provision and therefore carry little weight.

### **Option 2 - The 'Light Touch' Review Scenario**

For the reasons identified above, the 'Submission Version' Neighbourhood Plan cannot be progressed toward Examination. Nonetheless, the Plan, and the evidence base that underpins it is significant, and much remains relevant in the eventuality that a decision is made to progress the preparation of a Neighbourhood Plan.

Under this option, the evidence base and Plan would be reviewed, and policies that remain relevant, or could be updated with relatively modest additional evidence gathering/ amendment would be identified. This would enable the expedient production of a further iteration of the Neighbourhood Plan.

Under this option, the housing need of the parish would not be reviewed. Instead, reliance would be wholly placed upon the policies for housing contained at a district level. This approach would apply to the future Site Allocations DPD. At this stage, it is conceivable that this would identify future land for housing.

Under this option, a revised Plan would need to be the subject of further statutory consultation for two, six week periods (the Regulation 14 and Regulation 16 consultations). There would also need to be some additional evidence gathering, and this would be determined through a review of the existing evidence base, set against changes in circumstances since these were prepared. At this stage, it is estimated that a Regulation 14 Plan could be ready for consultation in circa four months, with a Referendum in circa twelve months, if matters progressed expeditiously.

### **Option 3 - The 'Comprehensive' Review Scenario**

Under this option the existing Plan would be reviewed and comprehensively updated. The substantive difference between this and Option 2, would be the intent to undertake a review of housing need, and potential candidate housing sites for potential allocation. This would be based upon those sites identified for consideration in the SHELAA (April 2018) together with any other sites submitted for consideration by landowners and their Agents.

Under this option, preparation of the Plan would have greater time and resource implications in comparison to Option 2. As Members will recall, the identification and consideration of housing sites must be by reference to extensive public consultation.

The merit of this would need to be considered against the potential independence of the housing requirements in a 'made' Neighbourhood Plan, which would then need to be given due consideration by the District Council in any future Site Allocations DPD over the same Plan period.

Due to the implications of this housing appraisal work, it is estimated that production of the Plan would take up to twelve months more than Option 2 (i.e. some 24 months), with this extra time focussed on the initial evidence gathering and stakeholder engagement.

### **Community Infrastructure Levy (CIL)**

Mid Sussex District Council have advised they are intending to progress work on a Community Infrastructure Levy Charging Schedule, which will set out the charging rates for, amongst other things, new housing developments. A timetable for this work to be undertaken has yet to be agreed by the district.

Once in place the CIL may be payable on development which creates net additional floorspace, where the gross internal area of new build is 100sqm or more. The levy rates will be determined by the District Council and agreed through the Examination of the Charging Schedule.

In line with national policy guidance, 15% of CIL charging authority receipts are passed to those Parish Councils where development has taken place. Where chargeable development takes place within the local council area, up to £100 per existing council tax dwelling can be passed to the Parish Council each year to be spent on local priorities. <sup>1</sup>

Where a Neighbourhood Plan is 'made', 25% of the levy revenues arising from the development that takes place in their area should be paid to the Parish Council. This amount is not subject to an annual limit. For this to apply, the Neighbourhood Plan must have been made before a relevant planning permission first permits development.

Where there is a Neighbourhood Plan in place, charging authorities can choose to pass on more than 25% of the levy. Guidance advises the wider spending powers that apply to the neighbourhood funding element of the levy will not apply to any additional funds passed to a Parish Council. Those additional funds can only be spent on infrastructure as defined in the Planning Act 2008 for the purposes of the levy. <sup>2</sup>

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<sup>1</sup> National Planning Policy Guidance: Paragraph: 072 Reference ID: 25-072-20140612

<sup>2</sup> National Planning Policy Guidance: Paragraph: 072 Reference ID: 25-072-20140612



The Act, identifies infrastructure as: roads and other transport facilities, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities and open space.

### **Summary**

Whilst acknowledging the significant hard work and progress in preparing the previous version of the Hassocks Neighbourhood Plan, the more recent conclusions of the District Plan Examiner and adoption of the District Plan means that the Neighbourhood Plan, in its current form, cannot be progressed to Examination. In light of this, it is considered there are three main options.

One of these is to conclude there is insufficient merit in progressing the Neighbourhood Plan; and instead, reliance would be placed wholly on the existing and future District Development Plan Documents to guide and determine development in the parish up to 2031.

If it is concluded there is merit in proceeding with a revised Neighbourhood Plan, it is considered there are two main alternative options. The first would be to undertake a 'light touch' review whereby the existing Neighbourhood Plan is assessed, and changes made to allow a Plan to progress expeditiously. Integral to this decision will be the omission of a determination on parish housing need (in either support or a variation of district conclusions) and/or additional allocation of housing sites.

If it is concluded that a more comprehensive review of the Plan is to be undertaken, this could include an assessment of housing need and potential site allocations. This would need to be in general conformity with the District Plan, and once adopted could assist in guiding future decisions at a district level on housing need/allocations up to 2031.

Under Option 1, any future CIL receipts liable to the parish would be set at 15%, with caps per property, whilst under Options 2 and 3, the limit would be 25%, with no upper limit cap.

## **APPENDIX 2**

**(MSDC COMMENTS ON THE DRAFT  
REGULATION 14 PRE-SUBMISSION HNP & SA)**

## Comments on Hassocks Draft Neighbourhood Development Plan (NDP)

Policy	Comment
<p><b>General Advice</b></p>	<p>Thank you for providing us with the opportunity to review the draft Hassocks NDP before the formal Regulation 14 consultation. We have provided some initial comments but may wish to supplement these at the formal consultation stage.</p> <p>We are pleased to see a new NDP for Hassock Parish that takes into account the revised housing requirement for Hassocks and the proposed housing allocations set out in the adopted Mid Sussex District Plan.</p> <p>For the Hassock NDP to be successful at Examination, it will need to meet the Basic Conditions tests set out in para 8 (2) of Schedule 4B of the Town and Country Planning Act 1990. One of these states that the “neighbourhood plan must be in general conformity with the strategic policies contained in the development plan”.</p> <p>We therefore set out below where the Hassock Neighbourhood Plan is not in conformity with the strategic policies in the District Plan. We have also identified where changes to wording of policies should be made, so that they can be used for development management purposes.</p>
<p><b>Policy 1 – Local Gap</b></p>	<p>Mid Sussex District Plan Policy DP13: Preventing Coalescence explains that Local Gaps can be identified in Neighbourhood Plans, in accordance with the criteria laid out in policy DP13, and supported by robust evidence.</p> <p>We note that the Local Gap boundary designation in the Hassocks NDP is, essentially, contiguous with the settlement boundary and mostly includes all land outside the Hassocks settlement boundary, apart from land that is identified for housing, or allocated for housing in the Mid Sussex District Local, or is covered by the South Downs National Park designation.</p> <p>The purpose of a Local Gap policy is to ensure the perception and appreciation of the separate identity and amenity of settlements are protected. In seeking to preserve a gap between settlements, this does not necessarily mean that all of the land within the gap, in its entirety, needs to be protected to achieve this purpose.</p> <p>Therefore, while we are supportive, in principle, of a Local Gap between the settlements identified in the Hassocks NDP, we think that criterion 2 of the policy (that development must make a ‘valuable contribution to the landscape character and amenity of the Gap and enhance its value as open countryside’), goes beyond the purpose of a Local Gap relating to preventing coalescence. This criterion relates more to protecting and enhancing</p>

landscape character and is such a high test that it prevents most new development in the Gap, notwithstanding whether it would lead to coalescence or not.

The recent appeal decision at Friars Oak Fields, East of London Road, supports our comments above that not all land between Burgess Hill and Hassock is necessary to prevent coalescence.

In assessing the issue of coalescence on the called in application, the Inspector stated:

“Policy C2’s purpose is more targeted, in seeking to preserve a gap between Hassocks and Burgess Hill. But that does not necessarily justify protecting the whole of the existing gap in its entirety. ....Although the development would be seen in glimpsed views from London Road, and distantly from the edge of Burgess Hill, it would not be unduly dominant in the landscape, nor would it extend the village threshold [68 - 71].

A clear gap of around 1.3km to Burgess Hill would still remain. As such, although the development would conflict with Policy C2, and would cause some landscape harm, it would not significantly damage the policy’s main aims with regard to coalescence and preserving settlement identity. In the circumstances, it seems to me that the conflict with Policy C2 should carry no more than moderate weight.”

The SoS did not disagree with the Inspector’s conclusion on this point.

The Local Gap policy, therefore conflicts with District Plan Policy DP 13: Coalescence as it introduces additional criteria unrelated to the purpose of a Local Gap Policy. It is also not in conformity with District Plan Policy DP6: Settlement Hierarchy as it would prevent any windfall development, for up to 10 dwellings, outside the settlement boundary, coming forward.

In addition, we have concerns with criteria 4 of this policy which requires all new development to conserve and, where possible, enhance tranquillity and dark skies. While we appreciate that all efforts should be made to minimise noise and light pollution and, in particular, within the setting of the South Downs National Park, we do not think this criteria is directly relating to preventing coalescence.

Tranquillity and dark night skies are special characteristics of the South Downs National Park and the policies in the South Downs Local Plan relating to these characteristics are supported by studies and mapping identifying which are most vulnerable areas across the National Park. This evidence base does not cover the Hassocks Neighbourhood Plan Area and therefore we do think the precise wording of

	<p>criteria 4 could be defended and enforced.</p> <p>We therefore recommend that criteria 2 and 3 of this policy are deleted as sufficient protection for maintaining the integrity of the Local Gaps is provided by the other criteria.</p>
<b>Policy 2 – Local Green Spaces</b>	<p>The NPPF Practice Guide states that landowners should be directly notified, as early as possible, regarding a proposal to designate their land as Local Green Space (LGS). If this has not been done, we advise that it is carried out as soon as possible.</p> <p>Paragraph 77 of the NPPF recognises that the LGS designation would not be appropriate for most green areas and those that are designated should be demonstrably special to a local community and hold a particular local significance, because of their beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife. It also goes on to say that LGS designation should be consistent with local planning for sustainable development; should not be used in a way that undermines this aim of plan making and generally LGS designation is rarely appropriate for land which is subject to planning permission for development.</p> <p>We note that the LGS 1 (Land to the north of Shepherds Walk) designation covers the Friars Oak site, where there is a current planning application for housing development. Based on the NPPF advice above, we recommend that this is removed.</p> <p>We question whether LGS8 (Land at Clayton Mills) has been drawn correctly and whether it should also include the open space adjacent to the railway line and the small area of woodland below this.</p> <p>In addition, the NPPF Planning Practice Guide provides clear guidance that LGS should not be designated simply to protect rights of way (which are already protected under other legislation), nor open countryside and the Parish Council needs to bear this in mind when designating LGS.</p>
<b>Policy 3 – Green Infrastructure</b>	No comment
<b>Policy 4 – Managing Surface Water</b>	No comment
<b>Policy 5 – Enabling Zero Carbon</b>	We suggest that the wording 'Encouragement will be offered' is replaced with 'will be supported' to be consistent with other policies in the NDP.
<b>Policy 6 – Development proposals affecting the SDNP</b>	No comment
<b>Policy 7 – Development in</b>	We note that a Conservation Area Appraisal has been

<b>Conservation Areas</b>	prepared for Clayton Conservation Area. To make this policy more locally distinctive, we suggest that it includes the special characteristics referred to in the appraisal document.
<b>Policy 8 – Air Quality Management</b>	No Comment.
<b>Policy 9 – Character and Design</b>	Reference to the Townscape Appraisal document which defines the Local Townscape Character Area's should be included in this policy.
<b>Policy 10 - Open Space</b>	<p>We note that there are two policies on Open Space. Policy 10 covers all formal and informal Open Space and Policy 11 covers the protection of Public Open Space. We question whether these two policies should be combined together?</p> <p>Policy 10 should also use consistent wording with District Plan Policy DP 24: Leisure and Cultural Facilities and NPPF paragraph 97. As currently worded it does include the same provisos as these, and does not allow for the replacement of open space: if land is surplus, or alternative provision is required. This will cause confusion when applications for planning permission are submitted. Ultimately, it will be the strategic policy that will be afforded the greater weight in the decision making process.</p> <p>As the NPPF largely defines open space as offering opportunities for sport and recreation, we also suggest that consideration is given to providing a clearer definition of the types of open spaces that the Parish wishes to especially protect. This is because the policy, as currently worded, could be open to wide interpretation and lose its value, as it could apply to any area of open countryside.</p>
<b>Policy 11 – Protection of Public Open Space</b>	This policy should also use consistent wording with District Plan Policy DP24: Leisure and Cultural Facilities and NPPF para 97, as the policy does not allow for the option of the replacement of the facility where it would provide for an equivalent or better provision, or the need for alternative provision outweighs the loss.
<b>Policy 12 – Outdoor Play Space</b>	This policy conflicts with the Council's Development Infrastructure and Contributions SPD where the threshold for the provision of Outdoor Play Space is 5 or more dwellings not the higher threshold of 15 set out in the NDP.
<b>Policy 13 – Community Facilities</b>	No comment
<b>Policy 14 – Education Provision</b>	No Comment
<b>Policy 15 – Residential development within and adjoining the built-up area</b>	No comment in relation to where the policy relates to development within the BUA. However, criteria 3 relating to land Outside the BUA conflicts with the strategic policy DP6: Settlement Hierarchy as it does not allow for any windfall

	development to come forward within the Local Gap.
<b>Policy 16 – Hassocks Golf Course</b>	<p>The supporting text to this policy acknowledges the recent application for the redevelopment of this site. However, the residential application is predicated on the relocation of some of the golf facilities. We note that criterion 1 states that the proposal should not extend into land in the Gap. We therefore advise, for clarity, that this criterion specifically refers to the <u>residential</u> development not extending into the Gap.</p> <p>We suggest the removal of criterion 8 of this policy, relating to a financial fund to maintain public open space, as it is not consistent with District Council advice set out in the Development Contributions SPD. This issue will be addressed through a S106 agreement associated with the planning application for this site at which time it will be known who will carry out this work, what the likely costs will be and what is a suitable time frame.</p>
<b>Policy 17 – Land to north of Clayton Mills</b>	We think further clarity is required in relation to criteria 6 regarding protecting the amenity of the Rights of Way that run through the site as these will be set within the context of the new development. We therefore suggest that additional wording is provide such as protecting the open aspect of the footpaths so that they are not enclosed and providing suitable landscaping etc.
<b>Policy 18 – Land west of London Road</b>	This site cannot be an allocation now as development has already commenced on site. This policy will therefore need to be deleted.
<b>Policy 19 – Housing Mix</b>	Policy 19 duplicates the District Plan Policy DP 30 and as such is not required. However if the intention of this policy is to set out a different mix for Hassocks Parish then it could be retained but would need to be supported by robust evidence, such as a Local Housing Needs survey, to justify this.
<b>Policy 20 – Affordable Housing</b>	<p>District Plan Policy DP31: Affordable Housing sets out the affordable housing requirements across the District. As with comments made above relating to Housing Mix, any departure from DP31 would require robust evidence.</p> <p>The policy also introduces local connection criteria which are not consistent with the Council's Allocations Scheme. We are happy to provide this document to you so that you can see how it would apply to new development in Hassocks.</p>
<b>Policy 21 – Village Centre</b>	No comment
<b>Policy 22 – Tourism</b>	No comment
<b>Proposals Map</b>	We also note that the NDP Proposal Pap shows the

	<p>strategic allocation (Land North of Clayton Mills) as within the Local Gap. In addition, the NDP Policy 16: Hassock Golf Club is not shown on the proposals map. Policy 18 – Land west of London Road needs to be deleted as an allocation as development has now commenced on site. These changes need to be made to the proposals map.</p>
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**Subject:** Hassocks NP - Sustainability Appraisal  
**Date:** Thursday, 6 December 2018 at 12:14:44 Greenwich Mean Time  
**From:** Andrew Marsh  
**To:** Laura Bourke (laura.bourke@dowsettmayhew.com)  
**CC:** Alma Howell, Alice Henstock, Lois Partridge

Dear Laura,

Apologies for not getting back to you sooner, but I have now had the opportunity to read through the draft Hassocks SA that you have provided us with.

Overall I am happy that it reflects the recent Scoping Report that I reviewed, in that it carries over the baseline information and objectives. In general the appraisals themselves are fine and appraise all reasonable alternative options for each policy. My only issue on these is whether the appraisal for Policy 15 'Windfall Development' needs to mention that some options may be in conflict with DP6 of the District Plan, which allows for 'up to 10' where contiguous with the built-up area.

I do, however, feel that the SA should address the Plan's stance on not including any housing allocations. I'm sure this is justified elsewhere in the evidence base, however the SA is silent on this matter. This could potentially cause an issue that any developer/landowner that may be promoting a site within the Parish area may raise with the examiner. They may be able to argue that the Parish have not considered the (quite legitimate) reasonable alternative of allocating further sites within the Plan, and in advancing that argument, that not all reasonable alternatives for sites themselves have been considered. As there are potential further sites within the Parish, and some who may feel they warrant allocation in the Plan (potentially the Friars Oak site may go down that route?), this does present a risk.

To address this, I would suggest that the strategy of the plan itself should be appraised. This may include an appraisal which assesses various housing need options (e.g. potential options of (1) 'status quo' of assuming the District Plan allocations and previous commitments 'meet' the Hassocks need and no further sites are required at this stage, (2) allowing for small-scale growth/windfall on top of the DP numbers, (3) allocating further site(s) in excess of the DP need).

Should this appraisal show that it is unsustainable to allocate further sites, the SA should list the potential sites within the Parish (taken from the Council's SHELAA perhaps) which the Parish have considered allocating, however don't feel they need to allocate them as the 'strategy' appraisal shows that this is unsustainable – I don't think it would need to go into the individual merits of each site as the principle of 'no further allocations' has been determined by the first appraisal. This would demonstrate that the Parish have reasonably considered that there are potential sites, but have ruled out allocating them. Without this step, it could be argued that the Parish have not considered the option of allocating further sites, which is a risk for the examination and a possible legal challenge area.

Hope this helps, and hope it makes sense. If you wish to discuss this please let me know. If you would like to run any revisions past me then, as always, I'm happy to review.

Regards,  
Andrew

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Economic Promotion and Planning  
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**APPENDIX 3**  
**(MSDC COMMENTS ON THE DRAFT**  
**SUBMISSION HNP & SA)**

**Contact:**

Alma Howell: 01444 477263  
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**Your Ref:**

**Our Ref:**

10<sup>th</sup> June 2019

Laura Bourke  
Dowsett Mayhew Planning Partnership  
63a Ship Street,  
Brighton  
BN1 1AE

Dear Laura,

**Re: Informal Comments on Draft Submission (Regulation16) Hassocks Neighbourhood Plan**

Thank you for providing MSDC with the opportunity to review the draft Hassocks Neighbourhood Plan before its formal Submission. We have set out below some initial comments but may wish to supplement these at the Regulation 16 consultation stage.

The progression of the Hassocks Neighbourhood Plan to the Submission stage is an important milestone, the result of a considerable amount of hard work by the steering group on behalf of the Parish Council. Many of the policies in the Neighbourhood Plan support the Mid Sussex District Plan policies and add local distinctiveness.

We are pleased to see that some of our comments made at the Regulation 14 consultation have been taken into account in this draft Submission version. However, there are still some outstanding concerns that need to be addressed for the Neighbourhood Plan to meet the Basic Conditions Tests and therefore for the Plan to be successful at Examination. These are set out in the attached table along with some suggestions to help refine policies for Development Management purposes.

We would urge you to reflect these comments in the Submission Version of the Neighbourhood Plan in order to give this Neighbourhood Plan the best chance of success at Examination.

Yours sincerely,



Alma Howell  
Senior Planning Officer  
Planning Policy and Economic Development

*Working together for a better Mid Sussex*



**Table of Comments on the Draft Hassock (Submission) Neighbourhood Plan**

Ref	Comment	Recommendation to Hassocks Parish Council
<b>General comments</b>	We note that there have been reviews and updates to original assessment documents that cover a number of different policy areas. While the more recent documents are accessible, the original assessments have been archived. For ease of reference at the Regulation 16 consultation stage and so that the relationship between documents can be understood, we suggest that these documents are collated together and are made easily accessible.	Collate relevant policy evidence base documents together and make them easily accessible at the Regulation 16 Consultation stage.
<b>Foreword, Para 6.13 and Housing Matters paper</b>	<p>The foreword to the Neighbourhood Plan, paragraph 6.13 and the Housing Matters Paper all state that there is no need to allocate any more land for residential development in the Neighbourhood Plan period.</p> <p>We think this statement could be misleading as there is to be a review of the District Plan, starting in 2021, which may alter the overall District Housing requirement and therefore the housing numbers and spatial distribution as currently set out in District Plan Policies DP4 and DP6. We therefore recommend that this statement includes some qualifying wording to reflect the emerging District Plan position outlined above.</p>	Include some qualifying wording to reflect the emerging District Plan position.
<b>Para 2.23</b>	Some of the text and footers in the document need to be updated to reflect the latest position with respect to planning applications. Para 2.23 should say 165 units at Hassocks Golf Club rather than 130; footnote 7 needs to be updated to DM/18/2616 and footnote 8 should be updated to DM/17/4307.	Update text and footers to reflect latest position regarding planning applications
<b>Para 4.11</b>	This should say 129 homes on Land to West of London Road rather than 97; footnote 11 needs to be updated to DM/17/4307.	Update text and footers to reflect latest position regarding planning applications.
<b>Para 4.12</b>	This paragraph relating to land west of London Road is confusing as it has not been updated to take into account the current planning application. In addition the last sentence relating to the appeal decision does not make sense as it says "The Inspector concluded with appropriate mitigation, the purpose of the gap and its character would be unduly changed."	Update and rephrase paragraph 4.12.
<b>Policy 1 – Local Gap</b>	<p>Mid Sussex District Plan Policy DP13: Preventing Coalescence explains that Local Gaps can be identified in Neighbourhood Plans, in accordance with the criteria laid out in policy DP13, and supported by robust evidence.</p> <p>The purpose of a Local Gap policy is to ensure the perception and appreciation of the separate identity and</p>	Include robust assessment to support the Local Gap designation that identifies the areas of land that are entirely necessary to preserve the integrity of the Local Gap and maintain the separate identity of settlements.

	<p>amenity of settlements are protected. In seeking to preserve a gap between settlements, this does not necessarily mean that all of the land within the gap, in its entirety, needs to be protected to achieve this purpose.</p> <p>MSDC appreciates that a Local Gap Review Paper has been prepared in response to representations received at the Regulation 14 stage and that now some small areas of land that are surrounded by development have been removed from this designation. However, the Local Gap Review paper is essentially a policy context statement that justifies the approach taken rather than the more detailed landscape and visual impact assessment work required to support where the Local Gap boundary should be drawn.</p> <p>For instance, there is still land included within this policy designation, including land identified in the recent appeal decision at Friars Oak (appeal reference - APP/D3830/V/17/3166992), as not necessary to preserve settlement identity and prevent coalescence.</p> <p>The Council recommends that a more thorough assessment is carried out to identify only those areas of land that are entirely necessary to preserve the integrity of the Local Gap and maintain the separate identity of settlements. This will support where the precise boundary should be drawn.</p>	
<p><b>Policy 2 – Local Green Spaces LGS 1 (Land to the north of Shepherds Walk); LGS 2 (Land at the Ham); and LGS 4 (Land to the east of Ockley Lane)</b></p>	<p>Local Green Space designation is a way to provide special protection for green areas of particular importance to local communities. The concept was introduced in the National Planning Policy Framework (NPPF) published in 2012.</p> <p>The revised NPPF 2019 allows communities to identify and protect Local Green Spaces (LGS) of particular importance to them (paragraphs 99 and 100). The NPPF explains that those areas that are designated should be demonstrably special to a local community and hold a particular local significance, because of their beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.</p> <p>The National Planning Practice Guidance (NPPG) includes further guidance on the LGS designation. The guidance addresses many common questions about the LGS designation, particularly relating to what sort of sites would be suitable for designation and what the designation means in practice.</p> <p>The following paragraphs in the NPPG are of particular relevance for the evaluation of sites for LGS</p>	<p>LGS 1, 2 and 4 are not in general conformity with the Government’s policies in the NPPF nor the advice set out in the NPPG and are recommended to be removed as Local Green Space designations in the Neighbourhood Plan.</p>

	<p>designation.</p> <ul style="list-style-type: none"> <li>• Designation should not be proposed for extensive tracts of land and should not be proposed as a ‘back door’ way to achieve what would amount to a new area of Green Belt by another name (para 015 of the Practice Guide).</li> <li>• Para 015 also highlights that blanket designation of open space adjacent to settlements will not be appropriate.</li> <li>• Para 018 explains that LGS should not be designated simply to protect rights of way (which are already protected under other legislation).</li> </ul> <p>The Council notes that land proposed for designation as LGS1, LGS2 and LGS4 comprise fields of pasture and are part of the wider countryside adjacent to the built up area boundary, all in private ownership. Public footpaths run across or close to the sites; however there is no statutory public access to the proposed LGS areas. The sites appear to be used unofficially, mostly by local dog walkers.</p> <p>We have looked at the Local Green Spaces Review Paper, but this is judged to be more akin to a policy context statement rather than additional Local Green Space assessment to justify why LGS 1, 2 and 4 are demonstrably special over and above other areas of countryside in the vicinity.</p> <p>We therefore still maintain our position regarding the three Local Green Space designations (LGS1, LGS2 and LGS 4); that they are not in general conformity with the Government’s policies in the NPPF, nor the guidance set out in the NPPG, and therefore should be removed as Local Green Space designations in the Neighbourhood Plan.</p> <p>We also question the boundary of LGS1 which includes the Friars Oak pub and land associated with this.</p>	
<p><b>Policy 4: Managing Surface Water</b></p>	<p>Our Drainage Engineer has looked at this policy and supporting text and recommends a number of changes:</p> <p>Development proposals which incorporate sustainable <b>urban</b> drainage techniques to manage surface water will be supported. Where technically feasible sustainable drainage techniques should include infiltration measures that reflect natural drainage patterns (<i>patterns</i>) and manage water as close to its source as possible.</p> <p>The last line/paragraph is not necessary as source control measures will always be “local”.</p>	<p>Amend policy and supporting text as set out in the adjacent column.</p>

	<p>4.28. Of these, 525 properties are identified as at risk of surface water flooding; 105 are identified as at risk of river <del>and</del> flooding; and 55 are at risk of flooding from a combination of both surface water and river <del>and sea-</del> flooding.</p> <p>4.30. To map areas of where surface <b>water</b> flooding is a current concern.</p>	
<p><b>Policy 5: Enabling Zero Carbon</b></p>	<p>We note that that stricter standards relating to minimising carbon emissions have been introduced in this policy compared to the Regulation 14 Neighbourhood Plan.</p> <p>We draw to you attention the risk associated with introducing new planning policy at this stage in the process, that has implications for viability, without undertaking the full consultation that other policies have received. This could result in this policy being deemed not compliant with legislation and the Basic Condition tests relating to Neighbourhood Planning.</p> <p>As set out in the para 34 of the NPPF, contributions or requirements from developers should be supported by viability assesment and should not undermine the viability of the development plan. We therefore recommend that viability testing of this policy is carried out to ensure that these standards do not undermine the deliverability of development in the Neighbourhood Plan area.</p>	<p>Ensure that that this policy is not subject to challenge as a result of new standards being introduced at this stage.</p> <p>Viability testing of this policy is required to ensure that these standards are viable and that they do not undermine the deliverability of new development and that of the Neighbourhood Plan overall.</p>
<p><b>Policy 7: Conservation Areas</b></p>	<p>In order for this policy to be robust and effective for Development Management purposes, we recommend that additional information is provided, either in the supporting text or as part of the evidence base, as to why the listed features identified in this policy are of special historic interest and should be protected.</p> <p>For instance, it is not clear why the bend in Keymer Road is of special interest, or what is special about the properties in the Crescent etc.</p> <p>The policy should also say <b>'preserve or</b> enhance, rather than and 'conserve and enhance' to comply the wording in the Planning (Listed Buildings and Conservation Areas) Act 1990.</p>	<p>Include additional supporting information either in the supporting text or as part of the evidence as to why the features identified in this policy are of speacial</p> <p>Amend text to say,</p> <p>'preserve or enhance' rather 'conserve and enhance' in the first, third and fifth sentences.</p>
<p><b>Policy 9: Character and Design</b></p>	<p>Para 4.52 of the Neighbourhood Plan refers to a Townscape Appraisal that has been carried out to inform this policy. As with our general comments, we recommend that all evidence base documents are made easily accessible at the Regulation 16 consultation.</p>	<p>Enusre that the Townscape Appraisal is made available as part of the evidence base at the Regulation 16 Consultation stage.</p>
<p><b>Policy 11: Outdoor Space</b></p>	<p>This policy has been updated to comply with the MSDC Development , Infrastructure and Contributions Requirements SPD. However, it sets out a preference for play space to be provided on site.</p>	<p>Amend policy to reflect advice in the MSDC Development , Infrastructure and Contributions Requirements SPD that for</p>



	<p>Para A2.9 of Appendix 2 of the Council's SPD explains that it is not always practical or appropriate to provide all categories of outdoor playing space, sport and recreation for every development and the Council would only expect children's playing space to be provided on site for developments of over 50 houses or more. We therefore recommend that the second sentence of the policy is amended to reflect this advice.</p>	<p>smaller development off site contributions will be required and that on site play space provision is normally only required for developments of over 50 dwellings or more.</p>
<p><b>Sustainability Appraisal</b></p>	<p>We have looked at the Sustainability Appraisal (SA) and advise that this needs to make clear what reasonable alternatives have been assessed, and the conclusions reached in order to assist in reducing any potential Examination risks.</p> <p>We recommend that the SA is carefully checked to ensure that any changes that have been made to policies since the Regulation 14 stage (including removal or addition of new policies) have been appraised. Changes to wording could arguably represent a new 'option', and the Parish Council needs to ensure these are appraised and outcomes clearly written-up. This will provide a clear SA 'audit trail' between the Reg 14 and Reg 16 versions.</p> <p>We note that the Parish Council's response to therepresentations made on the Reg 14 SA is included in the Housing Matters paper. We suggest that this response is better located in the SA as an Appendix.</p> <p>Para 5.7: - For clarity, the appraisal of the overall development strategy should be included within the main SA document (page 31-32) or as an Appendix. The conclusions that are reached from this need also to be detailed.</p> <p>Paras 5.9 - 5.10 – We do think these paragraphs are particularly clear as to what the alternative suggested approach was, and the precise reasons for why it was discounted as a reasonable alternative</p> <p>Sites: The appendix showing the SHELAA map is helpful, however it may be useful to list the site names/yields/etc and a clear statement explaining the reasons for rejecting allocating these sites (linked to the reasons given in para 5.9 and the comment regarding the appraisal of the overall development strategy).</p> <p>Should any policies be amended further as a result of comments made by MSDC, these amendments will also need to be addressed in the policy appraisals (where the changes would result in a distinct new option).</p>	<p>Update the SA as set out in the adjacent comments.</p>