

DM/23/2866 Outline planning application (All matters reserved except for access) for the redevelopment of land to the east of Ansty to create a new Garden Community, comprising of the erection of up to 1,450 homes (including 30% affordable housing), up to 90 residential care units (C2 class), a primary school, a SEND school, health hub, sports facilities including all weather hockey pitches and tennis centre, allotments, retail, community and employment uses together with ancillary and associated development including new and enhanced pedestrian/cycle routes, open spaces, and landscaping

DETAILED SUBMISSION TO MSDC PLANNING ON BEHALF OF RESIDENTS OF BROXMEAD HOUSE,
BROXMEAD LANE, RH17 5JH

JANUARY 22, 2024

Resubmission of representation dated JANUARY 12, 2024 amended to include further supporting information and explanations in both the submission and the appendices.

DM-23-2866

SUMMARY

This submission is made on behalf of residents at Broxmead House, which is within the Ansty and Staplefield Parish Ward. We have provided a copy of this report to the Ansty and Staplefield Parish Council for their consideration. The author¹ of this submission is suitably qualified to offer a professional view covering the feasibility and economic considerations of the outline application.

The applicant has submitted over 3300 pages of materials within 120 documents covering a wide range of topics in this outline application². We therefore have focussed on a limited set of the critical issues associated with the application. We consider the public benefits that the applicant considers to be significant along with some selected other issues. We have examined the application in detail in these areas and have found that: many of the assertions made by the applicant are based on misguided assumptions; there are material omissions (particularly concerned with statements of support from relevant Government Authorities) and that the analysis performed by the applicant relating to some critical issues is opaque. We have carried out our own independent research and analysis as reported herein. We have not had the benefit of significant time to verify all of our work, but where we can we show that our conclusions are aligned with those provided by State Authorities (e.g. WSCC and the Planning Inspection) relating to other similar developments. We reach a very different conclusion to that of the applicant and our primary conclusions are:

- The application is speculative, falling outside of the carefully considered current and emerging District Plans and is not supported by the District Infrastructure plan. It is therefore incumbent on the applicant to provide complete and accurate submissions to support their application.
- We have found that the application material provided in the areas we have investigated cannot be taken at face value. We have little confidence that the materials relating to other areas we have not looked at will be any different. We recommend that detailed due diligence is required to substantiate the claims of the applicant in all areas.
- We consider that the primary benefit of the application is for the provision of houses, with all other claimed benefits being insignificant / irrelevant.
- However, the provision of necessary houses is already catered for in the current and emerging district plans and so the additional houses proposed by the applicant are not required.
- The application understates the adverse effects of the development and there are a number of significant adverse effects associated with the development that the applicant does not present realistic mitigations for.
- The adverse effects (harms) outweigh the claimed benefits and the application should be fully rejected on this basis. The results of our analysis are summarised in Table 1
- The application is contrary to National, County, District and Local planning policies and should be fully rejected on this basis.
- The application does not constitute “sustainable development” and should be fully rejected on this basis.

We recommend that you take full consideration of the materials presented herein and that you fully reject this application.

¹ The Author is a former Partner and Practice Leader at a leading professional services firm who has advised private and public sector organisations on the feasibility, economic evaluation and financing of over 200 major development / infrastructure projects in a variety of sectors.

² We understand that this is an outline application, but we use the term “application” hereafter

BENEFITS AND HARMS SUMMARY

Topic	Effect	Applicant's view Benefit / Harm	Our view Benefit /Harm	Comment
Social	Provision of Houses	Major Beneficial	Major Beneficial	Beneficial but not needed as already catered for in the current and emerging district plans
Social	Provision of SEND school	Major Beneficial	Neutral	Insufficient information to make any assessment of the proposed SEND school at this site. Other developments, already in the emerging District Plan, provide for the possible inclusion of SEND school
Social	Provision of early years care	Moderate Beneficial	Not Significant	We consider there is adequate provision of early years so no need for extra capacity
Social	Provision of primary school	Negligible	Neutral	We agree with the applicant that the impact of this would be negligible / neutral
Social	Demand for secondary school	Negligible	Major Adverse	Application not clear about how to ensure secondary education is catered for
Social	Provision of healthcare (GP)	Negligible	Moderate Adverse	We find the facts and analysis provided by the applicant (in their Agent's health statement) both inaccurate and flawed
Social	Volume of transport movements and services withing walking distance	Neutral	Major Adverse	We consider that the majority of services will need to be accessed by car. Same for secondary School and SEND for in-bound pupils
Social	Provision of open space	Moderate Beneficial	Not Significant	Reliance on "Country Park" which does not form part of this planning application
Economic	Additional spend by construction workers	Major Beneficial	Not relevant	This is not relevant as all development projects have construction spend and construction is a means to an end.
Economic	Additional spend by operational workers	Major Beneficial	Not Significant	Spend figures overstated in application
Economic	Additional spend by residents	Major Beneficial	Not Significant	Spend figures overstated in application
Environmental	Biodiversity and Habitats	Moderate Beneficial	Major Adverse	Destruction of biodiversity and habitats at the site. The Applicant's view relies on offsets provided off site which are not a part of this planning application.
Environmental	Landscape and Visual Impact	Negligible	Moderate – Major Adverse	No amount of screening can hide this development, details in LHA reports

Table 1. Balance of benefits and harms. In our view the harms greatly outweigh the potential benefits

1. PROVISION OF HOUSING AND POLICY CONSIDERATIONS

The applicant proposes the provision of up to 1450 houses of which the 435 are deemed affordable. They consider this to be **major beneficial (significant) residual effect**.

The Applicant describes the speculative development in their Design and Access statement as: *“a new, sustainable and self-sufficient place to live healthy and active lives....where all daily needs can be met and a spectrum of daily life can occur.”* They describe inclusion of *“a GP surgery; a new primary school, SEND school, community facilities, retail and employment space, sports facilities for hockey and tennis”*. They further state: *“Sustainable movement will be at the forefront of the transport strategy, where walking and cycling come first, and the private car becomes obsolete”*

We do not disagree that the creation of homes for people in of a major benefit, but those homes need to be in the right place. We contend that the development as a whole would not support a sustainable community; the applicant’s proposals do not meet the objectives of sustainable development and that the houses are not required.

Would the size and location support a sustainable community?

The National Planning Policy Framework sets out the Government’s planning policies for England and how these should be applied. It provides material planning considerations for large-scale housing developments (such as that being proposed by the Applicant). Para 74 states that strategic policy-making authorities (such as MSDC) *“should ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access.”*

The fundamental premise of this speculative development application is flawed. The development is not proposed to be located in close to a large town which would provide good access to necessary services and employment. Instead, the applicant has a proposed a rural location and seeks to meet the social and economic needs of the circa 3500 residents in a self-sufficient way on Site. The proposed development is of insufficient scale to meet these needs and, due to its location, would inevitably result in significant out-bound private car use. This would not be sustainable from a transport perspective. The proposed facilities would be underutilised and not sustainable without significant use by people who do not reside at the development. They would either fail – which is not sustainable from a social needs perspective – or they would survive at the cost of significant in-bound private car use. Pedestrian access, safety, travel distances and travel times are examined in detail in Appendix A, and show that nearby facilities in Cuckfield are within acceptable walking distances to access day to day facilities.

Would the proposals meet sustainable development objectives?

Para 7 of the NPPF states: *“The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner.”*

Para 74 of the NPPF states: *“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:*

a) consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains;

b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access”

Para 11 of the NPPF states: *“Plans and decisions should apply a presumption in favour of sustainable development...For decision-taking this means: approving development proposals that accord with an up-to-date development plan without delay”*

Para 2 of the NPPF states: *“Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.”*

The NPPF is clear in that the purpose of the planning system is to achieve sustainable development and this is met by strategic policy-making authorities (i.e. MSDC) making plans (i.e. the current and emerging district plans) and that there should be a presumption of favour for developments which are in accordance with these plans. The proposed development is not in the district plan and, as accepted by the applicant themselves, is contrary to the policies within the district plan.

Para 8.3 of the applicants planning statement: ***“The site is not allocated for development in the adopted Development Plan and falls in a countryside location outside of but adjacent to the settlement boundary of Ansty. It is acknowledged that this scheme therefore is in conflict with the adopted development plan, however the public benefits of the scheme as a whole demonstrably outweigh the policy conflict.”***

The tests are clear. The application is not presumed to be sustainable development and the applicant must demonstrate that the sustainable development objectives are met and there are demonstrable public benefits arising from their proposals.

The NPPF describes economic, social and environmental sustainable development objectives. Table 1 shows the assessment of the applicant’s proposal in these areas and it is clear the balance of harms out-weigh the benefits. Furthermore, there are no material public benefits beyond that of the provision of houses. Therefore, in our view the applicant does not demonstrate that the benefits demonstrably outweigh the policy conflict and that the development does not meet the sustainable development objectives.

Are the houses needed?

Both the current MSDC District Plan and the emerging MSDC District Plan clearly show that the requirement for future housing developments are met and that the 1450 additional houses are not required. There is no need for this speculative development. This position is reinforced by recent statement in planning appeal for the speculative development of 120 residential dwellings in Alborne³ in which the inspector concluded:

“Overall, I find that the Council has taken and continues to take a proactive approach to housing delivery at both plan making and decision making. From the evidence to this Inquiry and in particular the summary contained within the Housing Land Supply Position including 5-year Housing Land Supply Statement (CDD.5), the Council is effectively using a variety of tools and mechanisms to ensure housing can be delivered in a timely manner”

“I therefore conclude that the Council has demonstrated that it can identify a supply of specific deliverable sites sufficient to provide a minimum of 5-years’ worth of housing against the standard method”

We do not consider there is a current need for the houses proposed by the applicant.

³ Appeal Ref: APP/D3830/W/23/3319542 Land south of Henfield Road, Albourne (Easting 526300: Northing 116837

2. POTENTIAL BENEFITS

In the applicant's planning statement⁴, the applicant claims some 40 benefits arising from the proposed development. Of these, the socio-economic report⁵ filters out those which are not deemed material or relevant arriving at 6 claimed benefits which are considered to be significant (see Table 6.3) by the applicant.

We examine certain critical aspects underpinning these claimed benefits in below, with supporting information shown in the appendices. In addition, we examine the proposed arrangements for secondary school education and GP services which will underpin the provision of health care.

PROVISION OF OPEN SPACE AND PLAY SPACE

The provision of open space mainly relies on the so called "Country Park" which is the subject of a separate planning allocation and therefore is not relevant to this application. We do not consider that the provision of play space is a material consideration. We consider that **the provision of open and play space is irrelevant / not material.**

PROVISION OF SEND SCHOOL

The applicant argues that there is a shortage of SEND specific capacity in MSDC and that they will fulfil this need by building a SEND school. The use of the school would be primarily for pupils commuting-in by car or other specialised transportation as there would be limited SEND student numbers from the development itself. They argue this will result in a moderate beneficial (significant) residual effect.

The applicant fails to demonstrate why it would make sense to locate a SEND school in a rural location at their proposed site. The applicant fails to provide any information, analysis or plans to show that they understand the needs of SEND pupils and those who support them. Planning and delivery against SEND needs is a highly specialised area and requires full co-ordination with WSCC experts. The applicant fails to demonstrate that they can deliver a viable SEND school. We would expect a full statement of support from WSCC Education Authorities for the applicant's plans. Such a statement is not provided and so we conclude that the provision of SEND school facilities to cater for the educational needs of SEND school age residents and those of the wider community has not been demonstrated by the applicant.

Using the applicants ranking methodology⁶ this a low magnitude impact applied to a medium sensitive receptor resulting in a **minor (not significant) effect.**

The provision of a suitable site for a SEND school facilities in the region is under consideration in the emerging district plan and financing for these facilities forms a part of the Mid Sussex District Plan 2021-2039 - Infrastructure Delivery Plan, December 2023. This confirms that plans are in-place to provide for the required SEND facilities and the proposed provision at the Site is not needed. Until such a time as the applicant demonstrates a compelling proposition which satisfies WSCC we can ignore any benefits/harms associated with SEND for this application.

⁴ Planning Statement, Savills, Nov 2023

⁵ ES Vol2 Ch6 Temple, Nov 2023

⁶ ES Vol2 Ch6 para 6.3.19 Temple, Nov 2023

PROVISION OF EARLY YEARS FACILITIES

The applicant argues in their socio-economic report that there is a shortage of early years provision in the immediate vicinity of the proposed development, arguing that facilities are running at 174% of their capacity (see para 6.5.43) and that this will persist around these levels until 2032. By then, they would have built a large facility to meet the needs of the residents on the site and the address the over-utilisation of early years in Cuckfield. They deem this as moderate beneficial (significant) residual effect.

The applicant considers only two early-year facilities (Norto5 and Next Steps Nursery), but fail to recognise that Norto5 offers a flexible part-time early year service and so the number of children on the role is not a fair representation of the full-time utilisation of the facility. Furthermore, they do not include two other early-year providers in Cuckfield (Cuckfield pre school and Kiddi Capers). Inspection of the most recent Ofsted reports for these providers and their web-sites are shown in Table 2.

	Places	Roll	Offer	Role
	at Ofsted			at Jan 2024
Norto5	25	61	Flexible	not known
Kiddi Capers	22	38	Part Flex	not known
Cuckfield pre school	30	31	FT	vacancies
Next Step	28	24	FT	vacancies
Total	58	55		
Notional utilisation			95%	

Table 2, Places, Role number and service offer of Early Years providers in Cuckfield

Putting Norto 5 and Kiddi capers to one side as they offer flexible services, the remaining facilities are at 95% utilisation and there are vacancies. Furthermore, from a welfare perspective to have early-years provision beyond their capacity. We consider that there is no need for additional early-years provision as proposed by the applicant and deem this claimed benefit to be a **negligible (not significant) effect**.

This example shows the use of misguided assumptions provides a misleading statement of claimed benefits / harms. We now consider the claimed economic benefits arising from the development.

EXPENDITURE OF CONSTRUCTION, OPERATIONAL AND RESIDENTS IN THE LOCAL AREA

We have investigated in detail the “significant” economic benefits⁷ claimed in the application namely:

- Construction worker expenditure in the Local Area of £836,000 per annum over 6.5 years
- Operational worker expenditure in the Local Area of £360,000 per annum and
- Residents’ expenditure in the Local Area of £737,000 per annum

We acknowledge that economic forecasts are only as good as the assumptions and methodologies used to generate them. The only certainty is that whatever the results are, they only provide an indication of what might occur. In any economic analysis it is critical to: consider what is relevant or not; to use appropriate

⁷ ES Vol2 Ch6 Temple, Nov 2023

assumptions; to use consistent definitions and approaches and to acknowledge / take into account risks which may impact the forecasts.

We note also that all economic analyses are subjective and are dependent on the assumptions, data and methodologies used. **In our view economic analyses should not be considered in a planning application such as this.** Residents of any housing development and workers will spend money somewhere and it is not a good use of planning officers time to get embroiled in subjective matters of where they might spend it. We also note that if MSDC planning were of the opinion that economic factors such as those raised by the applicant are important, then we would recommend that they seek expert opinion on these matters.

EXPENTITURE OF CONSTRUCTION WORKERS

We consider that all development projects will result in construction worker spend and this project is no different to any other. We take the view that construction is a means to an end and not an end in itself. We conclude that construction worker expenditure **is not relevant and should not be claimed as a benefit**

EXPENTITURE OF OPERATOIONAL WORKERS IN THE LOCAL AREA

We perform a detailed economic analysis shown in Appendix B. In doing this we apply adjustments to operational worker expenditure figures provided by the applicant to account: the risks of lower number of jobs due to risks associated with the various commercial BTB and Health facilities at the Site; propensity to spend by different worker types; access and parking constraints in Cuckfield (which create leakage from spend in the Local Area) and to take into account the retail expenditure opportunities at the Site. The combination of these result in a lower spend in the Local Area than provided by the applicant.

We consider that the assumptions we use used to calculate the benefits for operational workers and residents are more appropriate and we calculate a figure for operational workers expenditure in the Local Area of £32,000 pa. Others might consider harsher assumptions resulting in an even lower number. Although any expenditure is welcomed in the Local Area, we consider that this will produce a low impact on a medium sensitivity receptor producing a **minor (not significant) effect**. We disagree with the applicant that this receptor is a high sensitivity as this is based on the premise that the retail offer in Cuckfield requires revitalisation (see Appendix B for details).

This view is supported by a recent planning inspectorate opinion on a prospective development in Albourne, where the inspector states⁸: *"134. There would be economic benefits arising from the development. These would include construction jobs and future spending. However, it would be the case that any housing schemes of this magnitude would deliver similar benefits and as has been identified in evidence, such other developments are underway. Accordingly, I attribute this only moderate weight."*

EXPENTITURE OF RESIDENTS IN THE LOCAL AREA

Our economic analysis of the expenditure of residents in the Local Area is shown in Appendix B. In doing this we apply adjustments to expenditure figures provided by the applicant to account for expenditure at the Site and leakage out of the Local Area due to parking constraints in Cuckfield.

We consider that the assumptions we use used to calculate the benefits for residents are more appropriate and we calculate a figure for residents' expenditure in the Local Area of £147,000 pa. The assumptions we

⁸ Appeal Ref: APP/D3830/W/23/3319542 Land south of Henfield Road, Albourne (Easting 526300: Northing 116837

use could be seen as generous and somebody else might be even harsher. For example, we estimate the amount of expenditure outside of the Site as being 40% of the total available spend of residential spend locally, whereas somebody else might think – given the statements that the applicant made about the facilities at the site being designed to cater for the day-to-day needs of residents - that a lower percentage is more appropriate. It is subjective. Although any expenditure is welcomed in the Local Area, we consider that this produces a low impact on a medium sensitivity receptor producing a **minor (not significant) effect**. Again, we disagree with the applicant that this receptor is a high sensitivity as this is based on the premise that the retail offer in Cuckfield requires revitalisation.

A far more compelling economic argument to meet any perceived need to increase the expenditure in Cuckfield would be to meet the already identified requirement (of Cuckfield residents) of providing an additional grocery store(s) within Cuckfield Village Centre⁹. If such a store was provided, then the expenditure in Cuckfield would naturally rise through increased spend by Cuckfield residents. If the Nisa store is used as a comparator, this has an income of around £200,000 per year. An additional similar store or stores within Cuckfield centre would naturally increase the spend in Cuckfield by a similar quantum as the total expenditure from residents and operation workers from the applicant’s proposed development in Cuckfield, without the harms of extra traffic and parking problems.

THE BROADER ECONOMIC PERSPECTIVE

As the topic of economics has been raised by the applicant, we feel at liberty to look at these claimed economic benefits from the perspective of the prospective residents and the applicant themselves. Combining the operational worker (£32,000) and residential worker expenditure (£147,000) gives a total of £179,000 pa. From the perspective of the 3668 residents, these economic benefits of £179,000 pa would cost each resident £109 per year or 13p per day. In return they get equivalent goods and services. This is not a material number and is not considered as a major cost / benefit.

From the perspective of the applicant, we briefly look at some very high-level indicative numbers for the development (see Table 3). We see that the applicant / developer could make £130 million profit from sales proceeds of the houses in the development (we assume a profit margin of 20% provided by the applicant’s Agent¹⁰) and house values for Mid Sussex shown in the applicants Economics Report¹¹.

House	House	House	Income	Profit	Net
Type	Number	Sale value		Margin	Profit
Market	1015	535,000	543,025,000	20%	108,605,000
Affordable	435	250,000	108,750,000	20%	21,750,000
Total			651,775,000		130,355,000
20 years spend at 179,000 pa					-3580000
Net Profit					126,775,000

Table 3, Indicative economics of the development from the applicant’s perspective

⁹ Mid Sussex Retail Study, 2022 showing “Health Check” for Cuckfield Village Centre

¹⁰ https://www.savills.co.uk/research_articles/229130/292691-0

¹¹ Ansty Garden Community Economic Statement, Volterra, Oct 2023

There is a strong economic incentive for the applicant to pursue the development. Even if they were to cover the costs of the economic benefits in the Local Area with some form of community retail grant for the 20 years at a cost of £3.6 million, their profit still be a very substantial number of £127 million. This dwarfs the stated economic benefits for the wider public.

From the perspective of the applicant, the economics of this development is all about building houses. The wider public economic benefits are not a material consideration, except in the pursuit of gaining planning permission for the development.

OTHER POTENTIAL BENEFITS

The applicant that considers that other potential benefits arising from the development are not significant and so we disregard these.

3. ADVERSE EFFECTS (HARMS)

The proposed development would potentially create significant harms in a number of areas as described below.

HARMS FROM LACK OF SECONDARY SCHOOL PROVISION

The applicant does not demonstrate where the 268+ Secondary School pupils would go and how they would get there. The applicant does not demonstrate support from WSSC Education Authority. This is a moderate (significant) adverse effect

The applicant demonstrates that Secondary Schools in the area are full now and it will remain this way for the future without extra capacity being built. The applicant states they will contribute, via a Section 106 payment, so WSSC can arrange for someone else to build the necessary facilities: maybe an expansion of Warden Park; maybe a new school in Burgess Hill – this is not clear from the application. They argue that by paying someone else to take this problem on, the problem will be solved. In their language this results in a minor adverse (not significant) residual effect.

The applicant does not demonstrate where the capacity will be built, who is responsible for doing this and when it might occur. We further identify the following inaccuracies in their application: they understate the number of Secondary School pupils at the development by considering only the age range of 11-15yrs¹² as opposed to a correct age range of 11-16yrs¹³, and they materially understate the walking times and distances to Warden Park school (see Appendix A). The result of these effects is to further exacerbate the scale of the problem and rule out expansion of Warden Park as a possible option.

Whilst it is not evident what the applicant is proposing for their (speculative) development, the official plan for the building of new secondary schools is described in the Mid Sussex District Plan 2021-2039 - Infrastructure Delivery Plan, December 2023. Within this there is no mention in the plan of any further increase of Secondary School capacity at Warden Park, Burgess Hill or Haywards Heath. New Secondary Schools in the plan are to be located at Cophthorne and Sayers Common and the applicant's development would be well out side the catchment areas for these planned schools.

¹² Socio-Economics Study para 6.7.40

¹³ WSSC Planning for School places, 2023

The proposed development is speculative and is outside of both the existing and emerging Mid Sussex District Plans and is not catered for in the Infrastructure Development Plan for the District. Given this, we would expect a full statement of support from WSCC Education Authorities for the applicant's plans. Such a statement is not provided and so we conclude that the provision of secondary school facilities to cater for the educational needs of secondary school age residents has not been demonstrated by the applicant. Using the applicant's ranking methodology this is a high magnitude impact applied to a medium sensitive receptor resulting in a **major adverse (significant) effect**.

HARMS FROM LACK OF GP PROVISION

The applicant does not demonstrate that a GP practice at the Site is viable. The applicant does not demonstrate support from NHS Sussex ICB. This is a major (significant) adverse effect

The applicant proposes GP space, surgery, and health hub at the site to serve a population of circa 3688 residents. They indicate around 2FTE GPs will be required for this proposed facility and that these will be commissioned through a contract with the NHS Sussex Integrated Care Board. The applicant provides a HIA¹⁴ and also deals with health issues within their Socio-Economic Report. Note there are major inconsistencies between both reports and it is not clear which position the applicant supports.

In the Socio-Economics Report (para 6.5.39) report it is argued that there would be a medium impact on the demand for GP services due to the development. The applicant argues that this risk would be mitigated by the provision of GP services at the Site and in para 6.7.31 concludes that: *"on the basis that the healthcare provision at the Proposed Development will at least fully mitigate the additional demand from new residents, the impact of the Proposed Development on demand for healthcare is considered negligible."*

This conclusion does not feel correct given the immense pressures the NHS are under and the declining numbers of GPs. We have carried out research to look at the viability of small GP practices shown in Appendix C and have concluded that shows that a such a small practice located on the site is not likely to be viable and sustainable. We consider it unlikely that such a practice would be commissioned in the first place and, if it were, it would continually be under threat due to being sub-scale. A 3688 patient 2FTE GP facility in a rural location would be a complete outlier in the size and scale of GP practices in West Sussex. We consider that the viability of their proposed GP facilities has not been demonstrated as being feasible.

We would expect a full statement of support from NHS Sussex ICB for the applicant's plans. Such a statement is not provided and so we conclude that the provision of GP facilities to cater for the health needs of residents has not been demonstrated by the applicant. This would be a medium magnitude impact applied to a medium sensitive receptor resulting in a **moderate (significant) adverse effect**.

Our view is supported by NHS Sussex ICB's contribution to the Mid Sussex District Plan 2021-2039 - Infrastructure Delivery Plan, December 2023 where they state: *"Premises are not always ideally placed to accommodate increased patient demand as a result of new housing development, although the Council has aimed at facilitating housing allocations adjacent to existing settlements... A small number of practices are finding new funding pressures and may struggle to keep branch surgeries open."* We note that in the IDP there are no plans to build any small-scale GP facilities, with the focus being on expanding existing facilities (such as Cuckfield Medical Practice) and merging smaller facilities into larger practices near the major towns in the District.

¹⁴ Health Impact Assessment, Land East of Ansty, Savills, October 2023

TRANSPORT HARMS

We recognise that there are potential safety issues associated with walking from the proposed development to Cuckfield alongside narrow unlit footpaths by busy roads. We also consider that using unmetalled, unlit public footpaths / tracks are not acceptable for day-to day use. We consider the safest pedestrian access from the Site is via the proposed signalised crossing for day-to-day use to get to Cuckfield by foot/wheeling (see Appendix A). We consider that the primary way residents and workers would access facilities in Cuckfield would be by car.

The applicant provides complex and specialised reports on the effect the site has on traffic movements and we understand that WSCC are not content with the applicant's proposals. We have concerns that the volume of traffic flows is understated as the applicant assumes that most journeys will be made on foot, whereas we have seen that access to secondary schools, retail and incoming commuting for workers and SEND pupils will generate significant traffic movements. This is on-top of the travel movements from the residents themselves. We consider that there will be considerably more traffic movements resulting in harms to the environment and risks to safety. We assign this a **major adverse effect** as it will exacerbate a situation already deemed unacceptable.

BIODIVERSITY AND HABITAT HARMS

We consider that the destruction of biodiversity and habitats at the site is permanent, irreversible and unnecessary. The Applicant's view relies on offsets provided off site which are not a part of this planning application. **We consider this to be a major adverse effect**

LANDSCAPE AND VISUAL IMPACT HARMS

No amount of screening can hide this development. Details are given in the LHLA report¹⁵ submitted as part of the Reg18 Consultation to the District Plan Review. We consider this to be a **moderate-major adverse effect**

4. CONCLUSION

We do not accept that the applicant has demonstrated that their proposal constitutes sustainable development

We do not accept that the applicant has demonstrated that claimed benefits of their proposed development outweigh the claimed benefits out-weigh the harms

We do not accept that the applicant has demonstrated that their proposals are in accordance with National, County, District and Local planning policies

We conclude and recommend that this application should be fully rejected.

¹⁵ Landscape and visual impact assessment report, Louise Hooper Landscape Architecture, 2022

APPENDIX A – SUPPORTING INFORMATION ON PEDESTRIAN TRAVEL TIME AND DISTANCE CALULATIONS AND ACCESS

We have conducted detailed pedestrian travel analysis to access facilities in Cuckfield from the proposed development. We use distances and changes in elevation as calculated from ordinance survey maps and then use a walking speed of 4.6 km/hr. We note for people who need assistance with their mobility that lower walking speeds would be more appropriate. Also, there are considerable changes in elevation when traversing the Site and also going into / returning from Cuckfield. Again, these will affect the actual walking / wheeling speeds.

SUMMARY

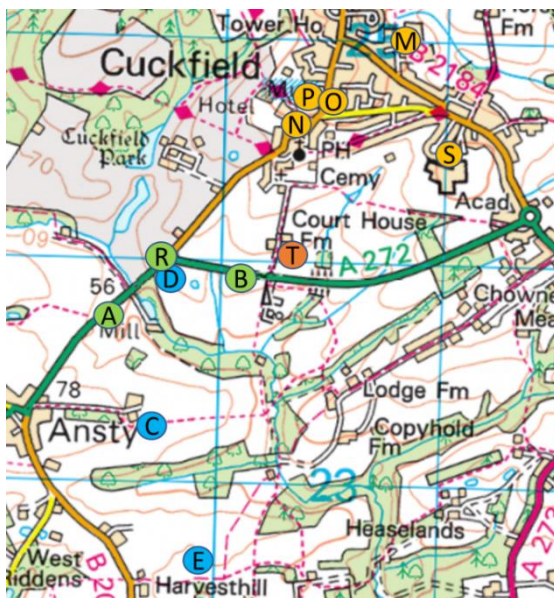
The safe access point from the Site which can be used for pedestrian / wheeling routes to Cuckfield is at Location A, to the west of the Site.

The applicant does not take into account the additional time to traverse the Site from the majority of dwellings on the Site. This will lead to an additional 10 minutes walking time from the Site to location A

The applicant understates distances and travel time to Warden Park School from the Centre of the Site C

The applicant uses an unrealistic 2km benchmark for the acceptable walking distance for day-to-day activities.

Cuckfield is not readily accessible via foot or wheeling and the majority of journeys from the Site to Cuckfield will be made by car



- M** Cuckfield Medical Practice
- S** Warden Park Secondary School
- P** Pharmacist
- O** Optometrist and Dentist
- N** Nisa convenience store
- T** Rough farm track
- A** Signalised pedestrian crossing to site
- B** Signalised pedestrian crossing to rough track
- R** Unsignalised pedestrian access at A272 / B2036
- C** Centre of site
- D** Location of dwelling at North of site
- E** Location of dwelling at South of site

The location of various facilities in Cuckfield are shown along with proposed pedestrian crossings and locations within the Site

Pedestrian access from the Site leading to Cuckfield

- The proposed signalised crossing at location B leads to a rough track. The track is unlit and unpaved and would not be accessible for wheeling and is not considered to be unsuitable for day-to-day use.
- The proposed crossing at location R is not signalised and is not considered to be safe for day-to-day use.
- The proposed signalised crossing at location A is considered to be the most safe location for day-to-day use providing access to the pavement alongside the A272, then the B2036 to Cuckfield.
- **Location A is considered to be the least-worse point from the site for pedestrians to access Cuckfield, in particular those with disabilities, and is used for the subsequent distance analysis in this submission.**
- Nevertheless, it is important to note that the pavement leading to Cuckfield is narrow, steep and unlit and would pose challenges for day-to-day use.

Travel times and distances

The Applicant creates a narrative that various facilities in Cuckfield are within an acceptable walking distance of the centre of the development site. The applicant provides a summary of distances from the centre of the Site to various facilities on p27 of the DAS¹⁶. They do not describe how they arrive these figures. It is surprising that the Applicant’s transport consultant has not given a view on these matters. We have calculated these distances and walking/wheeling times below.

Extract from Applicant's Table in DAS				Our calculations	
Type of Facility	Destination	Distance km	Walking Time (mins)	Distance km	Walking Time 4.6 km/hr
Retail	Nisa Loca	1.9	25	1.96	26
	Misc Shops	1.9-2.1	26-29	1.96-2.06	26-27
Healthcare	Pharmacy	2	26	2.06	27
	Dentist	2.1	28	2.06	27
	Doctors	2.8	36	2.78	36
Education	Secondary	2.3	30	2.79	36

The distances and walking times shown in the DAS¹⁷ are similar to those we calculate at an average walking speed of 4.6 km/hr **with the exception of those for accessing Warden Park Secondary School which the applicant appears to understate both distance and walking time by some margin.**

Furthermore, the applicant’s statements contradict their own analysis for Warden Park and takes further distance and time off (p27 of the DAS):

“Warden Park Academy secondary school is located within walking distance, to the north-east of the site, and Cuckfield contains a more extensive range of facilities, including education, healthcare, leisure, food and drink and retail opportunities. However, these are located slightly further afield, over a 15 minute walk away from the centre of the site.”

¹⁶ Design and Access Statement, Ansty Garden Community, Fairfax, November 2023

The applicant argues that the upper limit of acceptable walking distance is 2km for every day purposes and so claims that the majority of facilities are readily accessible in Cuckfield by foot. We consider that a guidance provided by Chartered Institution of Highways & Transportation (CIHT) is more appropriate with a figure of 1.2 km as the preferred maximum.

Consideration of additional distances and walking times to traverse the Site

- Distances and times shown to travel to access point A from the centre of the Site should be regarded as being towards the lower end for the majority of residents of the Site.
- The proposed Site is 100 hectares in size located on undulating topography with various physical barriers including ancient woodland, streams and heritage assets. To traverse the site to get to access point A requires additional travel for residents which needs to be considered.
- We use schematics provided by the applicant to track routes to access point A from the Centre of the Site C, Dwellings D and E
- We then calculate the distance and walking time to traverse the Site as shown below

Type of Facility	Destination	Properties near Centre		Properties near periphery	
		Distance km	Walking Time (mins)	Distance km	Walking Time (mins)
Retail	Nisa Loca	1.96	26	2.81	37
	Misc Shops	1.96-2.06	26-27	2.81-2.91	37-38
Healthcare	Pharmacy	2.06	27	2.91	38
	Dentist	2.06	27	2.91	38
	Doctors	2.78	36	3.63	47
Education	Secondary	2.79	36	3.64	47

Distances and walking times to various Community Facilities in Cuckfield from properties near the centre (location C) and at the periphery (locations D and E) of the proposed Site via access point A

Acceptable walking Distances for planning purposes

- The following table is provided in the Chartered Institution of Highways & Transportation (CIHT) publication “Guidelines for Providing for Journeys on Foot CIHT 2000”
- It shows that the preferred maximum distance to walk is 2km for commuting / school purposes and sight-seeing and 1.2 km elsewhere

Table 3.2: Suggested Acceptable Walking Distance.

	Town centres (m)	Commuting/School Sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1000	800
Preferred maximum	800	2000	1200

3.32. Table 3.2 contains suggested acceptable walking distances, for pedestrians without a mobility impairment for some common facilities. These may be used for planning and evaluation purposes.

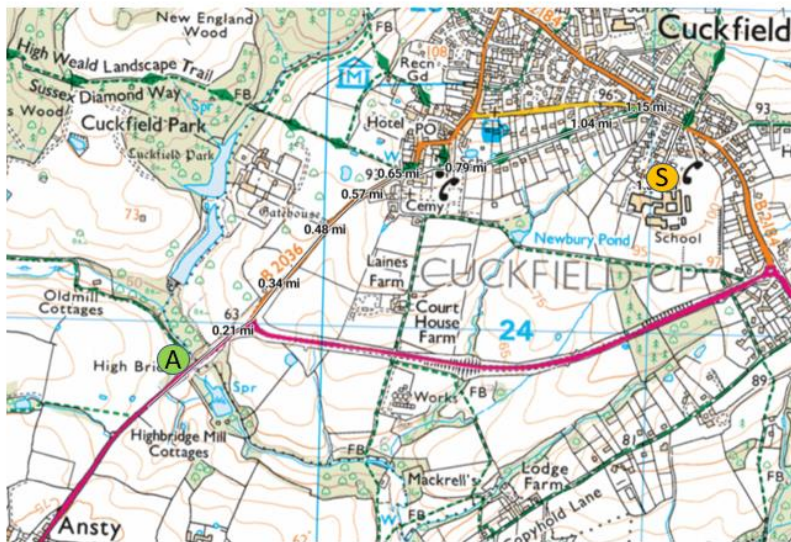
- The applicant appears to use the preferred maximum distance of 2km for all pedestrian journeys

Indicative route from Centre of Site C to signalised access point A



- A** Signalised pedestrian access to site
 - C** Location of dwelling at Centre of site
- Distance from C to A is ~2037 ft (0.62 km)

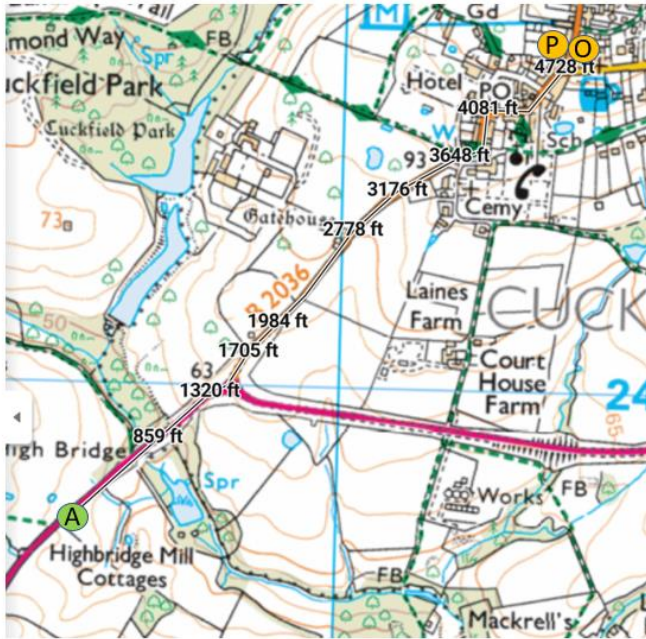
Indicative route from signalised access point A to Warden Park Secondary School



- S** Warden Park Secondary School
 - A** Signalised pedestrian crossing to site
- Distance from A to S is ~1.35 miles (2.17 km)
Distance from C to A is ~620 m
Distance from C to S is ~2.79 km

Note, Distance to Warden Park from Centre of the Site C is ~2.79 km

Indicative route from signalled access point A to Pharmacist, Optometrist and Dentist



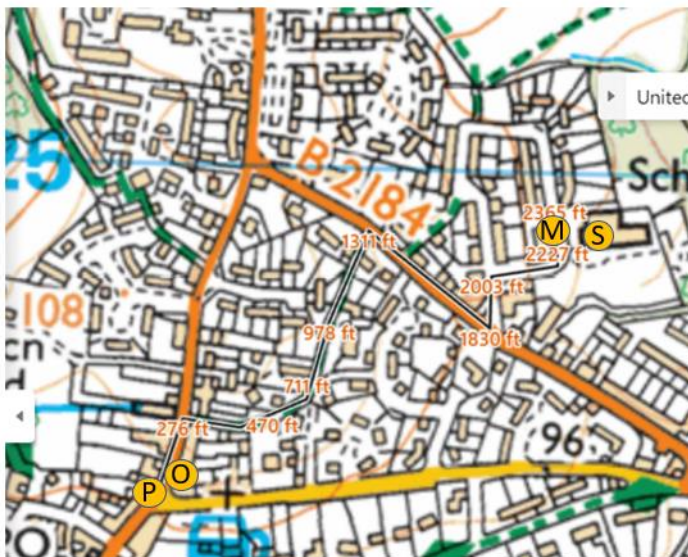
- P Pharmacist
- O Optometrist and Dentist
- A Signalled pedestrian access to site

Distance from A to P is ~4728 ft (1.44 km)

Climb from A to P is ~55 m

Descent from A to P is ~10 m

Indicative route from Pharmacist to Doctors and Holy Trinity Primary School



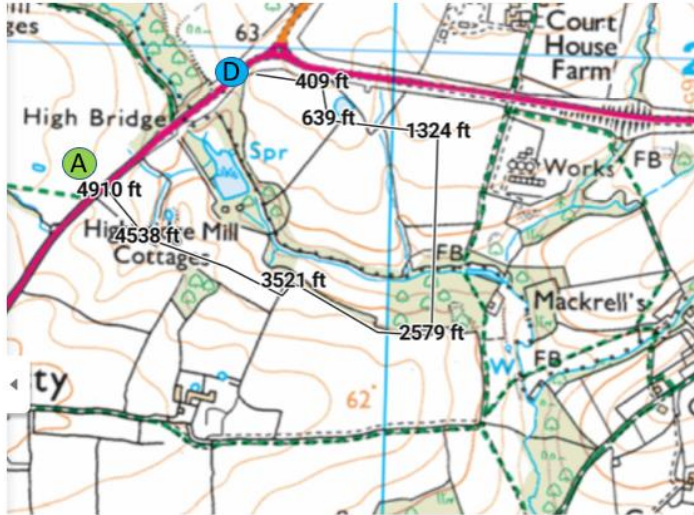
- M Cuckfield Medical Practice
- S Holy Trinity Primary School
- O Optometrist and Dentist
- P Pharmacist

Distance from P to M is ~2365 ft 0.72 km)

Climb from P to M is ~15 m

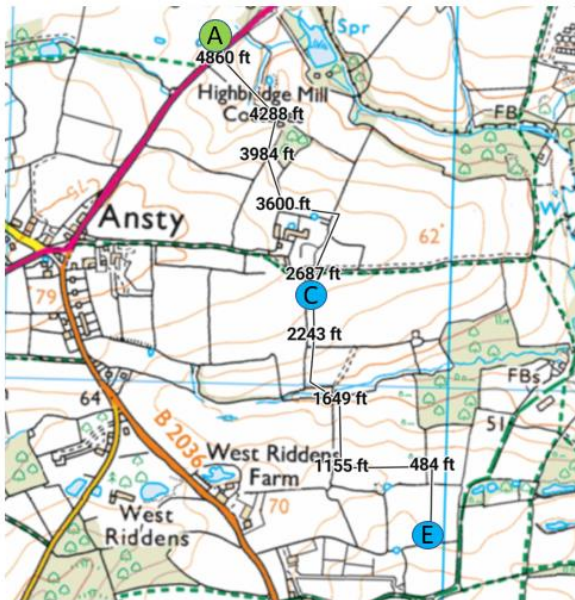
Descent from P to M is ~15 m

Indicative route from Dwelling D to signalised access point A, avoiding other access points which are not suitable for day-to-day use



- A** Signalised pedestrian access to site
 - D** Location of dwelling at North of site
- Distance from D to A is ~4910 ft (1.5 km)
 Climb from D to A is ~15 m
 Descent from D to A is ~15 m

Indicative route from Dwelling E to signalised access point A



- A** Signalised pedestrian access to site
 - C** Centre of site
 - E** Location of dwelling at South of site
- Distance from E to A is ~4860ft (1.48 km)
 Climb from E to A is ~25 m
 Descent from E to A is ~25 m

Travel time calculations based on a walking speed of 4.6 km/hr

Journey	Route	Distance	Climb	Decent	Time
		km	m	m	min
Entrance A to Dentist	A to O	1.44	55	10	19
Entrance A to Optomotrist	A to O	1.44	55	10	19
Entrance A to Pharmacist	A to P	1.44	55	10	19
Entrance A to Nisa Store	A to N	1.34	50	10	17
Entrance A to Secondary School	A to S	2.17	55	10	28
Pharmacist to Doctors	P to M	0.73	15	15	10
Centre of Site to Entrance A	C to A	0.62	0	10	8
Dwelling D to Entrance A	D to A	1.5	15	15	20
Dwelling E to Center of Site C	E to C	0.85	25	15	11
Dwelling E to Entrance A	E to A	1.47	25	25	19
Additional travel from D to A compared with C to A	D to A minus	0.88	15	5	11
	C to A				

Centre of Site to Pharmacist			
Route	Distance	Time	
	km	min	
Centre of Site to Entrance A	C to A	0.62	8
Entrance A to Pharmacist	A to P	1.44	19
Total	C to P	2.06	27

Dwelling D to Pharmacist			
Route	Distance	Time	
	km	min	
Dwelling D to Entrance A	D to A	1.50	20
Entrance A to Pharmacist	A to P	1.44	19
Total	D to P	2.94	38

Centre of Site to Doctor			
Route	Distance	Time	
	km	min	
Centre of Site to Pharmacist	C to P	2.06	27
Pharmacist to Doctors	P to M	0.72	10
Total	C to M	2.78	36

Dwelling D to Doctor			
Route	Distance	Time	
	km	min	
Dwelling D to Pharmacist	D to P	2.94	38
Pharmacist to Doctors	P to M	0.72	9
Total	D to M	3.66	48

Centre of Site to Nisa Store			
Route	Distance	Time	
	km	min	
Centre of Site to Entrance A	C to A	0.62	8
Entrance A to Nisa Store	A to N	1.34	17
Total	C to N	1.96	26

Dwelling E to Nisa Store			
Route	Distance	Time	
	km	min	
Dwelling E to Entrance A	E to A	1.50	20
Entrance A to Nisa Store	A to N	1.34	17
Total	E to N	2.84	37

Centre of Site to Secondary School			
Route	Distance	Time	
	km	min	
Centre of Site to Entrance A	D to A	0.62	8
Entrance A to Secondary School	A to S	2.17	28
Total	C to S	2.79	36

Dwelling E to Secondary School			
Route	Distance	Time	
	km	min	
Dwelling E to Entrance A	E to A	1.50	20
Entrance A to Secondary School	A to S	2.17	28
Total	E to S	3.67	48

APPENDIX B – SUPPORTING ECONOMIC ANALYSIS

We have investigated in detail the “significant” economic benefits claimed in the application namely:

- Operational worker expenditure in the Local Area of £360,000 per annum and
- Residents’ expenditure in the Local Area of £737,000 per annum

We acknowledge that economic forecasts are only as good as the assumptions and methodologies used to generate them. The only certainty is that whatever the results are, they only provide an indication of what might occur. In any economic analysis it is critical to: consider what is relevant or not; to use appropriate assumptions; to use consistent definitions and approaches and to acknowledge / take into account risks which may impact the forecasts. We perform a detailed economic analysis shown in below. In doing this we apply adjustments to operational worker and residential expenditure figures provided by the applicant.

Site adjustment factor

The methodology used by the applicant to calculate the £1.1 m per annum residential and operational worker spend is based on the expenditure spent locally and no distinction is made between expenditure at the Site and expenditure outside the Site in the local area (see para 4.10¹⁸ of the Economics report which simply says that £737,000 of spend is expected to be made by resident’s locally). This is confirmed in para 5.15 which states: *“This expenditure will not just be to the benefit of the new convenience store at the Proposed Development, but to existing retail in Cuckfield as well.”* Similarly, no distinction is made between expenditure at the Site and expenditure outside the site for the total residents’ expenditure of £360,000 pa

- Use of the term “Local Area” in the economic report **includes** the expenditure at the Proposed Development. However, the term “Local Area” is defined in Table 6.1 of the socio-economic report as: *“The immediate area surrounding the Site. In most instances, this will be the Cuckfield ward, although a bespoke Local Area definition may be utilised for the assessment of impacts on specific types of social infrastructure.”* This **excludes** the expenditure at the proposed Site
- The applicant’s planning statement describes *“The village core of the garden community is intended to provide for the vast majority of day to day amenities”*
- The majority of the day to day expenditure of residents and operational workers will (say 60%) will be at the Site.
- We assume a **40% Site adjustment factor** to account for the expenditure at the Site
- The importance of this is that the applicant seeks to show the wider public benefit of the development and this relies on expenditure **outside** of the site (i.e. in Cuckfield)

Local Area adjustment factor

We do not contend that expenditure will occur outside of the Site and this will be of benefit, but we disagree that this will primarily be in Cuckfield. We consider that Cuckfield is not within reasonable walking distance from the Site and it is most likely that residents would drive to access the facilities in the Local Area. We note that from a recent “health check” of the retail facilities in Cuckfield conducted for MSDC states as a key finding that “there is a lack of car parking within the centre and current on street car parking arrangements can create issues for congestion”. As Cuckfield lacks adequate car parking facilities, so it is likely that residents (once in their cars) would travel further afield to access facilities which would be outside of the “Local Area”. **We use a Local Area adjustment factor of 50% to account for this.**

¹⁸ Ansty Garden Community Economic Statement, Volterra, Oct 2023

Sensitivity of expenditure receptors

The applicant describes expenditure receptors based on spend in the Local Area (i.e. outside the Site and predominantly in Cuckfield). We disagree with the applicant that this receptor is a high sensitivity as this is based on the premise that the retail offer in Cuckfield requires revitalisation. The applicant makes a variety of statements and conducts analysis to support a notion that Cuckfield requires revitalisation:

- *“that Cuckfield is in significant need of convenience retail provision”* (para 5.10 of the Economics Report);
- *“revitalising local retail in Cuckfield to become a more vibrant place and fully support its new and existing residents”* (para 5.14) and
- *“This additional operational expenditure represents approximately 60% of what is currently spent in the Local Area annually and will be a significant benefit in revitalising Cuckfield village centre* (para 5.15).

The “Health Check” findings do not state that Cuckfield is in the need of revitalisation, merely that an additional store would increase diversity in the Centres’ retail offer. We therefore disagree that the sensitivity to this receptor is “high” and deem it to be “medium”

Key Takeaways	Having completed the health check assessment for Cuckfield Village Centre, the key takeaways include: <ul style="list-style-type: none">• Comparison stores are well represented, while the centre suffers from a lack of convenience stores with only two units identified in the overall composition. This was confirmed through the NEMS Household Survey and stakeholder engagement, when stakeholders identified that additional local grocery stores would provide increased diversity in the centre’s retail offer;• The centre benefits from an attractive environment, and it is a destination for both residents and tourists to visit;• There is a lack of car parking within the centre, and the current on street parking arrangement can create issues for congestion. Car parking management and traffic calming measures may need to be considered to assist in alleviating this issue.
----------------------	---

Extract from Mid Sussex Retail Study¹⁹ showing “Health Check” for Cuckfield Village Centre

A far more compelling economic argument to meet any perceived need to increase the expenditure in Cuckfield would be to meet the already identified requirement (of Cuckfield residents) of providing an additional grocery store(s) within Cuckfield Village Centre. If such a store was provided, then the expenditure in Cuckfield would naturally rise through increased spend by Cuckfield residents. If the Nisa store is used as a comparator, this has an income of around £200,000 per year. An additional similar store or stores within Cuckfield centre would naturally increase the spend in Cuckfield by a similar quantum as the total expenditure from residents and operation workers from the applicant’s proposed development in Cuckfield.

¹⁹ Mid Sussex Retail Study, Nexus Planning on behalf of MSDC, 2022

Claimed benefits arising from residents’ expenditure in the Local Area

- Para 4.10 of the economics report²⁰ states “Based on this, residents at the Proposed Development would be expected to spend £32.4m annually, with £737,000 spent locally.
- We argue that a more plausible value arising from residents’ expenditure in the Local Area is £147400 as shown below

Type	Annual Spend (365 days)	Site Correction	Local Area Correction	Annual Spend Cuckfield
Residents	737000	40%	50%	147400

- Although any expenditure is welcomed in the Local Area, we consider that produce a low impact on a medium sensitivity receptor producing a **minor (not significant) effect**

Claimed benefit arising from operational worker expenditure in the Local Area

- Para 4.7 of the Economics report states “it is estimated that the Proposed Development would generate between £360,000 - £400,000 in additional worker expenditure per annum based on the employment scenario compared to the existing Site”
- We argue that a more plausible value arising from operational worker expenditure in the Local Area is £32,000 as shown below
- Our starting point is to take the £360,000 figure provided by the applicant to calculate the daily expenditure for operational workers (as this is not provided in the economics or socio-economics reports).
- The economics report takes the assumption that 75% of workers spend money in the area near where they work based on a report written by the GLA (see Footnote 53 of the Economics report). So, if there are that 235 operational workers (para 4.6 of the Economics report) then 176 workers spend.
- We simply divide £360,000 by 176 to arrive at an annual spend of £2043 per operational worker, which is a daily spend of £9.30 a day based on 220 working days.
- We consider this daily spend figure to be large, given the occupations of the operational workers at the Site and the fact we are in rural Sussex and not in the CAZ which is described by the GLA as “London’s vibrant Centre”.
- We investigate the GLA report²¹ which states: “We have included two categories of worker expenditure: spend on lunch (£5.40 per day) and other office-related spend (including after-work drinks, clothing, technology, comfort items, gifts for colleagues, charity, equipment and stationery at £7.60 per day). Combined, this equates to an assumed worker expenditure of £13 a day or £2,940 per year.”
- The figure of £9.30 a day is lower than the £13 a day figure in the CAZ, but we note that the GLA figure includes significant office related spend, which is not applicable here. Furthermore: the access

²⁰ Ansty Garden Community Economic Statement, Volterra, Oct 2023

²¹ <https://data.london.gov.uk/dataset/lost-worker-tourism-expenditure-caz>

to facilities in central London; worker salaries; costs of goods, propensity to spend (i.e. the 75%) and the worker type is significantly different to the situation here.

- We use a more realistic figure of £5/day for the 155 workers involved in education, care-work and BTC and assume 50% of them will spend money each day and then assume that 75% of the 80 BTC/health workers spend and a figure of £8/day.
- Furthermore, there is no guarantee that all of the 80 BTC/health jobs will actually happen and this risk is not taken into account. Standard economic practice would require a discount to be applied to account for this and we assume a notional discount of 30%.
- Applying this approach we reach a figure of £160,000 for the benefits arising from operational worker expenditure per annum before applying the Local Area and leakage adjustments

Worker type	Unrisked No. workers	Risk Discount	Risk No. workers	Spend Discount	Workers who spend	Spend per day	Annual Spend (220 days)
Educational/care-work/BTC	155	0	155	50%	78	5	85250
BTC/health	80	30%	56	25%	42	8	73920
Total	235		211		120		159170

Calculation of the benefit arising from operational worker expenditure before applying Site and Local Area corrections

We now apply Site correction and Local Area correction to properly account for the expenditure outside of the Site and arrive at a figure of £31834 for the operational workers expenditure in the Local area before the leakage adjustment

Worker type	Annual Spend (220 days)
Educational/care-work/BTC	85250
BTB/health	73920
Total	159170

Site Correction	Local Area Correction	Annual Spend Cuckfield
40%	50%	17050
40%	50%	14784
		31834

Although any expenditure is welcomed in the Local Area, we consider that produce a low impact on a medium sensitivity receptor producing a **minor (not significant) effect**

Total benefits arising from operational worker and resident expenditure in the Local Area

Combining the operational worker (£32,000) and residential worker expenditure (£147,000) gives a total of £179,000 pa. Others may use different assumptions resulting in lower numbers.

APPENDIX C – SUPPORTING INFORMATION ON GP SERVICES

We have carried out research to look at the viability of small GP practices shown in here and have concluded that a small practice located on the site is not likely to be viable and sustainable. We consider it unlikely that such a site would be commissioned in the first place and, if it were, it would continually be under threat due to being sub-scale. A 3688 patient 2FTE GP facility in a rural location would be a complete outlier in the size and scale of GP practices in West Sussex. We consider that the viability of their proposed GP facilities have not been demonstrated as being feasible.

We use the most recent published information from the NHS Business Services Authority along with primary data published by GP practices to address the question whether a GP practice based at the proposed Ansty Community Site would be viable and create benefit to the residents of Sussex. We show that a GP practice at the Site would be sub-scale and cause a diversion of scarce GP resources from other areas in Sussex where they could be more effectively deployed, causing harm to the wider residents of Sussex. We show that a GP practice based at the Site would not be viable or sustainable and would soon face the risk of closure even if it was built - which would cause harm the Ansty Community Site and knock on effects for other local practices.

Practice Name	FQ GP FTE	Total No. Patients	Patients / FQ FTE GP	Patients per FQ FTE GP
MODALITY MID SUSSEX	9.0	30,859	3,427	3427
MID SUSSEX HEALTH CARE	8.9	21,142	2,378	2378
SILVERDALE PRACTICE	6.8	13,512	1,975	1975
MEADOWS SURGERY	6.0	10,128	1,699	1699
NEWTONS PRACTICE	5.8	13,218	2,279	2279
OUSE VALLEY PRACTICE	5.6	9,191	1,646	1646
CUCKFIELD MEDICAL CENTRE	5.1	12,648	2,466	2466
BROW MEDICAL CENTRE	4.8	7,127	1,489	1489
LINDFIELD MEDICAL CENTRE	4.4	11,248	2,547	2547
DOLPHINS PRACTICE	2.9	11,244	3,939	3939
NORTHLANDS WOOD SURGERY	2.7	8,938	3,278	3278
Grand Total	62	149255		

Table showing the number of patients per fully qualified FTE GP in for the 11 practices in Mid Sussex. Data taken from NHS Digital, Nov 2023. The highlighted column shows which practices are over the benchmark of 1800 patents per FQ FTE GP. Eight of the exceed this Figure, showing that GP Services in Mid-Sussex are under immense Strain. This corresponds to 72% of Practices in the District whereas the applicant considers this to be 8%²². By patient number, over 80% of patients in Mid Sussex are Currently Served by Practices which are over capacity,. This situation has got progressively worse over the recent years and trends show it will continue to deteriorate. The number of patients per FQ FTE GP we calculate is over 2400 in Mid Sussex District. This above the National current average of 2300 (Royal College of General Practitioners, Dec 2023)

Mid Sussex Region	
no of identified practices	11
av no GP per practice	5.6357
patients per GP	2407.6
av no patients per practice	13569

²² Health Impact Assessment, Land East of Ansty, Savills, October 2023

**RF2. Practice List
Size and GP
Count**

West Sussex

For Sep-23

Comm./Prov.	Code	Practice Name	Patients
NHS SUSSEX ICB - 7DF	HR2003	ADUR HEALTH PARTNERSHIP	36,265
NHS SUSSEX ICB - 7DF	HR2040	MODALITY MID SUSSEX	31,007
NHS SUSSEX ICB - 7DF	HR2004	LIVE TREE SURGERY	27,541
NHS SUSSEX ICB - 7DF	HR2017	PARK SURGERY	22,188
NHS SUSSEX ICB - 7DF	HR2057	WID SUSSEX HEALTH CARE	21,121
NHS SUSSEX ICB - 7DF	HR2045	WORTHING MEDICAL GROUP	20,855
NHS SUSSEX ICB - 7DF	HR2026	SAVONBROOK MEDICAL CENTRE	19,093
NHS SUSSEX ICB - 7DF	HR2058	BARKWOOD HEALTH CARE CENTRE	17,411
NHS SUSSEX ICB - 7DF	HR2052	POUND HILL MEDICAL GROUP	17,008
NHS SUSSEX ICB - 7DF	HR2025	WOODLANDS&CLERKLANDS PARTNERSHIP	16,315
NHS SUSSEX ICB - 7DF	HR2009	ETAWING SURGERY	16,290
NHS SUSSEX ICB - 7DF	HR2066	FITZALAN MEDICAL GROUP	16,149
NHS SUSSEX ICB - 7DF	HR2040	HOLBROOK SURGERY	15,811
NHS SUSSEX ICB - 7DF	HR2063	MOATFIELD SURGERY	15,780
NHS SUSSEX ICB - 7DF	HR2011	STRAND MEDICAL GROUP	15,600
NHS SUSSEX ICB - 7DF	HR2038	THE COURTYARD SURGERY	15,209
NHS SUSSEX ICB - 7DF	HR2065	BALL TREE SURGERY	14,279
NHS SUSSEX ICB - 7DF	HR2041	VICTORIA ROAD SURGERY	13,886
NHS SUSSEX ICB - 7DF	HR2055	BILLINGSURST SURGERY	13,799
NHS SUSSEX ICB - 7DF	HR2042	CATHEDRAL MEDICAL GROUP	13,628
NHS SUSSEX ICB - 7DF	HR2072	SILVERDALE PRACTICE	13,538
NHS SUSSEX ICB - 7DF	HR2012	LEACROFT MEDICAL PRACTICE	13,499
NHS SUSSEX ICB - 7DF	HR2013	LANGLEY HOUSE SURGERY	13,331
NHS SUSSEX ICB - 7DF	HR2070	GLEBE SURGERY	13,312
NHS SUSSEX ICB - 7DF	HR2007	WESTCOURT MEDICAL CENTRE	13,293
NHS SUSSEX ICB - 7DF	HR2016	BERSTED GREEN SURGERY	13,252
NHS SUSSEX ICB - 7DF	HR2038	FLANSHAM PARK HEALTH CENTRE	13,226
NHS SUSSEX ICB - 7DF	HR2030	PULBOROUGH MEDICAL GROUP	13,211
NHS SUSSEX ICB - 7DF	HR2056	NEWTONS PRACTICE	13,196
NHS SUSSEX ICB - 7DF	HR2032	RIVERBANK MEDICAL CENTRE	13,148
NHS SUSSEX ICB - 7DF	HR2014	CORPICE SURGERY	13,026
NHS SUSSEX ICB - 7DF	HR2005	CUCKFIELD MEDICAL CENTRE	12,658
NHS SUSSEX ICB - 7DF	HR2007	SELSEY MEDICAL PRACTICE	12,655
NHS SUSSEX ICB - 7DF	HR2077	THE CROFT SURGERY	12,271
NHS SUSSEX ICB - 7DF	HR2051	LAVANT ROAD SURGERY	12,165
NHS SUSSEX ICB - 7DF	HR2046	BROADWATER MEDICAL CENTRE	12,146
NHS SUSSEX ICB - 7DF	HR2022	STEYNING HEALTH CENTRE	12,014
NHS SUSSEX ICB - 7DF	HR2048	AVISFORD MEDICAL GROUP	11,809
NHS SUSSEX ICB - 7DF	HR2047	BRIDGE MEDICAL CENTRE	11,330
NHS SUSSEX ICB - 7DF	HR2044	DOLPHINS PRACTICE	11,308
NHS SUSSEX ICB - 7DF	HR2043	GROVE HOUSE SURGERY	11,270
NHS SUSSEX ICB - 7DF	HR2064	SOUTHGATE MEDICAL GROUP	11,265
NHS SUSSEX ICB - 7DF	HR2005	LINDFIELD MEDICAL CENTRE	11,245
NHS SUSSEX ICB - 7DF	HR2059	WILLOW GREEN SURGERY	11,178
NHS SUSSEX ICB - 7DF	HR2039	PARK SURGERY	10,984
NHS SUSSEX ICB - 7DF	HR2049	PARKLANDS SURGERY	10,026
NHS SUSSEX ICB - 7DF	HR2078	SOUTHBOURNE SURGERY	10,706
NHS SUSSEX ICB - 7DF	HR2005	WITTERINGS MEDICAL CENTRE	10,558
NHS SUSSEX ICB - 7DF	HR2062	VILLAGE SURGERY	10,528
NHS SUSSEX ICB - 7DF	HR2068	COACHMANS MEDICAL PRACTICE	10,355
NHS SUSSEX ICB - 7DF	HR2003	MEADOWS SURGERY	10,114
NHS SUSSEX ICB - 7DF	HR2060	HENFIELD MEDICAL CENTRE	10,062
NHS SUSSEX ICB - 7DF	HR2050	IFIELD MEDICAL PRACTICE	10,074
NHS SUSSEX ICB - 7DF	HR2089	RIVERSIDE MEDICAL PRACTICE	9,731
NHS SUSSEX ICB - 7DF	HR2020	BOGNOR MEDICAL CENTRE	9,379
NHS SUSSEX ICB - 7DF	HR2015	OUSE VALLEY PRACTICE	9,116
NHS SUSSEX ICB - 7DF	HR2100	NORTHLANDS WOOD SURGERY	8,986
NHS SUSSEX ICB - 7DF	HR2061	SELDEN MEDICAL CENTRE	8,934
NHS SUSSEX ICB - 7DF	HR2001	NEW POND ROW SURGERY	8,910
NHS SUSSEX ICB - 7DF	HR2036	ORCHARD SURGERY	8,897
NHS SUSSEX ICB - 7DF	HR2069	WEST MEADS SURGERY	7,781
NHS SUSSEX ICB - 7DF	HR2067	TANGWIERE MEDICAL CENTRE	7,663
NHS SUSSEX ICB - 7DF	HR2033	GOSSEPS GREEN MEDICAL CTR	7,556
NHS SUSSEX ICB - 7DF	HR2053	FURNACE GREEN SURGERY	7,295
NHS SUSSEX ICB - 7DF	HR2084	BROW MEDICAL CENTRE	7,078
NHS SUSSEX ICB - 7DF	HR2031	LORWOOD SURGERY	6,654
NHS SUSSEX ICB - 7DF	HR2088	BEBWUSH MEDICAL CENTRE	6,624
NHS SUSSEX ICB - 7DF	HR2021	ARUNDEL SURGERY	6,417
NHS SUSSEX ICB - 7DF	HR2066	THE PETWORTH SURGERY	6,086
NHS SUSSEX ICB - 7DF	HR2006	THE ORCHARD SURGERY	5,778
NHS SUSSEX ICB - 7DF	HR2004	COWFOLD SURGERY	4,891
NHS SUSSEX ICB - 7DF	HR2027	RUDGWICK MEDICAL CENTRE	4,038
NHS SUSSEX ICB - 7DF	HR2087	BARN SURGERY	3,942
NHS SUSSEX ICB - 7DF	HR2076	CORNERWAYS SURGERY	3,838
		ANSTY FARM DEVELOPMENT	3,500

Table showing the number of patients per practice for the 74 GP practices in West Sussex. Data taken from NHS Digital, Nov 2023. The highlighted row is the Proposed facility at the Site. This would be the smallest practice by patient number in West Sussex

Key Issues

- Evidence of pressures on GP practices²³ show that small practices are not sustainable and are subject to significant risk of closure
- We consider that the scale of the proposed facility (i.e. number of patients served and number of FQ FTE GPs) is unsustainably small.
- Residents at the site would be forced to use GP facilities elsewhere

- GP practices across the Country²⁴ and in particular West Sussex are under immense pressure, primarily due to the lack of fully qualified GPs
- The Royal College of General Practitioners²⁵, suggest a benchmark of 1800 patients per Fully Qualified GP FTE
- The applicant argues that there is capacity at Cuckfield Medical Practice quoting a number of 1,370 patients per GP (see Table 5-4 in the Health Impact Assessment)
- They further argue that in Mid Sussex only 8% of the GP practices are above this benchmark ratio (see para 5.5.4 of the HIA)
- Our analysis of information from NHS for practices in Mid Sussex shows that over 72% of practices exceed this benchmark capacity. Indeed over 80% of residents are served by practices which are above this benchmark.

- The applicant themselves in the Socio-Economics Report (para 6.5.39) report argues that there would be a medium impact on the demand for GP services due to the development
- The applicant argues that this risk would be mitigated by the provision of GP services at the Site
- which we have shown would be at the risk of closure if indeed they were built
- Residents would need to travel, presumably to Cuckfield Medical Practice (CMP), to secure GP services.
- The applicant states that CMP is 1.2 Miles (2 km) from the Centre of the proposed Site and that this distance is acceptable to walk.
- We dispute this and our analysis shows that CMP is circa 2.8 km from the Centre of the proposed Site
- The applicant does not demonstrate that CMP would have the capacity nor is readily accessible by foot or wheeling for residents at the development

- Due to the pressures on the NHS, particularly in relation to the provision of GP services both in the county and nationally it is essential that the provision of services are properly planned for.
- This speculative development is outside of both the existing and emerging Mid Sussex District Plans and is not catered for in the Infrastructure Development Plan for the District
- As this is a speculative development, outside of these plans, it is necessary for the applicant to fully justify how the GP services they propose will be delivered and why scarce resources should be prioritised to support their development.
- Given this and the unsustainability of the Site as shown above, a full statement of support for their proposals from the NHS commissioning authorities is necessary to accompany the application.
- Such a statement is not provided by the applicant and so we conclude that the GP services as proposed are not viable/fully supported and the application does not meet the requirements of a sustainable development as required by the NPPF.

²³ <https://www.pulsetoday.co.uk/analysis/lost-practices/why-gp-practices-close-for-good/>

²⁴ <https://www.bma.org.uk/advice-and-support/nhs-delivery-and-workforce/pressures/pressures-in-general-practice-data-analysis>

²⁵ NHS, 2009. HUDU Planning Contribution Model Guidance Notes