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Dear Sally & Andrew,

Letter of representation to MSDC for Site Allocations DPD: Response on behalf of Glenbeigh Developments Ltd and Wortleford Trading Company Ltd for the Mid Sussex District Council draft Site Allocations DPD public consultation

Please accept this letter as our formal representation on behalf of our client's Glenbeigh Developments Ltd and Wortleford Trading Company Ltd, in response to the Draft Site Allocations DPD (Regulation 18) which allocates the Land North of the A2300, as the preferred site for a Science and Technology Park (S&TP).

In summary, we support the Councils draft document that identifies our Site, as the preferred site for the Science and Technology Park in the draft Site Allocations Development Plan Document, under policy SA9 (Science and Technology Park). The proposal policy requires the site to accommodate a minimum of approximately 2,500 new jobs within the business sector, encouraging innovation growth and knowledge based businesses comprising that which fits within the definition of a 'Science Park' as stated in **Policy DP1: Sustainable Economic Development** of the Mid Sussex District Plan 2014-2031 (Adopted March 2018).

We also believe that our site is able to meet the strategic objectives set out in Policy DP1 which are central to the S&TP allocation, which require the allocation to are:

To promote a place which is attractive to a full range of businesses, and where local enterprise thrives; and

To provide opportunities for people to live and work within their communities, reducing the need for commuting".

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As identified in our SHLAA submissions we consider our site as the most suitable option for this allocation and we have adequately demonstrated that it is available, deliverable and achievable. We believe that our proposal meets with the requirements set out in policy DP1 and associated District Plan policies, demonstrating a sustainable economic development which will support the District's communities and local economy whilst protecting and enhancing the District's valued landscapes and environment.

To provide further clarity and detail, our representation is also supported by a Positioning Document which demonstrates our design evolution through our masterplan. The positioning document assists in providing plans and images that support the vision for our site to the north of the A2300, proposing up to 1.4 million sq ft of floorspace for employment and supporting uses.

A raft of supporting evidence has also been collated by our consultants in regard to transport and sustainable access, air quality, flood risk & water management, landscape & visual impact, design and phasing and market requirements. Technical reports will be made available electronically to support this representation

In regard to the specific requirements as set out in policy SA9, we believe that our development can achieve the following:

Objectives

- *Proposals will comprise employment accommodation capable of accommodating a minimum of approximately 2,500 jobs.* In line with our positioning document we anticipate an employment density of between 2325-5280 jobs to be accommodated
- *Proposals must demonstrate that the development would comprise uses falling within the definition of a Science Park: a business support environment that encourages and supports the start-up, incubation and development of innovation-led, high-growth, knowledge-based businesses. This is alongside any appropriate ancillary uses.* Our proposal demonstrates 35% B1a offices, 15% B1b high-tech, 50% R&D/Manufacturing B1c as well as incubation units and nursery units, hotel, creche, local store and café and other amenities within a Pavilion building.

Phasing

- *Development is to be phased in accordance with a Phasing Strategy which will have been submitted to and approved by the local planning authority.* Our positioning document demonstrates a 10+ year development programme and assumes a 2-3 year roll out for each phase aligning with market demand and infrastructure capacity. Each phase is indicated as circa 200,000-300,000 sqft.
- *The Phasing Strategy must set out any transport mitigation required to enable each phase to be delivered, including measures to mitigate impacts on the local and Strategic Road Network.* Further information on matters of transport are provided both within our technical evidence base by Connect and our positioning statement and summarised in our technical response, below.

Urban Design Principles

- *Development must be of high quality design and layout, in accordance with DP26: Design.* Please see our positioning statement and section 6 of our technical response below, for further details regarding this matter.
- *Landmark buildings should be located in prominent locations, to ensure high visibility from the A2300, where possible in accordance with Landscape, Biodiversity and Green Infrastructure Considerations.* Further information regarding landscape, setting, natural resources and design are detailing in our positioning statement.
- *Provide and integrate high quality public realms, including public areas containing ancillary uses.* Please refer to sections in our positioning statement relating to design and additional comment in our technical response below, regarding the Councils emerging Design Guide SPD.
- *Ensure the design is sensitive to the overhead power lines within the northern part of the site, including area of easement and explore opportunities for their diversion or placement underground.* This has been considered as an essential part of our concept drawing and design evolution.

Landscape, Biodiversity and Green Infrastructure Considerations

- *Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to minimise impact on views from the wider countryside to the south and to ensure the proposed development would not be dominant in the landscape.* This has been provided by Pegasus Group, submitted as part of our technical evidence base.
- *Retain the existing woodland to the east and retain and enhance existing mature trees and landscaping along the boundaries and within the site, incorporating them into the landscape structure and layout of the development.* This is clarified on our masterplan.

Historic Environment and Cultural Heritage

- *Archaeological pre-determination evaluation and appropriate mitigation may be required.* This will be undertaken as the formal planning process develops.

Sustainability

- *Provision of electric vehicle charging points in accordance with the Council's adopted standards.*
- *Ensure the design would make the development future-ready for improvements in technology and sustainability such as (but not limited to) green technology, artificial intelligence and automation*
- *Development to be built in accordance with DP39: Sustainable Design and Construction and DP42: Water Infrastructure and the Water Environment.*

Issues regarding EVCP, innovation and technology, and environmental sustainability are identified in more detail in our positioning statement.

Highways and Access

- *Provision of sustainable transport measures and other infrastructure requirements, including measures to mitigate impacts on the local and Strategic Road Network.*
- *Demonstrate that access can be achieved to the satisfaction of the highway's authority, minimising disruption and delay on the A2300 and surrounding roads.*
- *Provision of new bus routes or diversion of existing routes to connect with key hubs including railway and bus stations and Burgess Hill town centre.*
- *Provision of new pedestrian and cycle links to ensure connectivity with the Northern Arc, The Hub (south of A2300), Burgess Hill and surrounding countryside.*
- *Provision of pedestrian and cycle connectivity with Bolney Grange Business Park*
- *Provision of car parking and cycle storage in accordance with the Council's adopted standards.*

Further information regarding sustainable transport, highways improvements and mitigation, bus cycle and pedestrian links, and connectivity to surrounding areas are further considered in the positioning statement.

Flood Risk and Drainage

- *The northern boundary of this site is within Flood Zones 2/3 and therefore should not be developed.*
- *A site-specific Flood Risk Assessment will be undertaken to inform the site layout and any appropriate mitigation measures that may be necessary.*
- *Proposals must incorporate Sustainable Drainage Systems (SuDS) as an integral part of the Green Infrastructure and open space proposals to mitigate flood risk and improve biodiversity and water quality.*

To support this development further assessment on flood risk and water management, including SUDS, has been included and work undertaken by Bradbrook Consulting. For further detail see our technical evidence base.

In addition, it is acknowledged that the site is located within the boundary for the Hurstpierpoint and Sayer Common Parish Neighbourhood Plan 2031 (Made March 2015). Therefore, our proposed development is compliant with relevant polices set out in this Neighbourhood Plan in addition to the Mid Sussex District Plan 2014-2031 (Adopted March 2018). This is discussed in more detail in section 6 of this letter.

Our positioning document also outlines our commitment to ensuring our site embraces its unique opportunities and innovation in reducing energy use, re-using waste products and enhancing recycling. Further opportunities are being sought relating to energy use, transportation and water and to ensure the park is future ready for green technology, AI and automation aligning with market requirement progressions and those of potential clients. This includes opportunities sought to mobilise green technologies through connections with the neighbouring Solar farm, Southern Waters operation, Waste Allocation and potential



future phases of work on adjacent land to further embrace sustainability. These will be incorporated through carefully considered design and a green ethos, central to the delivery of a S&TP development.

In particular, our site can facilitate the WSCC Waste Local Plan (2015) allocation of around 5 ha of land within our site boundary for non-municipal solid waste. Accordingly, there is scope to utilise this existing relationship to create a co-located facility for commercial waste, also benefiting the wider strategic 'Hub' and 'Northern Arc' developments.

Furthermore, there is potential to connect with solar energy on land in the ownership of our clients, surrounding and near to the site. This comprises a site to the west on Land at Bob Land and Chapel Road, Twineham (planning ref: DM/15/0644) and a site within our allocation boundary on Land to the North of the A2300 Cuckfield Road, Ansty, West Sussex (planning ref: DM/18/3617). Both these sites have been granted permission for Solar Photovoltaic panels and are owned by our clients, showing their commitment to clean energy technologies and existing expertise that will enable our site to successfully incorporate solar energy into the fabric of development.

A key area of focus for us is the delivery of sustainable transport measures and access, to minimise the identified impact on local and strategic road networks and provide commuters with alternative modes of transport to car-travel, with a significant modal shift. This will be benefiting to the health and wellbeing of the District's local communities and natural environment.

We believe that our proposal as demonstrated in our positioning statement, further supports our allocation within the Site Allocations DPD as the preferred S&TP site, and hope that this letter and the following technical appendices as a response to each of the MSDC reports, further addresses the specific findings of the Mid Sussex Evidence Base, aligning with the councils aspirations to deliver this strategic S&TP allocation.

Further to our recent meetings and discussions, we would also like to confirm that, as stated in our technical appendices, that given the SYSTRA modelling used, we are also are that further transport assessments using a like for like comparison which be undertaken, that we believe will further support the existing conclusions that our site will have a lesser impact whilst providing greater employment floorspace than the site to the south.

Moreover, our commitment to sustainable transport options which is central to our proposal, will allow us to further exploit our locality as a continuum of the Northern Arc, to create a well-connected network of sustainable development that will enable the creation of sustainable communities and support the District's local economy whilst also protecting the Districts valued landscape, in particular the Ashdown Forest SAC.

We strongly believe that our site will be able to deliver a genuinely sustainable and future-proofed economic development, consistent with the District's aspirations over the plan period, and beyond, to support its local communities and local economic growth. Given this we have indicated a phasing plan that allows development to be brought forward in key phases and allows them to be aligned with any relevant road infrastructure

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requirements needed. In this regard our phasing looks to deliver the 1million sq ft within the plan period with additional land in phases 4 & 5 being able to be outside the plan period, if required to support key infrastructure delivery.

We are grateful for the opportunity to comment on the site allocation DPD and the supporting design guide in the following appendices and should you have any further questions regarding our site's suitability and its unique opportunity, please do not hesitate to contact us.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S Holloway'.

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Technical response to MSDC documents and site allocations DPD.

1. Response to the MSDC Sustainability Appraisal (Incorporating Strategic Environmental Assessment)

- 1.1 Paragraph 1.53 of the Site Allocations DPD Sustainability Appraisal (SA) states that “both sites are of a similar size, approximately 50ha and propose comparable levels of employment” and therefore, both sites are considered as Reasonable Alternatives for assessment. However, the Proformas submitted for the ‘Call for Sites’ show that the northern site is 49 hectares whereas the site to the south is 37 hectares and therefore, would likely propose comparably less employment floorspace than the northern site.
- 1.2 The SA concludes that whilst both sites perform similarly in regard to employment opportunities, the site to the north performs more positively in terms of environmental sustainability objectives specifically relating to flood risk, ancient woodland and highways.
- 1.3 Transport presents the most significant disparity in terms of the SA, highlighting that our site is anticipated to have less impact on junction capacity compared to the southern site. In

addition, the proposed access arrangements for the northern site are more favourable due to a less harmful impact on the A2300 traffic flow.

- 1.4 The SA concluded that, in sustainability terms, our site to the north performs more positively than the site to the south, against the 16 assessment objectives identified on pages 32-35 of the SA. These 16 objectives are detailed below to illustrate how we have approached each of these objectives in our proposal, to overcome some of the issues and challenges identified within the District over the plan period. These objectives align with our concept strategy to enable the delivery of a sustainable development based on social, environmental and economic priorities.

Housing – No impact or neutral impact on sustainability objective

- 1.5 The first objective is ‘**Housing**’ which aims to ensure that everyone in the District has the opportunity to live in a home suitable for their needs and which they can afford. Whilst there is no direct action here, we acknowledge the housing proposed on the nearby Northern Arc strategic allocation and consider this an important material consideration for our site to establish a relationship with local residents and contribute to meeting local employment need. Our position, north of the A2300 is advantageous for connectivity with the Northern Arc site, enabling sustainable and safe accessibility for pedestrians and cyclists.

Health - No impact or neutral impact on sustainability objective

- 1.6 The second objective is ‘**Health**’ which seeks to improve the access to health, leisure and open space facilities and reduce inequalities in health. Again, there is no direct correlation for our site albeit, our proposal seeks to promote sustainable travel modes through pedestrian and cycle routes; this will encourage healthier lifestyles for users of the site and local residents. Again, with adjacent residential properties and the provision of support facilities such as a creche, we can ensure a sustainable development that enhances wellbeing to its local employees, reducing commuting, and enhancing the local natural features to provide pocket parks and green links.

Education – Positive impact on sustainability objective

- 1.7 The third objective is ‘**Education**’ which seeks to maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities. Both sites scored positively on this objective given the proposed links to educational establishments which will improve employment opportunity post-education. We believe our commitment to work with Universities and Higher Education establishments to enable skilled and graduate work placed positions within the S&TP will support a much need skills gap, alongside critical partnering with commerce and education providers.

Retail - Positive impact on sustainability objective

- 1.8 The fourth objective ‘**Retail**’ seeks to improve access to retail and community facilities. Again, both sites scored positively on this objective due to opportunity for small-scale retail and community facility provisions on-site, as an ancillary use to employees and local residents. Our proposal recognises the location of the site and the scale of proposed development and supports provisions for small scale facilities to complement the needs of the employees without competing with local retail facilities and town centres.

Communities - Positive impact on sustainability objective

- 1.9 The fifth objective ‘**Communities**’ aims to create safe and crime resistant communities, and encourage social cohesion, reducing inequality. In addition, this objective promotes integration with existing towns and villages whilst retaining separate identities. Our site scores positively on this objective due to our connection with the Northern Arc strategic site. A key theme in our proposed concept is ‘connectivity’ illustrating our ability to develop upon existing rights of ways with the surrounding areas. This includes pedestrian and cycle connection with the Northern Arc and Hub development to the south west, Bolney Industrial Estate to the east as well as sustainable bus and train connection to Burges Hill town centre and beyond. This further enhances our opportunities over the site to the south, by virtue of our connectivity and accessibility.

Flood risk – Negative impact on sustainability objective

- 1.10 ‘**Flood Risk**’ as objective six aims to ensure that development does not take place in areas of flood risk, or where it may cause flooding elsewhere (taking into account and aiming to reduce the potential impact of climate change), to minimise the detrimental impact of flood events on public wellbeing, the economy and environment (SEA). Whilst there is a negative scoring for both sites by default of areas of flood zone 2/3 within both sites’ boundaries, the southern site is scored as significantly negative as it presents a higher risk of flooding than the northern site. However, we acknowledge that the northern boundary of our site is a flood risk area and therefore, our proposal encompasses mitigation strategies to alleviate such risk. Our consultants have undertaken further work to support our proposal and this is submitted in full as part of our supporting evidence base for this representation.

Land Use - Negative impact on sustainability objective

- 1.11 The ‘**Land Use**’ objective 7, seeks to improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings, and encourage urban renaissance. Whilst, this objective presents inherent difficulties for both sites which propose development on greenfield land development, the site to the north also includes potential areas of brownfield sites within the wider area that could be included as the site develops, reusing the Westbourne Motor site which is within our client’s ownership. In addition, given the nature of development there is significant opportunity to offset the impact

of greenfield development through carefully considered and innovative design, layout and landscaping, whilst recognising that the land is of low agricultural grade (CW to confirm). Further consideration of how the site can utilise its location adjacent to the water treatment works, the adjacent solar farms and existing uses, as well as the current waste allocation, also offers further scope to re-use and recycle building materials.

Biodiversity - Negative impact on sustainability objective

- 1.12 The eighth objective is '**Biodiversity**' which seeks to conserve and enhance the District's biodiversity (SEA). Our site scored negatively again due to greenfield location and therefore requires appropriate mitigation. However, it presents less impact on biodiversity than the southern site which scored significantly negative due to having Ancient woodland within the site which further restricts development potential, requiring a 15m buffer for development. Our proposal adopts a green ethos into the core of design to enhance biodiversity on site and retain where possible and enhance the site's natural resources and characteristics, especially with regard to its green heart, green infrastructure and use of the watercourse as a positive ecological feature.
- 1.13 In addition, careful consideration has been given to minimise impact on Ashdown Forest SAC through the integration of sustainable travel options to reduce where possible, additional car-travel in the vicinity of Ashdown Forest as a result of commuting and commercial vehicles associated with the S&TP. Further information will be available from our supporting air quality assessment undertaken by RPS as part of a hybrid planning application. This will include a detailed assessment of air quality impacts on the various ecological receptors in both the construction and operational phase of development and include effects from construction dust, construction-vehicle exhaust emissions as well as traffic generation from the built development.

Countryside - Negative impact on sustainability objective

- 1.14 The ninth objective is '**Countryside**' which seeks to protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes (SEA). Both sites score negatively again as a result of the significant development proposed on greenfield land. Accordingly, ensuring the appropriate mitigation is implemented is crucial to minimise impact on the landscape and setting. We have demonstrated through a Land and Visual Impact Assessment produced by Pegasus, that our site's typography limits views onto and surrounding the site for up to 5 storey buildings without mitigation. However, our proposal does not exceed 4 storeys and carefully incorporates landscaping detail which would further mitigate impact on landscape and visual setting of development. Our allocation would also ensure that the "gap" between the existing and emerging development at the Northern Arc and Bolney

Industrial Park is utilised retaining the open character of the land to the South, where less development surrounds the site.

Historic - No impact or neutral impact on sustainability objective

- 1.15 The tenth objective is '**Historic**' which aims to protect, enhance and make accessible for enjoyment, the District's historic environment (SEA). Given that there are no listed buildings or Conservation Areas within or near to our site, no impact is expected.

Transport – Uncertain or unknown impact on sustainability objective

- 1.16 The eleventh objective is '**Transport**' which aims to reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car, thereby reducing the level of greenhouse gases from private cars and their impact on climate change (SEA). This is a key objective for ensuring the sustainability of the S&TP allocation, given the scale and nature of development proposed. We have undertaken extensive work to ensure that our site is sustainable both in terms of accessibility, road capacity and travel options. This is further outlined in our positioning document and supporting report by Connect Consultants. This is to ensure that we delivery on the District Plan's aspiration to enable local employment and reduce the need for single use car commuting as well as minimise impact on local air quality and travel times.

Energy & Waste – Positive impact on the sustainability objective

- 1.17 The twelfth objective is '**Energy/Waste**' which seeks to increase energy efficiency and the proportion of energy generated from renewable sources in the District, utilise sustainably produced and local products in new developments where possible, and reduce waste generation and disposal. Our site scored positively for this objective as a result of opportunities available to utilise solar energy. In addition to this, there is scope to explore connections with the neighbouring Southern Water operations as well as the Waste Allocation on our site. Given our clients existing delivery experience and land ownership, we consider that the scope to explore renewable energy and waste schemes is significantly more positive than any alternative site, as detailed in our positioning statement.

Water - Uncertain or unknown impact on sustainability objective

- 1.18 '**Water**' Objective 14 seeks to maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management (SEA). The scoring for this objective is uncertain at this stage as although water usage will increase as a result of development, there is scope to address and incorporate measures to minimise impact. Our proposal incorporates a strategy to increase water efficiency and water management, as considered further in Bradbrooks report. The neutral impact on flood risk and

maintenance of the watercourse to the north should also be considered further under this objective.

Regeneration - Significant positive impact on the sustainability objective

- 1.19 Objective 14 '**Regeneration**' seeks to encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres. Both sites score equally positively for this objective. However, the provision of the S&TP in principle and the alignment with the strategic development adjacent to our site, would increase opportunities for connectivity for local employees and existing and emerging facilities.

Employment - Significant positive impact on the sustainability objective

- 1.20 Objective 15 '**Employment**' aims to ensure high and stable levels of employment so everyone can benefit from the economic growth of the District. Both sites score equally positively for this objective. However, we propose a higher total amount of floorspace for employment use and are well-located as a continuum of the Northern Arc allocation. Therefore, we consider our site to presents greater scope for increasing local employment levels for Mid Sussex residents in particular, in areas of high-skilled employment which is a key aspiration of the District Plan.

Economic Growth - Significant positive impact on the sustainability objective

- 1.21 The sixteenth objective is '**Economic growth**' which seeks to sustain economic growth and competitiveness across the District, protect existing employment space, and to provide opportunities for people to live and work within their communities therefore, reducing the need for out-commuting. Both sites score equally positively for this objective. However, with our site demonstrating the net increase in 1.4 million sqft of employment floorspace, and therefore a higher job ratio, as well as scope for new, innovative businesses within the District, we believe our site provides greater certainty for the significant contribution to the economic growth within the District over the plan period.

Sustainability Assessment Summary

- 1.22 In summary, the northern site scores the same as the southern site in housing, health, education, retail, land use, countryside, historic, water, regeneration, employment and economic growth objectives. Moreover, the northern site scores more positively than the southern site in communities, flood risk, biodiversity, transport and energy/waste objectives. However, the southern site does not score more positively than our site to the north in any of the objectives.

- 1.23 In addition, our site proposes a higher level of employment footprint on a larger site area. Therefore, we consider that our site presents a more positive impact on employment and economic growth objectives, especially given that our site presents a more positive impact also on environmental objectives, comparative to the southern site.
- 1.24 Therefore, our ability to provide a development which is able to deliver on economic growth and employment whilst also conserving and enhancing our environment, is a significant advantage that will support sustainable communities in the District. This considers the compatibility of the SA objectives as outlined in paragraphs 5.7-5.9 of the SA, further supporting our proposals ability to achieve a planning balance in minimising environmental impact and delivering on economic growth. We therefore consider that given the justification above the SA scoring that differentiates the sites should be considered further for the regulation 19 stage.

Response to the MSDC Site Selection Paper 4: Employment

Science Park

- 2.1. The Site Selection Paper 4: Employment (SSP4) considers both sites against a set of site selection criteria. As outlined in table 7 of the SSP4 (pg.13) below, the three key areas where our site surpassed the site to the south were flood risk, ancient woodland and highways, albeit the differences were marginal at this stage by virtue of the two sites close proximity.

| Site Selection Criteria | Difference |
|-----------------------------|--|
| 2 – Flood Risk | The southern option (site 801) contains an area of flood zone 2/3 running along the southern boundary. There is a significant section in the western part of the site which may impact on any proposed access from Pookebourne Lane. The northern option (site 949) contains an area of flood zone 2/3 running along the northern boundary but no other areas of flood risk within the site boundary. |
| 3 – Ancient Woodland | The southern option (site 801) contains a large area of ancient woodland in the south-eastern corner, development would need to avoid this area and not take place within 15m of it. The northern option (site 949) is not affected by ancient woodland. |
| 10 – Highways | The Mid Sussex Transport Model (2019 Update) tested each scheme individually (Scenarios 2 and 3). The modelling concluded that there are fewer instances of 'severe' impact on junctions for the northern option (11), compared to the southern option (12), prior to any mitigation. This is despite the northern option proposing more growth within the plan period than the southern option due to their different phasing strategies. |

Table 7: Science and Technology Park – Site Selection Criteria Conclusions

- 2.2. This identifies the most significant disparity between both sites as 'impact on junction capacity'.

- 2.3 Due to the marginal difference identified in the initial assessment, additional information was requested to inform the decision process for the most suitable site. This further supports our site as the preferred option for this allocation, including 14 criteria as identified in paragraph 5.14 of the SSP4 and summarised in Appendix 2 of the SSP4.
- 2.4 The overall conclusion reached in the SSP4 on the S&TP was that our site to the North of the A2300 was the preferred allocation. Paragraph 5.41. of the SSP4 highlights highway capacity and access, connectivity with the Northern Arc, and the deliverability of the site due to ownership, as the key distinctions that set our site above the southern site. These are summarised below and on pages 15-17 of the SSP4:

Transport

- Site to the north proposed upgrades to the existing Cuckfield Road junction whereas the site to the south proposes creating a new junction on the A2300 which may disrupt traffic flow and cause delay
- Land required to delivery proposed access arrangements for the north site, is owned by the client and therefore, is deliverable
- Mid Sussex Transport Model shows lesser impact for the north site in terms of impact on highways and junction capacity

Connectivity

- Co-location of the northern S&T park and Northern Arc scheme which proposed 3,500 homes provides greater opportunity and sustainable connections including safe pedestrian and cycle links
- Northern site provides greater opportunity to extend links into Bolney Grange Business Park
- These comprehensive links to housing growth and employment lad better reflects the District Plan objectives and support sustainable transport links

Other Matters

- The level of detail provided in Masterplanning helps to show the opportunities and weaknesses of a site
- Northern site master plan sets out the sites ability to respond to challenges and make the most of opportunities including the demonstrating mitigation for environmental constraints which are significant for the quantum of development proposed for a S&T park development
- In addition, northern site master plan proposes a location of flagship building to respect landscape and setting whilst being prominent and visible, and sets out potential phasing strategy; this information not yet available for southern site proposal

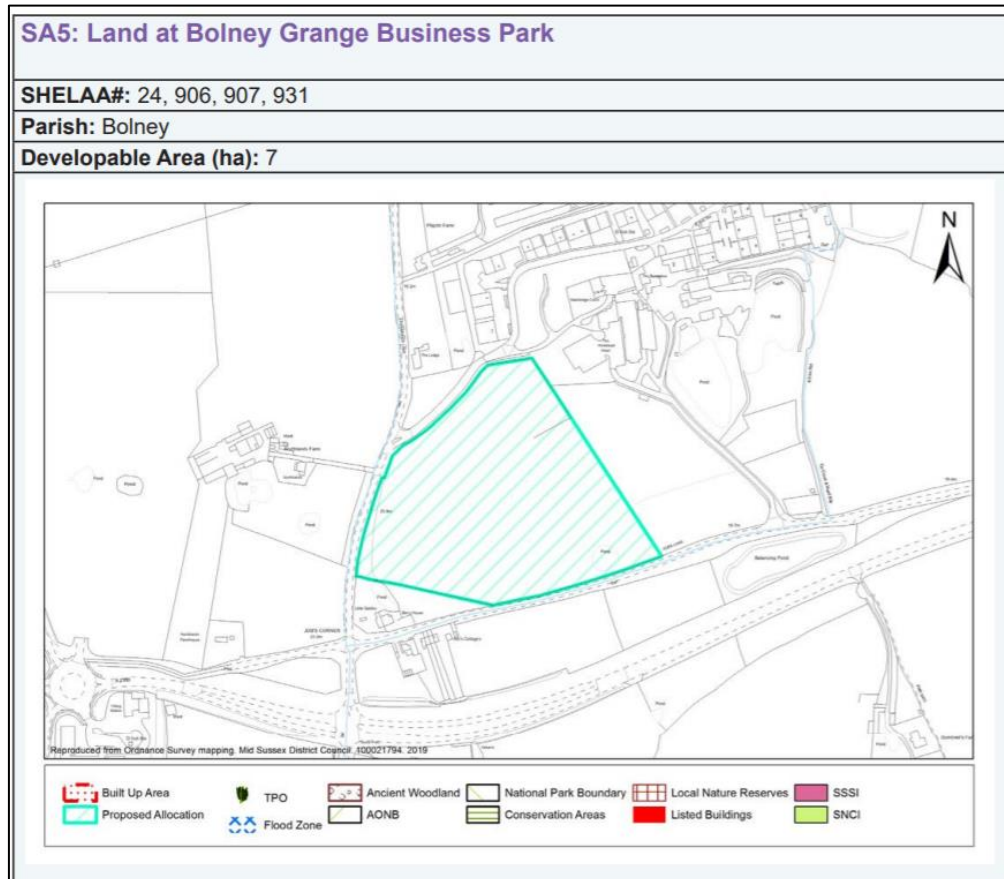
- 2.5 The key differences which remain following the additional information, were on matters of transport and connectivity. These are discussed in more detail in the following sections with

specific reference to the relevant DPD policies and supporting evidence base as well as further, more detailed evidence supporting the Council's decision to allocate the site to the north of the A3200.

- 2.6 Paragraph 5.44. of SSP4 states: *"The conclusion reached is a marginal one, however the distinction in transport terms is a key determining factor. Whilst the southern site option is not proposed for allocation at this time, it is not ruled out indefinitely and may therefore be revisited should the need/demand for more employment land in this location be required in the future (for instance, during the District Plan review or other subsequent reviews)"*
- 2.7 Whilst it is acknowledged that the initial assessment for the northern and southern site does not appear to identify huge disparities, we believe there are some key distinctions drawn from the supporting evidence base for this site selection, that validates our site as the preferred option.
- 2.8 Our more detailed response above to the SA, and our more detailed evidence base to be submitted to support this representation, as well as our positioning document therefore, address further why our site is considered to be more suitable for the S&TP allocation, over the southern site and endorses the MSDC decision to cite the northern site as its Preferred Location.
- Employment allocations**
- 2.9 In addition to the strategic allocation of the S&TP for over 1,000,000 sqft of floorspace, the SSP4 assesses site allocation options for the provision of an additional 10-15ha of employment land over the plan period.
- 2.10 This includes a cluster of sites to the north of the A2300 and immediately adjacent to our site which have been identified as new employment allocations. The allocation of these sites presents further localised development surrounding our site that could provide opportunity to further enhance employment provisions. These sites are:
- Undeveloped land (south) at Bolney Garage Business Park, Stairbridge Ln, Bolney Grange, which is a 0.6 ha site (SHELAA ref 906)
 - Undeveloped land (east) at Bolney Grange Business Park, Stairbridge Ln, Bolney Garage, which is a 0.2 ha site (SHELAA ref 907)
 - Land at Stairbridge Lane (South of Bolney Grange), Bolney which is a 5.5ha site (SHELAA ref 24)
 - Extension (east) at Bolney Grange Business Park, Stairbridge Lane, Bolney, which is a 0.7ha site (SHELLA ref 931)
- 2.11 These sites are allocated in the draft DPD Policy SA5: Land at Bolney Grange Business Park as a total developable area of 7ha. However, the map accompanying this policy does not appear

to include all four site areas therefore, we request for Regulation 19 that there is further clarification on this to ensure the proposed site boundaries re clearly identified.

- 2.12 However, we see the addition allocation also further strengthens the role, opportunity and connectivity of the site to the North of the A2300.



3 Response to the SYSTRA Mid Sussex Transport Study

- 3.1 To support the Site Allocations DPD, Mid Sussex District Council commissioned SYSTRA to run a strategic highway model to inform and update the Mid Sussex Transport Study (MSTS).
- 3.2 Connect Consultants has undertaken a review of the MSTS modelling evidence base, and has prepared a Technical Note which outlines the findings of the review, and which provides further evidence in support of the Project Newton site as the preferred location for the S&TP.
- 3.3 The Connect Consultants Technical Note (12th November 2019) is submitted in conjunction with this letter; it is summarised in the following paragraphs.

- 3.4 A total of eight future development scenarios were tested against a 2031 Reference Case Scenario including up-to-date highway infrastructure and development commitments and background growth, acting as a baseline for assessing the impact of proposed site allocation development.

Selection of S&TP North Site compared to South Site

- 3.5 Scenarios 2 and 3 of the MSTs were used for the comparative assessment of the northern and southern sites for the S&TP allocation, whereby the Project Newton site to the north of the A2300 is included in Scenario 2, and the site to the south of the A2300 is included in Scenario 3.
- 3.6 The MSTs focussed on Scenario 2c, which includes the upgrading of the A2300/Cuckfield Road roundabout to a 'hamburger' roundabout, which is one of the three proposed vehicular access options suggested in pre-application discussions between the Project Newton team and WSCC.
- 3.7 The scale and mix of uses of the S&TP differ between Scenario 2c and Scenario 3, with Scenario 2c assessing a larger quantum of S&TP development on the north site and Scenario 3 assessing a smaller quantum S&TP on the south site.
- 3.8 The south site is assessed with c.35-40% less traffic than the Project Newton site, but nonetheless the modelling results show that the Project Newton site (Scenario 2c) will have less traffic impact than the south site.
- 3.9 As the north and south site options were not assessed on a like-for-like basis, it is probable that the results of the traffic impact comparison are skewed in favour of the smaller development quantum of the south site, and it is therefore likely that a true like-for-like assessment would demonstrate that there is a greater difference between the two, in favour of the Project Newton site.
- 3.10 The Project Newton team has commissioned SYSTRA to undertake an additional round of strategic traffic modelling to include a more realistic like-for-like assessment, in which the two potential locations of the S&TP are compared using the same scale and mix of uses in both locations; the only difference being the sites' access arrangements and the associated difference in traffic distribution.
- 3.11 It is likely that the additional modelling will show a greater difference in traffic impact in favour of the Project Newton site.
- 3.12 Connect Consultants will prepare a Technical Note to set out the results of the like-for-like traffic impact comparison. It will also include a junction capacity assessment of the proposed Project Newton access junction.

Assessment of the Refined Scenarios Incorporating the Project Newton Site.

- 3.13 The MSTs Scenarios 7 and 8 represent the assessment of the refined, most up-to-date scenarios which have informed the Draft Site Allocations DPD. Both of these scenarios include the Project Newton site to the north of the A2300 as the preferred S&TP allocation.
- 3.14 Scenarios 7 and 8 are assessed initially without any traffic mitigation beyond the planned and committed improvements included in the Reference Case; an additional 'with mitigation' assessment has been undertaken of each of Scenarios 7 and 8, which tests the ability of various mitigation measures to remove 'severe' impacts at junctions.
- 3.15 The SYSTRA MSTs modelling report "Transport Impact of Scenarios 7 and 8" notes that without mitigation, both scenarios generate significant additional traffic, notably on the A2300 and surrounding roads, and the A23/A2300 junction.
- 3.16 This is attributed by SYSTRA to the traffic associated with the S&TP, and the recommendation is made by SYSTRA that mitigation measures should focus on the impact at the A23 / A2300 junction.
- 3.17 The results of the 'with mitigation' assessment show that 'severe' impacts are predicted at just two junctions, as opposed to eight junctions in the scenario without mitigation:
- A272 / B2036, Ansty
 - A23 / A2300 southbound on-slip, Burgess Hill
- 3.18 SYSTRA notes that a 10% reduction in the predicted future traffic (i.e. 65 fewer) on the A23/A2300 southbound on-slip could remove the 'severe' impact, which is predicted predominantly in the PM peak hour.
- 3.19 The SYSTRA 'with mitigation' modelling assumes that there will be three sustainable mitigation measures associated with the S&TP, which will reduce predicted S&TP traffic by 3%.
- 3.20 The proposed Project Newton Sustainable Access Strategy is far broader than the three measures assumed in the modelling and will provide additional benefits to the wider population which would achieve a wider-reaching regional mode-shift than just the S&TP users.
- 3.21 By virtue of the site's proximity to the Northern Arc development, there will be a synergy between the public transport strategies for the two developments.
- 3.22 As such, it is entirely feasible that the 10% reduction of predicted future traffic using the A23 / A2300 southbound on-slip, as cited by SYSTRA, will be realised in the advent of the Project Newton S&TP.

- 3.23 The Project Newton Phasing Strategy will incorporate flexibility in terms of scale and timing of each phase, in conjunction with traffic modelling and transport assessment, and through ongoing engagement with WSCC, Highways England, and local bus operators, to ensure that each phase can be acceptably accommodated and is appropriately mitigated.

4 Response to the Habitats Regulations Assessment (Footprint Ecology)

- 4.1 The HRA produced by Footprint Ecology, in Table 2 'Screening for likely significant effects' of the Habitats Regulations Assessment (HRA) of the Mid Sussex Site Allocations identifies that the allocations for a Science and Technology Park will have a likely significant effect on air quality implications for Ashdown Forest Special Area of Conservation (SAC). This is because the proposed development is anticipated to create approx. 2,500 jobs which will likely increase traffic generation to and from the site. Whilst not within close proximity to Ashdown Forest SAC, a notable increase in traffic generation could impact on traffic volumes within the vicinity of the Ashdown Forest SAC as a result of commuting and commercial vehicles.
- 4.2 A Science and Technology Park development of this scale and nature is a significant creation of new employment floorspace and therefore, some traffic generation increase is inevitable. We have incorporated the appropriate mitigation measures and strategy into our proposal which will minimise the potential impact of additional traffic volumes in the vicinity of the Ashdown Forest SAC
- 4.3 Paragraph 6.2 of the HRA states: – *“The screening for likely significant effects has not identified any individual policy issues that pose a risk to European sites, rather the screening has flagged that the overall quantum of development requires further detailed assessment to consider the implications of growth for Ashdown Forest SPA/SAC in terms of air quality and recreation pressure impacts. These topics are assessed in further detail in the appropriate assessment sections of this HRA report”*
- 4.4 Policy DP17 (Ashdown Forest SPA and SAC) of the District Plan seeks to prevent adverse effects on the Ashdown Forest from new development likely to have significant effect. The policy states that *“Large schemes proposed adjacent or close to the boundary of the 7km zone of influence may require mitigation for the SPA. Such proposals for development will be dealt with on a case-by-case basis”*.

- 4.5 Habitats assessment work will continue to build on existing assessment to inform the next plan-making stages therefore the Habitats and Regulation report will require updated and expanding as DPD progresses to inform the Reg 19 stage of plan making.
- 4.6 Therefore, we are undertaking further assessment that forms part of our positioning document and will develop further as part of Regulation 19 stage and formal planning submission.

5 Response to Air Quality Assessment (Wood Environment and Infrastructure Solutions Ltd)

- 5.1 As part of the DPD assessment, Air quality modelling was carried out by Wood to assess Scenarios 7 and 8 from the Transport Modelling. Both of these scenarios considered the Project Newton site.
- 5.2 Wood's Air Quality Assessment considers that there are not expected to be any exceedances of the annual-mean nitrogen dioxide (NO₂) objective of 40µg.m⁻³ at sensitive human receptors within Stonepound Crossroads Air Quality Management Area (AQMA) for Scenarios 7 and 8, and impacts are predicted to be 'negligible'. As these modelled scenarios include the Project Newton development, it can be inferred that the Project Newton development would not have a significant air quality effect on receptors within the Stonepound Crossroads AQMA. Nevertheless, this AQMA is approximately 5 km south of the proposed development site and air quality impacts at sensitive human receptors in the vicinity of the site would require assessment as part of the hybrid planning application.
- 5.3 With regard to the Ashdown Forest ecological site, the predicted change in traffic flows associated with proposed site allocations could adversely impact on sensitive habitats and species within the ecological site. Wood's Non-Technical Summary (para 3.4.) advises that further assessment by qualified ecologists is required as part of the HRA to ensure the appropriate mitigation is proposed by them, where necessary.
- 5.4 Chapter 7 of the Ashdown Forest Scenarios 7 and 8 Results concluded that:

"In terms of nitrogen deposition, the change in deposition values associated with the MSDC site allocations traffic is below the 1% of critical load change indicating insignificant impacts to sensitive species and habitats at all transect points for Scenario 7, but this threshold is exceeded at Transects T5 and T6 at the kerbside for Scenario 8 site allocations.

As expected, and advised by Natural England, the highest predicted concentrations and deposition values were located on the A26 (Transect T12). As demonstrated, even though Scenarios 7 and 8 contain different site allocations, in terms of air quality, the modelled results from the two scenarios are very similar, and the conclusions only change very slightly concerning nitrogen deposition.

Overall, it is concluded that the potential for significant impact to air quality posing a risk to sensitive species at Ashdown Forest has been identified and, in line with IAQM Position Statement, assessment by a qualified ecologist is required.”

- 5.5 Therefore, we are undertaking further assessment that forms part of our positioning document and will develop further as part of Regulation 19 stage and formal planning submission.

6 Additional Relevant Policies

In addition to the evidence base, it is also important to ensure that our emerging development is still District Plan policy compliant. This following section deals with key policies in turn as well as the emerging alignment with the Design Guide also currently out for consultation that would be considered as more detailed proposals for the site develop as part of the formal planning process.

Mid Sussex adopted District Plan (2015)

Design and Connectivity

- 6.1 Policy DP26 (Character and Design) of the Mid Sussex District Plan 2014-2031 seeks to ensure new development adopts high quality design that reflects the distinctive character of local settlements and is sensitive to the countryside.
- 6.2 In accordance with policy DP26, proposals for the Science and Technology Park must demonstrate that development:
- *“is of high quality design and layout and includes appropriate landscaping and greenspace;*
 - *contributes positively to, and clearly defines, public and private realms and should normally be designed with active building frontages facing streets and public open spaces to animate and provide natural surveillance;*
 - *creates a sense of place while addressing the character and scale of the surrounding buildings and landscape;*

- *protects open spaces, trees and gardens that contribute to the character of the area [...];*
- *creates a pedestrian-friendly layout that is safe, well connected, legible and accessible;*
- *incorporates well integrated parking that does not dominate the street environment [...];*
- *positively addresses sustainability considerations in the layout and the building design; [...]*
- *optimises the potential of the site to accommodate development”.*

6.3 Other key landscaping policies in the District Plan which we have and will continue to consider in our proposals are:

DP37: Trees, Woodland and Hedgerows which provides guidance for the required management for protection and enhancement of trees, woodland and hedgerows in new development proposals – Ancient Woodland and aged or veteran trees will be protected in particular.

DP38: Biodiversity which sets out how new development should protect and enhance biodiversity to ensure there is not net loss of biodiversity and where possible a net gain in biodiversity.

6.4 In addition, the Draft Mid Sussex Design Guide SPD Consultation (2019) recently published for public consultation, will form a key document for our proposal ensuring high quality and sustainable design. The design principles outlined in this SPD will guide and inform aspects of layout, building design and landscaping for our proposal, taking into consideration the specific context of our site, in a countryside location. This will be addressed in more detail as part of the formal application.

6.5 Whilst the location of this development is accepted in principle as it is situated within the broad location allocated for the Science Park in the District Plan, we recognise that this is a countryside location and therefore want to ensure that development is considerate of its setting especially given the scale and nature of an allocation this significant. Therefore, our proposal seeks every opportunity to protect and enhance the landscape and habitats within and adjacent to our site boundary.

- 6.6 This will be achieved through a carefully designed layout, respecting of the mature hedgerows and tree clusters along the site boundaries and surrounding areas. The development will be sensitively design giving careful consideration to ‘setting’ and seek to maximise the protection and enhancement of its countryside locations.
- 6.7 Specific landscaping details will be covered in the formal application for our development however, we consider the initial Masterplanning completed at this stage to highlight our aspirations for achieving a high-quality and sensitively designed development that successfully integrates into the wider landscape. Support for this is supported further in the LVIA, and the plans within the positioning document.
- 6.8 In addition, the Hurstpierpoint and Sayer Common Parish Neighbourhood Plan 2031 (Made March 2015) identifies an Area of Countryside Restraint and our site is include within this area. Therefore, development is required to comply with Policy C1 (Conserving and enhancing character) which states that development will be permitted in the countryside where:
- “• It comprises an appropriate countryside use;
• It maintains or where possible enhances the quality of the rural and landscape character of the Parish area”*
- 6.9 This reinforces the integral importance of delivering a high-quality and sensitively designed development that will protect and enhancement the surrounding landscape. Accordingly, design will continue to form a central part of the Masterplanning concept forwarded for our site to ensure the delivery of a genuinely sustainable development aligned with the District Plans aspirations.
- 6.10 We believe that our site’s co-location with the Northern Arc – a mixed use scheme proposing 3,500 new homes – further strengthens its position and opportunity to deliver a sustainable development.
- 6.11 With the Northern Arc is situated to the north of the A2300 and adjacent to the eastern boundary of our site, this creates a linear connection between two significant strategic sites within the District, enabling sustainable travel routes which will encourage pedestrian and bicycle assess onto and off site. This supports the District Plan in meeting objectives as outlined in paragraph 1.3. in terms of promoting sustainable communities through the sustainable location of housing and employment development and therefore supporting the District’s local economy and sustainable transport initiatives.

Climate Change

6.12 Key climate change policies in the District Plan which we have and will continue to consider in our proposals are:

DP39: Sustainable Design and Construction which seeks to ensure that new development is sustainable and should be appropriate and feasible in type, size and location of minimise risks associated with future climate change, incorporating the following measures:

- “• Minimise energy use through the design and layout of the scheme including through the use of natural lighting and ventilation;*
- Explore opportunities for efficient energy supply through the use of communal heating networks where viable and feasible;*
- Use renewable sources of energy;*
- Maximise efficient use of resources, including minimising waste and maximising recycling/ re-use of materials through both construction and occupation;*
- Limit water use to 110 litres/person/day in accordance with Policy DP42: Water Infrastructure and the Water Environment;*
- Demonstrate how the risks associated with future climate change have been planned for as part of the layout of the scheme and design of its buildings to ensure its longer term resilience”*

DP42: Water Infrastructure and the Water Environment which sets out the requirements that new development must accord with in regard to the Water Framework Directive and Gatwick Sub Region Water Cycle Study, so to demonstrate:

- “• that sufficient capacity already exists off-site for foul and surface water provision. Where capacity off-site is not available, plans must set out how appropriate infrastructure improvements approved by the statutory undertaker will be completed ahead of the development’s occupation; and*
- that there is adequate water supply to serve the development”.*

For non-residential building, policy DP42 requires a minimum standard of ‘Good’ with regard to the BREEAM targets for water consumption for this development type.

6.13 Our development incorporates a green ethos at the centre of the proposal and will be carefully designed to ensure that development is energy, waste and water efficient and able to keep up with market requirements as technology advances.

- 6.14 In addition, there is opportunity to mobilise green technologies on the site through connections with the neighbouring Solar farm and Southern Water operations immediately adjacent. The close proximity of our site to these operations presents a unique opportunity to mobilise green technologies on-site and ensure the development is consistent with the District Plan's aims and objectives in achieving sustainable development.
- 6.15 This includes opportunity for solar energy on land in the ownership of our clients, surrounding and near to the northern site. This includes a site to the west on Land at Bob Land and Chapel Road, Twineham (planning ref: DM/15/0644) as well as land within our site boundary on Land to the North of the A2300 Cuckfield Road, Ansty, West Sussex (planning ref: DM/18/3617). Both these sites have been granted permission for Solar Photovoltaic panels and are owned by our client, showing our clients commitment to clean energy technologies as well as their existing expertise to enable our site to successfully incorporate solar energy into the fabric of development.
- 6.16 A green ethos as a focal point for a development of this scale is fundamental to ensure that the Districts vision and objectives are met and that this strategic allocation contributes significantly to the creation of a place that is attractive for businesses across a range of sectors, and where local enterprise will thrive, providing opportunity for people to live and work within the district and reducing the need to commute. Again, further details on the vision for our site that address our approach to environmental sustainability are covered further in our supporting positioning document.

7 Conclusion

- 7.1 It is acknowledged that whilst our site to the north of the A2300 is proposed as the preferred allocation for the Science and Technology Park, the determining factors for this decision were marginal and therefore, the potential exists for the site to the south to be revisited as the preferred allocation.
- 7.2 Our covering letter and its supporting information set out the key opportunities and strengths to support our site as the preferred site for a Science and Technology park allocation, in accordance with District Plan policies and the MSDC evidence base, aligning with local, and regional aspirations.

- 7.3 We consider that one of the most significant impacts for any S&TP location, is on visual impact and on transport and highways. However, we believe on both key factors, there would be a lesser impact as a result of the northern site allocation, and we have demonstrated preferred design solutions which will respect the setting of the site, and its co-location with adjacent uses, and minimise impact on local and strategic road networks.
- 7.4 As stated in Section 3, additional MSTs traffic modelling has been commissioned, to include a more realistic like-for-like assessment, in which the two potential locations of the S&TP are compared using the same scale and mix of uses in both locations.
- 7.5 We will continue our dialogue with MSDC, WSCC, and HE, with regard to the use of the MSTs traffic data to inform future transport assessment, junction capacity testing, and the phasing strategy as the Project Newton development progresses.
- 7.6 Moreover, our commitment to sustainable transport options is central to our proposal which exploits our locality as a continuum of the Northern Arc, to create a well-connected network of sustainable development that will enable the creation of sustainable communities and support the District's local economy whilst also protecting the District's valued landscape, in particular the Ashdown Forest SAC.
- 7.7 We strongly believe that our site will be able to deliver a genuinely sustainable and future-proofed economic development, consistent with the District's aspirations over the plan period, and beyond, to support its local communities and local economic growth.
- 7.8 The positioning document and evidence base documents which accompany this letter highlight in more detail, our commitment to incorporating a green ethos at the centre of our design concept of development, whilst carefully considering the surrounding landscape to minimise impact on the setting of development as well as protect and enhance the District's valued landscape environment.

November 19th 2019