



Site Allocations Development Plan Document

Statement of Consultation

Regulation 18

August 2020

Contents

1.0	Introduction	2
2.0	When was the consultation for the draft Site Allocations DPD (Regulation 18)?	2
3.0	Which bodies and persons were invited to make representations?.....	3
4.0	How those bodies and persons were invited to make representations?.....	3
5.0	Summary of the main issues raised by those representations and how those main issues have been addressed	4
6.0	Next stage of the Site Allocations DPD.....	6
Appendix 1	Bodies and persons invited to make representations.....	7
Appendix 2	Community Involvement Plan (September 2019)	11
Appendix 3	How the requirements of the Community Involvement Plan have been met	16
Appendix 4	Summary of Responses (Regulation 18).....	17

1.0 Introduction

- 1.1 The District Plan 2014-2031, adopted in March 2018, sets out a commitment for Mid Sussex District Council (the 'Council') to prepare a Site Allocations Development Plan Document (DPD). The Site Allocations DPD has four main aims:
- (i) To allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan;
 - (ii) To allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development;
 - (iii) To allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development, and
 - (iv) To set out additional Strategic Policies necessary to deliver sustainable development.
- 1.2 Following consultation on the draft Site Allocations DPD between October to November 2019, the Site Allocations DPD has now reached the 'proposed submission' stage of the plan-making process.
- 1.3 Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 requires the publication of the proposed submission documents and a statement of representations procedure prior to the Submission of the Site Allocations DPD for Examination.
- 1.4 One of the proposed submission documents is a statement that sets out:
- (i) Which bodies and persons were invited to make representations under Regulation 18,
 - (ii) How those bodies and persons were invited to make such representations,
 - (iii) A summary of the main issues raised by those representations, and
 - (iv) How those main issues have been addressed in the [Site Allocations DPD].
- 1.5 This Statement of Consultation for Regulation 18 shows how these requirements have been met.

2.0 When was the consultation for the draft Site Allocations DPD (Regulation 18)?

- 2.1 The draft Site Allocations DPD was considered by the Scrutiny Committee for Housing, Planning and Economic Growth on the 11th September 2019. The Scrutiny Committee recommended to Council that the draft Site Allocations DPD should be subject to a six-week public consultation. Council approved the draft Site Allocations DPD for public consultation at its meeting on the 25th September 2019.

- 2.2 The Council carried out a public consultation for the draft Site Allocations DPD for six weeks from the 9th October to the 20th November 2019.
- 2.3 Alongside the draft Site Allocations DPD, the following documents were published for consultation:
- Sustainability Appraisal (and Non-Technical Summary)
 - Habitats Regulations Assessment (and Non-Technical Summary)
 - Policies Maps
- 2.4 Supporting background documents were also made available to view on the website.

3.0 Which bodies and persons were invited to make representations?

- 3.1 Appendix 1 lists the bodies and persons invited to make representations at the Regulation 18 stage.
- 3.2 The following bodies and persons were directly contacted:
- 77 statutory consultees (78 contacts)
 - 54 Members of Mid Sussex District Council (Councillors)
 - 159 organisations (207 contacts)
 - 164 individuals
- 3.3 Those not directly notified of the draft Site Allocations DPD were also able to submit a representation during the consultation.

4.0 How those bodies and persons were invited to make representations?

- 4.1 The Community Involvement Plan sets out how those bodies and persons were invited to make representations under Regulation 18. The Community Involvement Plan (September 2019) is set out in Appendix 2.
- 4.2 A table demonstrating how the requirements of the Community Involvement Plan were met is set out in Appendix 3.
- 4.3 The documents were made available on a dedicated section of the Council's website¹.
- 4.4 The documents were also made available at the following deposit points:
- Burgess Hill Help Point
 - East Grinstead Help Point
 - Haywards Heath Help Point
 - Libraries – Burgess Hill, East Grinstead, Hassocks, Haywards Heath and Hurstpierpoint
- 4.5 A total of 503 subscribers to the Mid Sussex Planning Policy e-mail update were notified of the draft Site Allocations DPD consultation by e-mail. This list consists of

¹ <https://www.midsussex.gov.uk/planning-building/development-plan-documents/>

individuals, organisations, Members of Mid Sussex District Council (Councillors) and specific consultation bodies that have provided an e-mail address.

4.6 Representations could be made in writing by:

- Post
- E-form
- E-form in Microsoft Word format
- E-mail to LDFconsultation@midsussex.gov.uk

4.7 Letters and hard copies of the consultation documents were sent to each Member of Mid Sussex District Council and each MP serving any part of Mid Sussex district. Town and Parish Councils also received a letter and hard copies of the consultation documents.

4.8 Exhibition boards presenting a summary of the key points of the Site Allocations DPD and the consultation were displayed in the District Council's reception and libraries:

Location	Dates of Display
Burgess Hill Library	10 th October – 8 th November 2019
East Grinstead Library	4 th November – 8 th November 2019
Hassocks Library	10 th October – 20 th November 2019
Haywards Heath Library	10 th October – 1 st November 2019
Hurstpierpoint Library	11 th November – 20 th November 2019
Mid Sussex District Council Offices	10 th October – 20 th November 2019

5.0 Summary of the main issues raised by those representations and how those main issues have been addressed

5.1 Just over 1,300 respondents made 2,124 individual comments on the document and supporting evidence (including the Sustainability Appraisal and Habitats Regulations Assessment).

5.2 Of the comments received:

- 115 were in support
- 90 were neutral
- 1,919 were objections, predominantly from residents to the proposed sites.

5.3 In terms of the respondents:

- 19 were from Town and Parish Councils. Every Town and Parish Council within the district responded aside from Balcombe, Lindfield, Lindfield Rural and Twineham and those within the South Downs National Park. Additionally, comments were received from Ditchling and Wivelsfield Parish Councils within neighbouring Lewes District.
- 8 responses were received from neighbouring authorities, including West Sussex and East Sussex County Councils, Horsham, Lewes, Tandridge and Wealden.

- 12 responses were received from ‘Specific Consultation Bodies’, including Natural England, Historic England and infrastructure providers.
- 88 responses were submitted by site promoters who have their sites allocated in the DPD, or those promoting alternative (omission) sites.
- 30 were received from organisations, local interest groups, and developers.
- Approximately 1,200 were from individuals.

5.4 All representations made at the Regulation 18 consultation stage were considered by Councillors at the following meetings of the Scrutiny Committee for Housing, Planning and Economic Growth and Council. Copies of the reports considered at these meetings are available on the Council’s website.

Meeting	Date	Subject of Meeting
Scrutiny Committee for Housing, Planning and Economic Growth	22 nd January 2020	Response to draft Site Allocations DPD Consultation (Regulation 18)
Scrutiny Committee for Housing, Planning and Economic Growth	11 th March 2020	Site Allocations DPD – Regulation 19
Council	22 nd July 2020	Site Allocations DPD – Submission Draft (Regulation 19)

5.5 Appendix 4 summarises the broad themes and issues arising from the consultation responses, by site and policy within the draft Site Allocations DPD. A more detailed schedule which includes each response received is available in the background paper ‘Draft Site Allocations DPD – Regulation 18 Consultation Report’ published on the Council’s website².

5.6 The listed actions to address the objections have been taken into account for the Regulation 19 version of the Site Allocations DPD. The changes are reflected within the submission draft (Regulation 19) Site Allocations DPD. This can be summarised as follows:

- **Amendments to policy wording** – to add clarity or additional requirements to site policies, following comments received during consultation.
- **Assessment of newly submitted housing and employment sites** – during consultation, 20 new housing sites and 8 new employment sites were submitted to the Council for consideration. These have been assessed using the same site selection process as all previous sites and corresponding updates have been made to Site Selection Papers 3 & 4. Following this assessment none of the additional sites submitted was concluded to be suitable for inclusion in the Site Allocations DPD.

² <https://www.midsussex.gov.uk/planning-building/development-plan-documents/>

- **Assessment of ‘Omission Sites’** – during the consultation, 58 site promoters objected on the grounds that their sites, previously assessed through the Site Selection process, had not been selected for allocation and included in the Regulation 18 Site Allocations DPD. Most responses provided additional evidence in support of their proposals. Although factual errors have been corrected and sites re-assessed this work has not resulted in a change to the submission draft Site Allocations DPD. Therefore, none of the 58 Omission Sites is proposed for inclusion in the submission draft Site Allocations DPD.
- **High Weald AONB: ‘Major’ Impact Assessment** – In their response to the Regulation 18 consultation, Natural England and the High Weald AONB Unit required the Council to carry out an assessment to determine whether any of the proposed sites within the AONB could be defined as ‘major’ development, in accordance with para 172 of the NPPF. The 11th March Scrutiny Committee report details the findings of this assessment. Only the proposed allocation SA25: Selsfield Road, Ardingly (100 dwellings), was considered to be major development. An alternative proposal for 70 dwellings was re-assessed and this was not considered to be major. The yield for this site has therefore been reduced. The High Weald AONB Unit and Natural England have indicated that the revised allocation would significantly reduce the impact of the proposed development on the AONB and are happy with this approach.
- **Transport** – The Scrutiny Committee report of the 11th March details the updated transport evidence that accompanies the submission draft Site Allocations DPD to address comments made during consultation. This includes a revised Strategic Transport Assessment (February 2020), prepared by transport consultants SYSTRA and in close co-operation with West Sussex County Council and Highways England given their technical expertise and responsibilities.

6.0 Next stage of the Site Allocations DPD

- 6.1 The submission draft Site Allocations DPD was approved for public consultation at a meeting of Council on the 22nd July 2020. The Regulation 19 public consultation will be for eight weeks between the 3rd August and the 28th September 2020.
- 6.2 Following the public consultation, the submission draft Site Allocations DPD will be submitted to the Secretary of State for Examination.

Appendix 1 Bodies and persons invited to make representations

Statutory Consultees

Adur and Worthing Councils
Albourne Parish Council
Ansty and Staplefield Parish Council
Ardingly Parish Council
Arun District Council
Ashurst Wood Village Council
Avison Young
Balcombe Parish Council
Bolney Parish Council
Brighton and Hove City Council
British Telecom
BT Plc
Burgess Hill Town Council
Burstow Parish Council
Chailey Parish Council
Coast 2 Capital
Colgate Parish Council
Cowfold Parish Council
Crawley Borough Council
Cuckfield Parish Council
Danehill Parish Council
Ditchling Parish Council
Dormansland Parish Council
East Grinstead Town Council
East Sussex County Council
EE
EMF Enquiries - Vodafone and O2
Environment Agency
Felbridge Parish Council
Fletching Parish Council
Forest Row Parish Council

Fulking Parish Council
Hassocks Parish Council
Haywards Heath Town Council
Highways England
Historic England
Homes and Communities Agency
Horsham and Mid Sussex CCG
Horsham District Council
Horsted Keynes Parish Council
Hurstpierpoint & Sayers Common Parish Council
Lewes District Council
Lindfield Parish Council
Lindfield Rural Parish Council
Lower Beeding Parish Council
Mobile Operators Association
National Grid
Natural England
Natural England
Network Rail (Kent, Sussex, Wessex)
Newtimber Parish Council
NHS Horsham and Mid Sussex
Poynings Parish Council
Pyecombe Parish Council
Savills (UK) Limited (Thames Water)
Shermanbury Parish Council
Slaugham Parish Council
South Downs National Park Authority
South East Water
Southern Gas Network
Southern Water
Surrey County Council

Sussex Police
Sussex Police
Sutton and East Surrey Water
Tandridge District Council
Three
Turners Hill Parish Council
Twineham Parish Council
UK Power Networks

Upper Beeding Parish Council
Wealden District Council
West Hoathly Parish Council
West Sussex County Council
Wivelsfield Parish Council
Woodmancote Parish Council
Worth Parish Council

Organisations

1952
AB Planning & Development Limited
Action in rural Sussex
Agri-Matters
Albourne Parish Council
Analytica Business Solutions
ARUN Land & New Homes
ASP
Avison Young
Balcombe Estate
Balcombe Parish Council & Balcombe Estate
Barton Willmore
Batcheller Monkhouse
Beacon Planning
Berkeley Homes (Southern) Ltd
Blue Cedar Homes
Boakes Land Projects Ltd
Boyer
British Horse Society
Brown & Co
Burgess Hill Business Park Association
Burgess Hill Town Council
Burgess Hill U3A
CALA Homes

Campaign to Protect Rural England - Sussex Branch
Carter Jonas
Catesby Estates
CBRE
Chilmark Consulting Ltd
Chris Carey Associates Ltd
Church Lands
Clarion Housing Group
Clifford Dann LLP
Countryside Properties
Courtley Planning Consultants Ltd
Crawley Down Monday Club
Crest Nicholson
Croudace Homes
Cuckfield Parish Council
DevAssist
Devine Homes
DevPlan
DHA Planning
Dixon Searle Partnership Ltd
DMH Stallard
Domus
Dowsett Mayew
DPDS Consulting Group

Emery Planning
Enplan UK Ltd
Fluid Design Group
Friends of Burgess Hill Green Circle Network
Fulking Parish Council
Future Planning and Development
Gatwick Airport Limited
Gatwick Airport Ltd
GL Hearn
Gladman
Glenbeigh Developments Ltd
Hallam Land Management
Hassocks and Hurst Lib Dems
Hastings Borough Council
Haywards Heath Golf Club Ltd
Haywards Heath Society
Henry Adams LLP
High Weald AONB Partnership
Hill & Company (Sussex) Limited
Home Group
Horsted Keynes Parish Council
Hume Planning Consultancy Ltd
Hurstpierpoint and Sayers Common PC
IDE Planning
IQ Planning Consultants
Jackson Planning Ltd
Judith Ashton Associates
Kember Loudon Williams
Kitewood
Lewis & Co Planning
Lichfields
Lindfield Parish Council
LocatED
Martin Lacey Buckley Limited
MCC

Mellish Homes Ltd
Mid Sussex Alliance of Local Councils
Mid Sussex District Council
Mid Sussex District Council - Land Charges
Millwood Designer Homes
My Neighbourhood Plan
National Grid
National Trust
Nexus Planning
Notcutts Limited
Obsidian Strategic
OSP Architecture
Parker Dann
Paul Newman Property Consultants Limited
Peacock and Smith Limited
Pegasus Group
Philip Andrews Architects
Philip Woodhams
Plan4Localism
planning and housing consultancy
planning works ltd
Planware Limited
PowerHaus Consultancy Ltd
Priceholme Almshouses
Prospective Planning
PRP
Rackham Planning
Reside Developments Ltd
rg-p Ltd
RH & RW Clutton
Robinson Escott Planning
Rodway Planning Consultancy Limited
Rubix Planning Limited
Rydon
Rymack Ltd

Sapiency
Savills
SHW
Signature Horsted Limited
South Downs Society
Speer Dade Planning Consultants
Sport England
Spruce Town Planning Ltd
SSA Planning Limited
St Modwen
Strutt and Parker
Sunley Estates
Sussex Chamber of Commerce
Sussex Wildlife Trust
Sustain Design
TCPS
Terence O'Rourke
Tesni
Tetlow King Planning
Thakeham Homes
The Greenfield Guardians
Theatres Trust
Theobalds Road Residents Association
Tim North & Associates Limited
Tim Raikes FRICS
Tobias School of Art
Turners Hill Parish Council Neighbourhood Planning Committee
Twentieth Century Society
Twineham Parish Council
Urban Edge Environmental Consulting
Urbanissta
Vail Williams
Vanderbilt Homes
Wates Developments Limited
Welbeck Land

West Sussex County Council
West Sussex Libraries
Woodland Trust
Woolf Bond
Worth Parish Council
WYG

Appendix 2 Community Involvement Plan (September 2019)

Community Involvement Plan – September 2019

For the:

- **Draft Mid Sussex Site Allocations Development Plan Document (Regulation 18) and the accompanying**
 - **Sustainability Appraisal**
 - **Habitats Regulations Assessment**
 - **Equalities Impact Assessment**

1. Background

The Site Allocations DPD is a daughter document to the Mid Sussex District Plan, which was adopted in March 2018. The District Plan sets out a vision for how Mid Sussex wants to evolve and a delivery strategy for how that will be achieved, covering the period up to 2031. The District Plan sets out the district's housing and employment requirements. Whilst the majority of this requirement has already been planned for, there is still a residual need that must be found – the role of the Site Allocations DPD is to allocate sufficient housing, employment and other sites in order to ensure the need identified in the District Plan is met.

The purpose of this Community Involvement Plan is to set out:

- Who is involved in the production and consultation of the Site Allocations DPD;
- Why people are being involved in the process;
- When and how people will be able to get involved and influence the Site Allocations DPD; and
- How the results of community involvement will be used.

This Community Involvement Plan has been written in accordance with the adopted Mid Sussex District Council Statement of Community Involvement (SCI) (2019)¹.

2. Who is to be involved?

Early engagement

In the SCI, the Council commits to 'front load' consultation activity, to identify potential issues and options. This work has assisted in the formulation of policies, and has informed and updated the evidence base. Early engagement with stakeholders has been sought from the very start of the process of producing the Site Allocations DPD, including:

- Oversight of the DPD's preparation has been led by elected Councillors through the Site Allocations Document Members Working Group.²
- Town and Parish Councils have been briefed and consulted in relation to the Strategic Housing and Employment Land Availability Assessment (SHELAA) and methodology for the site selection.

¹ See www.midsussex.gov.uk/sci.

² See the Terms of Reference in Site Selection Paper 1 (Appendix 1) for more information about the Working Group, available at: <https://www.midsussex.gov.uk/planning-building/development-plan-documents/#topic-site-allocations-document>

- A Developers Liaison Group, which includes representatives from across the development industry, was also established and consulted in relation to the SHELAA and methodology for site selection.
- Neighbouring Local Authorities and County Authorities; as a result, the District Council has been able to enter into Statements of Common Ground (SoCGs) with neighbouring authorities.
- External organisations, such as the High Weald AONB Unit. It is the Council's intention to invite relevant public bodies to enter into SoCGs.
- Consulting other statutory consultees, such as Historic England, the Environment Agency and Natural England.

SoCGs prepared for the Site Allocations Document provide an update on agreement's made in relation to the District Plan, and focus on the issues arising from the allocation of sites. Further information about early engagement during the preparation of the Site Allocation Document, and details of SoCGs will be included in a Duty to Cooperate Statement to accompany the DPD, and will be made available on the Council's website.³

Including everyone

The Equality Impacts Assessment (EqIA) that accompanies the DPD considers the needs of people classified as having 'protected characteristics'⁴. This assessment concludes that there are a number of future actions to ensure that everyone has the opportunity to engage with the consultation, and particularly in terms of removing barriers to the involvement of protected groups.

In terms of consultation, the Council must continue to promote consultation exercises that are inclusive of all, including liaison with representative organisations and monitoring of consultation. This consideration includes things like making documents available on the website, which is equipped with 'BrowseAloud' to make the website more accessible.

There is further analysis of the actions that will be taken to ensure that everyone has the opportunity to engage with the consultation included within the EqIA which accompanies the Site Allocations DPD.⁵

Who will be contacted?

A number of groups will be directly contacted and asked for their comments. These are:

- District Councillors;
- Town and Parish Councils;
- 'Specific consultation bodies'/'general consultation bodies' (statutory consultees) as set out in legislation⁶. These include West Sussex County Council, adjoining local planning authorities, service providers and government agencies such as the Environment Agency and Natural England, and the South Downs National Park Authority⁷;
- Other organisations, groups or individuals that may have an interest in the Site Allocations DPD. These include members of the Mid Sussex Partnership, voluntary services' associations, residents' associations, housing associations, business groups and associations, environmental, countryside and conservation groups, youth and elderly persons' groups and the development industry;

³ Available at: <https://www.midsussex.gov.uk/planning-building/development-plan-documents/#topic-site-allocations-document>

⁴ As defined by the Equality Act 2010

⁵ Available at: <https://www.midsussex.gov.uk/planning-building/development-plan-documents/#topic-site-allocations-document>

⁶ The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

⁷ Details of these groups are set out in a list of 'key contacts' available at www.midsussex.gov.uk/sci.

- Representatives of those groups highlighted as requiring targeted consultation by the EqlA;
- Subscribers to the Planning Policy e-mail alerts service⁸; and
- Internal consultees at the District Council.

Elected District Councillors have a key role to play in forming the Site Allocations DPD and will be fully involved in the process through:

- The Site Allocations Document Members Working Group;
- The Scrutiny Committee for Housing, Planning and Economic Growth (any District Councillor can attend and request to speak);
- Council (consists of all District Councillors); and
- Councillors will be directly informed and can respond during the public consultation period.

3. Why are people being involved?

We are asking for people's views on the Site Allocations DPD through a formal consultation period. It is important to seek input from the wider public, as the Plan will allocate sites for development in the district and include planning policies that will have an impact upon both the existing and future communities of Mid Sussex.

Responses to the consultation will provide a valuable source of information which will inform the final policies. All representation received through the consultation will be carefully reviewed by officers. A consultation report summarising the issues raised by consultation and how these comments have been used will be published on the Council's website and will be considered by the Council before the next stage in the plan-making process.

In order to make the consultation more meaningful, it is important that people understand the context within which the DPD has been drafted and that certain aspects of the Plan may not be able to be changed as a result of consultation:

- At this time comments can only be made on the Site Allocations DPD draft plan (Regulation 18), and the accompanying Sustainability Appraisal, Habitats Regulations Assessment, and EqlA.
- The Site Allocations DPD has been written in line with Government planning policy and guidance, set out in the National Planning Policy Framework (2019) and Planning Practice Guidance.
- The Site Allocations DPD has been written in accordance with legislation and regulations⁹.
- The Site Allocations DPD has been informed by the results of the accompanying Sustainability Appraisal. This shows which options have been considered for its strategy and policies and why the options chosen are preferred over those rejected.
- The Site Allocations DPD has been informed by background evidence. The background evidence (and any updates) will be made available to view on the Council's website.

⁸ To receive news and updates on policy documents being prepared please sign up to our email alerts at <https://www.midsussex.gov.uk/planning-building/consultation-monitoring/#topic-planning-policy-email-alerts>

⁹ *Planning and Compulsory Purchase Act 2004*, and other relevant legislation.

4. When will people be involved?

<p>Public Consultation on 'Preferred Options' draft plan (Regulation 18)</p>	<p>Following agreement by the Council in September 2019, the Site Allocations DPD will be published for a six-week consultation period from 9/10/19 to 20/11/19. During this time, the public can make representations on the Site Allocations DPD.</p> <p>Representation made during this consultation and recommend changes to the DPD will be considered by the Council before the next stage in the plan-making process.</p>
<p>Public Consultation prior to plan submission for examination (Regulation 19)</p>	<p>This stage presents another opportunity for public engagement. There will be a six-week public consultation period, scheduled for Spring 2020. Representations made during this consultation will be considered by the Planning Inspector appointed to carry out the Public Examination.</p> <p>Please note, the examination timetable is subject to change and could be affected by a range of factors, including the availability of the Planning Inspector.</p> <p>Further details of the Regulation 19 consultation will be updated in due course; a new Community Involvement Plan will be produced to accompany this stage of the plan.</p>

Further details of the timetable are available at: <https://www.midsussex.gov.uk/planning-building/development-plan-documents/#topic-site-allocations-document>

5. How will people be involved?

The consultation will be open to all and we will seek to inform and receive comment from the widest possible range of people. We will:

- Send out a press release, an email alert and utilise social media;
- Put all the details and documentation on the Council's website including an on-line response form. All on-line material will be compatible with 'BrowseAloud' for people who find it difficult to read on-line;
- Utilise electronic methods wherever possible in addition to traditional methods to make it as easy as possible to respond to the consultation;
- A translation service is available to those for whom English is a second language;
- Provide hard copies of the Site Allocations DPD to view at the District's libraries (including the mobile library); District Council, Town and Parish Council offices; help points;
- Send letters or emails to all the 'specific consultation bodies' (statutory consultees) and to all the other organisations listed in section 2 above.
- Static exhibitions will be stationed at libraries in the District, as well as at Mid Sussex District Council Offices; event details will be made available at <https://www.midsussex.gov.uk/planning-building/development-plan-documents/#topic-site-allocations-document>

Comments must be submitted in writing (physical or digital) and cannot be accepted as anonymous. All information received is public information, subject to relevant data protection legislation. ¹⁰

¹⁰ Such as the *Data Protection Act (2018)*

Comments can be submitted via the website, email or by post. A response form will be made available which can be completed and submitted on the MSDC website. All responses can also be returned by:

Post to: Planning Policy, Mid Sussex District Council, Oaklands, Oaklands Road, Haywards Heath, West Sussex, RH16 1SS

E-mail to: ldfconsultation@midsussex.gov.uk

6. What happens to the results?

All comments will be treated equally and it will be up to the Council to balance any conflicting opinions when considering the final document.

The effectiveness of the consultation and the level of involvement by people, particularly those classified as having 'protected characteristics'¹¹ and requiring particular consideration as detailed in the EqIA, will be monitored. This information will inform future consultation work¹².

A consultation report summarising the issues raised by consultation and how these comments have been used will be published on the Council's website and will be considered by the Council. An email notification that this report has been published will be sent to all statutory consultees, Planning Policy email alert subscribers and respondents who submitted a response and expressed a wish to be notified and provided a valid email address.

If you have any comments or queries on this Community Involvement Plan, please contact [...] ([...])@midsussex.gov.uk; (01444) [...]).

If you have a comment or concern with your experience of a Council-led community involvement exercise, you should in the first instance contact the officer detailed in the Community Involvement Plan. Alternatively, you can contact the Customer Services and Communications Team by phone (01444) 477478 or by writing to Customer Services and Communications, Mid Sussex District Council, Oaklands Road, Haywards Heath, West Sussex, RH16 1SS.

¹¹ As defined by the Equality Act 2010

¹² This information will be used solely for this purpose. Equalities information will be kept strictly confidential. All data is subject to the Data Protection Act (2018).

Appendix 3 How the requirements of the Community Involvement Plan have been met

Action	Achieved?	Notes
Press release	Yes	5 th September 2019 ¹⁵
E-mail alert	Yes	9 th October 2019
Social media	Yes	Facebook and Twitter on the 10 th October 2019
Make the documents available on the Council's website	Yes	9 th October 2019 for the duration of the consultation ¹⁶
All on-line material to be compatible with 'BrowseAloud'	Yes	Available as part of the Council's website
Utilise electronic methods wherever possible	Yes	E-form available for consultation responses
Provide a translation service	Yes	Available but not requested
Hard copies provided to: <ul style="list-style-type: none"> Libraries District Council Town and Parish Councils Help Points 	Yes	9 th October 2019 for the duration of the consultation
Send letters or e-mails to the specific consultation bodies (statutory consultees)	Yes	9 th October 2019
Send letters or e-mails to: <ul style="list-style-type: none"> District Councillors Other organisations Representatives of those groups highlighted as requiring targeted consultation by the EqIA Subscribers to the Planning Policy e-mail alerts service Internal consultees at the District Council 	Yes	<ul style="list-style-type: none"> Letters sent to District Councillors and MPs on the 9th October 2019 E-mail alert sent on the 9th October 2019 The EqIA concludes that existing engagement methods are responding to the needs of protected groups Ongoing engagement with internal colleagues
Static exhibitions at the libraries and the District Council offices	Yes	9 th October 2019 for the duration of the consultation

¹⁵ <https://www.midsussex.gov.uk/about-us/press-releases-and-publications/site-allocation-development-plan-published/>

¹⁶ <https://www.midsussex.gov.uk/planning-building/development-plan-documents/>

Appendix 4 Summary of Responses (Regulation 18)

Employment Sites

Site/Policy: SA2 Burnside Centre			
Number of Comments Received			
Total: 3	Support: 0	Object: 2	Neutral: 1
Comments from Organisations / Specific Consultation Bodies			
<ul style="list-style-type: none"> • Site is adjacent to the Pook Bourne Stream, Flood Risk Assessment will be required, and no development shall take place within 8m of the main river. (Environment Agency) • Requirement for stream and open area of green space to be protected and enhanced (Sussex Wildlife Trust) • “Burgess Hill Shed” are located at this site, this is a valuable community resource and they should be found alternative accommodation. There should be a comprehensive study of what is required in the town before Burnside is removed. (Burgess Hill Town Council) 			
Comments from Residents/Other			
<ul style="list-style-type: none"> • None 			
Actions to Address Objections			
<ul style="list-style-type: none"> • Liaise with West Sussex County Council (landowner and site promoter) regarding timeline for the site, including the policy requirement to replace existing use. • Amend policy wording to make clear there is a requirement for a Flood Risk Assessment. 			

Site/Policy: SA3 - Former KDG			
Number of Comments Received			
Total: 2	Support: 0	Object: 2	Neutral: 0
Comments from Organisations / Specific Consultation Bodies			
<ul style="list-style-type: none"> • Adjacent to open space which should be retained, alongside protection and enhancement for biodiversity on site (Sussex Wildlife Trust) • Site has planning permission for industrial use, the Council requests it is used for housing as defined in the Neighbourhood Plan (Burgess Hill Town Council) 			
Comments from Residents/Other			
<ul style="list-style-type: none"> • None 			
Actions to Address Objections			
<ul style="list-style-type: none"> • Clarify position in the policy in relation to the existing planning permission. Will still contribute towards the employment need as it was not previously counted as a ‘commitment’ • Neighbourhood Plan allocation relates to a mixed-use development at this location, this will not be possible when the existing planning permission is implemented. • Amend policy wording to make clear the requirements for biodiversity on site 			

Site/Policy: SA4 – Land north of A264**Number of Comments Received**

Total: 19	Support: 1	Object: 17	Neutral: 1
------------------	-------------------	-------------------	-------------------

Comments from Organisations / Specific Consultation Bodies

- This area was intended to be retained as a landscape screen between the A264 and the residential development permitted to the north. This use would contradict its purpose. (Worth Parish Council)
- The site is not required to meet the residual employment need, as the Sites DPD over-allocates (Worth Parish Council)
- No infrastructure concerns given information to date (Thames Water)
- Seems partially developed, would still need to retain biodiversity (Sussex Wildlife Trust)

Comments from Residents/Other

- Will increase traffic to the area, which is already congested
- B8 (Warehouse) units will inevitably mean logistics operations, therefore traffic movements on a 24/7 basis
- Was intended for landscaping as part of the St Modwen scheme to retain the strategic “gap” between Crawley and Copthorne
- Combination impacts with the permitted 500 homes on the same site

Actions to Address Objections

- Site specific requirements will be amended to refer to high quality design and landscaping in order to ensure provision of a landscape screen.
- The site was appraised favourably in Site Selection Paper 4 and Sustainability Appraisal therefore is a suitable site for allocation, its location is supported by the NPPF

Site/Policy: SA5 – Bolney Grange Business Park**Number of Comments Received**

Total: 10	Support: 1	Object: 7	Neutral: 2
------------------	-------------------	------------------	-------------------

Comments from Organisations / Specific Consultation Bodies

- Lies in a mineral safeguarding area, need to assess potential for mineral sterilisation (West Sussex County Council)
- No site-specific requirements related to biodiversity or green infrastructure, and no assessment of these in the Sustainability Appraisal (Sussex Wildlife Trust)
- Site extends outside the area of the Bolney Neighbourhood Plan, Parish Council requests a landscaping scheme is used to minimise the impact on views from the South Downs (Bolney Parish Council)

Comments from Residents/Other

- None

Actions to Address Objections

- Discuss requirements with West Sussex County Council and amend policy wording to address the requirements for potential mineral sterilisation
- Include biodiversity/landscaping requirements to the policy and address this in the Regulation 19 Sustainability Appraisal

Site/Policy: SA6 – Marylands Nursery			
Number of Comments Received			
Total: 3	Support: 0	Object: 1	Neutral: 2
Comments from Organisations / Specific Consultation Bodies			
<ul style="list-style-type: none"> Lies in a mineral safeguarding area, need to assess potential for mineral sterilisation (West Sussex County Council) The Parish Council would like to see a height restriction, light pollution and landscaping plan for this site. (Bolney Parish Council) 			
Comments from Residents/Other			
<ul style="list-style-type: none"> None 			
Actions to Address Objections			
<ul style="list-style-type: none"> Discuss requirements with West Sussex County Council and amend policy wording to address the requirements for potential mineral sterilisation Site specific requirements will be added to refer to high quality design, height and landscaping 			

Site/Policy: SA7 – Cedars, Brighton Road			
Number of Comments Received			
Total: 6	Support: 0	Object: 4	Neutral: 2
Comments from Organisations / Specific Consultation Bodies			
<ul style="list-style-type: none"> Site is adjacent to a waste management facility; development should not prevent or prejudice the continued use of the waste management facility (West Sussex County Council) In our view, would constitute major development in an Area of Outstanding Natural Beauty (AONB) (CPRE) Would require an assessment of whether this constitutes major development in the AONB and a Landscape and Visual Impact Assessment (LVIA) (High Weald AONB Unit) AONB site - agree that a LVIA should be carried out (Natural England) Priority habitats/woodland should be referred to in the policy text (Natural England) No infrastructure concerns (Thames Water) No ecological information has been provided; policy should also include reference to net gains in biodiversity (Sussex Wildlife Trust) 			
Comments from Residents/Other			
<ul style="list-style-type: none"> None 			
Actions to Address Objections			
<ul style="list-style-type: none"> Assessment to be carried out to determine whether development is major development in the AONB in the context of Para 172 of the NPPF Site promoter will be required to carry out a Landscape and Visual Impact assessment (LVIA) Amend policy text to address West Sussex County Council comments regarding the waste management facility. Amend policy text to refer to priority habitats and ecology requirements 			

Site/Policy: SA8 – Pease Pottage Nurseries**Number of Comments Received**

Total: 6	Support: 0	Object: 4	Neutral: 2
-----------------	-------------------	------------------	-------------------

Comments from Organisations / Specific Consultation Bodies

- Site is adjacent to a waste management facility; development should not prevent or prejudice the continued use of the waste management facility (West Sussex County Council)
- In our view, would constitute major development in an Area of Outstanding Natural Beauty (AONB) (CPRE)
- Would require an assessment of whether this constitutes major development in the AONB and a Landscape and Visual Impact Assessment (LVIA) (High Weald AONB Unit)
- AONB site - agree that a LVIA should be carried out (Natural England)
- Priority habitats/woodland should be referred to in the policy text. Ancient woodland present on site (Natural England)
- No infrastructure concerns (Thames Water)
- No ecological information has been provided; policy should also include reference to net gains in biodiversity (Sussex Wildlife Trust)

Comments from Residents/Other

- None

Actions to Address Objections

- Site has been promoted by the same landowner as the waste facility (car breakers yard), will liaise with the landowner to ensure it does not prejudice continued use
- Assessment to be carried out to determine whether development is major development in the AONB in the context of Para 172 of the NPPF
- Site promoter will be required to carry out a Landscape and Visual Impact assessment (LVIA)
- Amend policy text to refer to priority habitats, ecology and protection of ancient woodland
- Appendix C of the Sites DPD includes General Principles for development, this refers to biodiversity net gain. These principles will be made clearer in the Regulation 19 version of the Sites DPD.

Site/Policy: SA9 – Science and Technology Park**Number of Comments Received**

Total: 19	Support: 2	Object: 13	Neutral: 4
------------------	-------------------	-------------------	-------------------

Comments from Organisations / Specific Consultation Bodies

- Mix of B1/B2 uses, this is a similar aim to Horsham District Council who are seeking to strengthen this offer. Need to acknowledge the focus of the S&TP and ensure it is complementary to Horsham's proposed offer. (Horsham District Council)
- Include wording to address the eastern parcel being allocated in the West Sussex Waste Local Plan, and that uses could be complementary, plus urban design principles (West Sussex County Council)
- Further modelling work will be required to determine the scale of development, and sustainable transport and other mitigation measures to minimise disruption and delay on the highways network (West Sussex County Council)
- Pleased to see inclusion of flood risk and drainage in the site-specific requirements, and that the area of flood zones 2/3 will remain undeveloped (Environment Agency)

<ul style="list-style-type: none"> • Depending on trajectory, may trigger the requirement to replace the regulator to ensure the site could connect to the gas network satisfactorily (Southern Gas Networks) • Concerned about loss of biodiversity, need to include a requirement to deliver net gains in biodiversity (Sussex Wildlife Trust)
<p>Comments from Residents/Other</p> <ul style="list-style-type: none"> • Impose a condition related to car parking in order to encourage sustainable travel, and impose TPOs on all significant trees (CPRE) • Would like to understand the phasing of the project and what constitutes “science” companies • Consider blocking off Cuckfield Road so that it is no longer a through road, to save accidents • Object due to flooding, loss of biodiversity, woodland.
<p>Actions to Address Objections</p> <ul style="list-style-type: none"> • Continue discussions with Horsham District Council. Note that the principles for uses at the Science and Technology Park were established in the District Plan, and that this allocation is only specifying the exact site and policy requirements • Commission further modelling of the A23/A2300 junction and other mitigation measures, including phasing (level of development within the plan period) as part of the Regulation 19 version of the Transport Study. • Phasing work, once completed by the promoter, will be shared with Southern Gas Networks • Amend policy wording to respond to changes suggested by West Sussex County Council regarding the waste allocation, and Sussex Wildlife Trust.

Housing Sites

Site/Policy:			
SA12 – 96 Folders Lane, Burgess Hill			
SA13 – South of Folders Lane, Burgess Hill			
Number of Comments Received			
Total: 830	Support: 21	Object: 802	Neutral: 7
Comments from Organisations / Specific Consultation Bodies			
<i>(Note: The comments for these sites have been reported together, as most comments received were duplicate responses related to both sites. Where the comment relates to a specific site, this is labelled as such)</i>			
Transport			
<ul style="list-style-type: none"> • Reassurance sought regarding transport impacts on highway network in Lewes District and proposed details of all mitigation required. (Lewes & Eastbourne DC). • Traffic issues will be compounded by the extent of additional development proposed in this area (Ditchling Parish Council/Burgess Hill Town Council/Haywards Heath Town Council/CPRE/Hassocks Parish Council). • Concern regarding traffic impacts on village of Ditchling, development will erode the rural buffer between Burgess Hill and the SDNP harming its setting – landscape evidence required to inform capacity/mitigation – landscape assessment not just views and should also include setting, tranquillity and dark skies of the park (SDNP Authority). • No transport assessment has been carried out and existing issues will be compounded (Hassocks Parish Council). • Contract with Metrobus needed for sustainable transport between Burgess Hill and Haywards Heath. Haywards Heath to Burgess Hill cycle path must be delivered and highway mitigation provided to address impact of this development on Haywards Heath (Haywards Heath Town Council). 			
Landscape / Biodiversity			
<ul style="list-style-type: none"> • Query policy requirement for central open space (SA13) – southern area of site could better respect the settlement form and add to a landscape/ecological buffer to the Park. (SDNP Authority, CPRE). • Concern regarding the impact on the setting of SDNP, rural edge of Burgess Hill and high-quality biodiversity (CPRE). 			
Evidence			
<ul style="list-style-type: none"> • Evidence to identify appropriate assessment of the heritage assets has been undertaken on protection of the setting of the asset or assessing archaeology has not been provided (Historic England). • Limited capacity currently exists in the local sewerage infrastructure to accommodate the development. This is not a constraint to development and policy wording should be amended to align occupation with delivery of new wastewater infrastructure (Southern Water). • Evidence to determine the ecological value of the site has not been provided. Biodiversity and Green Infrastructure policy requirement should be strengthened to ensure mitigation hierarchy is adhered to – amend wording (West Sussex Wildlife Trust). • The impacts of existing major development are not yet fully understood, and a more strategic and cumulative assessment should be taken for future housing sites. Allocation is contrary to various Development Plan Policies. Loss of trees will impact on the aim of being carbon neutral by 2050. Loss of important green corridor (Burgess Hill Town Council). • The allocation goes beyond the level of housing required in the plan period for Burgess Hill. Lack of consultation with neighbouring authorities. Development will 			

harm the setting of the SDNP and biodiversity. It will erode the gap between the settlements (Ditchling Parish Council).

Comments from Residents/Other

Transport

- Unsafe vehicular access via Broadlands and lack of pavement. (SA13)
- Construction vehicles have already adversely affected the streets in the area.
- Transport assessment flawed – does not include Folders Lane and Keymer Road junction. Does not include any appropriate mitigation in the vicinity of the site.

Site Selection

- Support the allocation of these sites as they are in a sustainable location and will meet the housing needs within this area. (Residents and Site Promoter)
- No justification for choosing to allocate the site when these sites have been rejected numerous times in the past and no transport study has been undertaken to assess the impacts on already congested highway network and associated air pollution.
- Housing need should be spread fairly across the district based on planning decisions – Burgess Hill has taken a disproportionate amount of housing.
- The site selection Member's working group was not representative of the elected Councillors following May 2019 elections.
- Haywards Golf Club scored higher than Folders Lane sites in the Site Selection Paper and Sustainability Appraisal yet was not allocated.

Landscape / Biodiversity

- Site contains significant ecological value including ancient hedgerows and indigenous wildlife.
- Concern regarding impact on SDNP and biodiversity.
- Will erode the natural landscape.
- Loss of green space.

Infrastructure

- No planned infrastructure – schools, doctor's surgeries, water, sewerage systems, car parks.
- Negative impact on house values.
- Drainage and flood risk will be exacerbated – Ockley Lane often floods.

Actions to Address Objections

Transport

- The Systra Strategic Transport Assessment identified no site-specific issues. The Site promoters are carrying out a site-specific Transport Assessment and will enter pre-application discussions with West Sussex County Council Highway Authority to assess the more detailed highway impacts and safety issues and identify any required mitigation.
- Close working with Lewes DC and East Sussex CC will continue and the next version of the Strategic Transport Assessment will include a more detailed assessment of cross-boundary transport impacts.
- The Strategic Transport Assessment will make clearer the localised impacts and associated mitigation within the next version.
- Sustainable transport infrastructure improvements are included in detail in the Infrastructure Delivery Plan (IDP) and policy wording will be amended to include requirement to detail sustainable infrastructure improvements along with broader infrastructure requirements including any necessary contributions to schools, sports facilities, community infrastructure, healthcare and education.

Site Selection

- Site was assessed in the Strategic Housing Land Availability Assessment (SHLAA) in the past, however the reasons for rejecting the site in the past have been

addressed by the more up-to-date and site specific evidence base for the Sites DPD – particularly the Strategic Transport Assessment.

- Site Selection Paper 3: Housing and the Sustainability Appraisal contain the justification for selecting and rejecting individual sites and site options. The decision to publish the Sites DPD for consultation was made by Council which consists of Members from across the district.

Evidence

- Site promoter will be required to carry out a Landscape and Visual Impact Assessment (LVIA) which will provide evidence on yield which can be achieved and inform additional elements to consider including where open space should be located – consider amending policy wording once LVIA seen. Policy amended to refer to setting, not just views from the Park.
- Site promoter will be required to carry out a Heritage assessment in relation to archaeology and the adjacent listed building which will inform the layout and yield.

Policy Wording

- 'Utilities' policy wording to be amended to reflect comments raised.
- Biodiversity policy wording to be amended to accord with Sussex Wildlife Trust advice
- Site promoter will be required to address any potential flooding issues in accordance with the policy – policy wording will be strengthened to make this clear (SA13)
- Sites DPD will be amended to make clear the status and role of the Infrastructure Delivery Plan regarding infrastructure requirements.

Site/Policy: SA14 - Land South of Selby Close, Burgess Hill**Number of Comments Received****Total:** 12**Support:** 0**Object:** 8**Neutral:** 4**Comments from Organisations / Specific Consultation Bodies**

- Traffic issues between Burgess Hill and Haywards Heath will be compounded and therefore additional infrastructure improvements/financial support is needed to mitigate the adverse effects on the Town, (Haywards Heath Town Council).
- Remove the requirement to protect Southern Water's infrastructure as our records do not show the need for this (Southern Water)
- Various Sustainable Transport measures are suggested to be included in the policy requirement for this site (West Sussex County Council)

Comments from Residents/Other

- Impacts on residential amenity in terms of views and height as a tall building would be needed to accommodate 12 flats.
- There are rumours that the community use is for temporary housing. MSDC need to be more specific about the proposed plans for 'community use'.

Actions to Address Objections

- Site promoter is required to carry out a site-specific transport assessment and obtain pre-application advice from West Sussex County Council on the suitability of detailed highways arrangements.
- Amend policy to provide clarity over community use and amend policy wording to provide detail regarding the height of the building.
- Amend policy text to remove the requirement to protect Southern Water's infrastructure
- Amend Infrastructure Delivery Plan (IDP) to include recommended sustainable transport infrastructure and refer to this in policy wording.

Site/Policy: SA15 - Land South of Southway, Burgess Hill**Number of Comments Received****Total:** 69**Support:** 2**Object:** 65**Neutral:** 2**Comments from Organisations / Specific Consultation Bodies**

- The allocation is on a Local Green Space (LGS) which is not compliant with NPPF policies. The Burgess Hill Neighbourhood Plan designated this area as part of an important “green lung” for the west of Burgess Hill, a function which does not require accessibility (Sussex Wildlife Trust).
- The site is an important wildlife site including for nightingales, a species on the red list and in danger of extinction (Burgess Hill Town Council).
- Traffic issues will be compounded between Haywards Heath and Burgess Hill and therefore additional financial support/infrastructure improvements are needed to mitigate the adverse effects on the Town. (Haywards Heath Town Council)
- Various Sustainable Transport measures are suggested to be included in the policy requirement for this site (West Sussex County Council)

Comments from Residents/Other

- Conflicts with District Plan Policy DP38, which refers to enhancing biodiversity. There are numerous species on this site which are afforded statutory protection.
- Burgess Hill Neighbourhood Plan designated this site as a Local Green Space on the basis it is well used for recreational purposes and an important 'green lung' for the west of Burgess Hill.
- Concerns regarding pedestrian safety, lack of provision of sufficient vehicle parking, congestion and inappropriate access roads width.
- The proposed access from Linnet Lane is not suitable as it would be located between 2 blind bends and directly opposite existing resident drives
- Concerns about due process for site selection regarding geographical and political balance of the sites Member Working Group.
- The site boundary encroaches onto Croudace Homes land and a more precise land ownership plan is required.
- There is a covenant on the land which means this land cannot be built on/ developed.
- Burgess Hill is carrying a disproportionate share of the burden for Mid Sussex's expansion plans in relation to its infrastructure.

Actions to Address Objections

- The NPPF allows for an LGS designation to be subsequently allocated for a different purpose in a subsequent Development Plan Document if this is evidenced and justified. Carry out additional evidence to support justification for development in LGS.
- Site promoter is required to undertake an ecological survey to inform development proposals and to identify measures to deliver ecological enhancements and ensure there is a net-gain to biodiversity
- Site promoter is required to undertake a transport assessment including traffic and parking surveys and to obtain pre-application advice from West Sussex County Council Highways on suitability of the detailed highway arrangements.
- Site promoter to provide evidence on land ownership. Site promoter has confirmed that there are no restrictive covenants relating to this site.
- Discuss requirements with West Sussex County Council and amend policy wording to address the requirements for potential mineral sterilisation
- Site Selection Paper 3: Housing and the Sustainability Appraisal contain the justification for selecting and rejecting individual sites and site options. The decision to publish the Sites DPD for consultation was made by Council which consists of Members from across the district.

- Amend Infrastructure Delivery Plan (IDP) to include recommended sustainable transport infrastructure and refer to this in policy wording.

Site/Policy: SA16 – The Brow and St. Wilfrid's Catholic Primary School, School Close, Burgess Hill

Number of Comments Received

Total: 18	Support: 2	Object: 12	Neutral: 4
------------------	-------------------	-------------------	-------------------

Comments from Organisations / Specific Consultation Bodies

- This allocation is supported in light of work carried out through the Mid Sussex Growth Deal and the Burgess Hill Strategic Growth Programme. Various Sustainable Transport measures are suggested to be included in the policy requirement for this site (West Sussex County Council)
- Confirmation from Diocese that they have put in place actions and agreements which would allow St Wilfrid's Catholic Primary School to move to a new site adjacent to St Paul's Catholic College in agreement with West Sussex County Council (Diocese of Arundel and Brighton Education Service).
- Object to any loss of playing field unless it was justified through the current playing pitch strategy (PPS) or mitigation is provided (Sport England).
- Traffic issues between Burgess Hill and Haywards Heath will be compounded and therefore additional financial support is needed to mitigate the adverse effects on the Town, by provision of financial or infrastructure improvements (Haywards Heath Town Council).
- Wish to further understand the impact on primary education in this area. Site allocations should be considered in a more strategic manner. Question the deliverability and timeframe as the site involves numerous stakeholders (Burgess Hill Town Council).

Comments from Residents/Other

- Increased traffic congestion and lack of school places in town centre.
- Relocation of the school to the outskirts will result in further journeys for parents and children across the town.

Actions to Address Objections

- Viability and masterplanning to demonstrate deliverability and the timeframe for this has been commissioned as part of the One Public Estate bid. A report on these aspects will be produced.
- Continue ongoing consultation with West Sussex County Council (WSCC) regarding pupil places and provide an evidence paper on this matter.
- Site promoter is required to carry out a site-specific transport assessment and obtain pre-application advice from West Sussex County Council on the suitability of detailed highways arrangements
- Site promoter to ensure re-provision of playing fields to satisfy Sport England concerns
- Amend Infrastructure Delivery Plan (IDP) to include recommended sustainable transport infrastructure and refer to this in policy wording.

Site/Policy: SA17 – Woodfield House, Isaacs Lane, Burgess Hill**Number of Representations Received**

Total: 8	Support: 1	Object: 4	Neutral: 3
-----------------	-------------------	------------------	-------------------

Comments from Organisations / Specific Consultation Bodies

- Various Sustainable Transport measures are suggested to be included in the policy requirement for this site (West Sussex County Council)
- Contract with Metrobus needed for sustainable transport between BH and HH. HH to BH cycle path must be delivered and highway mitigation provided to address impact on Haywards Heath. Direct provision of infrastructure improvements may be more practical than S106. (Haywards Heath Town Council)
- Concerns of safety and the impact for residents using Isaacs Lane and the Bolnore Roundabouts. (Haywards Heath Town Council)

Comments from Residents/Other

- None.

Actions to Address Objections

- Amend Infrastructure Delivery Plan (IDP) to include recommended sustainable transport infrastructure and refer to this in policy wording.
- Site-specific Transport Assessment has been provided as part of current planning application. Site promoter will be required to obtain pre-application advice from West Sussex County Council on the suitability of detailed highways arrangements

Site/Policy: SA18 – EG Police Station, East Grinstead**Number of Comments Received****Total:** 31**Support:** 3**Object:** 22**Neutral:** 6**Comments from Organisations / Specific Consultation Bodies**

- The site should be used for the community – sheltered housing for elderly or disabled. Height should be limited to 2 storeys (East Grinstead Labour Society).
- Evidence to determine the impact of the proposed allocation on the designated heritage asset not provided (Historic England).
- Appropriate mitigation will be necessary to protect the Ashdown Forest (Natural England).
- Limited capacity currently exists in the local sewerage infrastructure to accommodate the development, this is not a constraint however planning policy should ensure that conditions ensure occupation of development is phased to align with delivery of new wastewater infrastructure. Policy wording should be amended (Southern Water).
- Consideration should be given to the impact on the conservation area. Community infrastructure and highways improvements must be sought. Requirement of adequate car parking and traffic management should be explicit in the policy and the Town Council should be directly involved in the process (East Grinstead Town Council).
- Various Sustainable Transport measures are suggested to be included in the policy requirement for this site (West Sussex County Council)

Comments from Residents/Other

- Concern regarding traffic impacts, parking facilities, access arrangements and the need for safety improvements. Lack of sustainable transport measures. Need for EG Cycling and Walking Infrastructure Plan (LCWIP) with purpose-built cycle routes along with wider sustainable transport measures to reduce car use. Development is unsustainable.
- Concern regarding the impact on the conservation area.
- Harmful impact from construction phase on users of nearby facilities – air quality/noise.
- Memorial trees and existing significant trees on site should not be moved/lost.
- Harm to neighbouring amenity.
- Covenant on any building within the Park exists.
- Flood risk and potential instability of the embankment adjacent to Blackwell Hollow.
- East Grinstead is saturated with flats and existing services are under significant pressure.
- Three storeys is too high.

Actions to Address Objections

- Amend Infrastructure Delivery Plan (IDP) to include recommended sustainable transport infrastructure and refer to this in policy wording.
- No issues have been identified in the Strategic Transport Assessment however a detailed transport assessment would be secured at the planning application stage to ensure highway safety is maintained and safe access is achieved. Policy wording updated to include requirement to make any necessary safety improvements and contributions towards sustainable transport infrastructure.
- Covenants do not prohibit the ability to allocate the site or approve planning permission however if they do exist the details will be explored with the site promoter /landowner.
- The Site promoter is required to carry out a preliminary assessment of ground instability which will inform the yield/layout. Amend the policy wording to include a

slope stability risk assessment report to ensure that adequate and environmentally acceptable mitigation measures are in place/are provided.

- Amend 'Utilities' policy wording to address comments raised
- Amend policy to make clear that parking standards will be applied in accordance with the adopted standards in the Development plan and details assessed through the submission of a Transport Assessment in support of the planning application.
- Site promoter advised to engage in pre-application discussion with Historic England and undertake any work necessary.
- Amend 'Historic Environment and Cultural Heritage' policy wording to address comments raised.
- Appendix C of the Sites DPD includes General Principles for development, this refers to Ashdown Forest. These principles will be made clearer in the Regulation 19 version of the Sites DPD.

Site/Policy: SA19 – Crawley Down Road, East Grinstead**Number of Comments Received****Total:** 38**Support:** 4**Object:** 27**Neutral:** 7**Comments from Organisations / Specific Consultation Bodies**

- Traffic impact a concern on A264 – Safeguarding land for Strategic Highway Improvements (SA35) should be extended to include the Dukes Head roundabout and junctions between Vicarage Road and Grange Road with Turners Hill Road (Worth Parish Council).
- Appropriate financial contributions towards delivering necessary strategic highway improvements, including in Surrey, should be secured and reference to potential need for cross boundary mitigation should be explicit; measures should include impacts on the wider A22/A264 corridor (Surrey CC).
- Early communication with Surrey CC is necessary regarding the access which is within Surrey (Tandridge District Council).
- Various Sustainable Transport measures are suggested to be included in the policy requirement for this site (West Sussex County Council)
- Policy wording in relation to flood risk is supported (Environment Agency).
- Impact on Hedgecourt Site of Special Scientific Interest (SSSI) - green space on site will therefore be critical. Potential harmful impact on ancient woodland - substantial semi-natural buffer and woodland management plan should be required. Enhanced ecological connectivity between the ancient woodland and wider landscape is critical. Ashdown Forest mitigation will be necessary and the proposed Suitable Alternative Natural Greenspace (SANG) needs to be in line with guidance and Natural England consulted (Natural England).
- More evidence of the baseline biodiversity data and cumulative impacts with SA20 (Imberhome Farm) required. Biodiversity policy needs updating (Sussex Wildlife Trust).
- Allocation must support existing and new community infrastructure and address highways and access, habitats and sustainability; the access may require 3rd party land. Concern regarding coalescence. Policy should be amended to address concerns relating to highway impacts and coalescence. (East Grinstead Town Council).

Comments from Residents/Other

- The surface of the Public Right of Way (PRoW) should be upgraded and permeability for non-car users is key to delivering sustainable travel objectives.
- Need to ensure design does not exacerbate flooding.
- Concern regarding traffic impacts.
- Insufficient infrastructure and services to support the development.
- Concern regarding traffic impacts, parking facilities, access arrangements and the need for safety improvements. Lack of sustainable transport measures. Need for EG Cycling and Walking Infrastructure Plan (LCWIP) with purpose-built cycle routes along with wider sustainable transport measures to reduce car use. Development is unsustainable.

Actions to Address Objections

- Amend the Sites DPD to make clear the status and role of the Infrastructure Delivery Plan (IDP) regarding infrastructure requirements.
- Amend IDP to include recommended sustainable transport infrastructure and refer to this in policy wording.
- Amend policy to incorporate Natural England advice.
- Appendix C of the Sites DPD includes General Principles for development, this refers to Ashdown Forest. These principles will be made clearer in the Regulation 19 version of the Sites DPD.

- Make ecological data available for consultees, audit biodiversity data and outcomes.
- Amend biodiversity policy wording to address comments raised
- Access arrangement and land ownership will be further explored with the site promoter and Surrey CC / Tandridge DC / West Sussex County Council
- Site promoter is required to carry out a detailed site-specific Transport Assessment and enter pre-application discussions with Surrey County Council to assess the more detailed highways impacts and safety issues, and identify mitigation
- Site promoter is required to carry out an ecological survey
- Amend policy wording to make clear there is a requirement for a Flood Risk Assessment.

Site/Policy: SA20 – Imberhorne Lane, East Grinstead**Number of Comments Received****Total:** 69**Support:** 6**Object:** 50**Neutral:** 13**Comments from Organisations / Specific Consultation Bodies**

- Appropriate financial contributions towards delivering necessary strategic highway improvements, including in Surrey, should be secured and reference to potential need for cross boundary mitigation should be explicit; measures should include impacts on the wider A22/A264 corridor (Surrey CC).
- Support the provision of land for early years and primary school and GP surgery. Contributions towards junction improvements should be sought where design identified (Tandridge).
- Reference to location in 7km buffer for the Ashdown Forest SPA or cross reference to policy DP17 should be made. Suitable Alternative Natural Greenspace (SANG) provision supported in principle. Cross boundary discussion with East Sussex County Council (ESCC) is necessary regarding highways and education (Wealden).
- Contaminated land policy wording does not refer to historic landfill around the farm which could impact on layout. (Environment Agency).
- Concern regarding the effects on the setting of grade II* listed assets. Heritage Impact Assessment should be undertaken (Historic England).
- Impact on Hedgecourt Site of Special Scientific Interest (SSSI) - green space on site will therefore be critical. Potential harmful impact on ancient woodland - substantial semi-natural buffer, beyond the 15m minimum in the policy and woodland management plan should be required. Enhanced ecological connectivity between the ancient woodland and wider landscape is critical. Ashdown Forest mitigation will be necessary and the proposed Suitable Alternative Natural Greenspace (SANG) needs to be in line with guidance and Natural England consulted (Natural England).
- Limited current capacity exists in the local sewerage infrastructure to accommodate the development, not a constraint however planning policy should therefore ensure that conditions ensure occupation of development is phased to align with delivery of new wastewater infrastructure. Policy wording should be amended (Southern Water).
- Biodiversity policy needs updating. Ecological survey results should be provided – concern regarding habitat loss and inclusion of section of the Worth Way Local Wildlife Site (LWS) (Sussex Wildlife Trust).
- Concern regarding coalescence. Clarity regarding the SANG required. Transport impacts. (Felbridge Parish Council).
- Allocation must support existing and new community infrastructure and address highways and access, habitats and sustainability; the access may require 3rd party land. Concern regarding coalescence. Policy should be amended to address concerns relating to highway impacts and coalescence – Suitable Alternative Natural Greenspace (SANG) should be used to preserve the gap between settlements. (East Grinstead Town Council).

Comments from Residents/Other

- Road network is congested
- Good quality cycle network needed in this area to remove cars from the road network Landscape and habitat implications from this large-scale development
- Excessive number of houses in the area, will impact on A22
- There are already suitable brownfield sites that could accommodate the required amount of development
- Few facilities nearby, meaning residents will need to drive to services

- Fields and footpath are currently well used by residents, dog walkers, school children
- Important to provide adequate housing in East Grinstead but this is the wrong location

Actions to Address Objections

- Amend the Sites DPD to make clear the status and role of the Infrastructure Delivery Plan (IDP) regarding infrastructure requirements.
- Amend IDP to include recommended sustainable transport infrastructure and refer to this in policy wording.
- Jointly commission additional evidence with West Sussex County Council /Surrey/Tandridge to explore highways improvements related to the A22/A264
- Cross boundary working will continue with all affected authorities.
- Discuss requirements with West Sussex County Council and amend policy wording to address the requirements for potential mineral sterilisation
- Site promoter advised to engage in pre-application discussion with Historic England and undertake any work necessary.
- Update policy to incorporate Natural England advice.
- Appendix C of the Sites DPD includes General Principles for development, this refers to Ashdown Forest. These principles will be made clearer in the Regulation 19 version of the Sites DPD.
- Make available up to date ecological survey information and assess the potential inclusion of a Local Wildlife Site.
- Amend 'Utilities' policy wording to address Southern Water comments.
- Carry out further work with the site promoter to determine the extent of proposed SANG. Work with site promoter re SANG location to address the concerns regarding coalescence.
- Site promoter is required to carry out a detailed site-specific Transport Assessment and enter pre-application discussions with West Sussex County Council to assess the more detailed highways impacts and safety issues, and identify mitigation
- Review Contaminated Land records in relation to site and update policy requirements where necessary.

Site/Policy: SA21 – Rogers Farm, Fox Hill, Haywards Heath

Number of Comments Received

Total: 16 **Support:** 1 **Object:** 14 **Neutral:** 1

Comments from Organisations / Specific Consultation Bodies

- Reassurance sought regarding transport impacts on highway network in Lewes District and proposed details of all mitigation required. (Lewes & Eastbourne DC).
- An assessment of impacts on heritage significance should be undertaken as a basis for the site selection. (Historic England)
- The requirements under Biodiversity and Green Infrastructure should be strengthened. (Sussex Wildlife Trust)
- In principle Haywards Heath Town Council (HHTC) objects to the inclusion of this site. This site conflicts with Haywards Heath Neighbourhood Plan (HHNP) as it is not within the approved built line. (HHTC and Wivelsfield Parish Council)
- Serious flooding issues – need for a full drainage report detailing how this ongoing problem will be rectified. Concerned with wastewater evacuation procedures (HHTC)
- Planning application in for this site previously refused and upheld at appeal. (HHTC and WPC)
- Allocation would require the provision of traffic lights at the junction of Fox Hill/Hurstwood Lane, combined with a speed limit reduction to 30 MPH. (HHTC)
- Various Sustainable Transport measures are suggested to be included in the policy requirement for this site (West Sussex County Council)

Comments from Residents/Other

- Previously refused scheme (at appeal).
- Flood risk.
- Road safety.
- Impact on the grade II listed building opposite.

Actions to Address Objections

- Amend policy requirements under Biodiversity and Green Infrastructure to reflect Sussex Wildlife Trust requirements.
- Detail regarding localised impact re cross-boundary impacts to be presented in forthcoming Strategic Transport report
- Site promoter will be required to carry out a Heritage assessment and undertake any work as necessary.
- Amend Infrastructure Delivery Plan (IDP) to include recommended sustainable transport infrastructure and refer to this in policy wording.
- Address flood risk comments within policy wording, seek additional information if required
- Site promoter is required to carry out a detailed site-specific Transport Assessment and enter pre-application discussions with West Sussex County Council to assess the more detailed highways impacts and safety issues, and identify mitigation

Site/Policy: SA22 – Land north of Burleigh Lane, Crawley Down**Number of Comments Received****Total: 21****Support: 1****Object: 17****Neutral: 3****Comments from Organisations / Specific Consultation Bodies**

- Various Sustainable Transport measures are suggested to be included in the policy requirement for this site (West Sussex County Council)
- An assessment of impacts on heritage significance should be undertaken as a basis for the site selection. (Historic England)
- Appropriate mitigation necessary to address impacts on Ashdown Forest. (Natural England)
- Existing local sewerage infrastructure has limited capacity to accommodate the proposed development – reinforcement of the wastewater network will be required ahead of connection of new development. (Southern Water)
- The requirements under Biodiversity and Green Infrastructure should be strengthened. (Sussex Wildlife Trust)
- The assessment of access is incorrect as it will require an existing property to be purchased and demolished, therefore not sustainable development. (Worth Parish Council)

Key Issues Raised – Residents / Other

- Impact on schools, and health centre.
- Copthorne and Crawley Down have exceeded their housing targets while other villages have not.
- Insufficient existing drainage, both in storm water and sewage.
- Impact on wildlife.
- Impact on ancient woodland - Burleigh Wood.

Actions to Address Objections

- Site proponent to provide transport assessment and seek pre-application advice from West Sussex County Council Highways. Site promoter to provide details on specific access arrangements.
- Amend Infrastructure Delivery Plan (IDP) to include recommended sustainable transport infrastructure and refer to this in policy wording.
- Appendix C of the Sites DPD includes General Principles for development, this refers to infrastructure, ancient woodland and Ashdown Forest. These principles will be made clearer in the Regulation 19 version of the Sites DPD.
- Site promoter will be required to carry out a Heritage assessment and engage in pre-application discussion with Historic England and undertake any work necessary.
- 'Utilities' policy wording to be amended to reflect comments raised.
- Biodiversity and Green Infrastructure policy to be amended to reflect Sussex Wildlife Trust.

Site/Policy: SA23 – Land at Hanlye Lane to the east of Ardingly Road, Cuckfield

Number of Comments Received

Total: 16	Support: 1	Object: 11	Neutral: 4
------------------	-------------------	-------------------	-------------------

Comments from Organisations / Specific Consultation Bodies

- Various Sustainable Transport measures are suggested to be included in the policy requirement for this site (West Sussex County Council)
- About half of this proposed allocation is occupied by good quality semi-improved grassland priority habitat, which is not referred to. (Natural England)
- Existing local sewerage infrastructure has limited capacity to accommodate the proposed development – reinforcement of the wastewater network will be required ahead of connection of new development. (Southern Water)
- The requirements under Biodiversity and Green Infrastructure should be strengthened. There must also be a requirement for a 15-metre buffer to the north of Horsegate Wood ancient woodland. (Sussex Wildlife Trust)
- The landscape, ecology and other features on this site are particularly sensitive to change and the site should not be expected to accommodate 55 dwellings – recommended capacity of 20 dwellings. (Cuckfield Parish Council)
- Suggested text changes to prevent development of southern field, remove reference to high density development, guidance for trees and hedges, to transfer the southern field to the Parish Council, infrastructure requirements. (Cuckfield Parish Council)
- Conflicts with Neighbourhood Plan. (Cuckfield Parish Council)

Key Issues Raised – Residents / Other

- None.

Actions to Address Objections

- Amend Infrastructure Delivery Plan (IDP) to include recommended sustainable transport infrastructure and refer to this in policy wording.
- Site promoter will be required to carry out further ecological work
- Remove reference to “high density development” in policy text
- Ancient woodland is in a small part of south eastern corner of the southern field forming part of the boundary. It is not proposed to develop this field as stated in this policy, therefore there is no requirement for a 15m buffer.
- Site promoter will be required to carry out a Landscape and Visual Impact assessment (LVIA) which may impact the yield for this site
- Site promoter to liaise with Parish Council regarding feasibility of transfer of southern field to them.
- Utilities policy criteria already refers to Southern Water suggested text.
- Amend Biodiversity and Green Infrastructure policy criteria to Sussex Wildlife Trust suggested text.

Site/Policy: SA24 – Land to the north of Shepherd’s Walk, Hassocks

Number of Comments Received

Total: 76	Support: 2	Object: 71	Neutral: 3
------------------	-------------------	-------------------	-------------------

Comments from Organisations / Specific Consultation Bodies

- Support the provision of a tunnel as it would complement non-motorised connectivity to the SDNP (South Downs National Park)
- Various Sustainable Transport measures are suggested to be included in the policy requirement for this site (West Sussex County Council)
- Pleased to see detailed site-specific requirements related to flood risk, satisfied with the proposals related to the planning application therefore no objection (Environment Agency)
- MSDC has not made sufficient self-build plots available, therefore this site should be designated self-build (Hassocks Parish Council).

Key Issues Raised – Residents / Other

- Ignores local resident wishes, undermines the Neighbourhood Plan
- Habitats, wildlife, local infrastructure will suffer
- Friars Oak Fields have been designated as a Local Green Space in the Neighbourhood Plan
- Contravenes the District Plan (residual requirements in DP6)
- Wasn’t included in the District Plan or Neighbourhood Plan, therefore shouldn’t be included now
- Hassocks cannot take any more development. It has fulfilled its housing obligations.
- Field is a vital community asset, much needed open space
- Significant flooding
- Impact on Air Quality Management Area
- Rydon have already received permission for this site
- Traffic pressure, particularly on Ockley Lane in combination with other sites and on London Road/Stonepound Crossroads
- Object to the rerouting of a footpath

Actions to Address Objections

- Many issues raised have been addressed as part of the approved planning application. Policy text will be amended to address the latest position and update evidence submitted as part of the planning application.
- Neighbourhood Plan is not yet “made”, Examiner has submitted his report into the Neighbourhood Plan and recommended the deletion of the proposed designation of this as a Local Green Space.
- Amend Infrastructure Delivery Plan (IDP) to include recommended sustainable transport infrastructure and refer to this in policy wording.

Site/Policy: SA25 – Selsfield Road, Ardingly**Number of Comments Received****Total:** 120**Support:** 2**Object:** 111**Neutral:** 7**Comments from Organisations / Specific Consultation Bodies**

- NPPF tests related to major development in the Areas of Outstanding Natural Beauty apply and need to be met before the allocation can be taken forward. Landscape and Visual Impact Assessment (LVIA) needs to inform if the allocation is taken forward (CPRE & High Weald AONB Unit).
- Evidence is not provided to identify appropriate assessment of the heritage assets has been undertaken on protection of the setting of the asset or assessing archaeology (Historic England).
- Appropriate mitigation will be necessary to protect the Ashdown Forest. LVIA should be undertaken and include impacts on historic setting. (Natural England).
- Existing sewerage infrastructure has limited capacity to deal with this development, although this is not a constraint. Wastewater network improvements required, which will be an infrastructure charge to developers (Southern Water)
- Site is adjacent to a football/cricket pitch, possibility housing could suffer from 'ball strike' – ball strike survey would need to be carried out (Sport England)
- Development is too large for the village, will increase the size of the village by 13%. This level of development is not required (re DP6). Within an Area of Outstanding Natural Beauty (AONB). Ardingly lacks services, site is not sustainable (environmentally or otherwise). Traffic and access issues within the village. Policy wording changes suggested. Location of a replacement scout hut requires consideration. (Ardingly Parish Council)
- Various Sustainable Transport measures are suggested to be included in the policy requirement for this site (West Sussex County Council)

Key Issues Raised – Residents / Other

- Support the sale to support the showground, however, disagree with the site yield as it is too high
- Scale of the site is too large for the village
- Public transport in the village is not sufficient
- Primary school is not large enough to support this development
- Health services are too distant
- Proximity to listed buildings and conservation area adjacent
- Traffic issues within the village
- Loss of Showground Car Park which may have implications in the village during large-scale events
- Support this site over the other two sites considered within the Parish
- Would conflict with the aims and objectives of the Neighbourhood Plan

Actions to Address Objections

- Amend Infrastructure Delivery Plan (IDP) to include recommended sustainable transport infrastructure and refer to this in policy wording.
- Assessment to be carried out to determine whether development is major development in the AONB in the context of Para 172 of the NPPF and liaising with promoters to secure further evidence including submission of a LVIA.
- Appendix C of the Sites DPD includes General Principles for development, this refers to Ashdown Forest. These principles will be made clearer in the Regulation 19 version of the Sites DPD.
- Site promoter will be required to carry out a Landscape and Visual Impact assessment (LVIA)
- Site promoter will be required to carry out a Heritage assessment and engage in pre-application discussion with Historic England and undertake any work necessary.

- Site promoter will be required to assess potential for 'Ball strike' and take necessary actions in consultation with Sport England.
- Update policy wording to incorporate Natural England advice.
- Site Selection Paper 3: Housing and the Sustainability Appraisal contain the justification for selecting and rejecting individual sites and site options. The decision to publish the Sites DPD for consultation was made by Council which consists of Members from across the district.

Site/Policy: SA26 – Hammerwood Road, Ashurst Wood

Number of Comments Received

Total: 24	Support: 2	Object: 20	Neutral: 2
------------------	-------------------	-------------------	-------------------

Comments from Organisations / Specific Consultation Bodies

- Not clear how potential for cross-boundary impacts (e.g traffic and education) and the setting of the Area of Outstanding Natural Beauty (AONB) have been addressed. Site is within the 7km zone. Policy requirements could be added to address these issues (Wealden District Council)
- Lies within a mineral safeguarding area, consider potential for mineral sterilisation (West Sussex County Council)
- Various Sustainable Transport measures are suggested to be included in the policy requirement for this site (West Sussex County Council)
- Pleased to see requirements related to contamination are fully considered, as the site is located on a secondary aquifer (Environment Agency)
- AONB – absence of a Landscape and Visual Impact Assessment and assessment of whether the development is “major” (High Weald AONB Unit & Natural England)
- Priority habitat woodland is present on part of the site, this needs to be referred to in the policy text (Natural England)
- Appropriate mitigation will be required as the site is within 7km of the Ashdown Forest (Natural England)
- Need to conserve and enhance areas of wildlife value, net gain in biodiversity (Sussex Wildlife Trust)
- Site appears to be predominantly woodland, not a workshop (Sussex Wildlife Trust)

Key Issues Raised – Residents / Other

- Village is being bombarded with larger developments
- Village infrastructure is stretched to capacity
- Should not be including sites that are within the AONB
- Ashurst Wood has already identified sufficient sites to meet its housing needs
- Twelve houses does not sound like it would contribute affordable housing which is much needed
- Landowners disagree about the provision of allotments on the site
- Creeping development/infill/outside the built-up area
- Adjacent development was agreed on the proviso there would be no more development south of the road
- SHELAA is out of date as it was published over a year ago
- There are other, better sites in Ashurst Wood

Actions to Address Objections

- Assessment to be carried out to determine whether development is major development in the AONB in the context of Para 172 of the NPPF
- Discuss requirements with West Sussex County Council and amend policy wording to address the requirements for potential mineral sterilisation

- Site promoter will be required to carry out a Landscape and Visual Impact assessment (LVIA)
- Appendix C of the Sites DPD includes General Principles for development, this refers to Ashdown Forest. These principles will be made clearer in the Regulation 19 version of the Sites DPD.
- Amend Infrastructure Delivery Plan (IDP) to include recommended sustainable transport infrastructure and refer to this in policy wording.
- Cross boundary working will continue with all affected authorities.
- Update policy wording to incorporate Natural England advice.
- Amend Biodiversity criteria to Sussex Wildlife Trust suggested text.

Site/Policy: SA27 – Land at St Martin Close, Handcross**Number of Comments Received****Total:** 10**Support:** 3**Object:** 5**Neutral:** 2**Comments from Organisations / Specific Consultation Bodies**

- Require a Landscape and Visual Impact Assessment and assessment as to whether this constitutes 'major' development in the Area of Outstanding Natural Beauty (AONB) (High Weald AONB Unit and CPRE).
- Various Sustainable Transport measures are suggested to be included in the policy requirement for this site (West Sussex County Council)
- Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout (Southern Water).
- Clarity is required in table 2.5 that this site is to deliver only 35 units and the adjacent site allocated in the Slaugham Neighbourhood Plan would deliver the other 30 units. The trigger points for the release of this site should also be mentioned in this policy (Slaugham Parish Council).

Key Issues Raised – Residents / Other

- The Mid Sussex District Plan has identified that there is no need for additional development in Handcross.
- There is abundance of wildlife on the site.
- Impact of volume of additional traffic on local access roads.

Actions to Address Objections

- Assessment to be carried out to determine whether development is major development in the AONB in the context of Para 172 of the NPPF
- Site promoter will be required to carry out a Landscape and Visual Impact assessment (LVIA)
- Include a criterion regarding protection of Southern Water's infrastructure.
- Amend Infrastructure Delivery Plan (IDP) to include recommended infrastructure contributions.
- Site promoter is required to carry out a site-specific transport assessment
- Clarify the quantity of development allocated by the Neighbourhood Plan and application of the trigger point
- Amend Infrastructure Delivery Plan (IDP) to include recommended sustainable transport infrastructure and refer to this in policy wording.

**Site/Policy: SA28 – Land South of The Old Police House,
Birchgrove Road, Horsted Keynes**

Number of Representations Received

Total: 25	Support: 3	Object: 19	Neutral: 3
------------------	-------------------	-------------------	-------------------

Comments from Organisations / Specific Consultation Bodies

- Various Sustainable Transport measures are suggested to be included in the policy requirement for this site (West Sussex County Council)
- Potential cross boundary impacts on infrastructure should be addressed in policy. Site located within Ashdown Forest 7km buffer and should therefore incorporate this issue within the policy or cross reference to policy DP17. (Wealden District Council)
- Incorrect identification of Source Protection Zone (should be 3, not 1). (Environment Agency)
- Absence of LVIA and need to address whether this is ‘major’ development. (High Weald AONB Unit)
- An assessment of impacts on heritage significance should be undertaken as a basis for the site selection. (Historic England)
- Mitigation will be necessary to address impacts on Ashdown Forest. (Natural England)
- The requirements under Biodiversity and Green Infrastructure should be strengthened. (Sussex Wildlife Trust)

Key Issues Raised – Residents / Other

- Impact on medieval field system, AONB, Ashdown Forest, habitats, wildlife, mature trees, rural public footpath, highways and access, infrastructure and amenities.

Actions to Address Objections

- Amend Infrastructure Delivery Plan (IDP) to include West Sussex County Council recommended sustainable transport infrastructure.
- Appendix C of the Sites DPD includes General Principles for development, this refers to Ashdown Forest. These principles will be made clearer in the Regulation 19 version of the Sites DPD.
- Site promoter will be required to carry out a Heritage Assessment and undertake any work as necessary.
- Amend inaccuracy of Flood Risk and Drainage policy criteria noted by Environment Agency.
- Amend Biodiversity and Green Infrastructure policy criteria to Sussex Wildlife Trust suggested text.
- Assessment to be carried out to determine whether development is major development in the AONB in the context of Para 172 of the NPPF
- Site promoter will be required to carry out a Landscape and Visual Impact assessment (LVIA)

Site/Policy: SA29 – Land south of St Stephens Church, Hamsland, Horsted Keynes

Number of Comments Received

Total: 89	Support: 3	Object: 82	Neutral: 4
------------------	-------------------	-------------------	-------------------

Comments from Organisations / Specific Consultation Bodies

- Support this allocation subject to continued discussions regarding detailed policy criteria and any future planning applications (Horsted Keynes Parish Council)
- Site is close to the boundary of Wealden District and it is not clear what the cross-boundary infrastructure impacts would be (Wealden District Council).
- Appropriate mitigation required as the site is within 7km of the Ashdown Forest (Natural England and Wealden District Council).
- Require a Landscape and Visual Impact Assessment and assessment as to whether this constitutes ‘major’ development in the AONB (High Weald AONB Unit & Natural England)
- Green field site, ecological assessment required. Achieve a net gain in biodiversity (Sussex Wildlife Trust).
- Various Sustainable Transport measures are suggested to be included in the policy requirement for this site (West Sussex County Council)

Key Issues Raised – Residents / Other

- Disruption in terms of increased traffic, congestion and impacts on existing infrastructure.
- The road width of Hamsland is insufficient which already serves 125 dwellings, extensive work would be required to widen access, this is unrealistic because of the steep slope, impact on pavement width affecting pedestrian safety, difficulties for emergency vehicles.
- The Challoners/Hamsland area already has long standing parking difficulties which this development will exacerbate
- The AONB Units’ assessment of the site should be re-examined.
- The access would affect a large number of mature trees.
- Impacts on wildlife, views from footpaths
- There is an alternative site available which would not have access problems, namely Jeffreys Farm.
- A petition has been signed by 350 residents objecting to the allocation of this site.

Actions to Address Objections

- Promoter has carried out parking and traffic surveys, transport assessment and obtained pre-application advice from West Sussex County Council to demonstrate access arrangements are suitable and safe. Have agreed also to improve local traffic conditions by setting back existing on street parking into the adjacent verge.
- Assessment to be carried out to determine whether development is major development in the AONB in the context of Para 172 of the NPPF
- Site promoter will be required to carry out a Landscape and Visual Impact assessment (LVIA)
- Site promoter will be required to carry out ecological assessment.
- Site promoter will be required to carry out a Tree Survey to confirm access arrangements are achievable.
- Appendix C of the Sites DPD includes General Principles for development, this refers to Ashdown Forest. These principles will be made clearer in the Regulation 19 version of the Sites DPD.
- Amend Infrastructure Delivery Plan (IDP) to include recommended sustainable transport infrastructure and refer to this in policy wording.
- Cross boundary working will continue with all affected authorities.

Site/Policy: SA30 – Land to the north of Lyndon, Reeds Lane, Sayers Common

Number of Comments Received

Total: 13	Support: 1	Object: 10	Neutral: 2
------------------	-------------------	-------------------	-------------------

Comments from Organisations / Specific Consultation Bodies

- Various Sustainable Transport measures are suggested to be included in the policy requirement for this site (West Sussex County Council)
- Contrary to Hurstpierpoint and Sayers Common Neighbourhood Plan. Sayers Common lacks necessary infrastructure to support additional development. Transport impacts on Reeds Lane need to be assessed, as well as flood risk (Hurstpierpoint and Sayers Common Parish Council)
- The requirements under Biodiversity and Green Infrastructure should be strengthened to make it clear that avoidance is always the first requirement as per the mitigation hierarchy. Further ecological assessment is required to be able to assess impacts on ecology (Sussex Wildlife Trust)

Key Issues Raised – Residents / Other

- The allocation is not in accordance with the Hurstpierpoint and Sayers Common Neighbourhood Plan
- Infrastructure in the village is insufficient
- There is no need for additional housing in Sayers Common

Actions to Address Objections

- Site promoter is required to carry out a site-specific transport assessment and obtain pre-application advice from West Sussex County Council on the suitability of detailed highways arrangements
- Site promoter will be required to carry out further ecological work
- Site promoter is required to carry out a site-specific flood risk assessment
- Amend the Sites DPD to make clear the status and role of the Infrastructure Delivery Plan (IDP) regarding infrastructure requirements.
- Amend IDP to include recommended sustainable transport infrastructure and refer to this in policy wording.

Site/Policy: SA31 – Land to the rear Firlands, Church Road, Scaynes Hill

Number of Representations Received

Total: 29	Support: 4	Object: 23	Neutral: 2
------------------	-------------------	-------------------	-------------------

Comments from Organisations / Specific Consultation Bodies

- Various Sustainable Transport measures are suggested to be included in the policy requirement for this site (West Sussex County Council)

Key Issues Raised – Residents / Other

- Departure from ribbon development pattern.
- Restrictive covenant with the owners of properties in Downs View Close which prevents any development of a significant part of the land the subject of SA31.
- Impact on countryside, parking, highways, Scaynes Hill Common, and has a dangerous access.
- Scaynes Hill is an unsustainable location.
- Junction of Church Road and A272 would be affected
- Houses along Nash Lane have outfalls from their septic tanks which drain onto the site.

Actions to Address Objections

- Amend Infrastructure Delivery Plan (IDP) to include recommended sustainable transport infrastructure and refer to this in policy wording.
- Covenants do not prohibit the ability to allocate the site or approve planning permission however if they do exist the details will be explored with the site promoter /landowner.
- Site promoter is required to carry out a site-specific transport assessment and obtain pre-application advice from West Sussex County Council on the suitability of detailed highways arrangements
- No objections received from water companies related to foul water drainage however issues re septic tanks to be explored further

Site/Policy: SA32 – Withypitts Farm, Turners Hill**Number of Comments Received****Total:** 30**Support:** 2**Object:** 24**Neutral:** 4**Comments from Organisations / Specific Consultation Bodies**

- Various Sustainable Transport measures are suggested to be included in the policy requirement for this site (West Sussex County Council)
- Small-scale Area of Outstanding Natural Beauty (AONB) site, incongruous with the countryside. Not a rural exception site. Council's housing target doesn't require its allocation (CPRE)
- Require a Landscape and Visual Impact Assessment and assessment as to whether this constitutes 'major' development in the AONB (High Weald AONB Unit & Natural England)
- Heritage Assessment required (Historic England)
- Appropriate mitigation required as the site is within 7km of Ashdown Forest (Natural England)
- No infrastructure concerns based on information provided to date (Thames Water)
- Turners Hill Parish Council strongly object as it brings no benefits to the village, public transport is poor, no health provision in the village, walk to the primary school is unsafe, access is dangerous, visual impact, last working farm in the Parish, AONB (Turners Hill Parish Council)

Key Issues Raised – Residents / Other

- None

Actions to Address Objections

- Assessment to be carried out to determine whether development is major development in the AONB in the context of Para 172 of the NPPF
- Site promoter will be required to carry out a Landscape and Visual Impact assessment (LVIA)
- Site promoter will be required to carry out a Heritage assessment and engage in pre-application discussion with Historic England and undertake any work necessary.
- Amend Infrastructure Delivery Plan (IDP) to include recommended sustainable transport infrastructure and refer to this in policy wording.
- Appendix C of the Sites DPD includes General Principles for development, this refers to Ashdown Forest. These principles will be made clearer in the Regulation 19 version of the Sites DPD.

Site/Policy: SA33 – Ansty Cross Garage, Ansty**Number of Comments Received**

Total: 11	Support: 4	Object: 5	Neutral: 2
------------------	-------------------	------------------	-------------------

Comments from Organisations / Specific Consultation Bodies

- Various Sustainable Transport measures are suggested to be included in the policy requirement for this site (West Sussex County Council)
- Due to current sites use as a commercial filling station, consideration of potential contamination is required prior to redevelopment – site specific requirements could be strengthened to reflect this (Environment Agency)
- Heritage Assessment required (Historic England)
- Strongly object to the allocation as Ansty has already seen numerous developments in recent years. Traffic concerns (particularly regarding the roundabout). No infrastructure to support this development (Ansty and Staplefield Parish Council)

Key Issues Raised – Residents / Other

- None

Actions to Address Objections

- Site is not located on the filling station itself; it is located to the north (car showroom) – seek clarification from the Environment Agency and amend policy requirements if needed.
- Amend Infrastructure Delivery Plan (IDP) to include recommended sustainable transport infrastructure and refer to this in policy wording.
- Developer will be required to carry out a Heritage assessment and undertake any work as necessary to assist.

General Policies**Policy: SA34 – Existing Employment Sites****Number of Comments Received**

Total: 11	Support: 2	Object: 6	Neutral: 3
------------------	-------------------	------------------	-------------------

Comments from Organisations / Specific Consultation Bodies

- Object to the inclusion of Old Court House, East Grinstead – it is not in B1/B2/B8 use (Site Promoter & East Grinstead Town Council)
- Protection of existing employment sites is supported in principle (Wealdent District Council)
- Query why Philpots Quarry, West Hoathly, is not included within this list (West Hoathly Parish Council)
- Amend final criterion to include reference to conforming with other plan policies (CPRE)
- Remove/amend Barns Court and First Farm as this is not solely in commercial use (Site promoter)
- Remove Benfell (Hurstpierpoint) as the site is promoted for residential use
- Remove Ivy Dene Industrial Estate (East Grinstead) as the viability of continued use on this site is uncertain, and employment needs can be met without requiring this site (Site promoter)
- Amend site boundaries (Site promoters - various)

Key Issues Raised – Residents / Other

- None

Actions to Address Objections

- Investigate objections relating to sites not in B1/B2/B8 uses and remove where appropriate
- Include additional sites where they meet the use clas (B1/B2/B8) criteria

- Review proposed boundary changes and amend where necessary
- Review proposed wording changes and amend policy wording where appropriate.
- Amend paragraph 3.16 in consultation with West Sussex County Council

Policy: SA35 – Safeguarding of Land for Strategic Highway Improvements

Number of Comments Received

Total: 12	Support: 3	Object: 4	Neutral: 5
------------------	-------------------	------------------	-------------------

Comments from Organisations / Specific Consultation Bodies

- Support the policy in order to set a framework for future housing/employment needs – accords with NPPF (DMH Stallard – promoter of SA20 Imberhorne Farm)
- Support the safeguarding of land for the A23/A2300 as this is included within the Growth Deal (West Sussex County Council)
- Support delivery of the schemes to improve strategic highways which serve the airport such as the A23, A264 and A22. Improvements to the A23 Junction at Hickstead could assist in improving the flow of traffic on this key transport artery to the M23 and to Brighton. (Gatwick Airport Limited)
- Concern that the policy is general in nature and that specific areas of land will need to be identified. Although this will be kept to a minimum, this should be reflected in the policy wording. Include reference to Biodiversity net gain (Sussex Wildlife Trust).
- The A22/A264 is already congested in peak hours, there is a need for Tandridge District Council, Surrey County Council, MSDC and West Sussex County Council to continue to work together to bring forward A22 upgrades. The DPD should acknowledge the possibility that improvements may not be deliverable at the Felbridge junction, amend para 3.16 to acknowledge that alternative strategy approaches may need to be introduced (West Sussex County Council)
- Junction of A272/London Road should be safeguarded to enable delivery of SA6: Marylands Nursery (Bolney Parish Council)
- Policy should include the safeguarding of Dukes Head Roundabout and junctions of, and between, Vicarage Road and Grange Road with the Turners Hill Road (Worth Parish Council)

Key Issues Raised – Residents / Other

- The assessment criteria for predicting the financial gain that is used in identifying the need to provide Safeguarding of Land for Strategic Highway Improvements needs explaining
- Existing congestion on A22 and A264 needs addressing
- Many of the proposed individual development schemes indicate only sketchy proposals for dealing with the increase in traffic which will (and has been) generated by continuing development in East Grinstead.

Actions to Address Objections

- Safeguarding areas to be kept under review as forthcoming evidence (particularly related to the A22/A264) emerges
- More specific site-specific Transport Assessments to be carried out
- Jointly commission additional evidence with West Sussex County Council /Surrey/Tandridge to explore highways improvements related to the A22/A264
- Cross boundary working will continue with all affected authorities.
- Potential for including additional safeguarded areas will need to be supported by the Transport Study, impacts arising and any proposed mitigation

Policy: SA36 – Wivelsfield Railway Station

Number of Comments Received

Total: 6	Support: 2	Object: 2	Neutral: 2
-----------------	-------------------	------------------	-------------------

Comments from Organisations / Specific Consultation Bodies

- Support the integrated use of sustainable transport however disappointing that an area allocated as Local Green Space in the Burgess Hill Neighbourhood Plan will be developed (Sussex Wildlife Trust)
- The Growth Deal includes the Burgess Hill Place and Connectivity Programme, a coordinated investment in public realm improvements and sustainable transport infrastructure that are integral to unlock planned growth at Burgess Hill. It is supported (West Sussex County Council)
- Support the proposals to expand and upgrade Wivesfield Railway Station (Policy SA 36) as it would complement the Airport Access Strategy which aims at improving sustainable transport access routes and options for travel to the airport. As GAL is the largest employer in the south east, it is likely that this route will be utilised by current and potential employees therefore increasing the modal transport share and the possible alternatives to the use of private cars for travel to the airport. (Gatwick Airport Limited)

Key Issues Raised – Residents / Other

- Any expansion must take into account the nearby junction of Valebridge Road and Janes Lane to avoid further traffic congestion in the Worlds End area and beyond. Transport Assessment to be carried out.

Actions to Address Objections

- The NPPF allows for an LGS designation to be subsequently allocated for a different purpose in a subsequent Development Plan Document if this is evidenced and justified. Carry out additional evidence to support justification for development in LGS.

Policy: SA37 – Burgess Hill / Haywards Heath Multifunctional Network

Number of Comments Received

Total: 81	Support: 6	Object: 71	Neutral: 4
------------------	-------------------	-------------------	-------------------

Comments from Organisations / Specific Consultation Bodies

- Concerned at the level of uncertainty from this policy. We would welcome acknowledgement that multifunctional networks would have the benefits to deliver benefits to biodiversity. The creation of a network could aid or hinder connection and function in the natural environment. (Sussex Wildlife Trust)
- Agree in principles to support provision of more sustainable transport opportunities in the area. Wish to work with Mid Sussex on the appropriate implementation of this policy – the policy should reference cross boundary working (East Sussex County Council).
- Lewes District Council support the principle of the safeguarded routes, the principle is consistent with the District Council's own adopted objectives to reduce the causes of climate change and promote alternative modes (Lewes District Council)
- Supported insofar as they relate to the Mid Sussex Growth Deal - The Growth Deal includes the Burgess Hill Place and Connectivity Programme. The Place and Connectivity Programme includes proposals to deliver a comprehensive pedestrian / cycle link between Burgess Hill and Haywards Heath (West Sussex County Council)

- Wivelsfield Parish Council supports the objections cited by the Theobalds Road Residents' Association (Wivelsfield Parish Council)
- Welcome the inclusion of this policy and policy wording (British Horse Society)
- Need for non-vehicular links between Burgess Hill and Haywards Heath has long been obvious and should be extended south to Hassocks. (CPRE)
- Theobalds Road is a private road and bridleway which is unsuitable for a Mid Sussex cycle highway. Pedestrians and equestrians will have to give way to cyclists (Mid Sussex Area Bridleways Group)
- Theobalds Road is a public ancient bridleway with priorities for pedestrians, metalled as an equestrian pathway. It is a private road. The route will be a commuter route, pavements on Valebridge Road will be too narrow. The route would need to conform with design requirements. How would the route be managed and maintained during construction and onwards? (Theobalds Road Residents' Association)
- In order to be deliverable and comply with design requirements, it is implied that Compulsory Purchase Orders would need to be used to purchase the road from residents and adjoining farmers. (Theobalds Road Residents' Association)
- Strongly support the route and MSDC's strong commitment to delivering the scheme (West Sussex Access Forum)
- Should be a cycle path connecting the Northern Arc to Wivelsfield Station, and Wivelsfield Station / Worlds End to the Town Centre (Worlds End Association)

Key Issues Raised – Residents / Other

- Object to the use of Compulsory Purchase Orders (CPOs) - would lead to the loss of private land (frontage of properties, front gardens) and possible blight
- Many established trees, hedges, verges, biodiversity on this route, their loss would impact on the historic character of the area
- Residents had not been made formally aware of the proposals, particularly as CPOs are required. Lack of public consultation.
- No objection to cycle path as long as it is within the existing highway boundary
- Disagree with the route chosen, particularly the eastern route
- Would make access from/to Foxhole Close dangerous
- There are few benefits as the route does not connect to any established cycleways
- Cyclists would be able to use the roads safely if speed limits were reduced
- No consideration of the safety of cyclists, pedestrians and equestrians
- No evidence of need from cyclists for this route

Actions to Address Objections

- The safeguarded areas shown in the map accompanying SA37 are indicative and a number of options are being investigated. The final route option is still to be determined; detailed designed work will be carried out to inform this.
- Detailed design work will be carried out to determine the exact specification of the proposed routes.
- Consultation was carried out in accordance with the District Council's adopted Statement of Community Involvement (SCI) – including publicising through social media, libraries & help points, press release and email alert to subscribers and statutory consultees. The provision of exhibitions and displays goes beyond this requirement.
- The Council does not consider the use of Compulsory Purchase of private property appropriate to facilitate any route. Policy wording will be amended in the next draft of the Sites DPD to make this clear.

Policy: SA38 – Air Quality

Number of Comments Received

Total: 6 **Support: 1** **Object: 4** **Neutral: 1**

Comments from Organisations / Specific Consultation Bodies

- Concur with the requirement for air quality assessments to be provided in relation to impacts on Ashdown Forest (Natural England)
- Council notes the HRA and certain considerations which are key to the conclusion of “no adverse impact” on the Ashdown Forest. The Council reserves the right for further comment upon receipt of its own inspector’s report on this matter (Wealden District Council)
- Call for a policy that is clear, objective, fair, flexible and legally compliant – changes to SA38 are needed (CPRE)

Key Issues Raised – Residents / Other

- The NPPF has been clear on air quality guidance and potential impacts of air quality since 2012, however this policy has only been drafted seven years later. Reference to the 2019 version should be replaced by latest version of the NPPF.
- This consultation requires latest air quality statistics in order to assess the air quality of proposals before the go ahead.

Actions to Address Objections

- Air quality/HRA/Ashdown Forest matters to be addressed within the Statement of Common Ground with Wealden District Council
- Review references to NPPF and revise/update where appropriate

General Comments

Site Allocations DPD – General Issues / Principles

General

Comments Received: 18

- Overpopulation of the South East (Resident).
- Lack of supporting infrastructure for housing and employment growth – missing from ‘four main aims’ of the DPD (Resident).
- Jargon could be simplified/explained, e.g. Northern West Sussex Housing Market Area (Resident)
- Copthorne taking greater levels of growth than other villages in the District – lack of infrastructure to support this (Resident).
- Overdevelopment of East Grinstead - insufficient infrastructure (Residents - multiple).
- Burgess Hill regeneration is inappropriate in terms of building heights, parking provision, and impact on highways and blue light services (Resident).
- Insufficient infrastructure in Burgess Hill (Residents - multiple).

Actions to Address Comments:

- Amend the Sites DPD to make clear the status and role of the Infrastructure Delivery Plan (IDP) regarding infrastructure requirements.
- Review the text of the DPD to amend for clarity/remove jargon.

Conflict with Neighbourhood Plans

Comments Received: 1

- Neighbourhood Plans must be protected, and reference in the document to their position in the Development Plan requires clarification (Resident).

Actions to Address Comments:

- Amend the Sites DPD to explain the Development Plan and status of Neighbourhood Plans.

Consultation

Comments Received: 2

- Worth Parish Council regrets that Mid Sussex did not discuss with it either the outcome of the Site Selection process or the possible use of Developer Contributions prior to the publication of the results. The Parish Council considers that it is better placed than Mid Sussex to determine how Developer Contributions can best be used to the benefit of the local community and requests that Mid Sussex implement a policy for Community Infrastructure Levy (CIL) as set In District Plan para 3.34 as matter of urgency (Worth Parish Council).
- Publicity of the consultation has been minimal, particularly in terms of the insufficient display at East Grinstead Library. The display was not well publicised or informative (Sussex Ramblers and Resident).

Actions to Address Comments:

- Amend the Sites DPD to explain the Development Plan and status of Neighbourhood Plans.
- Have liaised with Town and Parish Councils throughout the process of preparing the Sites DPD, this will continue
- The draft Infrastructure Delivery Plan (IDP) sets out requirements in line with the adopted Development Infrastructure and Contributions SPD and was prepared in consultation with infrastructure providers. It has been prepared to provide guidance on the scope of possible infrastructure, its status will be made clearer in the Regulation 19 Sites DPD.
- Consultation was carried out in accordance with the District Council's adopted Statement of Community Involvement (SCI) – including publicising through social media, libraries & help points, press release and email alert to subscribers and statutory consultees. The provision of exhibitions and displays goes beyond this requirement.

Duty to Co-Operate

Comments Received: 4

- Horsham District Council welcomes that our authorities have a close joint working relationship, which is important given that, together with Crawley Borough, our authorities make up the Northern West Sussex Housing Market Area (NWS HMA). It is helpful that we are working together on joint projects such as the Economic Growth Assessment update and have worked closely on matters relating to strategic and affordable housing needs across the HMA. HDC is committed to working with our neighbouring partner authorities to achieve the best outcomes for our wider area. Welcome also that work is progressing on a bilateral Statement of Common Ground (SOCG) between our authorities, to update the Northern West Sussex Position

Statement dated March 2016. We support Mid Sussex's continuing liaison with neighbouring authorities, including the SDNPA, to ensure cross-boundary strategic priorities are fully addressed.

- Support Mid Sussex's continuing liaison with neighbouring authorities, including the SDNPA, to ensure cross-boundary strategic priorities are fully addressed. (South Downs National Park).
- Tandridge has noted that it is proposed to include SANG to the west of SA20. Tandridge currently does not have any SANG but as noted in the SOCG, the proposed Garden Community could include SANG as part of its open space provision. The emerging LP is undergoing its examination, and in line with the Statement of Common Ground, Tandridge will continue to liaise with and work with MSDC on the provision of SANG.
- Gladman has concerns relating to strategic cross boundary issues, notably unmet housing needs, and what arrangements are in place to ensure housing needs of the HMA are met in full. (Developer).

Actions to Address Comments:

- To continue to work with Tandridge District to explore options for the provision on a strategic SANG.
- The strategic issues, such as unmet housing need were dealt with during the District Plan Examination. As the 'daughter' document, the Site Allocations DPD does not need to revisit this issue. Strategic issues will be revisited through the planned District Plan Review.

Typos/Errors

Comments Received: 1

- Description of the Development Plan in para. 1.4 should refer to Supplementary Planning Documents (CPRE Sussex).
- Glossary definitions of "Section 278 Agreement" and "Sites of Nature Conservation Importance" have become subsumed into a single definition (CPRE Sussex).

Actions to Address Comments:

- Review the Sites DPD and make suggested amendments.

Diagrams/Maps

Comments Received: 12

- SA5 map includes only one of the four sites being allocated (Developer)
- The full extent of the addition to the built-up area is not possible to discern from the drawing provided in SA4. SMD consider that the full extent of the proposed addition to the built-up area to the west of Copthorne should be shown in the plan so that it can be commented upon in full. SMD suggests that it should encompass the area covered by the outline planning permission 13/04127/OUTES, as shown on the accompanying drawing TOR-185004-DPD-001 (Developer)

- We are pleased to note that the SDNP boundary is shown on the proposed site allocation maps; a somewhat minor point, but we note that boundary is difficult to clearly recognise (South Downs National Park).
- Figure 1.1 (page 9) refers to the West Sussex County Council Local Plan, there is not one Local Plan for West Sussex County Council and the reference should be amended to read Joint Minerals Local Plan and the West Sussex Waste Local Plan (West Sussex County Council).
- In regard to SHELAA site 818 in SSP3, the Built-Up Area Boundary does not reflect the current built development adjacent the site, the boundary needs revision to reflect the true built form (Developer)
- In regard to SHELAA site 219 in SSP3, the Built-Up Area Boundary does not reflect the current built development adjacent the site, the boundary needs revision to reflect the true built form (Developer)
- To ensure a consistent approach to the location of BUA boundaries revisions should be made as proposed (Developer)
- Having objectively assessed the proposed 'Built-up Area Additions' as shown on the proposal map for Scaynes Hill we consider that a revision should be made to include the land to the north of Firlands to provide a consistent approach (Developer)
- Given that the site (Land to the rear of 1 - 11A Crawley Down Road, Felbridge) benefits from a resolution to grant permission for its redevelopment and is identified in some evidence base documents as an existing housing commitment of the Council's, we support the Council's proposal to re-align the settlement boundary to include the site (Developer)
- Crest Nicholson considers that the proposed Site (Land north of Old Wickham Lane, Haywards Heath) adjoins the actual built up area of Haywards Heath and that the Policies Map should be updated to reflect recent developments at the settlement (Developer)
- A2D consider the settlement boundary defined on the adopted Policies Map to be out-of-date, as it fails to take account of permitted developments which have subsequently been built out. This includes development to the West of Old Brighton Road North approved under planning ref. 12/02128/FUL and land north of Horsham Road, approved under planning consent DM/17/0747 and DM/15/3772 respectively (Developer)
- The document: <https://www.midsussex.gov.uk/media/2690/map-of-folders-meadow-folders-lane-burgess-hill.pdf> is very out of date (Resident).

Actions to Address Comments:

- Maps to be reviewed ahead of the Regulation 19 stage and amended to correct errors.
- Regulation 19 stage will be accompanied by a draft Policies Map
- Amendments to Built-Up Area boundaries will be addressed ahead of Regulation 19 stage and made clearer.

Saved Policies

Comments Received: 1

- Should Clock Field be deleted from this list, as this development is almost completed? (Resident)

Actions to Address Comments:

- This policy can now be deleted.

Evidence Base

Comments Received: 10

- Highways England have no in principle objections to the Council's proposals. However, this position is subject to robust transport assessment of the individual and cumulative transport impacts of the council's proposals (Highways England)
- The DPD/Local Plan should include a specific policy on the key issue of the provision of sewerage/wastewater [and water supply] infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5-year periods. (Thames Water)
- It is currently unclear from the published Transport Study documents how proposed development in the Plan will impact on the East Sussex road network particularly around Ditchling. Further clarification is needed on the outputs from the transport modelling work on the East Sussex road network (East Sussex County Council).
- Tandridge would be concerned at any worsening of the situation at the A264/A22 junction which operates over capacity and welcomes the policy requirement requiring a Sustainable Transport Strategy (Tandridge District Council).
- There appears to be a discrepancy between the additional allocated employment sites shown in table 2.1 of the DPD and the transport modelling assumptions from the Mid Sussex Transport Study (MSTS) scenarios 7 and 8. (West Sussex County Council).
- The Mid Sussex Transport Study report provided is not sufficiently detailed to demonstrate that the traffic congestion at East Grinstead can be mitigated (Felbridge Protection Group).
- Whilst it is acknowledged that the IDP focuses on the infrastructure and community facilities required to support the proposed site allocations. It fails to acknowledge the need to provide for specialist accommodation, such as extra care accommodation. The need to deliver specialist accommodation must therefore also be addressed in the IDP (Developer).
- In preparation of the SA DPD, the Council has not looked to update its assessment of need for specialist accommodation, now 3 nearly 4 years out of date. The HEDNA 2016 Addendum is therefore the only available evidence base, although the DPD does not rely on it and is in need of updating (Developer).
- The call for sites used to produce the SHELAA document on which the council basis its information can already be considered out of date. The Site Selection Paper 3 and its associated documents is based on a cut off point for site submission of 31st July 2018. This is already 15 months out of date as of October 2019 (the end of the DPD consultation period) and there has been no inclusion of new potential sites and no re-assessment of sites which have been discounted for reasons where situations may have changed such as ownership/availability/marketability of sites (Developer).

Actions to Address Comments:

- To continue to work with WSCC and Highways England to ensure a robust transport assessment is undertaken. Site promoters are required to carry out site specific Transport Assessments and engage in pre-application discussions with WSCC.
- To review and revise wording of Plan in relation to the provision of sewerage/wastewater infrastructure.

- In the updated Transport Assessment specifically identify and provide analysis of impacts of development generated by the Site Allocations within the East Sussex area.
- The updated Transport Assessment will review the impacts of development on the A264/A22 junction. The outcome of this work will be shared with the relevant highway authorities (West Sussex and Surrey) to ensure they are satisfied that the impact of development on the highway network at East Grinstead can be mitigated.
- The Transport model scenarios will be updated to ensure the correct mix of sites is tested.
- It is not considered necessary to identify specialist accommodation in the IDP as it cannot be considered infrastructure.
- The evidence relating to the need for specialist accommodation will be updated as part of the District Plan review, along with the wider housing need. The supply of specialist accommodation will be monitored through Authority Monitoring Reports.
- The Council have always maintained that the SHELAA is a live document and sites can be submitted to it at any time. The SHELAA will be updated as at 1 April 2020. This version will include new sites submitted during the Reg 18 consultation and those submitted to the Council outside the 'call for site' period.

Climate Change

Comments Received: 1

- We do not consider that the Council can any longer avoid having a specific, robust, policy as an integral part of its Local Plan to address its own commitments to reduce climate change impacts via the planning process, and its expectations of those who become involved in the planning process to do so. A robust climate change policy would feed directly into your Local Plan objectives, particularly those addressing environmental protection, healthy lifestyles and economic vitality (CPRE Sussex).

Actions to Address Comments:

- The strategic issues, such as climate change, were dealt with during the District Plan Examination. As the 'daughter' document, the purpose of the Sites DPD is to allocate sufficient sites to meet the residual housing requirement. The Sites DPD does not need to revisit this issue. The correct time to revisit these strategic issues will be through the District Plan Review.
- Appendix C of the Sites DPD includes General Principles for development, this refers to sustainability and references District Plan policies DP39-42. These principles will be made clearer in the Regulation 19 version of the Sites DPD.
- The Council is preparing a Design Guide SPD which will contain principles for sustainable development related to design.

Site Selection

General Objection

Comments Received: 29

- Note that for a number of sites there are specific requirements for addressing surface water flood risk. We support this detail, however, for clarity where a site-specific Flood Risk Assessment is required on this basis the Environment Agency would not provide

comment. We would look to West Sussex County Council as Lead Local Flood Authority alongside your own drainage engineer to assess the content (Environment Agency).

- An assessment of impacts on heritage significance should be undertaken as a basis for the selection of each site for allocation. We are unable to identify the evidence that supported such assessments in the draft Site Allocation DPD, and cannot discern the measures that may be necessary to conserve and enhance heritage assets that may be affected within the draft DPD beyond generic statements on protection setting or assessing archaeology. (Historic England).
- The scope for archaeological significance of allocated sites should be determined prior to allocation. Where there may be archaeology of possible national significance more detailed investigative work will be necessary. This may affect the developable area of sites or their capacity to deliver the floorspace or units proposed (Historic England).
- We note that the Site-Specific Requirements for each of the employment sites allocated under policy SA1 include much less than those for housing under policy SA11. It is not clear why this is when employment sites should also deliver a net gain in biodiversity as required by NPPF paragraph 170 and could contribute to a coherent network of green infrastructure as required in the majority of the housing allocations (Sussex Wildlife Trust).
- Waste management facilities may need future improvements/ expansion to accommodate this requirement, but it is unknown at this time what this would be, and the timescales for this (West Sussex County Council – Waste management).
- Future development should have regard for, and contribute to, the aspirations for new walking and cycling infrastructure listed in the West Sussex Walking and Cycling Strategy 2016-2026. (West Sussex County Council).
- The developments should also seek to support the aspirations of the government's Cycling and Walking Investment Strategy, which advocates the development of Local Cycling and Walking Infrastructure Plans (LCWIP). MSDC may wish to consider developing LCWIPs in the three main towns and perhaps also some of the larger villages. This may help to secure new walking and cycling infrastructure associated with future development (West Sussex County Council).
- All sustainable infrastructure is required to be designed and provided at an appropriate scale to the development and surrounding environment to enable travel by sustainable modes that meet local and national objectives on sustainable travel and air quality (West Sussex County Council).
- • The failure to allocate sufficient sites to meet the need for extra care housing is contrary to Adopted Local Plan Policies DP25 and DP30 and therefore fails to be "Justified" and "Effective" (Developer).
- At present, the necessary evidence to demonstrate why these sites are deliverable has not been published. It is ultimately unclear as and when they will deliver and whether they could be considered 'deliverable' to contribute to the Council's 5YHLS. We are also unable to undertake a review as to whether the delivery rates and lead-in times for these sites are realistic given no trajectory has been published (Developer).
- None of the new plans – Northern Arc in particular, and now these new proposals, make any mention of the provision of new relief roads for the centre of Burgess Hill. Land and funds MUST be set aside, at the very least to provide a southern link from Jane Murray Way to Keymer Road and thence Ditching Road. More and more traffic being fed into Folders lane and Keymer Road are particular potential problems (Resident).

Actions to Address Comments:

- Amend text clarify that Local Authority Drainage engineers that would assess information submitted in relation to flood risk.
- As set out in the Site Selection methodology, the Council's Conservation Officers have undertaken assessment of impacts on heritage significance during the site selection process and informed the policy criteria. These assessments can be shared with Historic England for review. Planning policy officers will continue to work with Conservation Officers and Historic England (where appropriate) to ensure heritage assets are not harmed.
- The County Archaeologist has been consulted during the site selection process and informed the site selected for allocation. The need for investigative work has been identified in the policy where required.
- Appendix C of the Sites DPD includes General Principles for development, this refers to biodiversity net gain. These principles will be made clearer in the Regulation 19 version of the Sites DPD.
- Continue to liaise with WSCC waste management team.
- To liaise with WSCC on update to IDP to ensure walking and cycling infrastructure is included.
- The development of Local Cycling and Walking Infrastructure Plans (LCWIP) is not a matter for the Site Allocations DPD to consider.
- To continue to liaise with WSCC and site developers to ensure sustainable transport requirements are provided as part of the development of strategic sites
- Prepare an AONB topic paper to further explain the site selection of sites in the AONB and how this conforms to the District Plan strategy and intentions of the NPPF.
- Prepare a topic paper setting out how the demand for specialist accommodation (in the form of elderly persons accommodation) has been met.
- An updated housing land supply position and further evidence of the deliverability of sites will be prepared to support the Reg19/submission versions of the Plan.
- The strategic transport matters at Burgess Hill are being addressed through other Council projects. Policy requirements of sites in Burgess Hill will require contributions to these strategic transport projects. The Strategic Transport Study does not require such mitigation.

Site Selection Paper 1: Assessment against District Plan Strategy

Comments Received: 5

- No specific justification is provided within the "High Level Assessment" document as to why it did not pass the above criteria. (Developer)
- The latter section of this criterion states that "sites that deliver levels of growth, significantly beyond that required by the District Plan strategy, are not considered to be compliant with the strategy." Crest Nicholson have significant concerns over the use of this criterion to identify additional development sites across the remainder of the plan period. In part this concern arises due to the fact that the requirements for specific settlements are expressed in the MSDP as being "minimum requirements", rather than absolute requirements. (Developer).
- This criterion seeks to differentiate between sites which are connected to or remote from existing settlements. We agree with the Council that this is a reasonable exercise in principle; however, the application in this case is flawed. In particular the Council's approach appears to consider the relationship of sites to the built-up area boundary as defined on the out of date Policies Map. (Developer).

Actions to Address Comments:

- Review SSP1 to ensure methodology is clear; sites have been assessed in accordance with methodology and the currently adopted built-up area boundaries.
- A review of a Built-up Area boundaries is taking place alongside the DPD and a Topic Paper will be produced.

Site Selection Paper 2: Site Selection Methodology

Comments Received: 0

No comments were received that objected to the Site Selection Methodology

Site Selection Paper 3: Housing

Comments Received: 72

- Object to the findings of individual site assessments (Developers – multiple)
- Factual errors identified in the findings of individual site assessments (Developers – multiple)
- An assessment of each proposed allocation should be undertaken to determine whether it comprises major development in the AONB; if determined to be major development the allocation should be deleted (High Weald AONB Unit)
- The site selection process should identify sites with potential to result in an unacceptable impact on a heritage asset; these sites should then be sifted out or assessed in greater detail (Historic England).
- Support rejection of sites with potential for adverse effects on designated sites; concern in relation to proportion of greenfield sites proposed for allocation and absence of detailed ecological survey data (Sussex Wildlife Trust).
- Support for the rejection of sites 495: Butchers Field and 691: Land east of High Street, Ardingly (Ardingly Parish Council and multiple residents)
- Support for the rejection of site 688: Land to west of Turners Hill Road, Crawley Down (Rowfant Society and multiple residents)
- Support for the rejection of site 727: Overshaw Cottage, Lewes Road, East Grinstead (multiple residents)
- Object to the rejection of the strategic site at Crabbet Park (Site 18) – the site should have been tested further and could meet Crawley’s agreed unmet housing needs if allocated; the potential to meet a proportion of Mid Sussex’s housing need at a new settlement should also be tested further (Felbridge Protection Group).
- Object to site selection methodology on the basis that sufficient weight is not assigned to different criteria of the assessment; object to conclusions reached in relation to Jeffreys Farm (Site 69) (Developer)

Actions to Address Comments:

- Evidence provided for sites will be reviewed. Site Selection Paper 3: Housing will be revised where appropriate to account for additional information where it is in accordance with the site selection methodology. Reported factual errors will be reviewed and addressed.

Site Selection Paper 4: Employment

Comments Received: 1

- Site Selection Paper 4 concludes there is little difference between the two Science and Technology Park options. Evidence is provided to address the differences on Flood Risk, Ancient Woodland and Highways criteria. Additional evidence is provided related to highways and access arrangements for the option of a Science and Technology Park south of the A2300. The benefits and disadvantages of each site should have been considered more thoroughly (Developer)

Actions to Address Comments:

- Evidence provided for sites will be reviewed. Site Selection Paper 4: Employment will be revised where appropriate to account for additional information where it is in accordance with the site selection methodology. Reported factual errors will be reviewed and addressed.

Housing Requirement / Supply

General Objection

Comments Received: 29

- Support the aim of the DPD to allocate sufficient housing to address the residual necessary to meet the identified housing requirement for the district up to 2031. It is to be welcomed that the DPD meets in full the agreed quantum of unmet housing need for the Northern West Sussex Housing Market Area, to be addressed in Mid Sussex, of 1,498 dwellings. (Horsham District Council).
- The distribution of housing across the settlement categories is felt to be proportionate and is therefore supported (Developer).
- Fails to identify a sufficient number of sites in order to be likely to deliver the residual housing requirement established under District Plan DP4. The limited number of sites places the overall level of delivery at risk, given that the relationship with the District Plan is not effectively balanced. Nor is there evidence that the approach established under DP6 to support the release of small sites is helping to re-address that balance. (Developer)
- We welcome the aim of the document to allocate sufficient sites to ensure that the housing requirement in Mid Sussex is met in full (Wealden District Council).
- MSDC is struggling to meet the substantial housing requirement as agreed in the adopted local plan. This issue will be compounded by the increase in housing requirement, as a result of the stepped housing trajectory, which increases to 1,090 dpa between 2024/25 and 2030/31 (Developer).
- In order to rectify this issue of soundness prior to next stages of consultation of the Sites DPD it is suggested that the Site Selection process is revisited to consider sites which fall outside of the AONB (Developer)
- We submit that the Site Allocations DPD as currently drafted, is unsound, on the basis that it doesn't identify sufficient sites for development to meet the need, particularly those already identified as suitable for housing development (through the development control process) (Developer).
- Concerned that the housing requirement will not be sufficient to meet the needs of the district over the plan period. Whilst it is noted that the policy allocates a number of sites from a variety of sources, we believe further allocations are needed to ensure a flexible and responsive supply of housing land is available over the course of the plan period, as a contingency (Developer).

- The Council should take into consideration potential future unmet need (beyond what was considered in the District Plan) from neighbouring authorities at this stage, instead of waiting for the District Plan Review starting in 2021 (Policy DP5 – Planning to Meet Future Housing Need) to ensure the Plan is robust and addresses the OAHN across the Housing Market Area (HMA). (Developer)
- It is our contention that the SADPD will not meet the minimum requirements for housing delivery as envisaged by the District Plan. Therefore, the SADPD is unsound (Developer)
- The scale of growth proposed in policy SA10 of the Reg 18 Plan provides for limited flexibility and does not reflect the spatial strategy set out in the adopted Local Plan. The level of growth directed to category 2 settlements in policy SA11 of the Reg 18 Plan is significantly short of that proposed in the adopted Local Plan, and there is a clear miss-match between what is said to be the minimum residual requirement for each settlement category in policy SA10 and what is actually allocated in policy SA11. (Developer)
- The Council has only identified a surplus of 445 units that equates to 2.8% of the overall supply. The supply position is therefore more susceptible to rapid change if delivery from key sites stalls or slows. (Developer)
- Policy SA10 (Table 2.3) is inconsistent with the NPPF and has not been correctly based on the evidence available. This has serious consequences for selecting an appropriate strategy for the future provision of housing in Mid Sussex District. The most obvious conclusion is that many more greenfield sites are allocated in the Draft Plan than are required (CPRE)
- It is not apparent that resilience to the effects of global warming has been considered as part of the assessment of individual site sustainability (CPRE).
- It is also not apparent that the Council search for suitable housing development sites has given sufficient attention to maximising opportunities to increase housing within the major town centres as part of town centre regeneration opportunities and as an alternative to such extensive greenfield site allocations, some of them within or affecting important designated areas (CPRE)

Actions to Address Comments:

- The approach towards site selection is clearly set out in Site Selection Papers 1, 2, 3 and 4. The Sustainability Appraisal sets out the assessment of reasonable alternatives. The assessment of omission sites and results will be set out in revised versions of Site Selection Paper 3: Housing, and 4: Employment.
- The strategic issues, such as unmet housing need were dealt with during the District Plan Examination. As the 'daughter' document, the Site Allocations DPD does not need to revisit this issue. Strategic issues will be revisited through the planned District Plan Review.
- Prepare an AONB topic paper to further explain the site selection of sites in the AONB and how this conforms to the District Plan strategy and intentions of the NPPF.

Commitments

Comments Received: 2

- The Council have applied an optimistic trajectory for the delivery of development associated with Burgess Hill (Developer).

- Hardriding Farm, Pease Pottage Phase 3 (SHLAA ID: 666) (200 units in phase), and absent clear evidence to explain its advanced trajectory - the development may deliver at a slower rate (Developer)
- Land north of Clayton Mills, Hassocks (SHLAA ID: 753) (500 units): based on Start to Finish averages, the development may deliver later and at a slower rate than envisaged. (Developer)
- From this review, the delivery from these four sites, in particular, appears to be based on overly optimistic lead-in times and delivery rates than that which would be expected from similarly sized sites as detailed in 'Start to Finish'. Our review does not claim that these sites will not come forward in the plan-period, but if delivery was delayed and/or came forward at a slower rate, additional sites would be required to make up the shortfall. These examples serve to highlight that achieving the Council's requirement for a rolling five-year supply is fragile. (Developer)

Actions to Address Comments:

- A revised Housing Trajectory will be prepared to support the Reg19/submission version of the Plan.
- There will be continued dialogue with house builders to delivery trajectory are realistic and supported by evidence.

Windfall Allowance

Comments Received: 9

- The number of additional dwellings attributed to windfalls is inconsistent with evidence. The windfalls contribution of 588 dwellings shown in Table 2.3 significantly under-represents the supply of housing which is likely to be derived from this source over the plan period. It is therefore clear that the windfall allowance shown in Policy SA10 (Table 2.3) is not justified. A contribution of 972 dwellings from small windfall sites (up to 9 dwellings) and 500 from large windfall sites is entirely justified by the evidence (Worth Parish Council).
- The consequence of underestimating the windfall contribution is to overstate the residual housing requirement for the district by 884 dwellings (Worth Parish Council).
- The Sites DPD places significantly greater reliance on windfall sites than the District Plan, without providing suitable evidence to support the assumptions made. The Council is therefore encouraged to rely less on non-identified sources of housing growth (which by their nature are unpredictable in relation to the realisation of the spatial strategy) and to plan more effectively by identifying additional sites for allocation in the Regulation 19 version of the Sites DPD (Developer)
- The Council's now proposed approach doubles the windfall allowance, only a year on from the adoption of the Local Plan when a higher figure was not considered justified and the planning policy background has not materially changed. The Council's approach, also potentially double counts housing already planned for in Neighbourhood Plans and is already accounted for in terms of overall housing numbers (Developer).
- The Council currently place too heavy a reliance of windfall development, also allocating sites which could come forwards as windfall development (Developer).
- Policy SA11 and SA33 identify the land at Ansty Cross garage (Ansty) for residential development of 12 dwellings. This is a brownfield site, the majority of which is within the development boundary and as such development of the site would already be supported by existing District Plan policy and would be considered a 'windfall' site. The Council cannot have it both ways, the reliance on windfall development cannot be increased whilst also seeking to allocate those sites which would be categorised as

windfall, this results in double counting which would be unjustified and therefore unsound. (Developer).

- Paragraph 2.24 of the Site Allocations DPD indicates that this increase is to “reflect changes in national policy and District Plan Policy DP6 that supports development of up to 9 dwellings that are contiguous to existing Settlement Boundaries and based on past performance”. However, the wording of Policy DP6 of the District Plan was of course known at the time of agreeing the current windfall allowance and therefore a change could only be justified through the availability of new evidence since the adoption of the District Plan. (Developer).

Actions to Address Comments:

- The Windfall Topic Paper will be reviewed and updated in light of any additional evidence and the passing of time since its preparation.

Housing Requirement – Under/Over Supply

Comments Received: 17

- The addition of these two ‘marginal’ sites takes the number of units allocated within Category 1 settlements to 1412, this is 572 units above the minimum residual housing figure. This oversupply is not justified within the DPD or supporting evidence base. Removing these ‘marginal’ sites will still result in the DPD that delivers more than the minimum housing requirement in the lifetime of the local plan (Sussex Wildlife Trust)
- It is agreed that the Council applying a buffer to the residual requirement was entirely appropriate and necessary in order to ensure delivery of the Council’s housing requirement. Without this buffer then any non-delivery, or even delay in delivery, of individual sites, which is inevitable to some extent over the Plan period, would have the potential to result in the Council not being able to achieve its housing requirements (Developer)
- The overall supply from Table 2.3 is 16,845 dwellings which aims to exceed the District Housing requirement by 455 dwellings by the end of the Plan period, but there is bound to be slippage and the flexibility of a 2.7% over-provision is supported in principle. However, the figures are not precise, and it is considered that this is still a fragile margin to compensate for non-delivery, particularly in the strategic housing allocations. The margin should be greater and a 10% non-delivery margin to extant planning consents and outstanding allocations is standard practice and should be applied (Developer)
- The Parish Council notes that the superior performance of Option B over Option A arises from its ability to deliver significantly more new homes than the District Plan Minimum Requirement. The Parish Council believes that it is unnecessary to deliver significantly more new homes than the District Plan Minimum Requirement. The Parish Council proposes that the size of the ‘buffer’ should be reduced in part by the elimination of the Site 519 to address the points made in points 8 and 9 above. (Worth Parish Council)
- Additional land should be identified and the inclusion of an appropriate buffer to be included on top of the housing requirement as it is unlikely that all of the sites in the Council’s housing land supply will come forward as anticipated due to the complex nature of schemes as stated above. (Developer)
- We note that the total supply is only 3% above the minimum requirement. This leaves very little flexibility to address any delays in sites coming forward or a reduced level of development being achieved on the strategic sites during the plan period (as evidenced by the Burgess Hill reduction). Para 11a of the NPPF is clear in the need for local planning authorities to ‘positively seek opportunities to meet the development

needs of their area' and to 'be sufficiently flexible to adapt to rapid change'. The lack of flexibility in the housing supply leads us to question whether the Reg 18 Plan complies with national policy (Developer).

Actions to Address Comments:

- The under/over supply against the District Plan requirement will be finalised in the Reg 19/submission version of the Plan. Table 2.3 will be updated following this.

Five Year Housing Land Supply

Comments Received: 2

- It is unclear how the Council will seek to maintain a 5-year housing land supply over the plan period as there does not appear to be any policy trigger to bring forward corrective action. Owing to the fact that the authority is encircled by Green Belt to the north it is recommended that the Local Plan Review mechanism is included within the policy wording which includes appropriate triggers in the event that the Council and/or neighbouring authorities are not meeting their full identified housing needs (Developer).
- In the absence of a Planning Inspectorate review (either by appeal or through the formal APS examination) we have undertaken our own deliverability assessment of the supply to determine whether there is sufficient evidence to demonstrate a 5YHLS. From this review (informed by the latest relevant policy and guidance) we have amended the delivery from nine sites. From these amends we consider that in fact the Council can at best only demonstrate 4.80 years (i.e. a shortfall of 192-units) (Developer).

Actions to Address Comments:

- There will be continued dialogue with site promoters/house builders regarding delivery trajectories, supported by evidence. A revised Housing Trajectory will be prepared to support the Reg19/submission version of the Plan.

Settlement Hierarchy (DP4/DP6)

Comments Received: 21

- There is an error in Appendix B of the DPD with regards to the figures at West Hoathly and Sharpthorne (West Hoathly Parish Council)
- The Parish Council believes there are inaccuracies in commitments/completions figures for Crawley Down and Copthorne; therefore, the residual requirement at these settlements should be zero meaning no sites should have made it past the first stage of the site selection process. (Worth Parish Council)
- There is a deficit at Category 3 settlements of 136. The DPD seeks to increase development at Category 1, however this approach does not meet the development needs at Cat3 and there are opportunities for additional sites to be allocated in this category (Developer)
- There are limited or no allocations at Category 2 settlements, particularly Cuckfield and Hurstpierpoint. There are sites in these areas which are less constrained than those chosen at Category 3. (Developer)
- It is not clear what the purpose of Appendix B is given the residual requirements are 'met' within the DPD (Developer)

- The distribution is not in accordance with DP4/DP6 as more homes are directed to category 3 than category 2. (Developer)
- There are insufficient allocations to meet the need at Bolney, the Council has rejected all site options at this settlement which appears unsound. (Developer)
- Hurstpierpoint should not have a residual need of zero as it is a category 2 settlement, the DPD presents the best opportunity to allocate additional sites at this location to meet needs. It is unclear whether Hurstpierpoint has met its need. (Developer)
- Although DP4/DP6 were approved in the District Plan, the Sites DPD should re-assess whether this is fit for purpose. (Developer)
- Additional development should be directed to Haywards Heath given it is a Category 1 settlement (Developer)
- Handcross, as a Category 3 settlement, is well placed to accept additional housing growth (Developer)
- No rationale is given in the Sites DPD to explain the difference between the figures set out in the District Plan (DP4/DP6) and the revised figures. (CPRE)

Actions to Address Comments:

- Individual sites are assessed in Site Selection Papers 1, 3, 4 and the Sustainability Appraisal, giving reasons for why they were rejected at each stage. The site selection process accounts for the Settlement Category (DP4) as well as individual settlements (DP6) - the sites chosen were those that were most consistent with this strategy.
- Review Appendix B, amend where required to address any errors in the figures or for clarity.
- The approach towards site selection is clearly set out in Site Selection Papers 1, 2, 3 and 4. The Sustainability Appraisal sets out the assessment of reasonable alternatives.

C2 Need / Requirement / Supply

Comments Received: 5

- It is generally welcomed that the Council has acknowledged a need for Extra Care accommodation. It is strongly contested that the HEDNA significantly underestimates the actual need which is not being met. The actual unmet need now is calculated as at least 462 units, of which 75% need to be for sale (367 units), with the undersupply of for sale units increasing to 604 units by 2030 (Developer).
- It is therefore evident that the sites on which the Local Plan is wholly reliant in delivering specialist accommodation for older people will not address the identified need for specialist older persons accommodation or need for extra care accommodation specifically. In short, the problem will continue to worsen (Developer).
- There are only 88 potential extra care units identified, against a need now for 492 units (as identified in the Need Assessment), leaving a residual shortfall of at least 404 units now (72%) which will increase to at least 516 units by 2032 (Developer).
- The Adopted Local Plan is wholly reliant on the Sites DPD to identify and address any shortfall (Developer).
- The need to deliver extra care housing (and other forms of specialist accommodation) should have therefore been an essential consideration at the outset to accord with the Adopted Local Plan, the NPPF (para 61) and the PPG guidance that specifically supports the provision of and allocation of sites for specialist accommodation where

there is an identified unmet need (reference 006 Ref ID: 63-0013-20190626) (Developer).

- In summary our representations on the Draft Plan relate specifically to the failure to address the need for housing for elderly people within the plan. This is against a background of a number of evidence documents produced in respect of the District Plan (adopted 2018) which demonstrate an ageing population in Mid Sussex, a shortage in provision of specialist accommodation and, fundamentally, a need for policy intervention to deliver specialist housing. The Site Allocation DPD fails to achieve this (Developer).
- There is no specific policy in the DP which allows for the delivery of specialist accommodation or care homes, albeit it is recognised that policy DP6 does allow for development within towns and villages with defined built-up area boundaries. The Site Allocations Document and its relationship with the DP and its supporting housing evidence is therefore fundamentally flawed. The Site Allocations Document fails to grapple with housing requirements of a significant specialist sector in the face of evidence of demonstrating clear need (Developer).
- The consultation on the Site Allocations DPD does not include any additional evidence-based documents in respect of housing for older people or specialist accommodation. No mention is made in the Site Selection Paper 3: Housing Sites as to whether the need for care homes has been assessed (Developer)
- It is necessary for the Council to allocate additional sites for Care Home developments to meet the need identified in the District. If land is not allocated then, as identified in the PPG, there is no certainty over the delivery of this type of development and the Plan will fail in a key objective (Developer).
- There is clear and immediate need to allocate specific sites for C2 uses and that the failure to do so renders the SADPD unsound. (Developer)

Actions to Address Comments:

- Prepare a topic paper setting out how the demand for specialist accommodation (in the form of elderly persons accommodation) has been met.
- Consider if the Sites DPD requires additional policy relating to provision of specialist accommodation in light of this.

Residual Housing Figure

Comments Received: 2

- Delivery assumptions are optimistic and do not form a credible baseline. If a more realistic trajectory were applied, it would leave the Council short of their target by circa 2,000 new homes (Developer)
- We commend the Council for seeking to meet their residual housing requirement in full, however the proposed housing supply components do not represent a credible baseline from which to calculate residual need. In this respect, we have some concerns regarding the balance between strategic and non-strategic scale allocations and the anticipated delivery trajectory. We would encourage the Council to allocate additional sites to deliver this increased residual need. Further, we would urge them to prioritise medium sized sites that can delivery quickly and require minimal intervention to supporting infrastructure, but still make a meaningful contribution to affordable housing needs. (Developer)
- The actual 'Updated Minimum Residual Requirement' does not, at 1,507 reflect the target set out in the table 2.3 in policy SA10 (1,962); and that the associated commentary on the overall housing requirement in section 2.3 of SSP3 (Oct 2019) also contradicts table 2.3 in policy SA10, such that clarification needs to be provided

as to what the correct residual requirement is. Reading between the lines it would appear that the Minimum Residual Requirement is 1,507, but that 1,962 is being allocated to provide some flexibility. In addition to the above, table 2.4 of Policy SA10 does not then reflect what is actually proposed in policy SA11 and table 2.5 (Developer)

Actions to Address Comments:

- There will be continued dialogue with site promoters/house builders regarding delivery trajectories, supported by evidence. A revised Housing Trajectory will be prepared to support the Reg19/submission version of the Plan.

Self-Build / Custom Build

Comments Received: 1

- None of the allocations set out in the Site Allocations DPD make any reference to self-build. It is considered that MSDC has failed in their duty under the self-build act and consideration towards the provision of self-build within the district must be given within the DPD (Developer)

Actions to Address Comments:

- A topic paper setting out how the self-build duty is being for filled will be prepared to support to Reg 19/submission version of the Plan.

Employment Requirement / Supply

General Objection

Comments Received: 6

- Notes that the employment figures have been updated in accordance with the method used for the District Plan, that additional need has been identified, and that there is an excess in supply identified to provide a buffer. This is supported. (Developer)
- Development for additional employment would be best sought from brownfield sites (Developer)
- Note that additional sites are located close to the Horsham boundary, therefore await further information in the emerging evidence base to assess any impacts (Horsham District Council)
- A broader spread of sites across the district would have been preferred as a strategy (Developer)

Actions to Address Comments:

- Additional sites put forward during the consultation period will be reviewed in a revised Site Selection Paper 4: Employment, subsequently appraised in the Sustainability Appraisal to assess their suitability for allocation.
- Continued liaison with neighbouring authorities regarding any potential cross-boundary impacts (none identified in the evidence to date).

Development Policies

Additional Policy Area Suggested

Comments Received: 3

- We strongly advise the Site Allocations DPD should include clearer and stronger policy wording upfront on requiring biodiversity net gain, for individual employment and housing allocations, and strategic allocations (Natural England).
- In order to achieve a robust 'plan-led' approach, we request that:
 1. Substantial efforts are made to maximise the number of allocations for residential development on sites within town centres – presently there are no allocations for residential development within Burgess Hill town centre in the DPD and we would request the Council undertakes a thorough review of sites within the town centre and their potential to deliver residential development; and
 2. Minimum densities should then be set for those sites (Developer).
- A policy in the DPD should be included confirming a presumption in favour of supporting residential land uses on town centre sites such as the Shopping Centre in order to support brownfield residential delivery (Developer).

Actions to Address Comments:

- Appendix C of the Sites DPD includes General Principles for development, this refers to biodiversity net gain. These principles will be made clearer in the Regulation 19 version of the Sites DPD.

General Principles (Appendix C)

Comments Received: 4

- We would ask that mention is made of aerodrome safeguarding considerations (Gatwick Airport).
- Landscape and Visual Impact Assessments (of an appropriate level of detail for plan-making stage) should be carried out of those sites proposed in the AONB to better inform the decision on whether they should be allocated and to inform the criteria that accompanies the allocations (High Weald AONB Unit).
- Under 'Landscape considerations', we welcome the third bullet point which sets out requirements with regard to the SDNP, however, we request that this requirement is integrated within the development criteria of the relevant allocation policies for allocations within the setting of the National Park. Under 'Historic environment and cultural heritage' we suggest reference is also made to historic landscape (South Downs National Park).
- Amend wording in Appendix C to include reference to waste safeguarding (West Sussex County Council).

Actions to Address Comments:

- Appendix C to be reviewed and additional requirement added where necessary.

Supporting Documents

Sustainability Appraisal – General Comments

Comments Received: 20

- Although we wholly support the SA process and assessment of land east and south of Imberhorne Upper School, it does not appear to identify the additional positive contributions the proposal will make towards education and health through the delivery of a 2FE primary school, land for Imberhorne Secondary School, a care village and GP surgery. (Developer)
- The SA/SEA has not considered/assessed all reasonable alternatives which suggests that the Draft SA DPD has not been Positively prepared as it does not meet the objectively assessed needs of the Category 3 Settlements or is Justified by not having the most appropriate strategy when considered against the reasonable alternatives (Developer)
- The Options presented were not sufficiently different in terms of addressing the approved spatial strategy. The choice around options was solely a choice around the overall number of units to be delivered in excess of the minimum residual requirement. There was no reasonable alternative presented in relation to the spatial strategy and the distribution of development between the settlement categories. (Developer)
- Support the conclusions reached in the SA with regard to the inclusion of a supplement policy for existing employment sites in the draft Site Allocation DPD, however concern with the conclusion reached regarding the preferred strategy for meeting the 10-15ha of employment need over the plan period. (Developer)
- All of the options contain the '20 Constant Site' with no derivation of alternative options such as those which seek to divert housing growth away from the AONB or designated heritage assets (Developer)
- Whilst the SA concludes that Option A is the most suitable approach for meeting employment need, need for B8 accommodation could be met through further provision of B8 at the existing Hub site (Developer)
- The Sustainability Appraisal (SA) does not identify the need for specialist accommodation (beyond residential nursing care) as a sustainability issue or problem to be addressed (Developer)
- The SA should consider a pallet of non-AONB sites first, to ensure the protection of designations of a national importance, and only when the most appropriate sites have been considered, move towards the identification of AONB sites (Developer)
- Land opposite Stanford Avenue, London Road, Hassock has been excluded through the Sustainability Appraisal based on a flawed assessment of the other site at Shepherds Walk in Hassocks (Site 221). Concern that the Council have not rigorously considered the reasonable alternative of allocating more of, or all of, the remaining 47 sites (that meet the Council's own suitability criteria) (Developer)
- The SA supporting the Site Allocations DPD must consider a reasonable alternative of removing any prospect of impacts upon the Ashdown Forest. (Developer)
- We support the council's decision to prefer option A (for existing employment sites), as we believe that option A would present greater certainty in regard to environmental, economic and social sustainability objectives for the delivery of development on existing employment sites. (Developer)

Actions to Address Comments:

- Site appraisals will be reviewed following any updates to site assessments in the revised Site Selection Paper 3: Housing

- Assessments related to AONB sites will be reviewed following the additional work on AONB sites requested by the High Weald AONB Unit (assessment of 'Major' development and production of Landscape and Visual Impact Assessment)
- A revised Sustainability Appraisal, addressing any additional site options, policy options and necessary amendments, will be published at Regulation 19 stage.

Habitats Regulations Assessment – General Comments

Comments Received: 6

- Concur with the findings of the HRA report for both the air quality impact pathway and recreational pressure (Natural England).
- For the air quality impact pathway, Natural England agrees with the conclusions drawn, at this stage, that proposed growth through the Mid Sussex draft Site Allocations DPD is unlikely to have an adverse effect on integrity of the Ashdown Forest SPA/SAC. This is given the context of longer-term projections in emissions improvements along with proposed highway improvements as part of the District Plan and Site Allocations DPD, to minimise retardation of improvement in air quality in Ashdown Forest (Natural England).
- Similarly, for recreational pressure, Natural England agrees with the conclusions drawn, at this stage, that proposed growth through the Mid Sussex draft Site Allocations DPD is unlikely to have an adverse effect on integrity of the Ashdown Forest SPA/SAC. This is given the requirement for residential developments to contribute to the Strategic Access Management and Monitoring (SAMM) Strategy as agreed with Natural England and other affected local authorities, as well as the provision of strategic SANG to provide for the target housing growth through the DPD (as in line with District Plan Policy DP17) (Natural England).
- The proposed SANG associated with SA20 will need to be carefully and sensitively designed, in line with agreed SANG guidance, but also to address potential impacts on the nearby ancient woodland at this location (Natural England).
- Wealden District Council notes the direction of the HRA and certain considerations, which are key to the conclusion made of 'no adverse impact' as a result of air pollution on Ashdown Forest, diverge from the approach taken and the overall conclusion made in respect to the HRA Submission Wealden Local Plan. Wealden District Council wishes to reserve the right to further comment on the HRA, when it has had the opportunity to consider the Inspector's letter in detail (Wealden District Council).
- Welcomes the detail of the draft HRA, however, considers that further evidence will be required for the next version of the HRA to support the current recommendations and to conclude that the Site Allocations DPD will not adversely affect the integrity of the Ashdown Forest SPA and SAC (CPRE Sussex).
- Requests that the next version of the HRA includes the number of new dwellings and employment places that are being assessed. It should also state whether the step-up in the housing trajectory as outlined in District Plan Policy DP4 has been taken into account. The HRA should include details of the highways improvements (CPRE Sussex).
- The Council's evidence fails to show that development of the proposed sites at East Grinstead will have no adverse effect on the Ashdown Forest SPA and SAC. No monitoring available for the East Court & Ashplats Wood SANG and the SAMM Strategy to assess its effectiveness (Felbridge Protection Group).
- There is a difference in approach to air quality impacts between Mid Sussex District Council and Wealden District Council (Felbridge Protection Group).

- Acknowledges that the HRA concludes that the Site Allocations DPD will not result in likely significant effects on the Ashdown Forest SPA and SAC (Developer)

Actions to Address Comments:

- In the next version of the HRA report provide additional information on the number of dwellings being assessed and the highways improvements.
- A SANG Topic Paper will be prepared to present evidence on visitor surveys.
- A monitoring strategy is being prepared for SAMM.
- Ongoing discussions with Wealden related to the findings of the Inspector's report into the Wealden Local Plan Examination.