



Site Allocations Development Plan Document Regulation 19 Submission Draft Consultation Form

The District Council is seeking representations on the Submission Draft Site Allocations Development Plan Document, which supports the strategic framework for development in Mid Sussex until 2031.

The Site Allocations DPD, has four main aims, which are:

- 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.

All comments submitted will be considered by a Planning Inspector, appointed by the Secretary of State, at a public examination to determine whether the plan is sound.

The Site Allocations DPD is available to view at:

www.midsussex.gov.uk/planning-building/development-plan-documents/

A number of documents have been prepared to provide evidence for the Site Allocations DPD and these can be viewed on the Council's website at the above address.

Paper copies will also be at the Council offices (see address below) and your local library and available to view if the buildings are able to open during the consultation period.

Please return to Mid Sussex District Council by midnight on 28th September 2020

How can I respond to this consultation?

Online: A secure e-form is available online at:

www.midsussex.gov.uk/planning-building/development-plan-documents/

The online form has been prepared following the guidelines and standard model form provided by the Planning Inspectorate. To enable the consultation responses to be processed efficiently, it would be helpful to submit a response using the online form, however, it is not necessary to do so. Consultation responses can also be submitted by:

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

E-mail: LDFconsultation@midsussex.gov.uk

A guidance note accompanies this form and can be used to help fill this form in.

Part A – Your Details (You only need to complete this once)

1. Personal Details

| | |
|-----------------------------------|--------------------------------|
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The information gathered from this form will only be used for the purposes described and any personal details given will not be used for any other purpose.

Part B – Your Comments

You can find an explanation of the terms used in the guidance note. Please fill this part of the form out for each representation you make.

Name or Organisation:

Pegasus Group on behalf of Persimmon Homes

3a. Does your comment relate to:

| | | | | | |
|----------------------------|-------------------------------------|------------------------------|--------------------------|---------------------------------|--------------------------|
| Site Allocations DPD | <input checked="" type="checkbox"/> | Sustainability Appraisal | <input type="checkbox"/> | Habitats Regulations Assessment | <input type="checkbox"/> |
| Community Involvement Plan | <input type="checkbox"/> | Equalities Impact Assessment | <input type="checkbox"/> | Draft Policies Maps | <input type="checkbox"/> |

3b. To which part does this representation relate?

Paragraph Policy SA ¹³ Draft Policies Map

4. Do you consider the Site Allocations DPD is:

4a. In accordance with legal and procedural requirements; including the duty to cooperate. Yes No

4b. Sound Yes No

5. With regard to each test, do you consider the Plan to be sound or unsound:

| | Sound | Unsound |
|-------------------------------------|-------------------------------------|--------------------------|
| (1) Positively prepared | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (2) Justified | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (3) Effective | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (4) Consistent with national policy | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Policy

6a. If you wish to support the legal compliance or soundness of the Plan, please use this box to set out your comments. If you selected 'No' to either part of question 4 please also complete question 6b.

Policy SA13 is considered to be sound, but amendments to the policy wording are requested in response to 6b below, in order to make it more effective.

6b. Please give details of why you consider the Site Allocations DPD is not legally compliant or is unsound. Please be as precise as possible.

Policy SA13 relates to an allocation for 300 dwellings at 'Land E of Keymer Road and S of Folders Lane, Burgess Hill'. The allocation itself is supported, for reasons set out in the accompanying document titled, 'Assessment of SA 13'.

However, there are two aspects of the policy that should be amended prior to the adoption of the DPD.

Firstly, the policy, and associated Table 2.5, refers specifically to 300 dwellings. Whilst it is possible that the site could deliver 300 dwellings, it is also quite possible that after more detailed assessment, a scheme of slightly more or less than 300 dwellings is considered more appropriate.

A policy that requires 300 dwellings to be achieved therefore might not be the most appropriate solution to the site's development potential. It might result in insufficient parts of the site being properly retained and managed for landscape or biodiversity benefit. Alternatively, it might mean that the site does not deliver as many dwellings as it is capable of doing.

Whilst 300 is a reasonable estimate of what the site might accommodate given its constraints and opportunities, the identification of a precise number to be delivered when a more detailed assessment has not been undertaken or consulted upon is inappropriate.

The second aspect of the policy that requires amendment, is the requirement under the Objectives and Urban Design Principles for 'a central open space' within the eventual layout.

It is acknowledged that open space will be an important part of the eventual development. But whether this is one central open space or made up of smaller open spaces in different parts of the site is considered to be best informed by more detailed landscape and other assessments. This is illustrated by the fact that the Concept Masterplan and Landscape Principles Plan prepared to date by CSA Environmental, has identified two considerable separate areas of open space – one in the northern half of the site, and one in the southern half. Such an approach has been informed by a Landscape and Visual Appraisal which explains why the inclusion of the two distinct and separate areas of open space is considered more appropriate than one larger single area.

As a result, the policy reference to 'a central open space' being required is not necessary or justified.

7. Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to improve Policy SA13, the following changes to the text are sought:

- Rather than refer to an allocation of 300 dwellings, it should refer to an allocation of 'approximately 300 dwellings'.

- Reference to 'a central open space' in the Objectives section of the policy, and to 'a main central open space' in the Urban Design Principles section should be removed. Instead, reference should be made to the importance of open space within the development, without detailing the form it should take. For example, an Objective as follows;

'To deliver a sympathetic and well-integrated extension to Burgess Hill, informed by a landscape led masterplan, which respects the setting of the South Downs National Park, creating purposeful open space incorporating attractive and convenient pedestrian and cycle routes.....'

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick below as appropriate)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

In order to properly respond to any matters arising from the Inspector, the Council, or any other interested parties.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Please notify me when:

- (i) The Plan has been submitted for Examination
- (ii) The publication of the recommendations from the Examination
- (iii) The Site Allocations DPD is adopted

Signature:

Date:

Thank you for taking time to respond to this consultation

MID SUSSEX SITE ALLOCATIONS DPD (REG 19)

REPRESENTATIONS ON BEHALF OF PERSIMMON HOMES

POLICY SA13

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PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

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1. Introduction

- 1.1 These representations are in respect of the Council's Regulation 19 Consultation on the Council's Site Allocations Development Plan Document (July 2020) on behalf of our client Persimmon Homes. Persimmon are one of the owners of the site referred to in the document as '*Land East of Keymer Road and South of Folders Lane, Burgess Hill*'. The site has been allocated for development within the document under Policy SA13 and as such, the focus of these representations will be on this policy.
- 1.2 The site has an area of 15.2ha and is allocated for 300 dwellings including 30% affordable housing which would have a density of 19.6dph across the site as a whole. Our client is in agreement with much of the content of Policy SA13, but objection is raised to some aspects of it, as explained within the representation form, with recommended amendments accordingly.
- 1.3 This accompanying submission explains why the principle of the SA13 allocation at Land east of Keymer Road and south of Folders Lane, Burgess Hill, is considered to be sound, and is consistent with relevant policies of the District Plan and the NPPF.
- 1.4 Policy SA13 covers the whole of the site, and as acknowledged by the Policy it is under the control of housebuilders, however separate parts of the site are owned by separate housebuilders and a landowner who are working collaboratively to deliver the site. As the policy covers the site as a whole, this representation will cover the site as a whole where possible however there are instances where it has been necessary to focus on the extent of our client's control only.
- 1.5 This representation has been informed by the following documents relating to the site, all of which are available on the Site Allocations Library on the Council's website, under SA13;
- Landscape and Visual Appraisal (CSA Environmental, April 2020)
 - Highways Appraisal (Odyssey, July 2020)
 - Ecological Deliverability Report (EAD Ecology, July 2020)
 - Cultural Heritage Statement (RPS, July 2020)
 - Flood Risk and Drainage Appraisal Technical Note (Odyssey, July 2020)
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- Utilities and Services Appraisal Technical Note (Odyssey, July 2020)

1.6 A separate representation has been made in respect of the Sustainability Appraisal.

2. Assessment of Policy SA13

Commentary is provided below on the different sub-sections of Policy SA13, and the appropriateness or otherwise of the requirements within them.

Objectives

- 2.1 The objective of Policy SA13 is *'To deliver a sympathetic and well-integrated extension to Burgess Hill, informed by a landscape led masterplan, which respects the setting of the South Downs National Park, creating a focal point with a central open space incorporating attractive and convenient pedestrian and cycle routes throughout the site providing good connections to local services and facilities.'*
- 2.2 Objection has been made to the requirement for a 'central open space' within the site's layout. Whilst it is possible that such an arrangement might introduce the most appropriate layout for various reasons, this is not yet known. Open space will be an important part of any subsequent layout, but to suggest it needs to be provided in one central open space is considered overly prescriptive and could potentially prevent the opportunity for the scheme to properly respond to the constraints and opportunities present. For reasons set out on the representation form, whilst the principle of the allocation is sound, it is requested that the associated wording of this objective should be amended accordingly. The other objectives set out within the policy are however supported.
- 2.3 Although the site is at present outside the settlement boundary defined by the Mid Sussex District Plan Policies Maps, it is adjacent to areas of settlement within Burgess Hill to the north and the west and as stated within the Council's Sustainability Appraisal is 15 minutes' walk from Burgess Hill Town Centre, which includes the railway station. As such, development of the site would form a natural extension to Burgess Hill that would integrate well with surrounding development, in a sustainable location.
- 2.4 Over time the development will blend into its surroundings and be read as part of the wider residential areas of Burgess Hill. It is considered that the allocation of such a site for residential development is consistent with the requirements of the NPPF to make sufficient provision for housing with the objective of contributing to the achievement of sustainable development and promoting an effective use of land in meeting the need for homes.
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- 2.5 The Concept Masterplan at Appendix F of the Landscape and Visual Appraisal reinforces how the site would be able to form a sympathetic extension to the existing settlement boundary and would be well integrated with the surrounding development, with pedestrian links through the site connecting it to the north and the west. Notable open space would form an integral part of the scheme, albeit in different areas, rather than one central location. A substantial amount of soft landscaping around and through the site would ensure that the development creates a semi-rural feel reflective of its urban edge location.

Urban Design and Layout

- 2.6 Policy SA13 requires development to follow various urban design principles, such as ensuring that it shall be sympathetic to the semi-rural character of Keymer Road and Folders Lane, integrating landscape features and established trees into the development and establishing a strong sense of place through the creation of a main central open space to provide a focus for the development with higher density housing in close proximity to benefit from the provision. This is consistent with the aims of Policy DP26 of the Council's District Plan which requires developments to be of high quality design including appropriate landscaping and greenspace, to create a sense of place and protect landscape features that contribute to the character of the area.
- 2.7 As demonstrated by the Concept Masterplan and Landscape Principles Plan included within the Landscape and Visual Appraisal, the development would be landscape-led with substantial amounts of soft landscaping ensuring that the development would be sympathetic to the semi-rural character of the surrounding area. The existing trees and landscaping will be integrated into the development as a whole, providing visual separation between residential areas and creating a sense of place through an attractive setting and high-quality design. In addition to providing an appropriate development within the site for future users, the retention and strengthening of established landscape features will help ensure the scheme sits comfortably within its surroundings.
- 2.8 As such, the Concept Masterplan demonstrates that appropriate development of the site can be delivered that will be consistent with the underlying requirements of District Local Plan Policy DP26 in terms of its layout and urban design.
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Landscaping

- 2.9 Policy SA13 correctly requires the applicant to undertake a Landscape and Visual Impact Assessment to inform the site layout, capacity and mitigation requirements in order to minimise impact in the most visible parts of the site on the wider countryside and any potential views from the South Downs National Park to the south. The policy also requires that the character and amenity of the existing public footpath to the south of the site shall be protected. As set out above, District Plan Policy DP26 requires development to include appropriate landscaping and greenspace and protect landscape features that contribute to the character of the area. The allocation at SA13 has therefore given proper consideration to the guiding comments set out within the relevant District Plan policy on landscape matters.
- 2.10 As explained within the Visibility section of the Landscape and Visual Appraisal ("LVA"), the site is very well contained in views from the surrounding area by virtue of the adjoining built development that borders the site to the north, and by existing mature vegetation to the west, south and east. There will be very few opportunities for public views of the new houses, with glimpsed framed views of the new houses and access road junctions, possible from Broadlands and Greenacres.
- 2.11 The LVA refers at paragraph 6.6 to the proposed development being well screened in views from the South Downs National Park, with any potential glimpsed views limited to highpoints in the middle distance, where panoramic views towards Ditchling, Keymer and Burgess Hill are possible. Where available, these glimpsed views will not be discernible to the naked eye and will be limited to the rooftops of the new houses seen as a continuation of the built up area of Burgess Hill, set within the mature landscape framework. Close range views from the South Downs National Park where it is closest to the Site, will be well screened by the densely vegetated land to the south and east of the Site.
- 2.12 The LVA concludes at paragraph 6.7 that the Site is capable of accommodating development in line with that shown on the Concept Masterplan and Landscape Principles Plan, without resulting in significant harm to the surrounding local landscape character, or views from the surrounding area, including the South Downs National Park.
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- 2.13 As explained at paragraph 4.32 of the LVA, the site is not covered by any designations relating to landscape character or quality, and due to its physical containment it does not provide an important setting for the adjacent housing areas and is not an important component for the setting of the South Downs National Park. As has been noted in the published capacity assessments it does not provide separation between Burgess Hill and the nearby settlements to the south. As such it is not considered a valued landscape which are offered protection by Paragraph 170 of the NPPF.
- 2.14 The Concept Masterplan demonstrates that the layout will minimise the impact of the most visible parts of the site on the wider countryside to the east and the south through retaining and reinforcing the tree cover on these boundaries. This will also serve to protect the character and amenity of the public footpath to the south. Landscaping will be integral to the development, with large areas of open space and green corridors to be provided which will provide visual separation between residential areas creating an attractive setting and sense of place. The layout will maintain the existing landscape structure and field pattern, and the tree cover on the boundaries will minimise the impact on the neighbouring properties.
- 2.15 As such it has been demonstrated that the identification of SA13 as an allocation will enable a development to be delivered that would include appropriate landscaping and greenspace, minimise views from outside the site and protect landscape features that contribute to the character of the area. Such development would comply with the relevant requirements of District Local Plan Policy DP26 in respect of landscaping.

Social and Community

- 2.16 Policy SA13 requires the site to provide a '*suitably managed and designed on site public open space, equipped children's playspace/kickabout area*'. And to '*mitigate increased demand for formal sport to the satisfaction of the LPA*'.
- 2.17 Such an approach is consistent with the NPPF's encouragement of healthy and safe communities at Chapter 8.
- 2.18 The Concept Masterplan demonstrates how large areas of public open space can be provided within the eventual scheme that would include children's playspace / kickabout areas. As such, development can be delivered that complies with national guidance and Policy SA13's requirements in this regard.
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Historic Environment

- 2.19 Local Plan Policy DP34 requires development to protect listed buildings and their settings, policy DP37 refers to the protection of historic hedgerows, whilst the NPPF sets out how the historic environment should be conserved and enhanced at Chapter 16. Policy SA13 of the draft Allocations DPD therefore correctly notes that there are Grade II Listed Buildings in the vicinity of the site, the closest being High Chimneys which is located to the west. This representation has therefore been informed by the Cultural Heritage Statement prepared by RPS dated July 2020.
- 2.20 The Statement advises that High Chimneys is a designated heritage asset of high significance. This significance is primarily provided by the architectural and historic special interest of the building's fabric and form. The enclosed, domesticated grounds, part of the immediate setting, provide a notable contribution to the asset's significance. Although there is no character or appearance of the former farmstead surviving, the wider setting, of which the Site at SA13 forms a small part, provides a secondary, minor level of contribution to the asset's significance.
- 2.21 The Site's development will result in change to a small part of the asset's wider setting with the introduction of built form to the east within the Site. Any of the screened and filtered views from High Chimneys to the Site will consequently include some legibility of the new development. The Site's development with two storey buildings would be likely to cause less than substantial harm to the significance of High Chimneys. The quantum of harm to the asset's significance would likely be towards the lower end of this spectrum.
- 2.22 With regards archaeological evaluation, the Statement concludes that overall the archaeological potential for remains at the site varies from low for the Roman, Anglo-Saxon, Medieval and Post Medieval periods, and low to moderate for Prehistoric remains. The Cultural Heritage Statement concludes that any necessary modelling would be most appropriately undertaken post planning, secured by an appropriately worded condition on any planning consent.
- 2.23 The hedgerows on site have been assessed within the Cultural Heritage Statement to establish whether they should be defined as historic hedgerows, with one found to mark the historic parish boundary. The Statement
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recommends the substantial retention of the boundary and internal hedgerows, taking opportunities to strengthen the hedgerow's planting.

- 2.24 The Concept Masterplan allows for all such Heritage matters to be appropriately addressed through the informed layout and development of the site, thereby adhering with relevant Local Plan policy and national guidance.

Biodiversity

- 2.25 Policy SA13 requires development to provide biodiversity enhancements within the site and surrounding area, and to conserve and enhance areas of wildlife value to ensure there is a net gain for biodiversity. This is consistent with the requirements of Local Plan Policy DP38 and the NPPF.
- 2.26 This representation has been informed by an Ecological Deliverability Report prepared by EAD Ecology in July 2020. The report advises that *'no impacts on statutory or non-statutory designated sites are considered likely as a result of the development of the site. The development would seek to retain and protect existing habitats of moderate to high ecological value such as hedgerows, semi-natural broadleaved woodland, mature trees and standing water, and to deliver Biodiversity Net Gain through habitat creation and enhancement in Public Open Space. The key species constraints are considered likely to be bats, birds, reptiles and amphibians. A comprehensive mitigation strategy for these species, including provision of suitable habitat/movement corridors within the site, would ensure that the conservation status of populations of these species was maintained.'*
- 2.27 The report concludes that *'There are no over-riding ecological constraints to the development of the site. It is considered that development could deliver biodiversity net gain overall and could be undertaken in compliance with designated-site and protected-species legislation. This would accord with paragraphs 170, 174 and 175 of the NPPF (2019) and Policies DP37 and DP38 of the Mid Sussex District Plan.'*

Highways and Access

- 2.28 Policy SA13 requires the development to provide a sustainable transport strategy to identify sustainable transport infrastructure improvements, demonstrating how the development will integrate with the existing network, providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks. Good permeability should be
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provided across the site with attractive and convenient pedestrian and cyclepath access connecting onto Folders Lane and Keymer Road to improve links to services in Burgess Hill.

- 2.29 In addition to such requirements adhering with the NPPF's support for sustainable transport as set out at Chapter 9 of the NPPF, they are also consistent with District Local Plan Policy DP21. This requires development to provide opportunities to facilitate and promote the increased use of alternative means of transport to the private car such as the provision of, and access to, safe and convenient routes for walking, cycling and public transport and that the scheme protects the safety of road users and pedestrians. It also requires development proposals to take into account whether the scheme is sustainably located to minimise the need for travel, that adequate car parking will be provided and to avoid severe traffic congestion, taking account of any proposed mitigation.
- 2.30 A Highways Appraisal for the site has been prepared by Odyssey, dated July 2020, and is included within the Examination Evidence for Site SA13. This explains how the site would be able to take advantage of existing public transport networks, with bus routes along both Folders Lane and Keymer Road providing services to Burgess Hill town centre and also other nearby settlements such as Haywards Heath. Contributions to, or the direct provision of, improved bus stop infrastructure at the existing stops on Keymer Road and Folders Lane is entirely feasible.
- 2.31 Burgess Hill railway station is located approximately 1km to the north which provides a frequent service to Brighton (a 10-15 minute journey) and London Victoria (a 50 minute journey). The station is also served by the Thameslink Brighton to Bedford service which provides access to various stations in London together with Gatwick and Luton airports. Contributions could be made towards improvements at Burgess Hill station, for example relating to the provision of new or improved cycle infrastructure.
- 2.32 There are also pedestrian routes along both Folders Lane and Keymer Road as existing leading to the facilities within Burgess Hill town centre, which as stated by the Council is within 15 minutes' walk of the site. Separate pedestrian accesses to the site are proposed to both the north and the west. As such the scheme is sustainably located as to minimise the need to travel and can promote the use of alternative means of transport to the private car, linking with existing networks.
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- 2.33 The site as a whole will have two vehicular access points, both via Keymer Road to the west. The Highway Appraisal explains that the approved site access junction from Greenacres onto Keymer Road was designed to cater for future development within the Policy SA13 site and if appropriately widened and extended is not expected to present highway concerns with regard to design, capacity or safety.
- 2.34 Any forthcoming planning application will be accompanied by a full Transport Assessment which will demonstrate the acceptability of these access points in terms of capacity and visibility to ensure that there would not be an adverse impact on highway safety as a result. Although it is acknowledged that there would be an increase in traffic as a result of the development, the Mid Sussex Transport Study has indicated that there is sufficient capacity in the highway network to appropriately accommodate the allocation. It is recognised that traffic movements are often an issue of concern to residents in the vicinity of a new housing scheme and that SA13 is no different in this respect. Our clients will work alongside the highway authority to ensure such concerns are taken account of in subsequent detailed designs for on and off-site proposed works in order to minimise the development's impact in this respect.
- 2.35 The Concept Masterplan identifies a layout that will ensure permeability throughout the site providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks, as required by Policy SA13. The development would also provide opportunities to facilitate and promote the increased use of alternative means of transport to the private car due to its sustainable location and links. Adequate car parking will be provided, and it will be ensured that safe access is provided and that the traffic impacts will be acceptable, with mitigation included where required. It will therefore be ensured that a development is delivered that complies with District Local Plan Policy DP21 in this regard.

Flood Risk & Drainage

- 2.36 Policy SA13 states that measures are required to address flood risk associated with the site and in particular the watercourse which runs across the site and down the western boundary. It goes on to advise that development should avoid areas at risk of surface water flooding and adjacent to the watercourse. The policy requires that the development will need to incorporate SuDS to minimise flood risk.
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- 2.37 A Flood Risk and SuDS Appraisal Technical Note for the site has been prepared by Odyssey, dated July 2020, and is available on the Council's Examination Library under Site SA13. The note explains why there are no major issues from a flood risk or drainage perspective that would pose a constraint to the proposed development at SA13.
- 2.38 The Note advises that it is anticipated the most feasible method of surface water discharge would be "to a surface water body"; the second most-preferred option of the drainage hierarchy as set out in the PPG. Surface water flows generated from the proposed development would pass through suitably designed SuDS features before discharging to the Ordinary Watercourse flowing through the centre of the site. The note goes on to comment that SuDS features are expected to consist of permeable paving and/or an attenuation basin, determined at the outline stage of the scheme and informed by soakage tests. Any discharge offsite would be limited to QBAR equivalent rates, to ensure that flood risk to downstream areas is not exacerbated by the proposed development during flood events up to and including the 1 in 100 year plus 40% climate change event.
- 2.39 The requirements of Policy SA13 regarding drainage, and ability of the scheme to achieve them, will therefore be in adherence with the associated District Plan Policy DP 41 and relevant national guidance on the matter.
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3. Conclusion

- 3.1 The accompanying Representation Form explains why some aspects of Policy SA13 are proposed to be changed. In particular, this relates to the precise number of dwellings to be delivered at the site, and the requirement for one main central open space area within it. For reasons explained within the Representation Form, such concerns can be addressed effectively by minor re-wording to the policy.
- 3.2 This submission has explained why the principle of development at SA13 for approximately 300 dwellings is appropriate and sound. The site's sustainability credentials, located at the edge of a major settlement within the District, ensure it lies within an appropriate location. This representation, together with the documents within the Examination Library under SA13, have demonstrated that a development can be delivered at the site which follows the objectives of Policy SA13 in terms of urban design and layout, landscaping, social and community facilities, historic environment, biodiversity, highways and access, and flood risk. Such objectives have been shown to adhere with the relevant requirements of the District Plan and the NPPF for reasons explained above.
- 3.3 It is therefore considered that the principle of Policy SA13 is sound and should be retained within the emerging Plan, subject to the minor re-wording referred to above.
-