



Planning Policy
Mid Sussex District Council
Oaklands House
Oaklands Road
Haywards Heath
RH16 1SS

Date 23 September 2020
Your ref SA21
Our ref 0704/260091-29

Dear Sirs

**Mid Sussex Site Allocations DPD - Regulation 19 Consultation
Land at Rogers Farm, Haywards Heath - Policy SA21
On behalf of Sigma Homes Ltd**

DMH Stallard LLP act on behalf of Sigma Homes Ltd in relation to the promotion of land at Rogers Farm, Fox Hill, Haywards Heath, as allocated at Policy SA21 of the Site Allocations DPD ("SA DPD"). Please find herewith our Regulation 19 consultation response.

Sigma Homes Ltd support the inclusion of land at Rogers Farm within the SA DPD. It is based on sound evidence base, submitted to the Council through the Call for Sites process, and through the submission of documents to be included in the 'Site Library'. The Council have taken thorough steps to ensure that the SA DPD is based on robust evidence, undertaking a number of rounds of SHLEAA site assessment 'sifting' as well as consulting on the methodology at Developer Liaison Groups and more publicly. Furthermore, the Council have worked with site proponents throughout the process to ensure that sufficient evidence is submitted to demonstrate suitability and deliverability.

The Site – Land at Rogers Farm – Policy SA21

The land at Rogers Farm, is allocated for 25 dwellings, which is a sound estimate of the site capacity based upon constraints and opportunities and a detailed evidence base. A site layout is enclosed showing how this could be delivered, whilst also delivering a range of dwelling types, sizes and tenures, including a policy compliant provision of affordable housing (currently 30%).

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Sigma Homes has provided a suite of technical evidence to the Council which demonstrates that the site is suitable for housing and deliverable in the short term. The following are included within this representation:

- Site layout plan
- Vision Statement
- Ecology Survey
- Landscape and Visual Impact Appraisal
- Heritage Statement
- Transport Technical Note

The above technical studies demonstrate the commitment to this site by Sigma Homes. They also collectively confirm that there are no technical barriers to delivery. The evidence base has been previously submitted to the Council who has sought to consult with statutory consultees throughout the process, independently and via the Regulation 18 consultation as corroboration for this position.

Sigma Homes Ltd welcome the inclusion of small sites within the SA DPD, as a suite of sites capable of meeting the residual housing requirement of 1,280, as set out in the District Plan and Policy SA10 of the SA DPD. This is a sound approach, acknowledging the importance of allocating a range of site sizes and types which are able to offer a range of benefits, including speed of delivery. The NPPF, at paragraph 68, acknowledges the important contribution that small and medium sized sites can make towards meeting the house requirement of an area, noting that they are often built-out quickly. This is further acknowledged in Policy SA21 citing indicative phasing of 1-5 years, making an important contribution towards the Council's rolling 5 year housing land supply, particularly relevant given the uplift in the annual requirement to 1,090dpa from 2024/2025.

The District Plan, within the supporting text for policy DP6, sets out the residual housing need by settlement, it notes that Haywards Heath has a residual housing target of 127 dwellings. It is acknowledged that the residual housing figure has been adjusted to account for commitments since the District Plan, however Policy SA10 states that Category 1 settlements (Burgess Hill, Haywards Heath and East Grinstead) have an updated residual requirement of 706 dwellings. The allocation of land at Rogers Farm, contributes towards meeting that residual housing need, and on the edge of a Category 1 settlement. This is a sound approach to the distribution of housing, having assessed a suitable, available and deliverable pallet of sites.

Strategic Housing and Economic Land Availability Assessment

As noted above, Sigma Homes support the Council's thorough approach to the SHELAA process, commencing with consultation on the methodology to be used throughout the process. We also broadly support the Council's assessment of the land at Rogers Farm (Site #783) through the SHELAA as a sound approach to the site selection process. We welcome the Council's acknowledgement that the site is not constrained by flood risk, Ancient Woodland, SSSI/SNCI/LNR's, a Conservation Area or Archaeology.

However, whilst we note the Council's 'amber' assessment of the impacts on heritage assets, we would dispute the level of harm given that our specialist advisor has concluded this is at the lower end of 'Less Than Substantial Harm'. The rationale and assessment for this are set out in detail within the Heritage Impact Appraisal (July 2020) prepared by the Heritage Collective and should be referred to again before progressing further. As such, we request that the Council review this submitted evidence and revise the wording within the SHELAA site assessment in order to ensure that it forms part of a sound evidence base.

The SHELAA site assessment also notes that the site is more than a 20 minute walk from schools, however, it fails to consider the sustainability credentials that will be delivered as part of the Hurst Farm development, to the south of Haywards Heath also on Fox Hill. Hurst Farm is allocated in the Haywards Heath Neighbourhood Plan for c350 dwellings and benefits from an outline planning application for 375 dwellings, a 2 form entry primary school with Early Years provision, Country Park, car parking and Green Way (DM/17/2739). Once built, the scheme at Hurst Farm will deliver a new primary school in close proximity to the land at Rogers Farm, this will significantly enhance the sustainability of the site. This should be recognised in the site assessment within the SHELAA as it is important for local plans to make appropriate reference to neighbourhood plan proposals as referred to in the NPPG (Paragraph 006 Reference ID: 61-006-20190723). This will enable greater conformity to exist between the two policy documents.

Sustainability Appraisal

The site is assessed in the Council's Sustainability Appraisal, concluding that it is a 'Site that Performs Well', these are a suite of sites which are considered appropriate for site allocation. The Council have undertaken an appraisal of the remaining 51 sites (sifted from the SHELAA process), the Council have then sought to assess the individual performance of sites as well as their performance when compared with other sites in the same settlement.

'Sites that Perform Well' are considered to comply the District Plan, which sets out the Strategic Policies for development. Haywards Heath is a Tier 1 settlement and the land at Rogers Farm is the only site in Haywards Heath that is considered a 'Site that Performs Well'. Policy SA10 identified a minimum residual figures for Tier 1 settlements of 706 dwellings. We therefore wholly support the Council in identifying the allocation of land at Rogers Farm, contributing towards meeting this residual housing need.

The land at Rogers Farm performs well in the Council's Sustainability Appraisal recognising the potential benefits of the proposals. It only performs negatively in relation to access to education, land use, countryside, and heritage. However, as stated above, it fails to acknowledge the sustainability credentials that will be delivered through the Hurst Farm development, namely access to a new primary school. It also appears that that the Council, through the SHELAA process, have over estimated the potential harm on heritage assets.

The site is in proximity to three listed buildings, Cleavewater (Grade II) is opposite the proposed access to the site, Olde Cottage (Grade II) and Rogers Farmhouse (Grade II) are to the south of the site. The Heritage Impact Assessment submitted to the Council during the production of the SA DPD, concludes that there will be a low level of Less than Substantial Harm to Cleavewater, acknowledging that the site is separated from it by a road, and there will be no harm to Olde Cottage and Rogers Farmhouse as there is a strong treed buffer separating the site from the Listed Buildings. We would submit that the Sustainability Appraisal (and the SHELAA) should be amended to reflect the assessment of harm to the Listed Buildings, which we consider to be an overestimate of the levels of harm.

It is noted that all greenfield sites are acknowledged to have an impact on land use and countryside, but it is welcomed that the Council acknowledge the change in character already occurring in this broad location (within the SHELAA).

Delivery

The site is being promoted by Sigma Homes Ltd, a regional housebuilder who are committed to bringing the site forward at the earliest opportunity, reflecting the site allocation. Given that the site is a small site of only 25 dwellings, the Council can be confident that it would be completed within the first 5 year period. Sigma Homes do not envisage impediment to the delivery of the site.



Summary

Overall, Sigma Homes supports the SA DPD and evidence base as a sound approach to the selection of sites to meet the residual housing need remaining from the District Plan. The Council have undertaken a thorough assessment of sites, through various stages of the SHELAA as well as in the Sustainability Assessment. Furthermore, they have engaged with site proponents throughout the process. Sigma Homes also welcomes the Council's 'Site Library' on their website as part of the Regulation 19 consultation, as this provides detailed site assessment evidence for members of the public and statutory consultees to review as part of their submissions, it also demonstrates an open and transparent approach.

Notwithstanding our support for the process and documentation, we would urge the Council to review the Heritage Impact Appraisal (July 2020) submitted to the Council as part of the Site Library process, and contained herewith, and re-consider their assessment of heritage impacts as in the SHELAA. We note the Council's categorisation of 'amber', but request that the text is revised in the interests of consistency of the evidence base.

Sigma Homes and the Council have evidence that the site is suitable, available and deliverable and could be delivered within the first 5 year period, and as such, the site allocation is supported as a sound approach to meeting the residual housing requirement set out in the District Plan.

Sigma Homes reserve the right to participate in the Examination Hearings on submission of the SA DPD to the Secretary of State, and look forward to receiving updates shortly.

For further information, please contact Katie Lamb, Planning Director, on 01293 605192 or at katie.lamb@dmhstallard.com.

Yours faithfully



DMH Stallard LLP