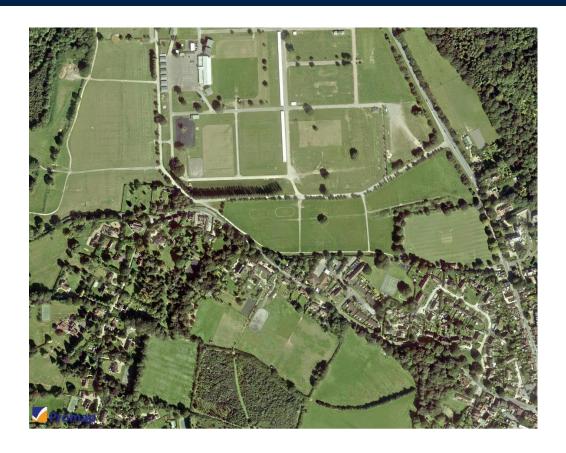
Regulation 19 Submission Draft Consultation

Land West of Selsfield Road, Ardingly









Contents

1.	Executive Summary	1
2.	The Site	2
3.	Draft Allocation – Site SA25	4
4.	National Planning Policy Position	5
5.	Considerations	9
6.	Conclusion	13
App	15	
Appe	16	

Regulation 19 Submission Draft Consultation



Executive Summary

1.1. On behalf of our clients Charterhouse Strategic Land and The South of England Agricultural Society (SEAS) (herein referred to as "our client"), Savills has prepared this representation to the Mid Sussex District Council (MSDC) Regulation 19 Submission Draft Site Allocations Development Plan Document (DPD) Consultation.

The Purpose of the Representations

- 1.2. These representations seek to support the allocation of Land west of Selsfield Road (identified as Site SA25 in the Draft Site Allocations DPD).
- 1.3. The allocation of site SA25 is fully supported. The Site is suitable, available and deliverable. The Site is adjacent to the existing Ardingly settlement boundary, and is not located in a prominent location in the countryside. The development of the site would result in a sustainable addition to the settlement of Ardingly.
- 1.4. The development of the Site will allow for the managed growth of Ardingly, and would allow a level of population increase that can be readily accommodated. Such a level of growth would provide further support for existing local services and would result in a greater level of economic expenditure in the village. It would provide further pupils to the local school, which is currently undersubscribed, and would also provide financial contribution through a Section 106 Agreement which would contribute to the ongoing operation and appropriate upgrade of the local recreational facilities.
- 1.5. The overriding need for housing across Mid Sussex is recognised, and the delivery of 70 new homes from allocation SA25 will provide much needed housing in Mid Sussex. It can be seen from Draft Policy SA11 Additional Housing Allocations that MSDC have sought to distribute homes relatively evenly across settlements, in order to ensure that population growth is balanced between settlements. Category 3 villages have been identified as supplying 238 units in the plan, and Site SA25 makes an important contribution towards achieving this target. This is especially so as it has not been possible to find suitable sites in other Category 3 settlements to allocate the full minimum of 371 homes which has been identified as being the minimum residual housing figure for Medium Sized Villages in table 2.4 of the draft DPD.



2. The Site

- 2.1. The Site comprises approximately 5.2 hectares of land to the north of the settlement of Ardingly. The Site is adjacent to the settlement boundary of Ardingly, designated as being within the High Weald Area of Outstanding Natural Beauty (AONB), and within the 7km Ashdown Forest zone of influence. It is classified as falling within Flood Zone 1. There are no listed buildings on or directly adjacent to the site, although it should be acknowledged that the Grade II Ardingly Church of England Primary School is in close proximity to the site, lying to the west of Street Lane just beyond the western end of the site. The designated Ardingly Conservation Area is located in two discrete sections to the east and west of the site.
- 2.2. The Site is currently a peripheral part of the South of England Agricultural Showground used for overflow car parking on only a handful of days during each year. The approximate Site boundary and the wider Site is shown in relation to Ardingly village (to the south) and the main South of England Agricultural Showground below.



2.3. In terms of a general location, the Site is bordered to the east by the B2028, to the north by the showground, to the west by Street Lane, and to the south by the existing residential development of Ardingly village. The Site is within easy access of the local road network which provides easy access to the M23 as well as nearby villages and towns.





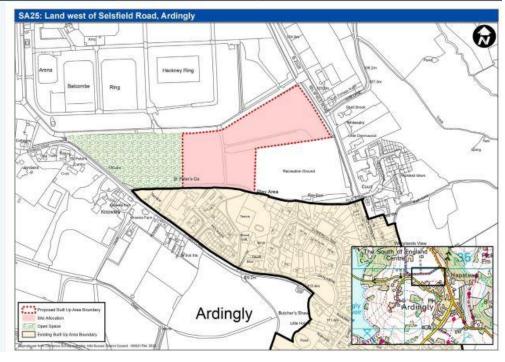
- 2.4. The Site is also located in close proximity to existing public transport, with a bus stop less than 100m from the eastern boundary of the site on the B2028, providing services to Crawley and Haywards Heath. Haywards Heath train station is located only 6km away to the south, and provides regular mainline rail services to both Brighton and London.
- 2.5. Within Mid Sussex district, Ardingly is identified in Policy DP6 of the District Plan 2014 2031 as being a Category 3 settlement, alongside such settlements as Balcombe, Pease Pottage and Handcross.



3. Draft Allocation – Site SA25

- 3.1. Site SA25 constitutes approximately 5.2ha. Of this, approximately 3.2ha is being proposed for development as part of a residential development scheme and associated green infrastructure that will deliver approximately 70 dwellings. This will be located on the central and eastern part of the site, and utilise the historic field boundary that once existed as a delineation point between the proposed development and the remainder of the site. The western 2ha of the site are proposed in the draft allocation to be designated as informal open space, to provide an open buffer between the Conservation Area and listed buildings that are close to the western end of the site along Street Lane.
- 3.2. Early stage discussions have been held with MSDC over the development of the Site. The precise layout of the built form within the Site continues to evolve, and there are ongoing discussions with the District Council and Parish Council to ensure the site can come forward with their support. However, this early engagement is indicative of how the Site is both developable, as outlined in the draft allocation, and readily deliverable.

SHELAA:	832	Settlement:	Ardingly		
Gross Site Area (ha):	5.17	Number of Units:	70 dwellings		
Description:	Housing allocation with on site public open space.				
Ownership:	Private land owner				
Current Use:	Greenfield/parking for showground	Indicative Phasing:	6 to 10		
Delivery Mechanisms:	Land owner has confirmed intent to bring the site forward for development.				





4. National Planning Policy Position

4.1. This section sets out the planning policy context for the Site, and considers the National and Local Policies that are relevant to the Site and the proposals.

National Planning Policy Framework (2018)

- 4.2. The National Planning Policy Framework (NPPF) (2019) sets out the overarching framework used for assessing planning applications and preparing Local Plans, based on the Government's aims for the planning system.
- 4.3. The NPPF seeks to contribute to the achievement of sustainable development, through meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 4.4. It sets out in paragraph 8 that Sustainable development has three interdependent objectives that need to be pursued in mutually supportive ways:

Economic Role – helping to build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity;

Social Role – supporting strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs:

Environmental Role – contributing to protecting and enhancing our natural, built and historic environment; including making effective use of land.

- 4.5. Paragraph 11 sets out a presumption in favour of sustainable development. For plan making, this means;
 - a) Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
 - b) Strategic policies should, as a minimum, provide for objectively addressed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole





- 4.6. Footnote 6 sets out that "the policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change."
- 4.7. Chapter 3 Plan Making clearly sets out the approach that should be adopted by Local Authorities in the preparation of their new Local Plan. Paragraph 16 sets out that plans should:
 - Be prepared with the objective of contributing to the achievement of sustainable development
 - Be prepared positively, in a way that is aspirational but deliverable
 - Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees
 - Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area.
- 4.8. Paragraph 20 sets out new requirements for strategic policies in the Plan making process. This states that:

"Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation."
- 4.9. Chapter 5 Delivering a Sufficient Supply of Homes sets out in paragraph 59 that "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed."
- 4.10. Paragraph 67 states that "planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability."
- 4.11. Paragraph 68 sets out that "small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out more quickly".





- 4.12. Paragraph 72 states that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as extensions to existing villages and towns, so long as they are well located and designed, and supported by the necessary infrastructure and facilities. It goes on to state that strategic policy making authorities should "identify suitable locations for such development where this can help to meet identified needs in a sustainable way". In doing so, it should:
 - a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;
 - b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;
 - c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;
- 4.13. Paragraph 73 covers how local authorities should seek to maintain and supply a delivery of housing, and states that "Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old."
- 4.14. Chapter 8 Promoting healthy and safe communities sets out how "planning policies and decisions should aim to achieve healthy, inclusive and safe places which:
 - a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
 - b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas;
 - c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling."

Planning Practice Guidance

4.15. The Planning Practice Guidance sets out additional guidance to support the policies and guidance contained in the NPPF (2019). The section on *Housing and Economic Land Availability Assessments* sets out guidance for Councils seeking to identify appropriate land to meet development needs. Paragraph 019 (Reference ID: 3-019-20140306) states that:





"Plan makers should assess the suitability of the identified use or mix of uses of a particular site or broad location including consideration of the types of development that may meet the needs of the community. These may include, but are not limited to: market housing, private rented, affordable housing, people wishing to build or commission their own homes, housing for older people, or for economic development uses."

- 4.16. The PPG goes on to advise that when assessing the suitability of sites or broad locations for development, LPAs should be guided by both the development plan, emerging policy and national policy, and; "market and industry requirements in that housing market or functional economic market area."
- 4.17. The PPG continues to advise that the following factors should also be considered when assessing the suitability of a site for development now or in the future:
 - "physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
 - potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;
 - appropriateness and likely market attractiveness for the type of development proposed;
 - contribution to regeneration priority areas;
 - environmental/amenity impacts experienced by would be occupiers and neighbouring areas"



5. Considerations

- 5.1. The adopted District Plan 2014-2031 identifies that the District's Objectively Assessed Housing Need (OAHN) as 14,892, and that there is an unmet need in the Northern West Sussex Housing Market Area of 1,498. Therefore the *minimum* District housing requirement over the plan period is 16,390.
- 5.2. As identified in the Site Allocations DPD, the District Plan 2014-2031 allocated four strategic locations which made provision for the delivery of 5,080 dwellings over the plan period. When taken alongside all other allocations or known completions, this left the housing delivery in Mid Sussex short of its intended target. As part of the District Plan, a commitment to produce a Site Allocations DPD was made to provide further housing allocations and so meet the required need.
- 5.3. Accordingly, the Submission Draft Site Allocations DPD has been produced, which provisionally allocates 1,764 dwellings. This document as a whole is supported in principle, however aspects of particular policies merit additional comment:

Policy SA10: Housing

5.4. Policy SA10 identifies the current status of housing supply in Mid Sussex District, and identifies the residual need for housing when considering the housing supply, completions, and known commitments that have occurred during the plan period of the District Plan. The policy also identifies the spatial distribution of the housing requirement across the various settlement categories of the District. This identifies that a minimum of 371 units should be allocated to Category 3 settlements. This distribution of housing across the settlement categories is felt to be proportionate and is therefore supported.

Policy SA11: Housing Allocations

- 5.5. It is of key importance that development is distributed evenly across the District to ensure that settlements and local infrastructure are not overloaded and so are able to cope with growth without negatively impacting on existing residents. It can be seen from the details set out in Policy SA11 that this has been acknowledged. Policy SA11 specifically identifies the sites and the number of dwellings on each site that will be brought forward as part of the Site Allocations DPD and that proportional growth has been attempted in the distribution of allocations across the District. This has been sought to be achieved through larger more sustainable settlements being given a larger proportion of growth given their current provision of infrastructure and services.
- 5.6. The DPD has identified a number of sites across Category 3 settlements that will provide a cumulative total of 238 dwellings. It has specifically identified that Site SA25: Land West of Selsfield Road, Ardingly, will provide 70 units of the identified provision.
- 5.7. Overall, Policy SA11 is supported. The allocation of the number of sites in policy SA11 is appropriate given the number of dwellings provided, the settlement categories into which they have been allocated, and the overall distribution of development across all settlement categories.





- 5.8. It must be noted that there is a clear disparity between the minimum number of units identified as being required in category 3 Medium Sized Villages (371) and the number of units allocated (238). It is felt that the shortfall in units in these types of settlements would be better met through further allocations in Category 3 villages, in order to ensure an even spread of development across the District and ensure that there is no imbalance in growth and demand on facilities. However, it can be seen that the shortfall in housing numbers identified is accommodated for in additional allocations at the larger settlements of Burgess Hill, East Grinstead and Haywards Heath. Therefore overall the volume of housing delivered is sufficient to meet MSDC's identified needs. Whilst better distribution across the smaller villages would be preferable, overall Policy SA11 is supported.
- 5.9. The identified provision of sites across Category 3 settlements is below the number calculated as being the residual need in Policy SA10, therefore the allocation of site SA25 as part of the Category 3 settlement allocations is strongly supported.

Policy SA25: Land West of Selsfield Road, Ardingly

- 5.10. Policy SA25 is the Individual Housing Allocation Policy for Land West of Selsfield Road, Ardingly. The policy is largely supported, however there are aspects to the policy over which amendments are sought.
- 5.11. The policy seeks the delivery of Land West of Selsfield Road, Ardingly for approximately 70 dwellings on approximately 3.2ha of the site, with "on site public open space" on the remaining 2ha. This is a reduction from the 100 units on 5.2ha of land (including open space) previously set out in the Regulation 18 Consultation Document.
- 5.12. This reduction in the quantum of housing to be provided, and the reduction in the identified area for development, is disappointing. It can be seen in the Regulation 19 Consultation document that MSDC are not meeting the minimum residual figure that has been calculated for Category 3 Settlements, and are in fact 133 units below. The provision of an additional 30 units on Site SA25 would ensure that the gap between the provision of units and the calculated minimum number of units would be reduced, and ensure that a more even distribution of development is achieved across the District. Therefore the loss of units from the allocation is a move that does not tally with MSDC's desired approach of a proportionate distribution of development across settlement categories. Consequently the decision to reduce units from the allocation is disappointing.
- 5.13. The reduction of the developable area, through drawing in hard boundaries on the western extent of the site, is also disappointing. The concept of leaving the western end of the site free is readily understood, as the desire to ensure that there is minimal impact on the Conservation Area or listed buildings along Street Lane is perfectly understandable. However, the inclusion of a new planted boundary will result in a harsh and abrupt end to development that will not be in keeping with the wider village. Whilst it is acknowledged that the line drawn on the plan is to mimic a historic field boundary, the sudden transition across a clearly demarcated boundary will result in the creation of an abrupt edge to the development. It would however seem more appropriate to allow organic integration into the western end of the site.





- 5.14. The allocation of the western end of the site as informal public open space in Policy SA25 is objected to. If this end of the site is to not be developed at this time, the Showground would instead like to maintain ownership and control of the part of the site and so continue to utilise the land for further car parking and other ongoing operational uses. The land will remain the same as it currently is, and will therefore not result in any encroachment of built form towards the Conservation Area or the western end of the site above and beyond that which is already experienced. The formal designation of the site as informal public open space will remove the ability of the western end of the site to be utilised by the Showground for its continued operational use.
- 5.15. With regard to other aspects of Policy SA25, a number of design principles are raised that the proposals should look to include. These are agreed with and supported, as they will ensure that the eastern end of the site will integrate with the existing built form of Ardingly and will deliver a positive and attractive place to live whilst maintaining the character of the village.
- 5.16. Technical reports have already been prepared to demonstrate the site's suitability and developability. Most notably a Landscape and Visual appraisal has been conducted, based upon the initial 100 units that were proposed in the Regulation 18 Consultation, which found that residential development on the site could be readily accommodated and would have limited impact upon the sensitive character of the AONB. In particular, the proposed development could help to deliver a softer and more in-character edge to the settlement that also contributes positively to meeting the objectives of the High Weald AONB Management Plan. Other reports have also found that traffic movements into and out of the site can be suitably accommodated; that there are no known ecological constraints that would prevent the site being developed. The site can therefore be shown to be readily able to accommodate the originally proposed 100 units, and therefore is certainly able to accommodate 70 units and in fact this is arguably underutilisation of the potential of this site to contribute towards the housing need of the district.

Summary

- 5.17. MSDC need to ensure that a suitable range of sites, of varying sizes and scales, are allocated in the Site Allocations DPD to ensure the delivery of a sufficient number of new homes to ensure a robust position when measured against five year housing land supply or the Housing Delivery Test. MSDC needs to ensure that the Plan is able to meet the demands both in terms of providing for housing need but also delivering at a sufficient rate.
- 5.18. Through seeking to distribute housing proportionally across the differing settlement categories, MSDC are seeking to ensure that the Site Allocations DPD provides a sufficient number of homes in a manner that is manageable for local communities and will not result in local services and facilities being unable to cope. Indeed research has shown that housing growth will have a wholly positive effect on local shops and services by providing valuable additional custom.





- 5.19. MSDC have shown that the desire exists to distribute development evenly across the various settlements. However there have been a lack of suitable sites in Category 3 settlements presented to MSDC for development. Therefore there have been only 238 dwellings allocated to Category 3 settlements when a minimum housing need figure of 371 has been calculated. It is therefore disappointing that a key site such as SA25, Selsfield Road, Ardingly, has seen a reduction in the number of units allocated to it (a decrease from 100 units allocated in the Regulation 18 Consultation to 70 units allocated in the Regulation 19 Consultation) when the Site Allocations DPD cannot distribute development evenly across the District.
- 5.20. The allocation of the site in the Site Allocations DPD is strongly supported as it remains key that it comes forward through this plan, in order to ensure the distribution of development across the District is achieved in a manner that is as balanced as possible. Accordingly, the inclusion of site SA25 in the Site Allocations DPD is strongly supported.
- 5.21. The designation of a firm boundary where the western edge of Site SA25 will fall, half way across an open field is disappointing, as this will not allow the allocation to naturally blend into the existing adjacent landscape. It is understood that the rationale behind this is to replicate a historic field boundary, but it is felt that this could appear visually jarring and would be best achieved through setting out in policy wording the approximate area of open space to be left at the western end of the site or altering the proposed edge to the allocation so it makes better use of the land available.
- 5.22. The designation of the western end of the site as informal public open space is strongly objected to. In the event that the western end of the site is not part of the residential development, the landowners would prefer to retain it in its current form. The site will therefore continue to be utilised as overflow parking and for showground operations as and when required. This will result in no encroachment of built form and the site will maintain the site in its current form. The allocation of the site as informal public open space will prohibit these operations from occurring unnecessarily.

Regulation 19 Submission Draft Consultation



6. Conclusion

- 6.1. These representations have been prepared on behalf of Charterhouse Strategic Land and the South of England Agricultural Society (SEAS) to support the allocation of Land west of Selsfield Road (identified as Site SA25 in the Draft Site Allocations DPD).
- 6.2. The Site Allocations Development Plan Document is supported, in particular policies SA10: Housing, SA11: Additional Housing Allocations, and SA25: Land west of Selsfield Road, Ardingly.
- 6.3. The allocation of site SA25 is supported. The Site is suitable, available and deliverable, and its development would not result in the overexpansion of the settlement of Ardingly. Site SA25 is adjacent to the existing Ardingly settlement boundary, and is not located in a prominent location in the countryside. The development of the site would result in a sustainable addition to the settlement of Ardingly, and would accord with the approach to plan-making as set out in National Planning Policy.
- 6.4. The development of the site will allow for the managed growth of Ardingly, and would allow a level of population increase that can be readily accommodated. The growth would provide further support of the existing local services and would result in a greater level of economic expenditure in the village. It would provide further pupils for the local primary school (currently operating at only 67% of capacity, with space for a further 46 pupils) and financial contributions through S106 contributions for any necessary enhancements to the school, and would contribute to the ongoing operation and upkeep of the local community recreational facilities.
- 6.5. The overriding need for housing across Mid Sussex is recognised by MSDC, and the delivery of 70 units through site SA25 in the Site Allocations DPD will result in the delivery of much needed homes in Mid Sussex.
- 6.6. It can be seen in both the adopted District Plan and the emerging Site Allocations DPD that MSDC have sought to distribute homes evenly across settlements, in order to ensure that population growth is balanced between settlements. Category 3 villages have been identified as supplying 238 units in the plan, less than the minimum need figure of 371. Therefore the reduction in units allocated through Policy SA25 from 100 in the Regulation 18 Consultation to 70 in the Regulation 19 Consultation, when the minimum required figure of 371 units is not being met and technical reports have been prepared that show the site can readily support 100 units, is disappointing.
- 6.7. The designation of an artificial and firm boundary where the western edge of Site SA25 will fall is also disappointing, as this will not allow the allocation to naturally blend into the existing landscape. It is understood that the rationale behind this is to replicate a historic field boundary but only one mature tree remains of this entire boundary, and it is felt that even with suitable landscaping and urban design this will appear visually jarring and would be better achieved through setting out in the policy wording the approximate area of open space to be left at the western end of the site.





- 6.8. The designation of the western end of the site as informal public open space is strongly objected to. In the event that the western end of the site is not part of the residential development, the landowners would like to continue to be use this for showground activities including overflow parking. This will result in no encroachment of built form and the site will maintain the site in its current form. The allocation of the site as informal open space will unnecessarily prohibit this from occurring
- 6.9. Overall however the inclusion of the site in the Site Allocations DPD is in keeping with both National Planning Policy and Local Planning Policy, and the inclusion of site SA25 in the Site Allocations DPD is strongly supported.





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Appendix 1.0 Proposed 100 Unit Scheme for Site SA25

Sketch Illustrative Masterplan

Land West of Selsfield Road, Ardingly



200m urban design studio



100m

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