



RODWAY PLANNING
CONSULTANCY LIMITED

Planning Policy
Mid Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS
VIA EMAIL ONLY

28th September 2020

Dear Sir/Madam

Site Allocations DPD - Regulation 19 Consultation

Rodway Planning Consultancy are instructed by our clients, Fairfax Acquisitions Limited, to continue to promote sites in their control for residential development purposes.

These representations relate to the following sites:

- **SHELAA Site Reference: 63 – Land north of Riseholme, Broad Street, Cuckfield**
- **SHELAA Site Reference: 207 – Land at Dirty Lane/Hammerwood Road, Ashurst Wood**
- **SHELAA Site Reference: 495 – Butchers Field, south of Street Lane, Ardingly**
- **SHELAA Site Reference: 568 – Middle Lodge, Lindfield Road, Ardingly**
- **SHELAA Site Reference: 573 – Batchelors Farm, Keymer Road, Burgess Hill**
- **SHELAA Site Reference: 634 – Land west of Dirty Lane, Ashurst Wood**
- **SHELAA Site Reference: 781 – Land to the south of Robyns Barn, Birchgrove Road, Horsted Keynes**
- **SHELAA Site Reference: 839 – Land at Hazeldene Farm, north of Orchard Way, Warninglid**

It will be noted that Fairfax are also promoting the sites at **Ansty Cross Garage, Ansty (SHELAA site ref: 644)**; and at **Woodfield House, Isaacs Lane, Burgess Hill (SHELAA site ref: 840)**

Both of these sites are included in the submission DPD as allocated sites (*see Policies SA33 and SA17 respectively*). We support the inclusion of these allocations.





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We have recently provided the Local Authority with a separate, and specific representation update in relation to the site at Ansty Cross Garage (our letter [and enclosures] dated 24th July 2020 refers), and we wish to make no further remarks at this stage in this respect.

With relation to Woodfield House, the Council will be aware that Outline planning permission has now been granted for a scheme of 30 dwellings on this site (application DM/19/3769 refers), and we will not be providing any further comments in respect of this site either.

We have had the opportunity to fully review the updated version of the DPD and the revised Sustainability Appraisal report. Accordingly, we wish to make the following comments in respect of the submission version of the Site Allocations DPD:

In summary, and on behalf of our clients, we continue to **object** to the DPD, and its omission of our client's other sites as allocations for future residential development. The detailed justification for our objection in respect of these sites is set out in our previous submissions, dated November 2019, in relation to the Regulation 18 public consultation. Essentially, we consider that the sites that are in our client's control to be suitable for residential redevelopment, and each merits inclusion within the Allocations DPD.

The submission version of the DPD is considered to be immaterially different from the previous Regulation 18 version of the plan, which was subject to public consultation in late 2019. It is understood that this consultation process elicited in excess of 1,300 responses from interested parties.

The Council will have assessed these responses and are required to have updated the DPD and its evidence base on this basis. It is understood that updated transport evidence accompanies the submission draft Site Allocations DPD to address comments made during the Reg 18 consultation. This includes a revised Strategic Transport Assessment (February 2020), prepared by transport consultants SYSTRA, with input from West Sussex County Council and Highways England.

However, the changes to the DPD appear to be negligible, with the main policies and allocations remaining almost identical to that set out within the Reg 18 version. The Reg 19 version has only minor amendments to policy wording (to add clarity or additional requirements to site policies). No new sites have been added, and all the previous proposed allocations remain. This is disappointing given the evidence we have previously provided relating to the suitability of our clients sites, and the flaws in the analysis work that underpins the allocation of some of the included sites (for example, the sites on land south of Burgess Hill).





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We note that the DPD seeks to meet the residual housing needs following adoption of the District Plan in 2018. The District Council advise that the residual figure is currently 1,280 units. The housing proposed to be allocated by the submission draft Site Allocations DPD is 1,764 dwellings, which represents an over-supply of 484 dwellings when compared with the residual requirement. Although any over-supply is welcomed, in order to provide resilience and flexibility, we strongly contend that the DPD does not go far enough in this respect. This therefore represents a missed opportunity to boost the supply of housing in the District over the coming years, thereby strengthening the District's currently marginal 5-year housing land supply position.

In this respect it is essential that the housing need context is considered. We note that the current District Plan requirement is 876 units per annum, rising to 1,090 units per annum after 2023/24 (Policy DP4 refers). However, the current standard method for calculating housing need is that a total of 1,114 dwellings should be provided in Mid Sussex each year, and if the Government's proposed new standard method is applied, this increases further to 1,305 units per year. Importantly, it is understood that the District's average delivery over the past 3 years has been just 760 dwellings per year.

Without taking the presented opportunity to allocate a significant level of housing now (in the DPD), there is a considerable, and tangible risk, that Mid Sussex will find itself with a significant housing shortfall in the coming years, which will bring with it social and economic implications, as well as the Development Plan policies relating to housing becoming out-of-date by virtue of Paragraph 11 of the NPPF. We urge the Inspector to reject the DPD as currently proposed.

When considering individual sites for allocation, we maintain our position that **ALL** of the Fairfax sites are suitable for residential development. We can confirm that these sites all remain available, sustainable and deliverable and should be allocated for residential redevelopment. The District Council's DPD provides the mechanism for acting on this positive recommendation.

As part of our previous submissions, we have demonstrated that development of the Fairfax sites would accord with the requirements of national planning policy, principally in that they would provide sustainable development without compromising the District's overarching development strategy, or adversely impacting on landscape quality and other matters of importance.

As currently submitted, we therefore do not consider that the submission version of the DPD is sound. We submit that the DPD should be revised so as to allocate sites that will deliver a significantly increased housing provision, so as to meet the housing needs of the District, when taking into account market signals, improve affordability, and help meet the unmet affordable housing needs of the District.





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This will require the allocation of further sites (including those promoted by our clients) for future residential development. This revised strategy would represent a more robust approach to meeting the District Council's significant need for new housing.

We would be grateful if we could continue to be informed of the DPDs progression, and be given the opportunity to make further written representations if or when possible. We would also like to confirm that we would like the opportunity to be present at any Examination Hearings, with a view to making verbal representations to the Planning Inspector if required.

Yours faithfully,



Tim Rodway
Director

c.c. Fairfax Acquisitions Limited

