

SA6: Marylands Nursery, Cowfold Road - Index by ID Number

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
706	Mr E Hanson	Barton Willmore	Glenbeigh and Dacorar	<div>Developer</div>	<input checked="" type="checkbox"/>
784	Mrs D Thomas	Bolney Parish Council		<div>Town &amp; Parish Council</div>	<input type="checkbox"/>

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA6

**ID:** 706

**Response Ref:** Reg19/706/2

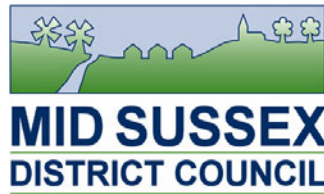
**Respondent:** Mr E Hanson

**Organisation:** Barton Willmore

**On Behalf Of:** Glenbeigh and Dacorar

**Category:** Developer

**Appear at Examination?** ✓



## **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/](http://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 28<sup>th</sup> 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/](http://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](mailto: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

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Ed"/>
Last Name	<input type="text" value="Hanson"/>
Job Title (where relevant)	<input type="text" value="Associate"/>
Organisation (where relevant)	<input type="text" value="Barton Willmore"/>
Respondent Ref. No. (if known)	<input type="text"/>
On behalf of (where relevant)	<input type="text" value="Glenbeigh Developments Ltd and Dacorar Southern Ltd"/>
Address Line 1	<input type="text" value="7 Soho Square"/>
Line 2	<input type="text"/>
Line 3	<input type="text"/>
Line 4	<input type="text" value="London"/>
Post Code	<input type="text" value="W1D 3QB"/>
Telephone Number	<input type="text" value="0207 446 6888"/>
E-mail Address	<input type="text" value="ed hanson@bartonwillmore.co.uk"/>



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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:**

Barton Willmore on behalf of Glenbeigh Developments Ltd

### 3a. Does your comment relate to:

Site  
Allocations  
DPD

☒

Sustainability  
Appraisal

☐

Habitats Regulations  
Assessment

☐

Community  
Involvement  
Plan

☐

Equalities  
Impact  
Assessment

☐

Draft Policies  
Maps

☐

### 3b. To which part does this representation relate?

Paragraph

Policy SA

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 type="checkbox"/>	<input type="checkbox"/>
(2) Justified	<input type="checkbox"/>	<input type="checkbox"/>
(3) Effective	<input type="checkbox"/>	<input type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>	<input type="checkbox"/>

**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**.

Refer to representations.

t is

**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.

Refer to representations.

**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.

Refer to representations.

**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:

Refer to representations.

**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:

25/09/2020

**Thank you for taking time to respond to this consultation**

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# Regulation 19 Consultation

## Mid Sussex Site Allocations Development Plan Document

Representations prepared by Barton Willmore on behalf of  
Glenbeigh Developments Ltd and Dacorar Southern Ltd

September 2020



# Regulation 19 Consultation

## Mid Sussex Site Allocations Development Plan Document

Representations prepared by Barton Willmore on behalf of  
Glenbeigh Developments Ltd and Dacorar Southern Ltd

<b>Project Ref:</b>	20253/A5/Site Allocations Reps	20253/A5/Site Allocations Reps
<b>Status:</b>	Draft	Draft
<b>Issue/Rev:</b>	01	02
<b>Date:</b>	23 September 2020	24 September
<b>Prepared by:</b>	Sophie Jamieson	Ed Hanson
<b>Checked by:</b>	Ed Hanson	
<b>Authorised by:</b>		

Barton Willmore LLP  
7 Soho Square  
London  
W1D 3QB

Tel: 020 7446 6888  
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Ref: 20253/A5/SJ  
Date: September 2020

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## **APPENDICES**

<b>APPENDIX 1</b>	<b>:</b>	<b>SITE LOCATION PLAN (PL-150)</b>
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## 1.0 INTRODUCTION

1.1 These representations are submitted on behalf of Glenbeigh Developments Ltd and Dacorar Southern Ltd in response to the draft Site Allocations Development Plan Document (DPD) Regulation 19 consultation being undertaken by Mid Sussex District Council (MSDC).

1.2 Glenbeigh control some 8.9 ha of land south of the A2300 (the Hub), Gatehouse Lane, Goddards Green for employment development. An application for employment development (LPA ref. DM/19/2641) was submitted in June 2019 and on 19<sup>th</sup> September 2019, Planning Committee resolved to grant permission for the following:

***"Employment development comprising up to 40,695sqm (Class B1(b), B1(c), B2 and B8) with ancillary offices, car parking and associated infrastructure. Access to be determined."***

1.3 Since planning permission DM/19/2641 was granted, a further application has been prepared under Section 73 of the TCP Act to amend condition 18 which limits the quantum of B8 floorspace at The Hub. This is due for submission by the end of September.

1.4 The Site was also subject to a previous planning permission (LPA ref. 13/0168/OUT) approved on 10<sup>th</sup> November 2015 for the following:

***"Employment development comprising up to 50,000sqm (Class B1(b), B1(c), B2 and B8) with ancillary offices, access, car parking and associated infrastructure. Access to be determined."***

1.5 This permission expired in November 2018 prior to the submission of all reserved matters applications.

1.6 A reserved matters application for landscaping only (LPA ref. DM/16/0007) was approved in April 2016. Approval was secured for two further reserved matters applications (LPA refs. DM/16/5637 and DM/18/4588) in September 2017 and March 2019, allowing for 4,076 sqm of B1b, B1c, B2 and B8 employment uses and 5,229 sqm of B1c, B2 and B8 employment uses respectively.

## 2.0 REPRESENTATIONS TO THE DRAFT LOCAL PLAN

### EVIDENCE BASE

- 2.1 The **Site Selection Paper 4: Employment Sites (February 2020)** confirms that the Council have updated the Employment Need evidence which has identified that an additional 10-15ha of B-Class employment land in addition to the 25ha allocated within the District Plan. This comprises 3.08 ha of B1 (office) use, 3.69 ha of B2 (general industrial) use and 8.23 ha of B8 (storage/distribution) use, albeit this should be treated as a guideline.
- 2.2 The **Sustainability Appraisal (SA) (July 2020)** states that “the employment need figure does not take account of the proposed Science and Technology Park allocated as a ‘broad location’ to the west of Burgess Hill in policy DP1. The aim of this site is to serve a niche market, and to help meet a wider regional need. It will, of course, provide jobs for those residents already economically active within Mid Sussex but is being treated as a separate instance – it is intended that the employment need will be met but allocating additional employment sites within the Site Allocations DPD.”
- 2.3 The SA provides an assessment of alternative employment strategies, namely:
- **Option A:** Allocate sufficient ‘new’ employment sites to meet the 10-15ha
  - **Option B:** Meet the need in part through allocating ‘new’ site and relying on ‘windfall’ from expansion/redevelopment/intensification of existing sites to meet the remainder
  - **Option C:** ‘Do Nothing’ i.e. solely rely on the Science and Technology Park to meet remaining need (as well as contributing to wider regional need).
- 2.4 Whilst the SA concludes that Option A is the most suitable approach for meeting employment need, Glenbeigh consider that the need for B8 accommodation could be through expansion and intensification of the existing Hub site.
- 2.5 With regards to land use and impacts upon the countryside, the assessment notes that option A will likely require development of greenfield sites, as would option C. However, expanding or intensifying existing sites such as the Hub would minimise the need to develop greenfield land elsewhere in the District for employment use.

- 2.6 In looking at employment and economic growth, the assessment also confirms that option A would provide more certainty that employment need would be met, compared to option B which relies on windfall development and option C which is likely to only provide employment opportunities in certain fields.

### **DRAFT SITE ALLOCATIONS DPD**

#### **Policy SA5: Land at Bolney Grange Business Park**

<b>Policy Reference</b>	<b>Site Name</b>	<b>Settlement Type</b>	<b>Settlement / Parish</b>	<b>Employment Uses</b>	<b>Available Development Land (ha)</b>
SA5	Land at Bolney Grange Business Park	Category 3 – Medium Sized Settlement	Bolney	B1/B2/B8	7

- 2.7 Policy SA5 allocates land at Bolney Grange Business Park for a mix of employment uses (B1/B2/B8). The policy also seeks improvements to public transport links, particularly between the site and proposed Science and Technology Park.
- 2.8 Reflecting the arguments above, development of the land at Bolney Grange Business Park is not considered necessary. Indeed, the District's B8 requirements could be met by delivering further B8 uses at The Hub.
- 2.9 Furthermore, given the nature of B8 uses, namely for storage and distribution, the use of larger vehicles is expected. Stairbridge Lane to the east of the site is unsuitable for HGVs and access to and egress from the existing Business Park is via a left-in, left-out arrangement. Glenbeigh consider that the Hub would be a more appropriate location for B8 accommodation where there are no restrictions to vehicle movements or parking.

#### **Policy SA6: Marylands Nursery, Cowfold Road**

<b>Policy Reference</b>	<b>Site Name</b>	<b>Settlement Type</b>	<b>Settlement / Parish</b>	<b>Employment Uses</b>	<b>Available Development Land (ha)</b>
SA6	Marylands	Category 3 –	Bolney	B8	2.4

	Nursery, Cowfold Road	Medium Sized Settlement			
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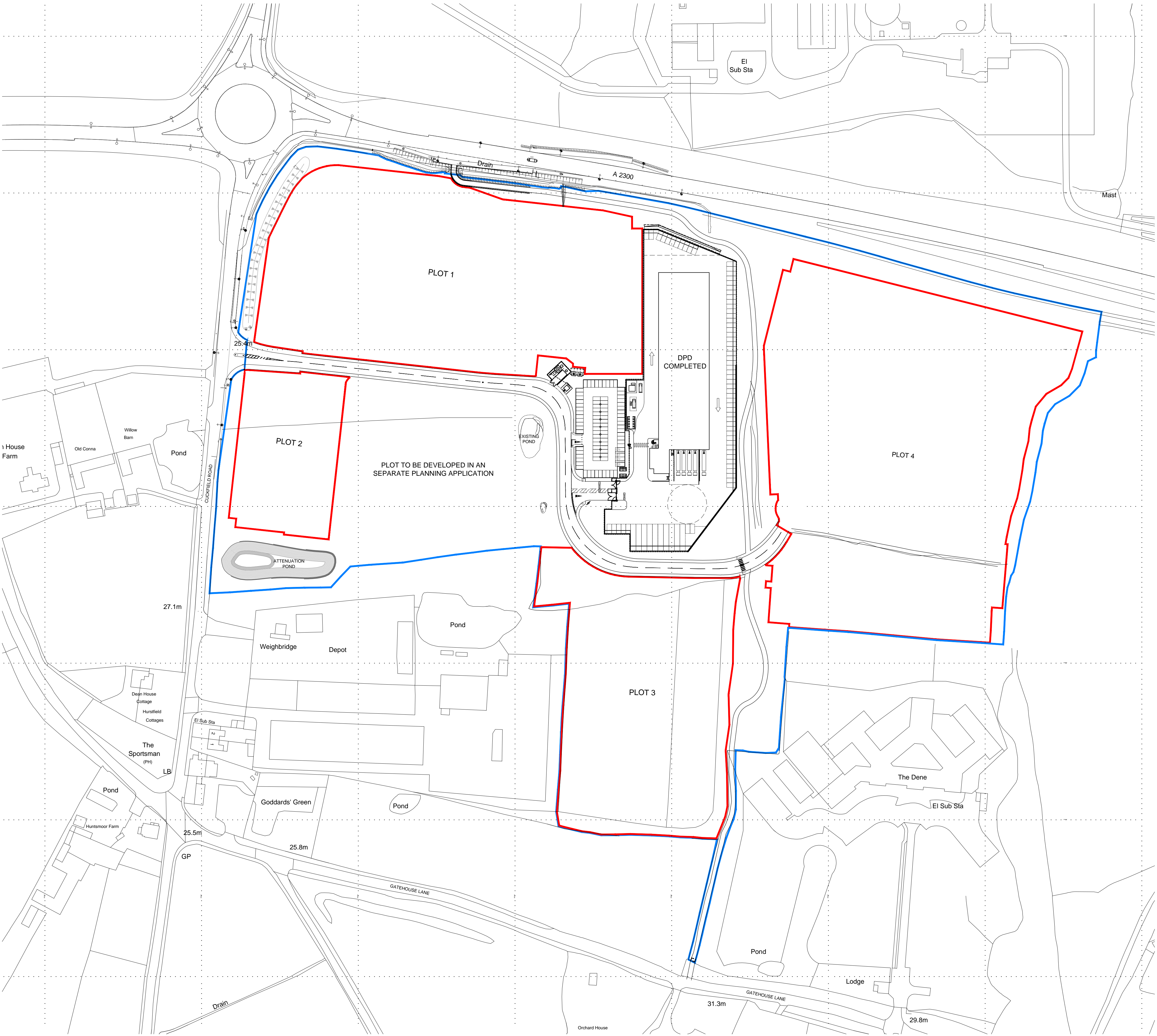
- 2.10 Policy SA6 allocates Marylands Nursery for B8 employment use, as well as enabling non-business classes where B8 uses alone would not be economically viable. The policy requires the existing access from the northern roundabout to be used.
- 2.11 Glenbeigh do not consider Marylands Nursery to be a suitable site for B8 uses. The site offers only 2.4ha of development land, which is not considered to be sufficient for accommodating B8 uses. In addition, the two completed parcels at the Hub operate on a 24/7 basis with no planning restrictions, thus it is appropriate to concentrate these uses in one location. Again, given the availability of land at the Hub, it is not considered necessary to allocate this SA6 to meet the District's B8 employment needs.
- 2.12 In light of the above, Glenbeigh object to the proposed employment allocations at Bolney Grange Business Park and Marylands Nursery. These allocations are not considered necessary to meet B8 employment need and the quantum of B8 use sought under Policies SA5 and SA6 could instead be provided by development at the Hub.

### **3.0 CONCLUSIONS**

- 3.1 Glenbeigh object to the proposed employment allocations at Bolney Grange Business Park (Policy SA5) and Marylands Nursery (Policy SA6).
- 3.2 The updated employment land requirement for the District does not take account of the availability of land at The Hub for additional B8 use, but this site is available now. Accordingly, allocations for new employment sites in Bolney are not considered necessary to meet the District's B8 requirements.
- 3.3 Further assessment of the proposed new employment sites in Bolney has identified additional issues associated with development of these sites, namely unnecessary development of greenfield land, potential highways impacts and insufficient land for the uses proposed.

## **APPENDIX 1**





NOTES:

SUBJECT TO STATUTORY CONSENTS

SUBJECT TO SURVEY

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PLANNING BOUNDARY  
TOTAL AREA:  
8.92 HA / 22.05 ACRES

OWNERSHIP BOUNDARY  
14.84 HA / 36.67 ACRES

—	18/06/2019	First issue	GZ	AC
REV	DATE	NOTE	DRAW	CHK



CHARTERED ARCHITECTS

11 PLATO PLACE  
ST DIONIS' ROAD  
LONDON SW6 4TU

TELEPHONE 020 7736 6162  
FAX 020 7736 3896  
www.mso-architects.co.uk

TITLE

GODDARDS GREEN

DRAWING

SITE LOCATION PLAN

CLIENT

GLENBEIGH DEVELOPMENTS

DATE	SCALE	DRAWN
APRIL 2019	1:1250@A1	GZ
	STATUS	CHECKED
	PLANNING	AC

DRAWING NUMBER

30425-PL-150

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA6

**ID:** 784

**Response Ref:** Reg19/784/3

**Respondent:** Mrs D Thomas

**Organisation:** Bolney Parish Council

**On Behalf Of:**

**Category:** Town & Parish Council

**Appear at Examination?** x

[REDACTED]

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**From:** Debbie Thomas [REDACTED]  
**Sent:** 28 September 2020 20:02  
**To:** ldfconsultation  
**Subject:** Consultation response  
**Attachments:** DPD Site Allocations Sept 2020.docx

Please find attached comments from Bolney Parish Council on the Draft Site Allocations DPD

Kind regards

Debbie Thomas  
Clerk to Bolney Parish Council

[REDACTED]

Email: [clerk@bolney.com](mailto:clerk@bolney.com)

## Bolney Parish Council (BPC) comments on MSDC's Submission Draft Site Allocations Development Plan

### General comments:

1. Bolney Parish Council support MSDC in not including any requirement for any extra housing development in the parish.
2. Bolney Parish Council support the comments made by Cuckfield Parish Council in their response to MSDC and especially the comments about the number of windfall developments.

### Comments about specific policies:

#### SA5: Land at Bolney Grange Business Park.

The Statement of Consultation, Regulation 18, notes that BPC requested a landscape scheme to minimise the impact on views from the South Downs and the MSDC response was 'to include biodiversity/landscaping requirements to the policy'. No such requirements have been included in the Submission Draft. We request that they should be included.

#### SA6: Marylands Nursery, Cowfold Road, Bolney.

BPC request MSDC to reconsider its decision not to include a site-specific lighting plan to reduce light pollution. The site is likely to be in use 24 hours per day and is close to residential housing and the Grade 1 listed parish church which is floodlit.

The boundary of the site in the south west corner provides a pinch point to the layout of the London Road junction with the A272. The current developer has offered some land to enable the addition of a second lane for the traffic queuing to access the A272. However, this may not be the developer who carries out the work and this new developer may not be so accommodating. This issue is addressed further in our comments about SA35: Safeguarding of Land for Strategic Highway Improvements.

#### SA9: Science and Technology Park

BPC consider that the addition of 2,500 jobs would inevitably increase the volume of traffic using the A23 northbound off slip and the junction with the A272. The residents of Chapel Road have already experienced an increase of traffic at peak times since the DPD distribution centre has been in operation in the new business park on the A2300. Vans use Hickstead Lane and Chapel Road to access the A272 and thus avoid queuing at the junction. Other vehicles use The Street for the same purpose. Both of these roads are narrow and do not have pedestrian pavements. Children need to use the road to walk to the village primary school. Also, if Horsham District Council opt for the strategic development at Bucks Barn, it is highly likely that a proportion of the new residents will find work at the STP or elsewhere in Mid Sussex. The volume of traffic along the A272 as well as the extra turning traffic will increase the queuing time at the junction.

BPC request that the words "and the A23/A2300 junction" are added to the 'Highways and Access' bullet point 3.

#### SA35: Safeguarding of Land for and Delivery of Strategic Highway Improvements

The Statement of Consultation notes that BPC request that the junction of A272/London Road should be safeguarded to enable delivery of SA6: Marylands Nursery. However, this misrepresents what BPC tried to get over to Council officials during a consultation meeting. Our concern is that the massive increase in housing numbers in the district and especially at the Northern Arc together with the extra employment opportunities, increases the problems at the junction. We, and others who have witnessed the very risky driving that happens at peak times, consider the junction to be extremely dangerous.

BPC understand that the northbound off slip (London Road) junction with the A272 is due to be signalised as part of the Northern Arc development. BPC consider that traffic signals would produce long queues on the A272 and an increase in the rerouting of vehicles onto the narrow lanes in the parish to the north of the A272 as well as onto The Street.

BPC consider that a roundabout would not produce the same length of queuing traffic as a signal-controlled T junction. This would require some land take outside the current highway land. However, as the developer for the Maryland's Site SA6 has shown, adding an extra Lane to the south end of London Road requires some land take. Providing a safe central island for pedestrians is also likely to increase the road width.

BPC request that "A23 junction upgrades at A272 Bolney" be added to the 3 schemes already included.