

SA25: Land west of Selsfield Road - Index by ID Number

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
437	Mr M Margrett			Resident	<input type="checkbox"/>
494	Mrs R Goulding			Resident	<input type="checkbox"/>
524	Mr T Hughes			Resident	<input type="checkbox"/>
527	Mr D Spence			Resident	<input type="checkbox"/>
589	Ms S Dolton			Resident	<input type="checkbox"/>
628	Mr D Port		Ardingly Cricket Club	Resident	<input checked="" type="checkbox"/>
628	Mr D Port		Ardingly Cricket Club	Resident	<input checked="" type="checkbox"/>
628	Mr D Port		Ardingly Cricket Club	Resident	<input checked="" type="checkbox"/>
628	Mr D Port		Ardingly Cricket Club	Resident	<input checked="" type="checkbox"/>
642	Ms C Tester	High Weald AONB Unit		Statutory Consultee	<input checked="" type="checkbox"/>
653	Mr C Vallis			Resident	<input type="checkbox"/>
689	Mr M Brown	CPRE Sussex		Organisation	<input checked="" type="checkbox"/>
705	Mr O Bell	Nexus Planning	Miller Homes - Lewes Road HH	Developer	<input checked="" type="checkbox"/>
708	Mrs P Canning	Kember Loudon Williams	Mayfield Market Towns	Developer	<input checked="" type="checkbox"/>
710	Mr N Burns	Natural England		Statutory Consultee	<input type="checkbox"/>
714	Mrs B Cox	Ardingly Parish Council		Town & Parish Council	<input type="checkbox"/>
731	Mr & Mrs & Miss J James			Resident	<input type="checkbox"/>
877	Mr P Kelly			Resident	<input type="checkbox"/>
887	Mr G Bills			Resident	<input type="checkbox"/>
946	Mr & Mrs R & R Browne			Resident	<input type="checkbox"/>
968	Mrs J Lewis			Resident	<input type="checkbox"/>
975	Mr J Rich			Resident	<input type="checkbox"/>
988	Mr D Reeves			Resident	<input checked="" type="checkbox"/>
988	Mr D Reeves			Resident	<input checked="" type="checkbox"/>
1001	Ms F Rocks			Resident	<input type="checkbox"/>
1014	C Fleming			Resident	<input type="checkbox"/>
1015	Ms E Fleming			Resident	<input type="checkbox"/>
1029	Ms E Cairns			Resident	<input type="checkbox"/>
1071	Ms M Meldrum			Resident	<input type="checkbox"/>
1076	Mr W Meldrum			Resident	<input type="checkbox"/>
1088	Mrs S Simpson			Resident	<input type="checkbox"/>
1090	Ms K Surgeoner			Resident	<input type="checkbox"/>
1091	Mr S Surgeoner			Resident	<input checked="" type="checkbox"/>
1098	Mrs H Smith			Resident	<input type="checkbox"/>
1099	Mr & Mrs B Gass			Resident	<input type="checkbox"/>
1105	Mrs S Holley			Resident	<input type="checkbox"/>
1109	Mr D Smith		Family	Resident	<input type="checkbox"/>

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
1321	Mrs J Sanders			Resident	<input type="checkbox"/>
1570	Ms R Goulding			Resident	<input type="checkbox"/>
1571	Mr C Goulding			Resident	<input type="checkbox"/>
1583	Ms M Stinson			Resident	<input type="checkbox"/>
1630	Mr H Garrood			Resident	<input type="checkbox"/>
1640	Ms H Duncan			Resident	<input type="checkbox"/>
1693	Mr A Bridge			Resident	<input type="checkbox"/>
1694	Mr and Mrs R & J Planterose			Resident	<input type="checkbox"/>
1792	Ms J Edwards	Sport England		Statutory Consultee	<input type="checkbox"/>
1821	Mr G Dixon	Savills	Charterhouse Land - SA25	Promoter	<input checked="" type="checkbox"/>
1857	Mr D O'Leary			Resident	<input type="checkbox"/>
1948	Mr B Sansom			Resident	<input type="checkbox"/>
2013	Ms H McLellan			Resident	<input type="checkbox"/>
2064	Mr S Rocks			Resident	<input type="checkbox"/>
2064	Mr S Rocks			Resident	<input type="checkbox"/>
2068	M, P & S Holman			Resident	<input type="checkbox"/>
2079	Mr A Black	Andrew Black consulting	Vanderbilt Homes - Hurstwood HH	Promoter	<input type="checkbox"/>
2080	Mr A Black	Andrew Black consulting	Vanderbilt homes - CDR	Promoter	<input type="checkbox"/>
2140	Mr C Hough	Sigma Planning Services	Rydon Homes Ltd	Promoter	<input checked="" type="checkbox"/>
2174	Ms M Stafford			Resident	<input type="checkbox"/>
2174	Ms M Stafford			Resident	<input type="checkbox"/>
2193	Ms and Mr D Harris / Graves			Resident	<input type="checkbox"/>
2194	Mrs K Burchnall			Resident	<input type="checkbox"/>
2196	Mr S Brown			Resident	<input type="checkbox"/>
2215	Ms R Mcnamara			Resident	<input type="checkbox"/>
2244	Ms J Galelli			Resident	<input type="checkbox"/>
2277	Mrs & Mr C & G Howarth			Resident	<input checked="" type="checkbox"/>
2336	Ms C Sansom			Resident	<input type="checkbox"/>
2357	Ms R Molony			Resident	<input type="checkbox"/>
2384	Mr R Hughes			Resident	<input checked="" type="checkbox"/>
2389	Mr S Hooper			Resident	<input type="checkbox"/>
2390	Mrs L Davis			Resident	<input type="checkbox"/>
2399	Mr & Mrs N & P Hucknall			Resident	<input type="checkbox"/>
2410	Ms B Cox			Resident	<input type="checkbox"/>
2412	Mr G Taylor			Resident	<input type="checkbox"/>
2426	Mr P Lewis			Resident	<input type="checkbox"/>
2428	Mrs S Laker			Resident	<input type="checkbox"/>

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 437

Response Ref: Reg19/437/1

Respondent: Mr M Margrett

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: Michael Margrett [REDACTED]
Sent: 23 September 2020 16:12
To: ldfconsultation
Subject: SA25, Selsfield Road Ardingly

Good afternoon,

I am Michael Margrett, resident of Ardingly, and I am writing with regard to the proposed development SA25 on the South of England Showground.

I believe that this proposal is unsound in its current format and should be resisted. There are several reasons for my view, chief among them considerations about water supply and sewage, and in addition concerns over access and parking.

I feel that the intended 70 houses is too great a number for this site and that a maximum of 50 would be more fitting.

Yours faithfully,
Michael Margrett

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 494

Response Ref: Reg19/494/1

Respondent: Mrs R Goulding

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

From: Rosemary Goulding [REDACTED]
Sent: 28 September 2020 20:43
To: ldfconsultation
Subject: SA25 Land west of Selsfield Road, Ardingly

With reference to the proposal for the development of SA25, Land west of Selsfield Road, Ardingly

The SA25 site is wholly within the Area of Outstanding Natural Beauty (AONB), it borders the Conservation Area and is outside of the built-up area of Ardingly village. Section 85 of the Countryside and Rights of Way Act requires local authorities to have regard to

“the purpose of conserving the natural beauty of AONB”
in making decisions that affect a designated area.

The MSDC Site Allocations DPD includes an oversupply of 455 dwellings. There are alternative locations for schemes outside the High Weald AONB and there are no exceptional circumstances in relation to the need for this particular development – it is not justified.

The residual requirement for housing as set out in the DPD for Ardingly (1 October 2019) is for 22 dwellings and the current SA25 proposal requires more than three times that amount. There is no local need for a development of this size, which would adversely affect the village and which would outweigh any perceived benefits of the scheme. It would represent an 18% increase in area and 15% in dwellings in the parish, it would negatively affect the character and the longer- term development of the village.

The current proposal for 70 dwellings is by any reasonable criteria a “major” development within the AONB. The decision maker should consider whether the proposed development has the potential to cause a significant adverse impact on the purposes for which the area has been designated or defined. The ordinary sense of the word ‘major’ is important and the decision maker should take a common-sense view.

The proposed development of this scale fails to take into account the impact on the existing village of Ardingly. Health services, all of which are located at a distance from the village, are already under significant strain in meeting the needs of local residents. An increased population of the size resulting from the SA25 proposal would adversely affect the availability of GP and clinic appointments, dental and hospital services.

The proposal also fails to take into consideration the impact of increased traffic in the village. Public transport is already poor with one limited bus route during the week and no Sunday service at all. The speed and volume of traffic currently experienced by residents on the High Street is already of great concern, without any pedestrian crossings to assist the elderly, mobility impaired or those with young children. Based on previous requests to better manage congestion, WSCC Highway’s Authority informed Ardingly Parish Council that Ardingly Village High Street is not suitable for traffic calming measures. Any suggestions that developers might subsequently make in planning proposals to mitigate the impact would be rejected and this should be taken into consideration in relation to this proposal, it is not effective.

Noise and pollution levels are significant; the potential large increase in private transport and delivery vehicles resulting from a development of this scale would have a very negative impact on the health and quality of life of residents in the village.

Overall, this proposed development is neither sound, effective nor justified and should be rejected. It would significantly adversely affect the village and outweigh any perceived benefits of the scheme.

Rosemary Goulding 20.09.2020
Resident of Ardingly Village

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 524

Response Ref: Reg19/524/1

Respondent: Mr T Hughes

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: Timothy Hughes [REDACTED]
Sent: 24 September 2020 16:12
To: ldfconsultation; ldfconsultation; Ardingly Parish Clerk; info@cpresussex.org.uk; Michael Brown
Subject: SA25 - LAND WEST OF SELSFIELD ROAD, ARDINGLY WEST SUSSEX - FROM TIMOTHY HUGHES, [REDACTED]

SOUNDNESS CRITERIA;

SA25 makes the DPD UNSOUND.

For the Plan to be LEGAL and SOUND the Plan must be

1. Positively prepared (meets the housing needs of Mid Sussex to 2031).
2. Justified.
3. Effective.
4. Consistent with National Policy.

The inclusion of SA25 in the DPD RENDERS IT UNLAWFUL and UNCOMPLIANT AND DOES NOT MEET THE "SOUNDNESS" TESTS FOR THE FOLLOWING REASONS;

UNSOUND - The Plan is for the period 2014 - 2031.

It ignores new Planning reforms announced by The Prime Minister earlier this year, which although not yet law, will undoubtedly be so well before 2031.

These reforms are focussed on local people having the right to decide how areas of land in their towns or parishes, will be designated for development and PROTECTED, meaning that NO building can take place.

That aside, Ardingly Showground is a greenfield site, set on a high ridge within the ASHDOWN FOREST 7km BUFFER ZONE OF INFLUENCE(DP17) and in the HIGH WEALD AREA OF OUTSTANDING NATURAL BEAUTY (DP16).

SA25 contravenes ANOB Visual Impact Statements as ANY building will have a seriously adverse visual impact and will not meet PRIORITY THEMES of PROTECTION AND ENHANCING THE ENVIRONMENT - in fact totally the opposite. (Para2.14 and DP12.)

Because this greenfield site is situated on a high ridge it would be visible immediately from the village Recreation Ground, looking immediately to the North and from miles away from other high areas of land at Turners Hill (looking South), Balcombe (looking East), Highbrook, West Hoathley and Sharpthorne (looking West) and the South Downs (looking North).

NOTE - This contrasts with recent Monks Meadow development of 38 dwellings in Ardingly, which has a far lesser visual impact.

URBAN DESIGN PRINCIPLES (SA25) DP12 AND NPPF 15.

Seriously conflicts with the ancient historical aspect of Ardingly, with two distinct settlements of Hapstead (East side) now the High Street area and around St. Peters Church (West)
The attempt to create a "green space" between the two is of no practical benefit, and the land as it is now should not be disturbed.

SA25 is outside the Ardingly Built up boundary thus contravening Policy ARD2 (A spatial plan for the Parish).

IT IS A MAJOR DEVELOPMENT.

Despite the interpretation by MSDC that the construction of 70 dwellings is NOT a "Major Development", common sense and applied Ardingly housing and population figures show it clearly is.

MSDC's interpretation is NOT supported by a number of organizations, including CPRE, High Weald AONB, Natural England and other partners across the High Weald AONB, plus National rulings giving protection to other protected landscapes.

MSDC have devised a formulae to make this development fit their criteria and as such cannot be regarded as lawful, until tested in Court.

NOTE - Ardingly Village Local Plan recommended that Monks Meadow (completed in 2018) consisting of 38 dwellings was adopted and approved as the Parish's preferred option when Butchers Field was also put forward for development.

This was agreed and voted through, as the plan stated (amongst other things), that it would meet the Village's housing contribution to the District up to 2031.

DISTRICT PLAN 2014 - 2031 2nd CONSULTATION (REGULATION 19).

This set out the process, timescale and number of houses required to be built in Mid - Sussex.

ARD 3 - Housing Supply and Site Allocation , determined a need for approximately 30 houses.

MSDC required 73 houses from Ardingly, but 53 were already included in this figure. This has now been adjusted down to 22..

SA25 is therefore NOT even a valid consideration, as this number can be built within the existing built up area between now and 2031.

Site Allocations DPD SA10 (Housing) (DPD - Scrutiny March 2020) DPP DP4 table 2.3, shows a net OVERSUPPLY of 422 dwellings.

This brings into question WHY SA25 is even being considered.

In any event, there is ample spare capacity from other sites in Burgess Hill , Haywards Heath and East Grinstead to meet the housing outlined in SA25, thus further rendering it completely unnecessary and unlawful.

ADDITIONAL POINTS REGARDING SA25.

Commenting on DP requirements 2.14 (Protecting and Enhancing the Environment,) as shown from previous examples, it FAILS in all areas (1 - 6), see NPPF 15 and DP 12.

Promoting Economic Vitality - (7 - 11) , none of these apply or are relevant to SA25, for example,(7). No businesses / local enterprise likely.(8). There will be few opportunities for people to work within their community other than working from home, with poor public transport - buses and no cycle ways.

Therefore, vehicular use will be primarily by car / road adding to congestion pollution plus more traffic generated by delivery vans and service vehicles which have diesel engines producing more harmful particulates contravening NPPF 8 and DP 12.

(9) Not applicable or relevant

(10) This will not change the current social structure of the Village. It is plainly official "jargon", which cannot be measured in any meaningful way.

(11) Again, not relevant. There are already attractions in the area, such as Wakehurst Place (Kew), one mile to the North, Ardingly Showground, used for recreation by numerous members of the public, both from this and other towns and villages in the area and Ardingly Reservoir, one mile to the South.

Ensuring cohesive and safe communities ((12, 13 and 14).

(12) This will not result in any material benefit.

(13) Unlikely to happen.

Ardingly is a popular sought after area which has meant Developers build more expensive "up market" houses to maximize their profits. As an example, Monks Meadow ended up with the majority of houses being 4 or 5 bedrooms at an average price of £800,000 (most expensive was £950,000).

Only FOUR dwellings there were classed as "Affordable" for Social Housing and were taken over by a Housing Association for renting.

Even if plans were approved to a lesser specification, Developers use the "Permitted /Development " rules to increase the size and therefore the selling price . EXAMPLES of this were the five houses constructed in 2018, behind Victoria House, College Road and the Ardingly Inn, which had permission granted for lower cost 2 and 3 bedroom properties and ended up as 3 - 4 bed with a price tag of £499,000.

There is no guarantee under current legislation, that even if planning permission were granted, any "low cost" or "affordable" housing would be built, or local people would be prioritized, if past examples of new housing in the Village are examined.

Supporting Healthy Lifestyles (15). adequately catered for by the beautiful rural location for walking and recreation with Wakehurst Place, The Showground and Ardingly Reservoir as previously covered. How would SA25 add benefit?

Social Economic and Environmental criteria are NOT met . In fact ALL will be DETRIMENTALLY AFFECTED.

THEREFORE SA25 does not meet DP 4 (Housing) DP 5 (Planning to meet future housing needs) or DP 6 (Settlement Hierarchy).

THE PROPOSED FINANCIAL BENEFITS WHICH MAY RESULT, WITH PARISH FUNDING.

In practice, would there actually be an improvement to Bus services as a result of more funding - I suggest not. (Does anyone from Monks Meadow use the Bus service regularly??!!!!!!!!!!!!!!)

Education - St Peters C of E Primary School, is currently well undersubscribed and therefore has ample spare capacity, so there is no need for additional spaces.

In fact the site has no further space for expansion, (unless the Scout Hut was moved and if that were the case, where would it go to?).

Recreation for Children. - A considerable amount of money has been spent in recent years upgrading the Children's Play Area.

The current facilities are sufficient as they stand and do not need further improvement.

SHOPS IN THE VILLAGE.

The argument that additional housing will support local shops and business is a myth.

When I moved to the Village in the early 1980's, there were far more shops. The population then was less than it is now.

There are now FIVE businesses, an Antique Shop, Diving Equipment shop, Chinese takeaway, Bakers and Cafe, with the main shop being the Post Office.

The Post Office is closing and will only be a shop.

There were THREE Public Houses, but currently, the "Oak" has been sold and is being converted into residential accomodation, (included in the figures in the DPD).

TO SUMARIZE

SA 25 IS FLAWED AND UNLAWFUL.

In addition to all the points mentioned, there is a fundimental question concerning legality of the SEAS to sell the land.

When SEAS was founded in 1967 as a Registered Charity, Restrictive Covenants were placed, which prohibit the land to be used for anything other than agricultural, equestrian and rural educational purposes.

Before anything further is done, a proper INDEPENDENT legal examination of the relevant Title Deeds and Documents should be undertaken to confirm whether the sale of ANY of the land for development and residential housing can lawfully proceed.

This concludes my submission.

Please acknowledge receipt ASAP?

Timothy HUGHES, Ardingly Resident.

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 527

Response Ref: Reg19/527/1

Respondent: Mr D Spence

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: David Spence [REDACTED]
Sent: 22 September 2020 16:10
To: ldfconsultation
Subject: My response to SA25 Land west of Selsfield Road Ardingly

Hello; my name is David Spence and I live in [REDACTED] Ardingly.

I and my family have been residents of Ardingly for well over 30 years.

All my children attended the local primary school, my two sons were baptized at St Peters Church and my daughter was married there, our family has strong links to this very rural community and village.

SA25 has been prepared with absolute bias containing statements that are both unsound as they are false throughout the proposal. It is my sound and reasonable view that SA25 should be overhauled and reviewed in its entirety. If it is considered necessary to then proceed as a proposal then do so with a balance of integrity, honesty and sound balanced opinion not unsubstantiated rhetoric and bias which is how it is currently presented.

I make that statement on the following grounds supported by evidence and fact and not the doubtful and unproven propaganda within the proposal.

This is a small rural village; we are a small community in a defined rural area. Our small village enjoys the protection afforded to it by its location within an area of outstanding natural beauty and is a small village by definition and location, the proposal is therefore unsound and simply wrong in its definition of Ardingly.

Our village under current Government guidelines is one that must be protected against any development and over development which this proposal clearly is. Our village has already absorbed over 50 new builds in the past few years. This far exceeds requirements and earlier expectations on our small community which again makes this proposal unjustified and beyond all reason.

The scale of the development proposal significantly affects the natural boundary of the village. The open space lies completely within the High Weald AONB a wholly unnecessary incursion and intrusion into such area which again cannot be justified. This is rural, agricultural and community land which also contains PROW. The proposal creates an un natural boundary and incursion.

The proposal in its absolute entirety is a major development to a small rural community and based on the above there is surely a duty to protect our rural village, protect our community and protect our environment. That is surely the first duty of anyone assessing this proposal, the common law test of the reasonable man would simply discard this proposal in its entirety.

This proposal seeks to affect and interrupt this protected area. Nowhere within the proposal do I see any comment or statement that seeks to protect our village, protect our environment and protect our village !

Government current advice and present thinking is to protect such areas not to develop. I believe therefore that this absolute necessity to protect makes this proposal unsound.

Within the protection of our rural community you should also look at the dark sky impact which will be very considerable and have a real impact this will have on the close nearby countryside.

The site forms part of the South of England showground which I believe is designated agricultural land. I also believe from current and historic conversations with village 'elders' that covenants exist that directs the showground to 'hand back' land they have identified as surplus or no longer required back to agricultural use. Therefore, there is a legal issue to inquire into and investigate with regards to covenants bound by law that may affect this proposal.

It matters not what or why the showground has determined within its desire to sell for development based on business requirements but based on if there is a legal issue that simply means that they cannot. A full frank disclosure has to be expected in relation to these legal issues and it is incumbent on the local authority planning to ensure an investigation is undertaken with regards to this covenant issue and any other issues of legality that may arise within those investigations.

Objectives LBE1 and LBE2 within the proposal are condescending and unsound, they contain deliverables and promises that are unlikely to be fulfilled and evidence is required how the developer would actually attempt to achieve this taking into account and based on evidence from a previous development (Monks Meadow) College Road Ardingly where there is little or no evidence of such social and affordable housing despite similar historic assurances.

Objective OQ1 through to OQ4 is again pure speculation and propaganda without any substance and should be considered unsound as well as unjustified for the following reasons based on justification and legal issues.

The Mid Sussex District Plan 2014-2031 clearly states that development within the High Weald AONB will only be permitted where it conserves or enhances natural beauty and has regard to the High Weald AONB Management Plan, in particular; the identified landscape features or components of natural beauty and to their setting; the traditional interaction of people with nature, and appropriate land management; character and local distinctiveness, settlement pattern, sense of place and setting of the AONB; and of the conservation of wildlife and cultural heritage.”

It continues;

The High Weald AONB Management Plan is a statutory document and a material consideration in the determination of planning decisions. It is character-led and addresses the components of character that define the High Weald's natural beauty. The stated vision for the future of the High Weald is a landscape which: “Retains its distinctive historic landscape character and beauty and has halted the erosion of natural beauty avoiding poor development and incremental change.

Furthermore “The High Weald is one of the best-preserved Medieval landscapes in North West Europe”

Clearly within your own proposal the impact to this historic AONB is cause for great concern and makes the proposal simply unjustified, the proposal is simply not sound and probably in breach of statute which I believe covers an awful lot of grounds to refuse this proposal in its entirety.

There are many other considerations which I believe are also fundamental within your considerations and these of course will include the impact from traffic pollution and volume to a small rural village as a consequence of development and as I have already said this community has certainly 'done its bit' with regards to recent new build development's which are now well in excess of 50 over the past few years.

In closure the proposal as laid out in SA25 is unsound, certainly not justified and probably in breach of legal statute and perhaps common law.

MSDC probably do not need me to state this but I am going to anyway, their primary duty specific to this proposal is to protect, protect and protect and I believe this proposal fails that duty in so many ways and in particular to those areas I have specifically mentioned and probably some I have overlooked.

Regards

David Spence

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 589

Response Ref: Reg19/589/1

Respondent: Ms S Dolton

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: Sally Dolton [REDACTED]
Sent: 26 September 2020 16:04
To: ldfconsultation
Subject: SA25 Land West of Selsfield Road Ardingly

Dear Sirs

> I wish to make known my view on the above development.

>

> This site is within the Area of Outstanding Natural Beauty, borders the Village Conservation Area and outside of the built up area. At present the land is occasionally used as an overflow car park for the South of England Showground at the 3 major events and also for the dressage element of some of the minor one day events. It is also used for parking for the current car boot sales taking place on a Sunday and it is considered to be a local open space. So where will all these cars go in the future?

>

> Ardingly have already committed a large portion of the houses required by MSDC and a further 70 new houses would contribute a 15% increase in the number of houses, which I consider a Major development in an area of AONB. This is backed up by the legal advice given by James Maurici regarding developments in AONB. There is very little local need for more new houses in Ardingly with many houses at present for sale in the Village.

> If this large SA25 development goes ahead the requirement for the Mid-Sussex district will be more than supplied which I believe is wrong in an area of AONB. The Ardingly Village Neighbourhood Plan outlined a need for 30 houses which was exceed by 23 houses up to October 2019. The outlined plan up to 2031 will vastly exceed the needed allocation by this proposed plan in an AONB which is not Justified and therefore NOT Sound.

>

> The site of SA25 is on agricultural land, well drained and of a good

> grade of topsoil which is not usual in many parts of the County

>

> The traffic through the village is particularly bad in the rush hour and it is not an easy drive or walk down the High Street at any time. The large number of houses being planned would undoubtedly effect the flow of traffic all day through the village making crossing the B2028 very hazardous. The villagers have frequent power cuts and the mobile reception in parts of the village is poor and virtually non-existent in places. Extra usage of these facilities will not help matters.

>

> Shops in the village are few - due to good local supermarkets in Haywards Heath - therefore they are not profitable so do not succeed. Villagers need their cars to go anywhere as the bus service through the village is very poor indeed. The large scale of the planned extra housing will affect the traffic through the village to an unacceptable degree. I do not believe the infrastructure of the local doctors for this amount of houses can be put in place easily never mind all the other necessary local services.

> A survey carried out in the Village showed a huge majority of the residents were against such a large development. Due to all this I believe this development plan is Unsound.

>

> I do not believe the Plan is Consistent with national policy. The area is good agricultural land and in an area of AONB, outside the built up area of the Village. Planning permission in these circumstances I believe is usual refused except in exceptional circumstance, especially if it does not benefit the public interest. In this case it does not benefit the public interest so I believe the Plan is Unsound.

>

> I Consider the Site Allocations DPD is NOT Sound

>

> Please Notify me when:

> The Plan has been submitted for Examination, The publication of the

> recommendations from the Examination The Site Allocations DPD is

> Adopted

>

> I hope my views will be taken into account Yours faithfully

> Sally Dolton.

> 26.09.2020

>

> Mrs Sally Dolton



Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 628

Response Ref: Reg19/628/4

Respondent: Mr D Port

Organisation:

On Behalf Of: Ardingly Cricket Club

Category: Resident

Appear at Examination? ✓

Name	David Port
Job title	N/A
Organisation	N/A
Respondent ref. number	Unknown
On behalf of	N/A
Address	[REDACTED]
Phone	[REDACTED]
Email	[REDACTED]
Name or Organisation	David Port
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound
Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	<p>It is illegal because</p> <ol style="list-style-type: none"> 1. When the land was transferred to SEAS ownership c1967 it was to be used consistent with the SEAS Charter and if not then restrictive covenants requir it to be returned to Agricultural use 2. SEAS is a registered charity and its\ ' Charter dos not allow for property development 3. The original planning approvals for the construction of the Showground in the 1960s required that no other development would be approved to the north of the Recreation ground 4. Construction directly to the north the Recreation Ground knowingly introduces danger to property and persons as a consequence of cricket balls and footballs and is thus in contravention of Health and Safety legislation. Mitigation to this danger would either constrain the villagers from enjoying their sporting pastimes that have been carried out for over 100 years or would require unsightly and costly to maintain high fencing. 5. It contravenes the ANOB visual impactment requirements because the western end of the proposed development sits on a high ridge plateau 120m AOD making it very visible from all points of the compass. 6. The development significantly exceeds the DPD requirement for only 22 further new houses in the parish of Ardingly

<p>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.</p>	<p>There can be no compliance with points 1, 2 and 3 above without legal recourse to change covenants, the SEAS Charter and previous planning agreements.</p> <p>Points 4, 5 and 6 can be addressed by reducing the number of houses to 22 and siting them in middle of the site at the low point in the fold of land thus effectively screening the development.</p> <p>Further, the land promised for additional recreation should be that immediately north of the recreation ground to make a contiguous and sensible layout. This parcel of land has historically, in agreement with previous regimes at the SEAS, been used by the village for special events for many years. It therefore has precedents of use. It would also be most welcome for the parcel of land to be gifted to the village and not retained in SEAS ownership. This is what the previous owner and village benefactor would undoubtedly have wished.</p>
<p>If you wish to provide further documentation to support your response, you can upload it here</p>	
<p>If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination</p>	<p>Yes, I wish to participate at the oral examination</p>
<p>If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary</p>	<p>I have lived in the village for nearly 50 years and through my past associations with the SEAS and my current and past involvements with village organisations, I have a wealth of local knowledge that can benefit the enquiry.</p>
<p>Please notify me when-The Plan has been submitted for Examination</p>	<p>yes</p>
<p>Please notify me when-The publication of the recommendations from the Examination</p>	<p>yes</p>
<p>Please notify me when-The Site Allocations DPD is adopted</p>	<p>yes</p>
<p>Date</p>	<p>24/09/2020</p>

Name	David Port
Job title	Secretary
Organisation	Ardingly Cricket Club
Respondent ref. number	Unknown
On behalf of	Ardingly Cricket Club
Address	[REDACTED]
Phone	[REDACTED]
Email	[REDACTED]
Name or Organisation	Ardingly Cricket Club
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound
Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	<p>It is illegal because construction of the proposed development will knowingly create danger to property and persons in contravention of Health and Safety legislation. For more than 130 years players have hit balls into the field directly north of the recreation ground without fear of prosecution.</p> <p>It is believed that the parcel of land directly to the north of the recreation ground been left fallow since the Showground was built and that for safety reasons vehicle parking has always been allocated to the centre and west of the land described for development in SA25.</p> <p>There is no rationale in changing a proven safe environment.</p>
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.	Retain the parcel of land directly to the north the recreation ground as a fallow field and locate all housing development to the centre and west of the land outlined in SA25. Essentially this would move the developers proposed recreational area currently identified to the west of the SA25 land to the east end, thus creating a safe and contiguous (with the recreational ground) recreational area.
If you wish to provide further documentation to support your response, you can upload it here	
If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	Yes, I wish to participate at the oral examination
If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary	To advocate changes to SA25 using my long term knowledge of historical use of Ardingly's recreational facilities

Please notify me when-The Plan has been submitted for Examination	yes
Please notify me when-The publication of the recommendations from the Examination	yes
Please notify me when-The Site Allocations DPD is adopted	yes
Date	25/09/2020

Name	David Port
Job title	Chairman
Organisation	Ardingly Village Club
Respondent ref. number	Unknown
On behalf of	Ardingly Village Club
Address	[REDACTED]
Phone	[REDACTED]
Email	[REDACTED]
Name or Organisation	Ardingly Village Club
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound
Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	<p>It is illegal because it has not met the legal requirements under the duty to co-operate with other bodies when preparing plans under Section 110 of the Localism Act 2011.</p> <p>The Ardingly Village Club is a private limited company by guarantee without share capital. It acts as an umbrella organisation to assist in community activities for the village of Ardingly. Active sections include the tennis club, the cricket club and the summer fete.</p> <p>It has not been consulted and worse still requests to SEAS for discussions have been ignored.</p>
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.	The planners and developers should constructively meet with Ardingly Village Club to jointly determine improved development proposals that would benefit the activities of sections of the Club. There is no doubt that the design of the proposed development could be varied at little or no cost to provide for long term community benefits. Some joined up thinking could produce some amazing outcomes.
If you wish to provide further documentation to support your response, you can upload it here	
If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	Yes, I wish to participate at the oral examination
If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary	To present opinion that has been ignored

Please notify me when-The Plan has been submitted for Examination	yes
Please notify me when-The publication of the recommendations from the Examination	yes
Please notify me when-The Site Allocations DPD is adopted	yes
Date	25/09/2020

Name	David Port
Job title	N/A
Organisation	N/A
Respondent ref. number	Unknown
On behalf of	N/A
Address	[REDACTED]
Phone	[REDACTED]
Email	[REDACTED]
Name or Organisation	None
Which document are you commenting on?	Sustainability Appraisal
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound

Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD

SA25 is illegal because it is not in compliance with the Council's Statement of Community Involvement and not consistent with the National Planning Policy Framework

The Council's Statement of Community Involvement key contacts list was last updated October 2011 and does not include the Ardingly Village Club, the umbrella organisation for assisting in Ardingly village community activities.

Inconsistency with the National Planning Policy Framework as it does not provide for the delivery of sustainable development (section 15) and in particular departs from AONB policy. The Landscape and Visual Appraisal report prepared by Huskisson Brown on behalf of the developers is flawed and inaccurate. It makes statements where there is evidence to the contrary and makes reference that are patently wrong. It works backwards from the SA25 policy to make conclusions consistent with that policy. Some examples are

Para 2.11 - to provide a permeable layout and seek to enhance connectivity of the site with Ardingly Village ...; The fact is that the site sits on a high ridge that is isolated from the village.

Para 2.18 refers to the East of England Showground; This is obviously a cut and paste exercise and not a unique study of the site in question. Very poor.

Para 2.25 states that the land is used for overflow parking but otherwise has an informal recreational use. It should say that the west of the site is used for overflow parking and that the east of the site is fallow ground used for general visitor and village recreational use.

Para 2.28 describes the site as being on a plateau at 120m AOD with slight fall to the south west. It fails to draw the obvious conclusion that this makes any development on the plateau to be visible from all points of the compass.

Para 2.29 says that the B2028 is a ridge top road running through the village but fails to draw the conclusion that this makes any development on the plateau to be visible when passing

Para 2.40 says that there is an open access land in the vicinity of the site but fails to mention that the east end of the site is immediately north of the recreational ground.

Para 2.45 mentions views across the countryside but fails to say that any development when viewed from the recreational ground will be totally obliterated by a development to the north of the recreation ground.

Para 2.51 describes a faulted landform of clays, sands and soft sandstone. It fails to draw conclusions as how this affects drainage. It is known that the cricket table and football pitch suffered worsening drainage when the SEAS made a bund from spoil in the 1960s. Further disturbances of the fallow land to the north of the recreation ground will have unknown consequences.

Para 2.57 states that land management guidelines are to avoid skyline development. Well the proposed development does exactly that!!

Para 2.60 confirms that the proposed development sits on a plateau

Para 2.64 refers to a non-existent school playing field. Another inaccurate cut and paste??

Para 2.84 states that the flatness of the site and the artificial bund make it inconsistent with the High Weald characteristics. This is disputable as the land is integral to the High Weald.

Para 2.87 is totally wrong. The site is visible from all around. It is not invisible.

Para 2.95 correctly calls for a visual impact assessment. However, this must be before a scheme proposal comes forward and after.

Para 3.6 The conclusions drawn here that the baseline and visual considerations identified in the report support residential development are most definitely one-eyed. How?

Para 3.10 bullets 12, 13 and 14 are matters that should be followed up and determined before planning approvals are given. Ditto para 3.13.

Para 4.4 has some lovely words but fails to mention 'how'

Para 7.2 mentions gaps. Hapsted and Ardingly settlements have been mentioned in the report but the proposed development would also link Ardingly to Little London. Do the same arguments apply?

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.	To delete any proposal to build directly to the north of the recreation ground and limit development to 22 house in the central low lying fold of land.
If you wish to provide further documentation to support your response, you can upload it here	
If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	Yes, I wish to participate at the oral examination
If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary	To advocate my local views as derived from my knowledge of living in Ardingly for nearly 50 years
Please notify me when-The Plan has been submitted for Examination	yes
Please notify me when-The publication of the recommendations from the Examination	yes
Please notify me when-The Site Allocations DPD is adopted	yes
Date	25/09/2020

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 642

Response Ref: Reg19/642/5

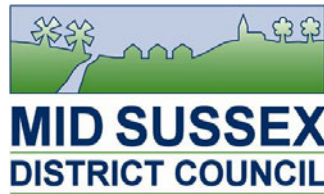
Respondent: Ms C Tester

Organisation: High Weald AONB Unit

On Behalf Of:

Category: Statutory Consultee

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/

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

Title	<input type="text" value="Ms"/>
First Name	<input type="text" value="Claire"/>
Last Name	<input type="text" value="Tester"/>
Job Title (where relevant)	<input type="text" value="Planning Advisor"/>
Organisation (where relevant)	<input type="text" value="High Weald AONB Partnership"/>
Respondent Ref. No. (if known)	<input type="text"/>
On behalf of (where relevant)	<input type="text"/>
Address Line 1	<input type="text" value="Woodland Enterprise Centre"/>
Line 2	<input type="text" value="Hastings Road"/>
Line 3	<input type="text" value="Flimwell"/>
Line 4	<input type="text" value="East Sussex"/>
Post Code	<input type="text" value="RH7 5PR"/>
Telephone Number	<input type="text" value="01424 723018"/>
E-mail Address	<input type="text" value="Claire.test@highweald.org"/>



Information will only be used by Mid Sussex District Council and its employees in accordance with the Data Protection Act 1998. Mid Sussex District Council will not supply information to any other organisation or individual except to the extent permitted by the Data Protection Act and which is required or permitted by law in carrying out any of its proper functions.

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: High Weald AONB Partnership

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	<input type="text"/>	Policy SA	SA 25	Draft Policies Map	<input type="text"/>
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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 checked="" 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**.

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.

'Special qualities' is a phrase used in the legislation for National Parks and AONB Conservation Boards but is not applicable to the High Weald AONB.

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.

Please can you make the following amendments in red – ~~deletions crossed through.~~

Under 'AONB'

"Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to conserve and enhance the landscape of the High Weald AONB, ~~and minimise impacts on its special qualities~~, as set out in the High Weald AONB Management Plan".

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:

To ensure that development proposals in the DPD conserve and enhance the High Weald AONB.

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:

21.09.2020

Thank you for taking time to respond to this consultation

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 653

Response Ref: Reg19/653/1

Respondent: Mr C Vallis

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

From: colin vallis [REDACTED]
Sent: 28 September 2020 17:58
To: ldfconsultation
Subject: SA25. Land west of Selsfield Road, Ardingly
Attachments: 20191228_122400.jpg; 20200416_095457.jpg

Dear Sir/Madam

I am writing to you regarding the proposed building of houses on site SA25 on land west of Selsfield Road in Ardingly. This is obviously a MAJOR development. The word major means serious or significant. How can 70 houses not be significant. That would mean in the parish an increase in size in the number of dwellings of 12% which IS major so the plan is definitely NOT sound. How can 70 houses be justified when MSDC as of 1st october 2019 required 73 houses from Ardingly. 53 have already committed or been completed so that only leaves 20. 70 houses is NOT justified.

SA25 is AN AREA of OUTSTANDING NATURAL BEAUTY. It is used by many thousands of people throughout the year. There are always families there with their small children on bicycles/scooters as there is nowhere else in Ardingly where they can go where there are no cars. With this development built it would not be safe walking or playing as the path would now be a road. Where else in Ardingly will parents be able to take their children to play or people can walk their dogs in complete safety. There must be other sites that would not have such a substantial effect on the local people and their children. (I believe MSDC reviewed 233 sites). Site SA25 again cannot be sound or justified.

Public transport in Ardingly is appalling. The High Street is chaotic. Building 70 more houses in the village will only make matters a lot worse as there will be even more cars for our already creaking, overcrowded roads. Buses are few and far between. Doctors, dentists and supermarkets are many miles away. So again SA25 site is neither sound or justified.

I am attaching some pictures to show what an absolutely beautiful place SA25 site is and how many people use it. It would be a tragedy if it was taken away from them.

Yours sincerely

Colin Vallis

[REDACTED]





Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 689

Response Ref: Reg19/689/1

Respondent: Mr M Brown

Organisation: CPRE Sussex

On Behalf Of:

Category: Organisation

Appear at Examination? ✓



The countryside charity
Sussex

CPRE Sussex
Brownings Farm
Blackboys
East Sussex TN22 5HG
Telephone 01825 890975
info@cpresussex.org.uk
www.cpresussex.org.uk

Mid Sussex District Council,
Oaklands Road,
Haywards Heath,
West Sussex RH16 1SS

26th September 2020

Sent by e-mail to: LDFconsultation@midsussex.gov.uk

Dear Sirs,

SUBMISSION DRAFT SITES ALLOCATION DPD

1. INTRODUCTION

- 1.1 This letter is written on behalf of CPRE Sussex, the Sussex countryside charity and a member of the Campaign to Protect Rural England network. CPRE Sussex campaigns for the health and enhancement of Sussex's countryside and for the vitality of its rural communities and heritage. Nationally, CPRE has campaigned for a strong, effective and transparent planning system for nearly 100 years.
- 1.2 We are writing on the assumption that you aim to proceed with the public examination and adoption of this DPD notwithstanding recent Government radical proposals to streamline the planning system and replace the entire corpus of plan-making law in England within an uncertain timeframe.
- 1.3 This letter explains why we consider that the Regulation 19 draft Sites Allocation DPD (the Plan) is unsound in certain respects, and suggests ways in which it can be made sound. Our representations below relate to
 - Policy SA25 (Land west of Selsfield Road, Ardingly);
 - Policy SA37 (Haywards Heath to Burgess Hill Multifunctional Routeway);
 - Policy SA38 (Air Quality); and
 - The absence of any specific frame-setting climate change policy within your District Plan.

2. POLICY SA25 - LAND WEST OF SELSFIELD ROAD, ARDINGLY

2.1.2 Our reasons for objecting to this proposed allocation, in summary, are:

- National planning policy requires conservation and enhancement of AONBs from development to be given the "highest status of protection" as a public interest priority.
- That public interest priority, which LPAs are responsible for implementing, is already at severe risk of being undermined in the High Weald by the rapidly growing level of development permissions granted there.

To promote, enhance and protect a thriving countryside for everyone's benefit

President: Lord Egremont

Campaign to Protect Rural England Sussex Branch CIO | Registered charity number: 1156568

Facebook : www.facebook.com/CPRESussex | Twitter : @cpresussex

- The provision of market housing that exceeds local community need is not a more important priority than AONB conservation where alternative sustainable site allocations outside an AONB are available or there is no essential Plan necessity for them to be sited within the High Weald.
- National AONB conservation policy is given effect in your Local Plan by policy DP16 which only permits small scale development there, and then only if it positively conserves and enhances the High Weald AONB.
- This proposed allocation would, on any reckoning, involve large-scale, relatively high density, development that exceeds both local need or to provide a cushion over the housing needed to meet your District Plan housing target. Most of it involves market housing that is not compatible with national policy limiting development within AONBs, or prioritising the social need for affordable housing.
- On a fair overall assessment of relevant factors, the development of this allocated site would be classified as major development for the purposes of NPPF para 172; and, as your Council has acknowledged, as such it would not be capable of meeting the exceptional circumstance and public interest tests that are a NPPF precondition to its approvability.
- A 70 dwelling development of this site has been assessed as having moderate potential to cause significant adverse effects on the High Weald AONB. Great weight must be given both to that finding of potential harm and to the fact that such development would not meet either DP16 criteria of being small scale or serving to conserve and enhance the AONB.
- The basis on which the site's sustainability appraisal was assessed is flawed;
- Whether or not it would constitute major development, any development proposal for the site would be unsustainable and ought to be rejected as contrary to your Local Plan AONB conservation and enhancement policy. DP16 is consistent with national planning policy and is the key Plan policy by reference to which planning decisions must be made.

2.2 Why a 70 dwelling development on site SA25 would not be approvable whether or not it constitutes major development

All development within an AONB must be limited

2.2.1 The statutory and NPPF policies for AONBs state that AONBs have a highest status of protection in relation to conserving and enhancing landscape and scenic beauty, and that within AONBs the scale and extent of development should be limited. As recognised in the recent Glover review on their safeguarding, AONBs and national parks also play an especially important part in public health and wellbeing, biodiversity, and climate change management terms. National planning policy in terms of their conservation in the public interest is given effect via the High Weald AONB via policy DP16 of your District Plan which requires approvable development there to be small scale and to demonstrate that it would conserve and enhance the High Weald's natural beauty.

2.2.2 A 70 dwelling development at Ardingly cannot possibly be considered a small-scale development and would not be compatible with these provisions. It would be imprudent to allocate a site for a level of

development that your Council would be likely to have to reject on application as inconsistent with your Local Plan and national AONB conservation policy.

- 2.2.3 Given that the High Weald enjoys the “highest status of protection” from development, there should be no allocation of land within the High Weald for development beyond the level required to meet local neighbourhood needs (and concentrated on affordable housing) unless there are no sustainable developable sites outside the High Weald – which, as the Sustainability Appraisal demonstrates, is not the case in Mid Sussex. It is a legal flaw in the site assessment system to assess sites within the High Weald on a par with sites elsewhere, rather than as a last resort option, as appears to have happened with this draft DPD. It is a flaw because it fails to give effect to the public policy objective of CROW Act cl 82 of diverting new development away from AONBs, and to the NPPF para 172 directive which gives AONBs the highest status of protection from development. The sustainability appraisal is wrong to attribute no greater weight to the site’s AONB status than to other 15 sustainability factors assessed: its conclusion that it performs relatively well against the Sustainability Appraisal framework demonstrates that the framework itself is flawed. Its conclusion is not justified.
- 2.2.4 Providing market housing for non-local people, and general Plan policies that permit that, should not take priority within the High Weald over these national AONB protective policies. The NPPF requirement to “limit” development there, and your own DP16 policy to support only suitable, sustainable “small-scale” development within the High Weald, would be rendered meaningless if a need to meet a District-wide housing target (a non-exceptional challenge faced by all planning authorities) could be used to justify overriding the public interest in conserving and enhancing the High Weald by building 70 houses here. Nor does your Local Plan support the allocation of larger sites within the AONB to meet Mid Sussex’s housing target.
- 2.2.5 The importance of protecting the High Weald from inappropriate development is highlighted by the statistics which show that, since the introduction of the NPPF in 2012, the average annual number of dwellings permitted for development there has increased from 186 homes p.a. pre 2012 to 895 homes p.a. by 2017¹. There is no other AONB in England where anything like this rate of housing growth or number of new homes is being allowed. The conservation purposes for which the High Weald AONB was so designated has already been seriously eroded by this unparalleled level of erosion. It is incompatible with the statutory duty imposed by CROW Act s.85 on local planning authorities to give effect to the Act’s policy purposes.

Why the degree of harm to the AONB is not a material factor

- 2.2.6 We note that a 70 dwelling development of the Ardingly site has been assessed as having moderate potential to cause significant adverse impact on AONB purposes, even if the development is sited to minimise its visibility.

¹ Independent Review of Housing in AONBs by the National Association of Areas of Outstanding Natural Beauty and The Campaign to Protect Rural England (November 2017).
<https://landscapesforlife.org.uk/application/files/5315/5552/0923/Housing-in-AONBs-Report.pdf>. See table 4, p.26. See also Glover report on strengthening the protections and purposes of National Parks and AONBs (May 2018): <https://www.gov.uk/government/publications/designated-landscapes-national-parks-and-aonbs-2018-review>.

- 2.2.7 There is a common misconception that the degree of protection from development within an AONB depends on an assessment of the degree of harm that the development would cause. That is not so. Parliament, in designating the area and boundaries of an AONB, has determined the area to which the designation applies, and the whole of that area is entitled to the same level of protection against development within or proximate to the AONB that would be liable to harm the special visual amenity and/or landscape character that led to that AONB's designation. We accept that an assessment is required to establish whether a development proposal (of whatever scale) will harm or enhance the AONB's protected characteristics²; but, unless the conclusion is that it will conserve and enhance them, the overriding nature of AONB conservation policy imposes a strong presumption that an application should be rejected. This fact is reflected in your Local Plan policy DP16 which states that development within Mid Sussex's portion of the High Weald "*will only be permitted where it conserves or enhances natural beauty and has regard to the High Weald AONB Management Plan*".
- 2.2.8 Once it is concluded that a development would fail to enhance the High Weald's essential characteristics, the trigger for rejecting the development is pulled, and arguing over the degree of harm is largely irrelevant. Every individual part of an AONB contributes to the whole, and it is no argument that a particular site is, in itself, not "special" in some way. Nor is it justifiable to argue, for example, that a development would be acceptable because it only just inside the boundary of the AONB or that the District has a housing shortage, or that it does not fall into the category of a major development in NPPF para 172 terms. All development applications affecting any part of the High Weald have to be viewed in the context of the "highest status of protection" purposes of DP16, CROW Act and para 172.
- 2.2.9 The position is akin to the statutory provisions that require great weight to be given to preserving and enhancing conservation areas and listed buildings (Planning (Listed Buildings and Conservation Areas) Act 1990 ss66(1) and 72(1)). The Court of Appeal has ruled that the statutory presumption against approving new development where harm would be caused must be given great weight whether or not that harm is substantial³. The position is no different where the potential for harm to an AONB has been identified.
- 2.2.10 We are further reinforced in our above views by a 2019 High Court decision⁴ in which the judge ruled that, where the first sentence of NPPF para 172 applies and the potential for harm is identified, (i) the NPPF para 11(d) presumption in favour of development is not triggered and (ii) that is a sufficient freestanding reason to refuse planning permission within an AONB even where the development does not qualify as a major development and even in a district, unlike Mid Sussex, with a 5 year housing supply shortfall.
- 2.2.11 We conclude therefore that, were a planning application for 70 houses on the Ardingly site to be made your Council, acting rationally, would be bound to refuse that application as incompatible with your Local Plan's countryside and AONB protection policies. Your Council has already accepted our argument from the previous round of consultation that it should not allocate the site for major development (of 100

² A sympathetic proposal to redevelop a derelict brownfield site within the High Weald might well enhance its essential characteristics, for example.

³ *Barnwell Manor Wind Energy Ltd v. East Northamptonshire District Council, English Heritage and The National Trust* [2014] EWCA Civ 137 (Court of Appeal)

⁴ *Monkhill v SSHCLG* [2019] EWHC 1993.

dwelling) because no development of that site would be approvable under the terms of your Plan. Whether or not a 70 home development is also a “major development” in para 172 terms (and we argue below that it is), the conclusion has to be the same, namely that no planning application to develop the site to the extent proposed in draft policy SA25 is likely to be capable of approval.

2.3. Why a 70 dwelling development on site SA25 would constitute major development

- 2.3.1 Your Council is given the responsibility to judge whether or not to treat a development proposal within the AONB as major development for NPPF para 172 purposes. In our view, proper consideration of the factors that your Council is required by NPPF footnote 55 to consider, a 70 home settlement on this proposed AONB site would almost certainly need to be assessed as major. We appreciate that this view is contrary to the advice you have received from the High Weald AONB Unit, which has been influenced to change its previous negative advice by the reduction in the number of dwellings for which the site is to be allocated from 100 to 70. We consider the change in the advice to be unjustified, not least because the size of the site to be allocated (at 12.8 acres) is not reduced and the AONB Unit concludes in both their regulation 19 analyses that the alternative allocations would both have the same moderate potential to create a significant adverse impact on the AONB’s purposes.
- 2.3.2 The only rationale offered by the AONB Unit for its changed opinion is based on an argument as to the impact of somewhat fewer houses - a 3% reduction in the growth of the village housing stock - on Ardingly’s settlement pattern, a point which we address below. The AONB Unit’s latest regulation 19 assessment does not suggest any other reason why it would not continue to advise that a development of this site would be major.
- 2.3.3 Applying the considerations listed in NPPF footnote 55, our reasoning, which we will ask the examining Inspector to endorse, as to why a 70 dwelling development on the site should on a common sense basis be treated in its local context as a major development for para 172 purposes, is as follows:

- (i) ***Nature of development:*** The proposal is an allocation for 70 dwellings to be built on part of a 12.8 acre site to the north of Ardingly village (a category 3 settlement), on a gently southwards-sloping open, prominent plot outside the village development boundary and beside the South of England Showground of which the land currently forms the southernmost part. The site girdles the village recreation ground, and there are public rights of way along the lanes that constitute the southern and northern site boundaries. The site is north-east of the nearby Butchers Field for which planning permission was refused on appeal in 2014 on grounds of harm to the historic pattern and character of Ardingly as a settlement and harm to the High Weald AONB⁵. This site involves similar considerations.

Development drawings show that the new housing would be densely packed. That packing would be all the more significant if any development was limited to the eastern section of the site in order to reduce its visibility within the landscape. This relatively high density layout offers minimal private outdoor space for individual homeowners. Greenfield is being turned irrecoverably into brownfield. Such a substantial, high density residential development building is alien to the AONB’s character and existing small scale of the development in the area; it would change the long-term pattern of development within the village adversely and irrevocably.

⁵ PINS Reference APP/D3830/A/12/2172335.

- (ii) **Scale of development:** Whilst the number of dwellings proposed has been reduced from 100 (accepted to involve major development) to 70, the 12.8 acre site to be allocated has not been reduced in size. A 70 dwelling development would represent an 18% increase in Ardingly's overall built-up area, and a 15% increase in the number of houses there. On any basis that is substantial. These percentages are all the greater if one argues that Ardingly should be viewed for planning purposes as constituting two communities based on their different historical development.

Even on its own, the proposed residential development would be of a sizeable scale, with a density level that is alien to the local character of village and the AONB and is disproportionate to the size of Ardingly's built-up area as a whole. The local large-scale impact is all the greater when considered cumulatively with other AONB development within the parish recently permitted, including the 37 houses on Standgrove Field.

The increase in population of, say, 160 people, would be liable to put noticeable additional pressures on local services and side roads, another factor that ought to be considered in assessing the scale of the development.

We also note that it is twice the size of a 35 dwelling, lower density development scheme proposed elsewhere within the High Weald that your Council has assessed as involving major development and rejected accordingly.

- (iii) **Setting of development:** Relevant indicators of a major development include:
- The site is beyond the village built-up boundary and partially beyond the open recreation ground;
 - The site is a greenfield site, albeit used on occasion for parking for visitors to the South of England Showground;
 - The location is prominent in the local open countryside; any development there would be likely to detract from the village's landscape setting and views from the adjacent PROWs and, potentially further afield;
 - The village's heritage assets: two conservation areas and 47 listed buildings: there is potential for any development to impact them (or some of them). The significance of any such impact will need to be addressed; and
 - Any development would extend light pollution further out into the countryside to the north of the village, thereby harming the dark skies objectives of the High Weald's Management Plan in an open location otherwise ideal for sky watching.
- (iv) **The potential for significant adverse impact on the purposes for which the High Weald AONB has been designated:** The High Weald AONB Unit's regulation 19 assessments of both the originally proposed 100 dwelling allocation and the current 70 dwelling allocation is identical, namely that "*it is considered that the potential for a significant adverse impact on AONB purposes is moderate*". We do not contest that conclusion that there is a reasonable potential for a 70 dwelling settlement to have a significant adverse impact on the High Weald. What is significant is that the reduction in the size of the proposed new settlement has not affected the AONB Unit's conclusion as to the potential for it to have a significant impact on its purposes and is not part of the rationale for their changed advice. It also has to be borne in mind that any development that fails to conserve and

enhance the High Weald's natural beauty is likely to be contrary to policy whatever the degree of significance of the identified harm.

2.3.4 Permitting the building here of 70 houses – way beyond Ardingly's own housing needs – is on any view a significant development that would, at a stroke, see a major increase in the size of the village beyond its current boundary, whilst putting substantial new pressures on local community services and causing harm to the AONB and potentially also to the Ardingly conservation area. In our view the only rational conclusion would be that any such development here must be treated as a major development for NPPF para 172 and footnote 55 purposes. Any other conclusion could be unlawfully inconsistent with other "major development" determinations by your Council.

2.3.5 If, as we argue above, a 70 home development on this site were properly to be considered a major development in para 172 terms, we understand that your Council has already accepted that it would almost certainly fail the two exceptional circumstance and public interest tests that are prerequisites to its approvability, and therefore be undeliverable. We agree with that conclusion, and so for the purpose of this submission we do not address here the reasons why that would be a correct conclusion, beyond arguing that it would be a nonsense to allocate for development a site on which no development of the scale proposed in this DPD would be likely to be acceptable in planning policy terms.

2.4 Summary re Policy SA25

2.4.1 In our view, whether or not development of this proposed site for allocation would constitute major development (as we believe it would be), the proposal to allocate this site for the scale of housing proposed in the draft DPD would be contrary to your Local Plan policies, contrary to the public interest protective purposes of the High Weald's designation under s.82 of the Countryside & Rights of Way Act 2000 (**CROW Act**) as an Area of Outstanding Beauty, and contrary to NPPF para 172 that gives effect in planning policy terms to the relevant part of the CROW Act.

2.4.2 For these reasons, the proposed allocation in the SADPD policy SA for a 70 home development on the SA25 site is neither justified nor consistent with national policy and should be withdrawn.

3 POLICY SA37 - BURGESS HILL TO HAYWARDS HEATH MULTIFUNCTIONAL NETWORK

3.1 CPRE Sussex supports the policy of safeguarding land for the creation of a multi-functional routeway for sustainable travel between Haywards Heath and Burgess Hill. We trust that the route will be extended down to Hassocks for whose residents Burgess Hill will be a magnet for its employment, shopping and recreational opportunities. The significance of the need to link people living in Haywards Heath or Hassocks with Burgess Hill is increased with the designation of the new Burgess Hill employment and science park areas and the decision to provide 6th form education in Haywards Heath rather than the Northern Arc.

3.2 However the policy unjustifiably lacks

- (i) a timeframe within which the Multifunctional Network should be up and running: to say simply that its construction would ideally be "within the lifetime of this plan" is not good enough for a strategic

plan document given its significance for providing a sustainable transport option for so many local people;

- (ii) promises to consult on route options early and fully not merely with “key stakeholders”, but also with local communities liable to be affected, including in Lewes District; and to apply the net environmental gain principle to its development;
- (iii) the absence within this safeguarding policy of a pledge not to allow the network to become a focus for allowing future ribbon development along its route. We believe that considerations of deliverability might favour development along the more western elements of the network over the more easterly ones.

4 AIR QUALITY POLICY SA38

- 4.1 In our view draft air quality policy SA38 is neither justified nor consistent with national policy on air quality improvement and monitoring, and therefore unsound.
- 4.2 Poor air quality kills. It has to be a key health and environmental policy issue for any public body responsible for controlling and/or monitoring it. Air quality policy, and its implementation, need to be comprehensive, robust and consistently applied. Neither proposed policy SA38, nor current District Plan policy meet the necessary high standard. The Air Quality Standards Regulations 2010 on which they depend are themselves out of date in that they fail to take account of the extensive science that has developed since they came into force. The degree of small particle particulates’ role as a killer is now well understood. It is therefore not good enough for your Council to sit back and say that they will upgrade their air quality monitoring and mitigation if and when the Government gets round to tightening their decade-old discredited regulations. Reliance on those Regulations alone is unjustified.
- 4.3 Air quality guidance that the Council bases its policy on does not, for example, require the Council to measure for concentrations of particulate matter with a diameter of PM0.1 from combustion particles, organic compounds or metals, despite World Health Organisation advice that their small size makes them particularly invasive as they can be absorbed via the lungs straight into the bloodstream.
- 4.4 SA38 identifies the Ashdown Forest SAC/SPAs and the whole District’s only AQMA in Hassocks as the only places of air pollution sensitivity. There is no evidence presented as to the last time on which there was a comprehensive survey was undertaken across Mid Sussex of air quality based on current (2020) standards to verify that no other locations required additional monitoring, AQMA designation or development impact minimisation, including for small diameter particulate pollution. The summary air quality modelling technical document prepared by Wood Environmental & Infrastructure Solutions Ltd to support SA38 did not consider any other sites and did not assess the effect of PM0.1 particulate matter pollution.
- 4.5 As a vital public health issue, air quality is one that requires a robust policy. Both DP29 and the current draft SA38 fail that test. We call for a policy that is
 - clear: so that developers and others know precisely what is required of them and of the Council, and the standards by which the effect of development proposals will be judged (when, for example, will a development be deemed by the Council to be “sensitive” or “major”);

- comprehensive, including all relevant potential pollutants including PM0.1 particulates;
- objective, so that the types of pollutants of concern, and the criteria and thresholds by which they will be measured and monitored are precise rather than (as currently drafted) vague and subjective;
- fair: so we suggest that the policy be, at a minimum, expressly benchmarked against national air quality standard regulations, and not discretionary in its application;
- flexible, to recognise the likelihood that national regulations are expected to be tightened in future and that the suggested Council's minimum benchmarking policy remains at least in step with changing national standards (though we would welcome of a more progressive policy rather than a legal minimum, least-we-can-get-away-with one);
- legally compliant, which the current draft is not (in our opinion) as regards the requirements and language of the Habitats Regulations in respect of Ashdown Forest. We explained in detail why we believe that those Regulations are being misinterpreted by your Council in our 19th November 2018 representations to you in respect of the previous consultation draft of this Plan.

4.6 Changes to the current draft SA38 needed to make the policy suitably robust are suggested in our mark-up in the Appendix below. In any case the reference in SA 38 to the Air Quality & Emissions Guidance for Sussex 2019 should refer to the 2020 version of that guidance.

4.7 The sustainability appraisal of SA38 is unacceptable. It compares false options. Rather than comparing the merits of the current policy that you have already (and rightly) decided needs to be upgraded, you should, in our view be comparing practical alternative ways in which good air quality can be maintained throughout the District, in which that high quality can be effectively verified on an ongoing basis, and effective steps can be taken to ameliorate any problem locations. Delivery should be monitorable and measurable against clear minimum quality criteria which are identified within the policy, which neither SA38 or District Plan policy DP29 do.

5 CLIMATE CHANGE

5.1 We do not consider that the Council can any longer avoid having a specific, robust, policy as an integral part of its Local Plan to address its own commitments to reduce climate change impacts via the planning process, and its expectations of those who become involved in the planning process to do so. A robust climate change policy would feed directly into your Local Plan objectives, particularly those addressing environmental protection, healthy lifestyles and economic vitality. The absence from your District Plan of a specific climate change policy is unsound in being neither legally compliant nor achieving sustainable development.

5.2 Section 19 (1A) of the Planning and Compulsory Purchase Act, as amended under the Planning Act 2008 which, together with the NPPF, puts local authorities under a positive duty to reduce future climate risks through the planning system and to ensure that Local Plans contribute to climate adaptation. We note that this law is not even included in the list of applicable legislation in Appendix 1 of the Sustainability Appraisal. LPAs have a leadership responsibility to ensure through the planning system that all new and adapted buildings, and infrastructure supporting them, are climate resilient and energy efficient. How can the Council demonstrate its compliance with its legal obligations in the absence of a Local Plan policy that sets the ground rules for what is required of developers, and the Council's own role in securing reductions in atmospheric pollutants that increase temperatures and in promoting energy efficiency, not least in building design and retro-fitting?

- 5.3 We particularly commend the recent guidance “Preparing for Climate Change: Good Practice Guidance for Local Authorities” (June 2019) published by the Association of Directors of Environment, Economy, Planning & Transport in conjunction with DEFRA (<https://www.adeptnet.org.uk/climategpg>) as a starting point for the defining of the scope of an appropriate climate change policy for Mid Sussex. Opting out of having a comprehensive climate change policy would be an abnegation of responsibility to protect Sussex’s citizens.
- 5.4 An essential element of an effective, sound, climate change policy is that it should seek to ensure that new development is sustainable through securing energy-efficient dwellings, both new builds and through retro-fitting the existing much larger housing stock. We appreciate that the Council’s admirable Good Design Guidance does offer helpful guidance to developers on what the Council considers to be appropriate energy efficient new home design. However, as it stands, that guidance would exist in a policy vacuum. What is needed, and in our view legally required, is a clear Council directive in the form of Local Plan policy that gives force and weight to the guidance - in the same way as the NPPG would be ineffective in the absence of the NPPF.
- 5.5 The role of climate change mitigation also in enhancing public health, biodiversity, in reducing air pollution and avoiding flooding should also be acknowledged in a robust climate change policy that cross-references to appropriate other District Plan policies and puts those policies into a wider context (climate change currently gets no mention in Biodiversity policy DP38 or Flood Risk policy DP41 for example).
- 5.6 In our view, there is no justification for delaying setting policy now, or limiting the Council’s policy to the outdated minimum current requirements of central Government. We would, amongst other ideas, urge your Council to take the initiative to set a time target within Mid Sussex for all new homes to be built to a zero net-emissions standard by a tough but realistic date.

6. PUBLIC EXAMINATION

- 6.1 CPRE Sussex will welcome the opportunity to expand on these representations at the Plan’s public examination if the examining Inspector would find that helpful.

Yours faithfully,

Michael A Brown

On behalf of CPRE Sussex, the Sussex countryside charity

APPENDIX : CPRE Sussex's suggested changes to draft policy SA38 (Air Quality)

The Council is committed to ensuring that the Plan area's air quality at least meets the minimum legislative standards required from time to time (currently the Air Quality Standards Regulations 2010, as amended) and those set out in this policy SA38. The Council will measure and monitor for ambient air pollutants, as required by those standards and by reference their thresholds and criteria. We will additionally monitor PM0.1 particulates in accordance with at least World Health Organisation recommended standards.

Any development that is liable to result in any of those threshold limits being breached either during the construction process or at any time during the lifetime of the completed development, taking account of cumulative impacts from committed developments, and including from vehicle emissions, will be deemed to have an unacceptable impact on air quality. The Council will require applicants to demonstrate that there is no unacceptable impact on air quality. If that cannot be demonstrated to the Council's reasonable satisfaction, in order to be eligible for approval, the development must minimise any air quality impacts to an acceptable level through a redesign of the development proposal or, where this is not possible or sufficient, through appropriate mitigation.

Where sensitive development is proposed in areas of existing poor air quality and/ or where major development is proposed, including the development types set out in the Council's current guidance (Air Quality and Emissions Mitigation Guidance for Sussex (2019 or as updated)) an air quality assessment will be required. This assessment must be carried out as set out in 'Air quality and emissions mitigation guidance for Sussex authorities (2013) – Appendices, as updated or replaced from time to time.

[Development proposals that are likely to have an impact on local air quality, including those in or within relevant proximity to existing or potential Air Quality Management Areas (AQMAs), will need to demonstrate measures/ mitigation that are incorporated into the design to minimise any impacts associated with air quality] *[Delete this paragraph. It adds nothing to the above].*

Where required to ensure compliance with this policy SA38, mitigation measures will need to demonstrate how the proposal, including design and/or other mitigation would make a positive contribution towards the aims of the Council's Air Quality Action Plan and be consistent with this Policy SA38.

Mitigation measures will be secured either through a negotiation on a scheme, or via the use of planning condition and/ or planning obligation depending on the scale and nature of the development and its associated impacts on air quality.

In order to prevent adverse effects on the Ashdown Forest SPA and SAC, new development likely to result in any adverse air quality effects, including in combination impacts, from increased traffic will be required to demonstrate how those effects will be avoided to the Council's satisfaction. Any planning consent granted will be subject to any appropriate planning conditions or limitations to give effect to those necessary avoidance measures.

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 705

Response Ref: Reg19/705/3

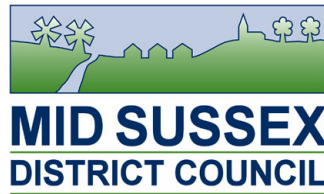
Respondent: Mr O Bell

Organisation: Nexus Planning

On Behalf Of: Miller Homes - Lewes Road HH

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/

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

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Oliver"/>
Last Name	<input type="text" value="Bell"/>
Job Title (where relevant)	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Nexus Planning"/>
Respondent Ref. No. (if known)	<input type="text"/>
On behalf of (where relevant)	<input type="text" value="Miller Homes Ltd"/>
Address Line 1	<input type="text" value="Fifth Floor, Thames Tower"/>
Line 2	<input type="text" value="Station Road"/>
Line 3	<input type="text" value="Reading"/>
Line 4	<input type="text" value="Berkshire"/>
Post Code	<input type="text" value="RG1 1LX"/>
Telephone Number	<input type="text" value="07795 977961"/>
E-mail Address	<input type="text" value="o.bell@nexusplanning.co.uk"/>



Information will only be used by Mid Sussex District Council and its employees in accordance with the Data Protection Act 1998. Mid Sussex District Council will not supply information to any other organisation or individual except to the extent permitted by the Data Protection Act and which is required or permitted by law in carrying out any of its proper functions.

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:

Miller Homes Ltd c/o Nexus Planning

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

25

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

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.

Please see attached

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.

Please see attached

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:

As a housebuilder with significant interests in the District and substantial concerns with the soundness of the Site Allocations Plan, it is essential that we attend the oral part of the examination.

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:

Oliver Bell

Date:

17/09/2020

Thank you for taking time to respond to this consultation

Representations to Mid Sussex Draft Site Allocations DPD (Regulation 19) Consultation

1. These representations have been prepared by Nexus Planning on behalf of Miller Homes Ltd in respect of the Regulation 19 consultation on the Mid Sussex draft Site Allocations DPD ("SA DPD").
2. Miller Homes control land south of Lewes Road, Haywards Heath ("the Site") (SHELAA ref. 844). The Site measures approximately 5 hectares, is available for development now and has an indicative capacity of 100 dwellings.
3. Overall, our representations identify a number of fundamental concerns with the Site Allocations DPD and its supporting evidence. These can be summarised as follows:
 - i. The Site Allocations DPD fails to provide a sufficient buffer against the District Plan requirement to ensure the Plan incorporates flexibility and robustness against the non-implementation of allocated sites. It is suggested that a 10% buffer should be applied.
 - ii. There is no evidence to justify an increase in the windfall allowance, contrary to the 'compelling evidence' test set by the Framework (paragraph 70).
 - iii. The level of growth proposed at Haywards Heath is significantly too low.
 - iv. The SA should have considered a reasonable alternative of no further growth at East Grinstead having regard to the Habitats Directive and potential impacts upon the Ashdown Forest SAC.
 - v. Too much growth is proposed at certain Category 3 settlements in an effort to slavishly comply with indicative figures outlined within the District Plan.
 - vi. Site allocation SA25 represents major development in the AONB for which no exceptional circumstances exist.
 - vii. The SA is unduly reliant upon, and constrained by, indicative and untested settlement figures, which has led to the allocation of unsustainable sites having regard to alternatives that exist in the District.
 - viii. Site Selection Paper 3 includes a number of errors or incorrect conclusions in respect site SHELAA ref. 844.

4. Given the above, the SA DPD is unsound. Additional sites will need to be allocated in order to address these issues of soundness, such as land to the south of Lewes Road, Haywards Heath (SHELAA ref, 844), which has capacity to accommodate approximately 100 dwellings, is controlled by a housebuilder – Miller Homes and is available for development now.

SA 25: Land west of Selsfield Road, Ardingly

5. Paragraph 3.4.6 of the Site Selection Paper 3 states that “It is important to note that a number of settlements in the plan area are entirely within the AONB, including several settlements at Category 3 of the settlement hierarchy where the adopted District Plan Strategy distributes housing growth. It will be necessary to ensure that housing needs at settlements in the AONB are met where possible, including through allocation, where doing so does not cause unacceptable harm to the AONB.”
6. In this context, we note that the Inspector’s Report relating to the District Plan outlines that *“Further allocations are likely to be needed in the future Site Allocations DPD to meet the housing requirement. There are locations within the District of lesser landscape value, in relatively sustainable locations near to settlements and close to main transport routes. Some settlements lie within the AONB and may be appropriate for modest housing schemes, but there is no evidence that meeting the housing requirement will necessitate major development in the AONB other than that already permitted by the Council at Pease Pottage, or that it would harm the National Park.”* (paragraph 53) (emphasis added).
7. It is therefore demonstrable that the Inspector considered only “modest” housing schemes may come forward in the AONB and that “no evidence” existed to support major development in the AONB.
8. Having regard to the above, we note that the SA DPD is proposing growth in the AONB at Category 3 settlements, most notably 70 dwellings at Ardingly (SA25).
9. Paragraph 172 of the Framework states that *“great weight should be given to conserving and enhancing landscape and scenic beauty in...Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.”* It also outlines that the scale and extent of development in the AONB should be “limited” and that major development in the AONB should be refused other than in *“exceptional circumstances, and where it can be demonstrated that the development is in the public interest”*.
10. Paragraph 3.4.6 of the Site Selection Paper rightly identifies that the Framework does not define what constitutes major development in the AONB. Indeed, footnote 55 of the Framework states that this *“is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined”*

11. Having regard to footnote 55 of the Framework, SA25 would result in some 3.5ha of greenfield land being developed to accommodate 70 dwellings, reduced from 100 dwellings in the previous iteration of the plan due to the Council accepting that it did comprise major development in the AONB. 70 dwellings does however remain a significant scale of development, particularly on the edge of a modest rural village and resulting in a fundamental and irreversible change to the landscape and scenic beauty of the site and wider area as the development would be readily perceptible from outside the site. It would also represent a significant expansion of the existing village in a sensitive location adjacent to a conservation area. For these reasons, it would represent major development in the AONB for the purposes of 172 of the Framework.
12. Paragraph 172 of the Framework sets out relevant matters to consider when assessing exceptional circumstances that are in the public interest. The Council's Major Development in the High Weald AONB Topic Paper references the provision of affordable housing and a replacement scout hut as being in the public interest. However, there is no evidence to demonstrate that such a scale of development is necessary to meet local affordable housing needs and that this couldn't be addressed through a rural exception site that would typically be much smaller in scale. There is also no evidence to support the need for a replacement scout hut or again that 70 dwellings are necessary to facilitate this. As such, the Council rightly accept that exceptional circumstances do not exist.
13. Comparing SA25 with land south of Lewes Road (ID 844 within the Site Selection Paper 3), for example, this allocation is by definition proposed at a significantly less sustainable location (Category 3 settlement compared to a Category 1 settlement). Furthermore, land south of Lewes Road is not located within the AONB. In terms of heritage considerations, the Council's Site Selection Paper 3 considers less than substantial harm would arise in respect of developing land south of Lewes Road on the setting of a Grade II listed building and a conservation area. The same is concluded in respect of SA25, albeit with the potential to effect the setting of a Grade I listed building which is an asset of the highest significance as per paragraph 194b of the Framework. Despite this, in combination with the fact SA25 is also located in the AONB and on the edge of a less sustainable settlement, it is still allocated. The Site Selection Paper 3 indicates that this is in order to "*deliver Ardingly's housing target...*" (page 832), presumably to meet the settlement level residual figures in the District Plan.
14. In this regard, paragraph 6.11 of the SA outlines that Policy DP6 of the District Plan sets out an indicative level of development for each settlement. It then goes on to state that "*The methodology for attributing the residual housing requirement to category/settlements was found sound through the District Plan process and it is not intended to revise it at this stage.*" The SA does however acknowledge that the indicative figures were only calculated at a high level i.e. not having regard to specific sites and therefore "*whilst it is fully intended to allocate sufficient sites in order to meet the category/settlement residual requirements set out in DP4/DP6 as far as possible; there may be reasons why this cannot be achieved*" (paragraph 6.14).

15. Notwithstanding the above, it is important to note that the principal purpose of providing residual housing figures by settlement was to guide the preparation of neighbourhood plans. This conclusion is supported by the District Plan Inspector who at paragraph 33 of his report states that Policy DP6 *"includes a table setting out the spatial distribution of the housing requirement with minimum housing requirements for the settlements and an assessment of the minimum residual requirement, to provide a suitable context for the preparation of neighbourhood plans"* (emphasis added). National policy has now been amended to specifically require this within strategic policies (paragraphs 65 and 66 of the Framework) and this approach is entirely logical when neighbourhood plans are prepared for a single parish. However, the use of settlement figures are not appropriate in the context of preparing a District-wide site allocations documents, as the settlement specific figures simply serve to unduly restrict the growth strategy despite, as the Council freely admit, not being robustly tested such that the figures are actually known to be deliverable.
16. The adverse effects of the Council's approach are evidenced in paragraph 6.16 of the SA where it states that *"...in order to meet the District Plan strategy, conclusions will be compared on a settlement-by-settlement basis with the most suitable sites at each settlement chosen in order to meet the residual needs of that settlement. This may result in some sites being chosen for allocation which have higher negative impact across all the objectives because this will be on the basis that the aim is to distribute allocations according to the District Plan strategy in the first instance; as opposed to simply selecting only the most sustainable sites in the district (as this may not accord with the spatial strategy and would lead to an unequal distribution of sites across settlements)."*
17. We agree that the SA DPD should not simply allocate all sites in Category 1 settlements as they should broadly align with the spatial strategy set out in the District Plan, but only where it is sustainable to do so. Where sufficient sites cannot be identified within a settlement category, any shortfall should then first be tested in Category 1 settlements. We consider that this approach would promote a sustainable pattern of growth, something the Site Allocations DPD currently fails to do, as evidenced by the proposals to allocated 70 dwellings in the AONB at Ardingly.
18. Given the above, SA25 should be deleted or substantially reduced in scale (irrespective of whether it is concluded 70 dwellings comprises major development in the AONB), with the residual housing requirement delivered through more sustainable sites such as land south of Lewes Road.

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 708

Response Ref: Reg19/708/2

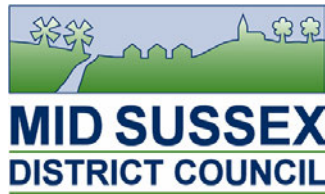
Respondent: Mrs P Canning

Organisation: Kember Loudon Williams

On Behalf Of: Mayfield Market Towns

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/

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

Title	<input type="text" value="Mrs"/>
First Name	<input type="text" value="Polly"/>
Last Name	<input type="text" value="Canning"/>
Job Title (where re evant)	<input type="text"/>
Organisation (where re evant)	<input type="text" value="Kember Loudon Williams"/>
Respondent Ref. No. (f known)	<input type="text"/>
On behalf of (where re evant)	<input type="text" value="Mayfield Market Towns Limited"/>
Address Line 1	<input type="text" value="Ridgers Barn"/>
Line 2	<input type="text" value="Bunny Lane"/>
Line 3	<input type="text" value="Tunbridge Wells"/>
Line 4	<input type="text"/>
Post Code	<input type="text" value="TN2 5DG"/>
Telephone Number	<input type="text" value="01892 750018"/>
E-mail Address	<input type="text" value="Polly.canning@klw.co.uk"/>



Information will only be used by Mid Sussex District Council and its employees in accordance with the Data Protection Act 1998. Mid Sussex District Council will not supply information to any other organisation or individual except to the extent permitted by the Data Protection Act and which is required or permitted by law in carrying out any of its proper functions.

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:

Mayfield Market Towns Limited

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

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.

We object to the way in which the draft Plan has been prepared finding that housing allocations have not been chosen on the basis of a robust assessment process. It is demonstrably clear that reasonable alternatives to the spatial strategy have not been considered and that the Plan is inconsistent with the NPPF. Specific and particular concerns are raised in regard to the Council's methodology and assessment of identifying sites for housing development/growth in the designated Areas of Outstanding Natural Beauty (AONB) when other suitable and sustainable sites are available outside of the AONB. **For further details please refer to the supporting statement accompanying this submission.**

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.

The following section from the supporting statement sets out the necessary changes that are required in order to make sure the Plan is sound:

- In order to ensure that the Plan is consistent with national policy and provides the most appropriate strategy when considered against reasonable alternatives, settlements outside of the AONB (such as Sayers Common) should be examined further to explore whether they are able to accommodate further growth.
- In order to ensure that the Plan is justified and has been based on proportionate evidence, the site selection process should be re-examined. It is important that there is only one landscape category in the assessment process regardless of whether a site is located in the AONB or not to ensure that all sites are assessed on a level playing field.
- In order to ensure that the Plan has been based on proportionate evidence and provides the most appropriate strategy when considered against reasonable alternatives, Site 857 Land West of Meadow View, Sayers Common should be carried through to the Stage 4 testing and be considered as a site suitable for housing.
- In order to ensure that the Plan has been positively prepared and based on effective working it is important that any work that has been undertaken in combination with the AONB Unit is publicly available. If, as we suspect, the involvement with the AONB unit was limited then the whole site selection process should be re-appraised to ensure that the process is 'landscaped led'.
- In order to ensure that the Plan is consistent with national policy the qualification of major development in the AONB should be reassessed and that Site SA 25 Land West of Selsfield Road, Ardingly in particular should be revaluated.

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 make sure that the plan is found sound.

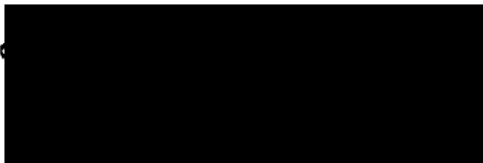
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

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:

28/09/20

Thank you for taking time to respond to this consultation

Representations Setting Out Why the Site Allocations DPD is Unsound

In relation to Mid Sussex District Council's Consultation Draft Site Allocations Development Plan Document (Regulation 19).

Contents

1	Introduction	3
2	Test of Soundness	4
	<ul style="list-style-type: none">• Inconsistencies with National Policy• Not a Justified Plan• Not an Effective Plan	
3	Major Development in the AONB and Site Allocation SA25	13
4	Sayers Common and Site 857 – Land West of Meadow View	16
5	Conclusions	23

APPENDICES

- 1 Site Proforma Site 832 Land West of Selsfield Road in Ardingly
- 2 Site Proforma Site 857 Land West of Meadow View Sayers Common
- 3 High Weald AONB Regulation 18 Consultation Response
- 4 Landscape Visual Appraisal
- 5 Accessibility Plan

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Project Contact: Polly Canning MRTPI

Our Reference: klw/18/123



1 Introduction

- 1.1 This Statement has been prepared by Kember Loudon Williams, on behalf of Mayfields Market Towns Limited (MMTL), in relation to Mid Sussex District Council's Site Allocations Development Plan Document (hereinafter referred to as 'the Plan') Regulation 19 Submission Draft: dated July 2020.
- 1.2 This Statement sets out our concerns regarding the DPD's ability to meet the required National Planning Policy Framework (hereinafter referred to as the NPPF) tests of soundness. Overall, this submission objects to the way in which the draft Plan has been prepared finding that the housing allocations have not been chosen on the basis of a robust assessment process. It is demonstrably clear that reasonable alternatives to the spatial strategy have not been considered and finds that the Plan is inconsistent with the NPPF. Specific and particular concerns are raised in regard to the Council's methodology and assessment of identifying sites for housing development/growth in the designated Areas of Outstanding Natural Beauty (AONB) when other suitable and sustainable sites are available outside of the AONB.
- 1.3 This Statement identifies areas where it is considered that the Plan fails the tests of soundness and concludes with recommendations to make the Plan sound. This includes a request to release Site Number 857 – Land West of Meadow View, Sayers Common for housing and to review the size of the development associated with Site Allocation 25, Land West of Selsfield Road, Ardingly.



2 Test of Soundness

2.1 The NPPF states at Paragraph 35 that Plans should be examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. Plans are 'sound' if they are:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with national policy.

2.2 Kember Loudon Williams previously submitted representations on the Site Allocations DPD Regulation 18 which set out that the Plan failed the test of soundness on two counts:

- **Not being consistent with national policy**: because of the excessive amount of growth and development that was planned to take place in the AONB contrary to the Government's stated ambitions to conserve and enhance the most valuable landscapes; and .
- **Not being justified**: because there are credible alternative and available sites that are not constrained by any landscape designations which offer sustainable advantage. The spatial strategy relating to the distribution of development across the District was therefore considered to be fundamentally flawed.

2.3 It remains our assertion that the latest Regulation 19 version of the Plan fails the test of soundness on these two grounds. The following Section of this Statement provides further details and evidence to support this claim. In addition, we are of the view that the Regulation 19 document fails the third test of soundness on the count of:

- **Not being an effective Plan** – based on a lack of evident and effective joint working with the High Weald AONB Unit.

1) Inconsistent with National Policy

2.4 Paragraph 35 (d) of the NPPF explains that Plans are sound if they are: "*consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework*".



- 2.5 The NPPF contains the presumption in favour of “sustainable development” as set out in Paragraph 11. This means that, in plan-making, strategic policies should, as a minimum, provide for objectively assessed needs for housing.....unless the application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution in the plan area. For obvious reasons, landscapes designated for their outstanding natural beauty (AONBs) are one such restricting policy, as set out in footnote 6.
- 2.6 Paragraph 170 of the NPPF explains that planning policies should protect and enhance valued landscapes in a manner commensurate with their statutory status. The following paragraph (171) requires the need for Local Planning Authorities to differentiate between land of the highest environmental quality and that of lesser quality, and to allocate development and growth to the least sensitive areas/landscape.
- 2.7 The most relevant policy in the NPPF for AONBs is paragraph 172. The first part of which states:
*“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, **which have the highest status of protection** in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in the National Parks and the Broad. **The scale and extent within these designated areas should be limited**”.*
- 2.8 The second part to paragraph 172 sets out the corresponding presumption against major development in AONBs other than in exceptional circumstances, and where it can be demonstrated that the development is in the national interest.
- 2.9 Planning Practice Guidance, revised July 2019, states:
“The National Planning Policy Framework makes clear that the scale and extent of development in these areas should be limited, in view of the importance of conserving and enhancing their landscapes and scenic beauty”.
- 2.10 However, taken as a whole, it is considered that the number of sites in the AONB that have been allocated for development in the Council’s emerging Plan is excessive. In total it is proposed to allocate six housing sites in the AONB and two employment sites, resulting in a cumulative total of 188 units and 3.6 hectares of developable land for employment purposes.



Table 1: Proposed Site Allocation in the AONB

Policy	Site	Settlement	Yield	Developable Area
SA7	Cedars, Brighton Road	Pease Pottage		2.3 ha
SA8	Pease Pottage Nurseries	Pease Pottage		1 ha
SA25	Land west of Selsfield Road	Ardingly	70	5.17 ha
SA26	Land south of Hammerwood Road	Ashurst Wood	12	1.71 ha
SA27	Land at St. Martin Close	Handcross	35	1.9
SA28	Land south of the Old Police House	Horsted Keynes	25	1.23
SA29	Land south of St Stephens Church	Horsted Keynes	30	1.13
SA32	Withypitss Farm	Turners Hill	16	2.01
Total			188 Units	16.45 hectares

- 2.11 Both the strategy and the quantum of growth in the AONB are considered excessive and unacceptable. There is a failure to recognise the importance and national intent of protecting the most sensitive landscapes. Moreover, sequentially, there are other deliverable sites within Category 3 settlements that are suitable for development that are not constrained by the AONB designation. Site 857 Land West of Meadow View, Sayers Common is a credible and sequentially preferable alternative site for instance and further details about this site are provided in Section 4 of this Statement.
- 2.12 The Plan clearly fails to follow a process of directing growth to the least constrained and least sensitive landscapes in the first instance and thereafter avoiding/limiting development within the AONB. As such the Plan it is not consistent with national policy and specifically fails in accordance with the core planning principles set out at Paragraph 11, 171 and 172 of the NPPF.



2) Not Being Justified

2.13 Paragraph 35 (b) of the NPPF explains that plans are sound if they are “*Justified – an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence*”.

2.14 As set out above, the appropriate strategy for allocating sites in the DPD should have been investigating the development potential for sites outside the AONB (or in any other protected landscape) in the first instance. Instead, it is clear that the Council has adopted an approach based on distributing allocations according to the District Plan strategy, with little regard to the overall impact this will have on protected landscapes.

2.15 The following specific concerns are raised and then explored in further detail below:

1. The site selection process is biased with the traffic light scoring system favouring sites in the AONB;
2. Reasonable alternatives to the spatial strategy have not been considered (i.e sites outside the AONB in the first instance); and
3. Lack of ‘landscape led’ planning at the start of the site selection process.

1. Bias in the Site Selection Process

2.16 Site Selection Paper 3: Housing Sites (February 2020) explains that part of the selection process involved Officers grading the potential impact of a site against 17 assessment criteria using a five tier ‘traffic light’ system, as set out below.

	Very Positive Impact
	Positive Impact
	Neutral Impact
	Negative Impact
	Very Negative Impact

2.17 A proforma was prepared for each site with a score given against each criteria and a reasonable justification for each score. Overall, 159 sites were tested at this stage, of which 108 sites were excluded and 51 were taken forward to be assessed in more detail as a “Reasonable Alternative” within the Sustainability Appraisal.



- 2.18 However, there is an obvious flaw with the scoring system which has led to favouring sites in the AONB, helping these sites to progress to the next stage above other sites not constrained by any landscape constraints. This stems from the fact that out of the 17 assessment criteria there are two landscape assessments – ones for sites located in the AONB (Planning Constraint 1) and one for sites not located in the AONB (Planning Constraint 8). This means that sites in the AONB are judged and given an overall weighted score based on a different set of criteria to those sites outside of the AONB.
- 2.19 The best way to explain this is by looking at two individual site proforma assessment sheets for Site 857 Land West of Meadow View, Sayers Common and Site 832 Land West of Selsfield Road in Ardingly. For ease of reference, the site assessment proformas are attached at Appendix 1 (Site 832) and Appendix 2 (Site 857).
- 2.20 In both instances, the landscape score given was found to be Negative. Site 832 reported the potential impact on the AONB to be Negative. Yet a similar Negative assessment was given to Site 857 despite the site not being in an AONB and not exhibiting any particular special or valued characteristics.
- 2.21 As a result of the flawed assessment process Site 857 Land West of Meadow View was dismissed and removed from the site selection process specifically because of concerns about its impact on the landscape. The detailed explanation as to why Site 857 was not taken forward is set out in Appendix A of the Council's Site Selection Paper 3 (February 2020). It states:
- "Development of this site has the potential to have an impact on the landscape. There are long distance views from the site to the south, and no strong defensible boundary or substantial screening to the south".*
- 2.22 It is fundamentally wrong that Site 857 in Sayers Common was dismissed at the early stage of the site selection process on landscape grounds whilst Site 832 in the AONB was taken through to the detailed testing stage. In view of the Council's conclusions about Site 857 in Sayers common, a full Landscape and Visual Appraisal was undertaken by Barton Willmore, which found that the Council's assessment of the impact on the landscape had been exaggerated and could be overcome. This specific issue is looked at in more detail in Section 4 of the Statement.
- 2.23 Something has clearly gone wrong with the assessment process. The starting point for any site in the AONB should have been that Site 832 in the AONB would have a Very Negative Impact on the landscape and the sites without AONB designation should naturally be favoured in the first instance. Otherwise, it makes a mockery of the designations/protectionist policies. Yet as a direct result of the "traffic light system", Site 857 was thrown out of the site selection process



specifically because of landscape concerns. This is not a justified approach and as such the Plan is considered unsound.

2. Not Considered Reasonable Alternatives

- 2.24 As identified above, The Sustainability Appraisal only considered sites that made it through the Stage 3 process. Yet, because of the identified flaws in the scoring system, a number of individual sites should have made it past Stage 3 and should have been considered as “reasonable alternative” sites. This includes Site 857 Land West of Meadow View, Sayers Common, which is examined in more detail in Section 4 of this Statement.
- 2.25 The site selection assessment process then rigidly sticks to distributing development in accordance with the spatial strategy and completely fails to consider a reasonable alternative, and correct approach of directing growth to sites outside the AONB. The Sustainability Appraisal is fixed on the spatial strategy so much so that it completely fails to consider whether it would be “better” spatially and more sustainable to direct growth to settlements (such as Sayers Common) that are unconstrained by any landscape designation.
- 2.26 It is important to remember that the District Plan spatial strategy was appraised and adopted before any individual sites were undertaken. In other words, whilst it was accepted that that the strategy was deliverable at a high level, this could not be confirmed until the Council had completed an analysis of individual sites and in combination with each other.
- 2.27 Policy DP6 was only therefore intended as a guideline and the number of dwellings planned for in each settlement was not fixed. Indeed, Paragraph 6.32 of the Sustainability Statement makes reference to this and explicitly states that “*the housing requirement were established ‘policy off’*”.
- 2.28 Yet, despite this, the site selection and assessment process has still been based firmly on a fixed approach of allocating sites specifically to meet the residual settlement numbers set in Policy DP6. As a result, a significant quantum of growth is directed to sites in the AONB, particularly in the Category 3 settlements.
- 2.29 This is not a justified approach and in our view that Plan has not been “positively prepared”. There is no acknowledgment whatsoever that the in-combination impact from allocating all of these sites for development will have a negative impact on the landscapes of the AONB.
- 2.30 A reasonable alternative approach would be to seek to maximise development outside those areas of the district constrained by an AONB designation, an approach which is understandably favoured by the Government and set out in the NPPF.



- 2.31 The Council's rigid approach of adhering to the spatial strategy (i.e. allocating sites according to the residual housing requirement in each settlement) is best exemplified in the categorisation process undertaken to take sites through to Stage 4 for detailed assessment. This is set out in Table 14 (Page 46) of the Sustainability Appraisal.

Sites That Perform Well	These sites perform well individually, and relative to other sites within the same settlement. These sites, collectively, are therefore assessed as being compliant with the District Plan strategy.
Sites That Perform Poorly	These sites don't perform well against the sustainability objectives. There are a number of negative impacts that, it is concluded, would not be outweighed by positive impacts. These sites also don't perform well relative to other sites within the same settlement – i.e. there are more sustainable sites within the same settlement that would meet the residual housing requirement before these sites are required. These sites are therefore rejected at this stage, however they may need to be considered again in the future should circumstances change (e.g. increased housing requirement within the settlement, change in strategy, or withdrawal of other sites from the process).
Marginal	These sites perform well individually (positives generally outweigh negatives); however they are not necessarily the most sustainable sites within the settlement. The residual housing requirement can be met sufficiently by 'Sites That Perform Well'

Table 14 - Housing Appraisal - Categories

- 2.32 The Marginal sites performed well individually, but some were not taken through to allocation because of concerns over exceeding the residual housing requirements for that settlement. Take for example Site 830 'Land to the west of Kings Business Centre, Reeds Lane, Sayers Common' for 100 units. This site performed well individually but because the indicative residual requirement at Sayers Common had already been reached with another site allocation the site was dismissed.
- 2.33 Surely, a more reasonable alternative approach would have been to consider whether or not Sayers Common is able to take further levels of growth because of its location in the Low Weald outside of the AONB. Furthermore, Sayers Common is considered a sustainable settlement with access to business, jobs and a local shop as explained further in Section 4 of this Statement.
- 2.35 The spatial strategy was established "policy off". Now that the policy constraints have been identified and it is clear that there is an unreasonable amount of development taking place in the AONB we question why the Council has not considered reviewing alternative sites outside of the AONB. The fact that the Council has not considered whether settlements outside of the AONB (such as Sayers Common) can accommodate more growth means that the Plan is unjustified and therefore unsound.
- 2.36 The Sustainability Appraisal should therefore be required to have an environmental objective relating to landscape constraints to ensure that development is directed to land outside the

AONB in the first instance. A sequential approach for flood risk is adopted in Objective 6 of the Sustainability Appraisal and so we see no reason why a similar sequential approach cannot be adopted for landscape considerations.

3. Lack of Landscape Led Planning

- 2.37 Decisions on allocating sites within AONBs should be 'landscape led'. Yet, it was only after the sites were identified for housing in the first draft of the Plan (Regulation 18) that the Council asked individual landowners to prepare individual Landscape and Visual Impact Assessment for the sites.
- 2.38 The Council should have had a robust understanding of the landscape impacts including the key characteristics, history and settlement patterns of the wider landscape at the start of the site selection process, not at the end. Yet in this case, the Council have put "the cart before the horse". As such the Plan has not been properly prepared and is unjustified. It is our assertion that in order to ensure that the Plan is found sound, Stage 3 of the site selection process needs to start again now that the Council have a better understanding of the landscape constraints affecting the site.

3) Not being Effective

- 2.39 The NPPF states that plans are sound if they are: *"effective – deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground"*.
- 2.40 There should have been early, proportionate and effective engagement with the High Weald AONB unit to inform the decision-making process, yet there is no evidence to suggest that this happened in any meaningful or constructive way. In fact, the High Weald AONB unit were very critical of the Council's approach to site selection in their comments on the Regulation 18 version of the Plan. A copy of the Unit's representations on the Regulation 18 document is attached at Appendix 3 for reference. The Unit states:
- "It is not clear from the SHELAA or the Site Selection Paper what evidence has been taken into account when allocating sites within the AONB"*.
- 2.41 Again, the NPPF is clear (Paragraph 26) that effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. Yet there is no evidence of any joint working with the AONB Unit.
- 2.42 There are several sweeping statements in the various supporting documents about involvement with the AONB unit yet there is no evidence to back this up. For instance, the Topic Paper 'Major



Development in the High Weald AONB' (July 2020) sets out at Paragraph 1.6 that "Sites within the High Weald AONB were assessed having high, moderate or low impact based on the advice provided by the High Weald AONB unit". Yet, there is no record of this advice.

- 2.43 In fact, as evidence from the Regulation 18 consultation response from the AONB unit (attached Appendix 3) it is suggested that there has been absolutely no cross-party involvement at all. Similarly, in the Council's Duty to Cooperate Statement (August 2020) the Council have a vague statement about the process of engagement with the AONB unit stating:

"Whilst not a statutory body the officers have worked closely with the AONB unit during the site selection process and the methodology for the assessment of major development in the AONB, alongside Natural England. A 'position statement' is being sought with the AONB unit to set out the liaison that has taken place".

- 2.44 Given the current pressures on the economy and the prevailing uncertainty, it is not acceptable to defer the publication of this document to a later date. In order to provide transparency in the system this should have already been prepared and been made publicly available at this stage in the plan making process. In view of this, it is our assertion therefore that the plan is ineffective and does not pass this test of soundness .



3 Major Development in the AONB

- 3.1 The following Section of this Statement undertakes a review of Site SA25 Land West of Selsfield Road, Ardingly relative to the qualification of major development in the AONB in the context of paragraph 172 and footnote 55 of the NPPF.

Background

- 3.2 At the Regulation 18 consultation, Site Allocation SA25: Land west of Selesfield Road, Ardingly was set for 100 dwellings.
- 3.3 Following feedback from Natural England and the High Weald AONB a decision was then taken by the Council to undertake an assessment to determine whether Site Allocation SA25 along with all the other allocations in the AONB could be defined as 'Major'. The Assessment was published in the "Major Development in the High Weald AONB Topic Paper" (July 2020). The assessment deduced that a 100 unit scheme in Ardingly would constitute major development but, interestingly concluded that 70 units would not.
- 3.4 It is our suggestion that the Council has wrongly judged this site.

Definition of Major Development

- 3.5 Footnote 55 to para. 172 of the NPPF says 'major development' is "*a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.*" As such, it is:
- A matter of judgement for the decision maker;
 - Must have regard to "nature, scale and setting".
 - Must consider "whether it could have a significant adverse impact on the purposes for which the area has been designated or defined".
- 3.6 The policy requires the exercise of planning judgement, but this judgement needs to remember that:



“The ordinary sense of the word ‘major’ is important and the decision maker should take a common sense view as to whether the proposed development could be considered major development. (Paragraph 2.4 of the Major Development in the AONB Topic Paper summarising the legal advice from the Maurici Opinions).

- 3.7 It is acknowledged that there is no threshold of when a scale of development in an AONB may be regarded as major. However, for research purposes, Kember Loudon Williams have undertaken our own assessment of appeal decisions dealing with this issue. The pattern that emerges is that applications for 30 houses or less have not been seen as major development with applications more housing than this seen as “major”. There are exceptions to this rule of thumb, but we have not identified any decisions comparable to the size of the proposed development at Ardingly where an Inspector has found it not to be seen as major.

Site SA25: Land West of Selsfield Road, Ardingly

- 3.8 As explained above, land west of Selsfield Road in Ardingly has a draft allocation for 70 units. In our view, taking into the account the amount of development, comparative to the size of the existing settlement of Ardingly, it is common sense to determine that the scheme is major. By the Council’s own admissions, Ardingly is a relatively small settlement. It is classed as a Category 3 Settlement in the Council’s Settlement Hierarchy and the updated residual housing requirement for the settlement is for only 16 dwelling. Yet, the village which is located in an AONB is faced with an allocation for 70 new dwellings.
- 3.9 The Topic Paper helpfully undertakes an assessment of the proposed allocation in relation to the existing settlement and finds that:
- The land take up represents an increase of 18% in the built-up area of Ardingly; and
 - The site allocation represents an increase of 15% in the number of dwellings in the Village.
- 3.10 Clearly, the scale of this development is considered proportionally significant for the size of the existing village.
- 3.11 Overall, it is considered that the development would have an unacceptable negative impact on the scenic character of the area and result in an intrusion to the landscape that would cause unacceptable harm to the landscape and scenic beauty of the AONB.
- 3.12 It follows that the proposed site allocation is ‘major development’ for the purposes of paragraph 172 of the Framework.
- 3.13 On a separate note, it is incredibly frustrating to see that the Council are supporting the promotion of this site even when there is no requirement for this number of units in the Village.



The Council have dismissed countless other sites because they are not in accordance with the spatial strategy, yet this site, which because of its location in the AONB should be afforded the greatest protection, is still being proposed for development. In our view, this is unjustified and, as such, the Policy is considered to be found unsound.

- 3.14 In order for the plan to be found sound, Site SA:25 Land West of Selsfield Road, Ardingly should be significantly reduced in size and other replacement sites in sustainable settlements outside of the AONB such as Site Number 857 should come forward. This site is examined in further detail in the following Section.



4 Sayers Common and Site 857

- 4.1 Kember Loudon William previously submitted representations on the Site Allocations DPD Regulation 18 which set out that that Sayers Common is one of the only villages in the District that lies outside of the AONB and suggested that growth should be directed to this village. It specifically identified Site 857 Land West of Meadow View at Sayers Common as a site suitable of accommodation growth and set out a credible set of planning arguments supporting the inclusion of the site into the emerging Plan. Our representations also identified errors and inaccuracies with the site selection process, and specifically provided a detailed Landscape and Visual Appraisal for the Council to use as an evidence base to reassess the site.
- 4.2 Disappointingly, however, the site has not been included in the latest Regulation 19 version of the Plan. Nor has it been reassessed or revaluated. It remains as a site that never made it past the Stage 3 site selection process.
- 4.3 It is our view that the site has been unfairly disadvantaged. A number of errors with the site selection process (as set out in Section 2 of this Statement) has led to ill-considered and incorrect conclusions being drawn on the planning merits of this site. The site should have made it through to the Stage 4 evidence testing stage and it should have been considered as a reasonable alternative to avoid large amounts of growth taking place elsewhere in the AONB.
- 4.4 This Section begins by setting out the physical and sustainable credentials of Sayers Common to demonstrate why this settlement is considered entirely suitable to accommodate further growth. It then highlights specific concerns over the way in which Site Number 857 has been assessed as part of the site selection process.

Sayers Common

- 4.5 The settlement of Sayers Common lies within the landscape of the Hickstead Low Weald. Significantly, within the context of its promotion of new housing, the land does not lie within the more valuable and highly protected landscapes of the High Weald Area of Outstanding Natural Beauty (AONB) or the South Downs National Park. The High Weald AONB is located approximately 3.5kms to the north of the site and the South Downs National Park lies approximately 3kms to the south of the site.



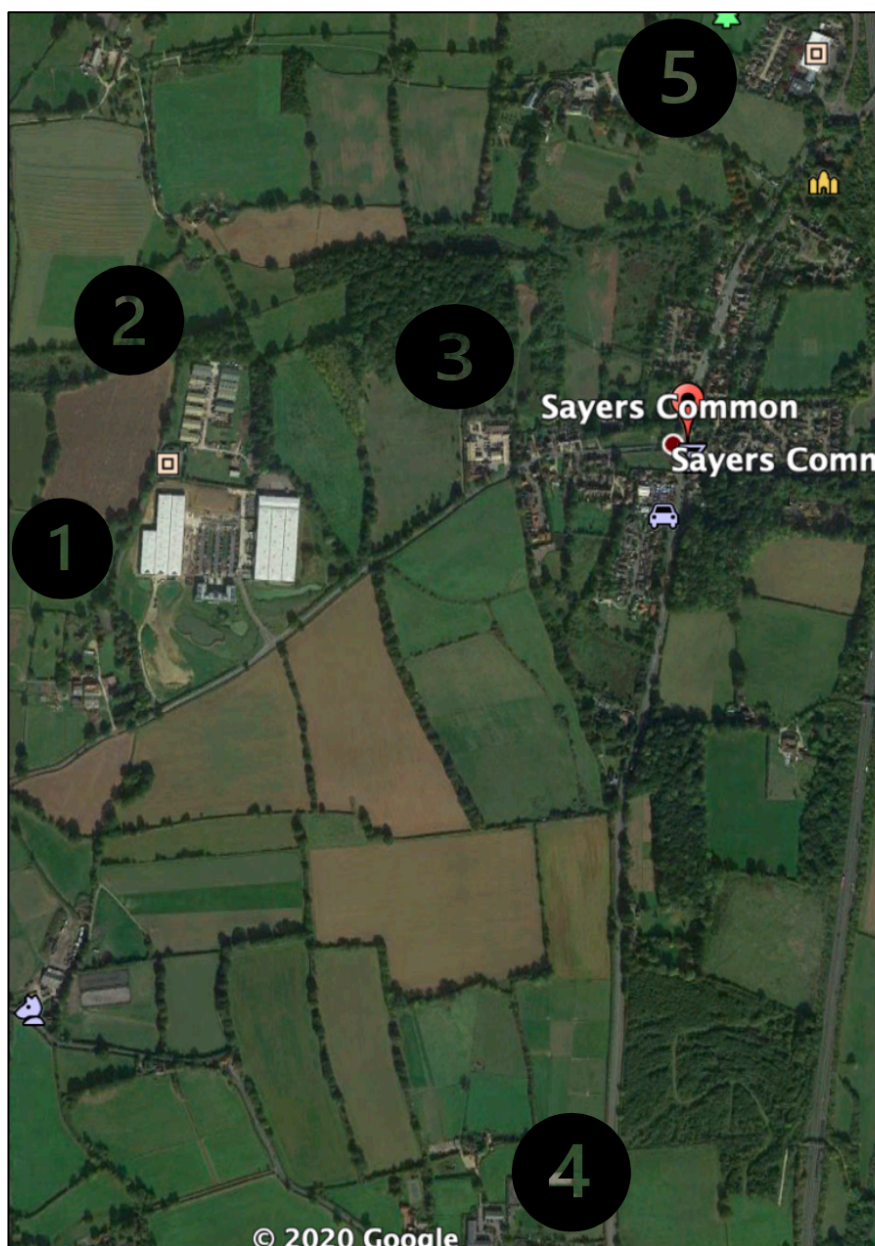
- 4.6 The settlement comprises 300-400 dwellings with a population of 800 – 900 residents. Facilities include a church, parish hall and a community-run shop (open every day). The village has also benefited from a pub, the Duke of York, recently being re-opened (December 2019) after having been boarded up for a number of years. Sayers Common does not have a school but there are schools at Albourne (2km) and Hurstpierpoint (within a 5k radius) which can be reached by means other than the car (foot, bike or public transport).
- 4.7 Sayers Common is well served and integrated with existing public transport infrastructure. Two bus routes run from the B2118. Bus Route 100 provides a local service to Hurstpierpoint, whilst Route 273 provides services to Crawley and Brighton. An additional school bus (331) providing direct access to Hurstpierpoint is provided during term times. These bus routes are demonstrated on the Accessibility Plan provided at **Appendix 5**.
- 4.8 Sayers Common also benefits from being located next to a number of large business parks and places of employment. The largest of which being Avetrade Global Headquarters (image below) which specialises in the sale and lease of aircraft components and is estimated to have between 200 – 250 staff.



- 4.9 Other large business parks in the immediate area include: Valley Farm Business Park, Reeds Lane, BN6 9JQ (estimated to have in the region of up to 45 personnel); Kings Business Centre, Reed Lane, BN6 9LS (estimated to have between 63 and 142 personnel); and Albourne Court, Henfield Road, BN6 9FF (estimated to have in the region of between 155 to 346 personnel). The Friday Media Group Head Office is also located to the north of Sayers Common on London Road. All of these employment locations are shown on the map below.

Key

- 1: Avetrade Global Headquarters
- 2: Valley Farm Business Park
- 3: Kings Business Centre
- 4: Albourne Court
- 5: Friday Media Group



- 4.10 The employment centres shown above are all within a 20-minute walking distance of Sayers Common. The settlement is therefore clearly very well related to the provision of employment services and facilities.
- 4.11 Overall, Sayers Common is a sustainable settlement. It has enough service provision to meet the day to day needs of the local residents. It is accessible and well related to the provision of public transport and provides access to a large number of local employment opportunities. Given that Sayers Common is not constrained by any overriding environmental landscape designations it is therefore considered ideally suited to accommodate more growth. It seems

logical to build more houses at this location to keep in line with the employment opportunities that are available as this would enable more people to walk to work, rather than the traveling by the private car.

- 4.12 It is frustrating that the DPD fails to recognise the suitability of Sayers Common to accommodate more housing and instead supports growth in the AONB. It is our assertion that this would not have happened if a sequential site selection process based on landscape constraints was assessed as a ‘reasonable alternative’ in the Sustainability Appraisal.
- 4.13 The role of a Sustainability Appraisal is to demonstrate that the Plan being prepared is the most sustainable given all realistic alternatives. This section has demonstrated that accommodating more growth in Sayers Common is considered entirely realistic. It should therefore be explored as a reasonable alternative in order to ensure that the Plan is found to be sound.

Site 857: Land West of Meadow View, Sayers Common

- 4.14 Site Selection Paper 3: Housing Sites (February 2020) reveals that Site 857 Land West of Meadow View at Sayers Common was not taken forward because of concerns about the impact any development on this site would have on the landscape. It specifically states that:

“Development of this site has the potential to have an impact on the landscape. There are long distance views from the site to the south, and no strong defensible boundary or substantial screening to the south”.

- 4.15 This contradicts the findings from the Landscape and Visual Appraisal (LVA) prepared by Barton Willmore and submitted as evidence as part of our Regulation 18 representations. A copy of the LVA is attached for reference at Appendix 4. In summary, it finds that:
- The site does not exhibit any particular special or valued characteristics;
 - incursion into the countryside would be very limited,
 - any potential development of the site would be screened by the combination of a mix or mature trees and vegetation and undulating topography,
 - that the site is not conspicuous in any long-distance view from the South Downs National Park or High Weald AONB; and that
 - potential landscape and visual effects arising from residential development of the site would be limited to the immediate locality of the site, with no significant effect on the wider landscape and visual context.

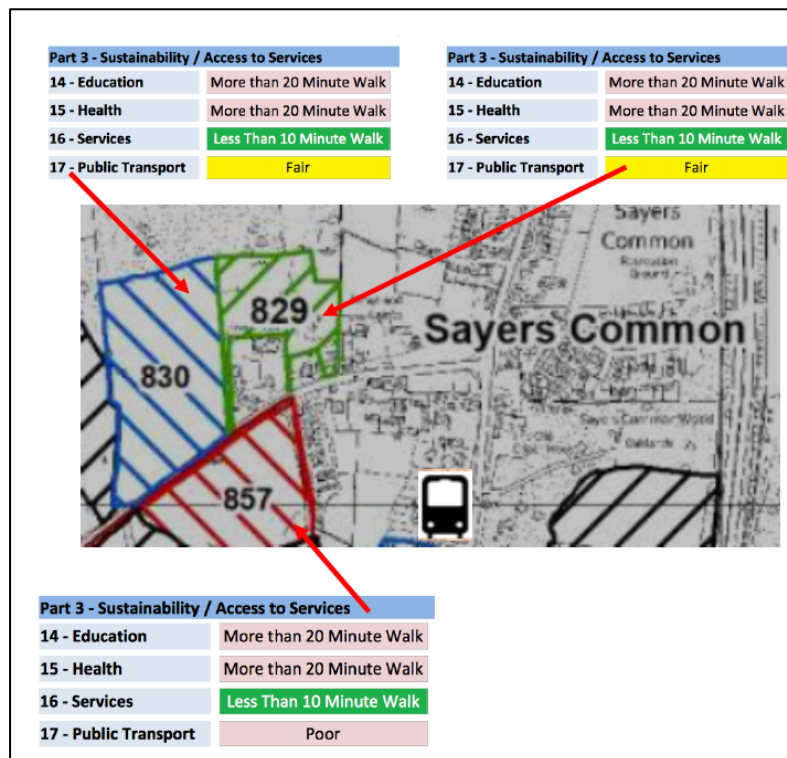
- 4.16 The LVA concludes at Paragraph 6.22 by stating that:



“...considering the highly constrained nature of much of the District of the Mid Sussex, in landscape terms, the site is one of the more suitable sites in Mid Sussex to accommodate residential development, such that it can be considered to have capacity for a small urban extension, being closely related and having regard for, the setting and form of existing settlement; existing features and sensitivities; and the character and sensitivity of adjacent landscape character areas”.

- 4.17 It remains our assertion that the landscape impacts assessment relating to Site 857 Land West of Meadow View, Sayers Common has been over exaggerated. In order to ensure that the Plan is justified and fair, it is crucial that the Council reassess the site based on the detailed and up-to-date landscape information that we have submitted.
- 4.18 Other than the impact on landscape, the only other concern that the Council have with regards to Site 857 Land West of Sayers Common is its location in terms of access to education, health and public transport (Criteria 14, 15 and 17). The individual site assessment proforma sheet (which is attached at Appendix 2) gives a low score to all three of these categories. Yet, the two sites immediately adjacent to the subject site (Site 829 and 830) have, for some reason, scored better when it comes to proximity to public transport and have ultimately fared much better overall in the whole site selection process.
- 4.19 As part of the previous Regulation 18 submission we highlighted this inconsistency. We also provided an Accessibility Plan showing where the bus stops and the footpaths are within the immediate vicinity of the site. The Accessibility Plan (reattached at Appendix 5) demonstrates that the subject site is within a 5-minute walking distance of a bus stop. We specifically made a written request to the Council to update the site proforma so that it more accurately assessed the site in terms of provision to public transport as “fair” as opposed to “poor”. Yet, despite this request, the subject site still scores poorly on the individual site proforma and it is rated worse than the other two adjacent and competing sites. This error must be addressed to ensure that a fair and non-prejudicial site selection process takes place.
- 4.20 The inconsistency in the scoring system is demonstrated in the image below showing the score given in Part 3 of the Site Selection Pro Forms to the subject site compared to Site 829: Land to the north Lyndon, Reeds Lane, Sayers Common and Site 830: Land to the west of Kings Business Centre, Reeds Lane, Sayers Common.





Other Competing Sites in Sayers Common

- 4.21 A total of thirteen sites in Sayers Common were put forward as part of the Strategic Housing Employment Land Availability Assessment (SHELAA) exercise. Only one site has successfully managed to secure an allocation in the draft Plan - Site 829 Land to the north Lyndon, Reeds Lane, Sayers Common (hatched in green above) for up to 35 dwellings (Site Allocation SA30).
- 4.22 For the reasons explained above, it is considered that Sayers Common has the capacity to accommodate much larger levels of growth than simply 35 units.
- 4.23 Site Selection Paper 3: Housing Sites (February 2020) gives an explanation as to why Site 829 was taken through as a site allocation and why the other twelve sites in Sayers Common were not. Interesting, the Paper also shows that Site 830 Land to the west of Kings Business Centre, Reeds Lane (hatched in blue above) is found to have performed well individually but that it was only dismissed because the indicative residual requirement at Sayers Common had already been reached SA 30 (Site 829).
- 4.24 Again, concerns about exceeding residual housing numbers appear to have taken precedent above everything else. This is considered unjustified and unsound (as explained in more detail

of Section 3 of this Statement) and the Council should be looking for more sites in Sayers Common in particular.

- 4.23 It seems particularly unjust that Sites 829 and 830 have done so well in the site selection process and yet the subject site was dismissed at the very early stages of the process, never fully assessed and never considered as a reasonable alternative site. The subject site has clearly been disadvantaged. In order to ensure a robust and fair assessment process is carried out we think it is crucial that Site 857 Land west of Meadow View, is revaluated and taken through to the Stage 4 of the assessment process for further consideration.



5 Conclusions

5.1 This report has outlined our concerns relating to the Site Allocation DPD, the Sustainability Appraisal and the site selection process more generally. In order for the Plan to be found sound we have recommended the following changes:

- In order to ensure that the Plan is consistent with national policy and provides the most appropriate strategy when considered against reasonable alternatives, settlements outside of the AONB (such as Sayers Common) should be examined further to explore whether they are able to accommodate further growth.
- In order to ensure that the Plan is justified and has been based on proportionate evidence, the site selection process should be re-examined. It is important that there is only one landscape category in the assessment process regardless of whether a site is located in the AONB or not to ensure that all sites are assessed on a level playing field.
- In order to ensure that the Plan has been based on proportionate evidence and provides the most appropriate strategy when considered against reasonable alternatives, Site 857 Land West of Meadow View, Sayers Common should be carried through to the Stage 4 testing and be considered as a site suitable for housing.
- In order to ensure that the Plan has been positively prepared and based on effective working it is important that any work that has been undertaken in combination with the AONB Unit is publicly available. If, as we suspect, the involvement with the AONB unit was limited then the whole site selection process should be re-appraised to ensure that the process is 'landscaped led'.
- In order to ensure that the Plan is consistent with national policy the qualification of major development in the AONB should be reassessed and that Site SA 25 Land West of Selsfield Road, Ardingly in particular should be revaluated.

5.2 In order to ensure that the Sustainability Appraisal is found sound we have recommended the following changes:



- Section 5 – The Sustainability Framework is flawed as there should be an environmental objective relating to landscape constraints. This would ensure that development is directed to land outside the AONB in the first instance.
- Section 6 – Accommodating more growth in settlements outside the AONB should be recognised as a ‘realistic alternative’ and assessed accordingly.
- Section 6 – Site 857 Land West of Sayers Common should have been judged to be a reasonable alternative option for the purposes of the Sustainability Appraisal and appraised against the Sustainability Framework.

5.3 It remains our assertion that Site 857, Land West of Sayers Common has been unfairly treated in the site selection process. The site should have made it through the to the Stage 4 evidence testing stage and it should have been considered as a reasonable alternative site to avoid large amounts of growth taking place elsewhere in the AONB. The site is considered entirely suitable to accommodate growth. It is located in a sustainable and accessible settlement and would represent a logical extension to the village. The landscape and visual impacts of the development of this site have been thoroughly assessed and it has been demonstrated the potential effects would be limited to the immediate locality of the site, with not significant effect on the wider landscape and visual context. The site is suitable, available and deliverable and as such it should be released for housing within the Site Allocations DPD.



APPENDIX 1

Site Selection - Housing

10 - Highways		Potential for junction impact at Selsfield Road / Vowells Lane without mitigation
11 - Local Road/Access	Minor - Improve	Safe access is not available but potential exists to easily gain access.
12 - Deliverability	Reasonable prospect developability	Site is being marketed early 2019. Outline application October 2019.
13 - Infrastructure	Infrastructure capacity	Developer Questionnaire - normal contributions apply.

Part 3 - Sustainability / Access to Services

14 - Education	Less Than 10 Minute Walk
15 - Health	More than 20 Minute Walk
16 - Services	Less Than 10 Minute Walk
17 - Public Transport	Fair

Part 4 - Other Considerations

Neighbourhood Plan

Site outside the built up area of the village.
Policy ARD2: Spatial Plan for the Parish directs future housing within the parish to within the built up area.
Development outside the built up area will be required to demonstrate how they conserve the AONB.

Waste

Development at the site may require reinforcement of the sewerage network

Sustainability Appraisal

This site performs relatively well against the SA framework. There is a 'Very Negative' impact against objective (9) due to its location within the High Weald AONB, however the AONB unit have concluded that there is Moderate Impact as opposed to High Impact. As the District Plan strategy anticipates growth at Ardingly, and there are a number of positive impacts against social and economic criteria, the positive impacts from progressing this site for allocation outweigh the negative impacts.

Minerals

Site is within Building Stone (Cuckfield) MSA

Environmental Health

Potential for contaminated land to be present on site related to past or present land uses within or adjacent to the site.

Notes

Conflict as site is outside the built up area.

Part 5 - Conclusion

Summary The site is within the AONB and has potential for a moderate landscape impact. However, in the context of other site options at Ardingly the site has potential for minimal landscape effects given that is screened to the north by existing planting with potential to enhance further and in light of the fact it is adjacent to the existing built area of the village to the south. The SA supports this view, finding that the site represents the most sustainable option to deliver Ardingly's housing target in light of the site's positive performance in relation to the social and economic SA objectives.

Recommendation Site is proposed for allocation.

APPENDIX 2

Site Selection - Housing

13 - Infrastructure

Infrastructure capacity

Developer Questionnaire - normal contributions apply.

Part 3 - Sustainability / Access to Services

14 - Education

More than 20 Minute Walk

15 - Health

More than 20 Minute Walk

16 - Services

Less Than 10 Minute Walk

17 - Public Transport

Poor

Part 4 - Other Considerations

Neighbourhood Plan

Hurstpierpoint & Sayers Common Neighbourhood Plan
Policy C1 - Countryside: Conserving and enhancing
character

Minerals

Minerals considerations unnecessary as site does not
progress past detailed assessment stage.

Waste

Water and wastewater considerations unnecessary as site
does not progress past detailed assessment stage.

Environmental Health

Environmental health considerations unnecessary as site
does not progress past detailed assessment stage.

Sustainability Appraisal

Assessment indicates site is not a reasonable alternative
and is therefore not tested through the SA.

Notes

Part 5 - Conclusion

Summary

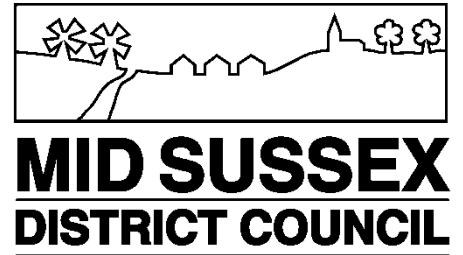
The assessment finds that the site is not suitable for allocation.

Recommendation

Site is not proposed for allocation.

APPENDIX 3

Mid Sussex District Council



Site Allocations DPD – Regulation 18

9th October – 20th November 2019

Consultation Report

did not raise objection to the site access being achieved initially via the adjacent Vicarage Field site, which is allocated in the made Turners Hill Neighbourhood Plan, nor from a northerly access from Turners Hill Lane, subject to further investigation.

Site 852 is potentially a candidate for the approach encouraged under NPPF paragraph 68 (d). The site divides naturally into 3 main component areas as indicated on the Development Principles plan at Appendix B, prepared by Allen Pyke. The southerly parcel would be accessed via the Vicarage Field development and could deliver approximately 46 dwellings. This part of the site should certainly be considered as a means of delivering against the shortfall of 51 units against the minimum residual target for Turners Hill. The larger central parcel has an indicative capacity of 62 dwellings, and the northern area 17 dwellings (a total of 125 units). Allocation of the entire area would address the shortfall in Category 3 villages.

642	Ms C Tester	Organisation:	High Weald AONB Unit	Behalf Of:		Statutory Consultee
Reference:		Reg18/642/1				

It is accepted that part of the consideration of the appropriate level of housing within an AONB will be assessing potential sites for allocation. In considering allocations, para 170 of the NPPF states that planning policies should protect and enhance valued landscapes in a manner commensurate with their statutory status. The NPPF also highlights the need for local planning authorities to differentiate between land of the highest environmental quality and that of lesser quality, and to allocate development accordingly to areas of lesser environmental value (paragraph 171).

Decisions on allocating sites within AONBs should be ‘landscape led’. This requires a robust understanding of landscape including the key characteristics, history and settlement patterns of the wider landscape. The PPG advises that “To help assess the type and scale of development that might be able to be accommodated without compromising landscape character, a Landscape Sensitivity and Capacity Assessment can be completed. To demonstrate the likely effects of a proposed development on the landscape, a Landscape and Visual Impact Assessment can be used” (Paragraph: 037 Reference ID: 8-037- 20190721). These documents need to be supplemented by studies such as historic landscape characterisation. AONB Management Plans are key documents to understanding what makes the area special and therefore what qualities need to be conserved and enhanced when deciding the location, scale and design of new development. Local planning authorities also need to consider the cumulative impact of the proposed sites and such development occurring within multiple Local Plan areas in an AONB. **It is not clear from the SHELAA or the Site Selection Paper what evidence has been taken into account when allocating sites within the AONB. In particular it does not appear that Landscape and Visual Impact assessments have been carried out to inform the allocation or the criteria set.**

In addition to the above there should be a formal consideration of whether proposed allocations constitute ‘major development’ in an AONB in the terms of NPPF paragraph 172. The second part of paragraph 172 says “Planning permission should be refused for major development⁵⁵ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated”.

Footnote 55 says: “For the purposes of paragraphs 172 and 173, whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined”.

Whilst this part of the paragraph specifically refers to planning permissions, it has also been considered relevant by Local Plan Inspectors to allocations within Local Plans. Legal advice provided to the South Downs National Park Authority by Landmark Chambers also concluded that “it would arguably amount to an error of law to fail to consider paragraph 116 (now 172) at the site allocations stage of plan making for the National Park. The consequence of doing so would be to risk allocating land for major development that was undeliverable because it was incapable of meeting the major development test in the NPPF”.

Recommended Action: as assessment should be carried out of each proposed allocation in the AONB to determine whether it constitutes major development. Where a proposed allocation is so considered it should not be included in the submission document unless it is shown to have exceptional circumstances, is in the public interest and complies with the three tests in paragraph 172.

APPENDIX 4

Land West of Meadow View, Sayers Common: Landscape and Visual Appraisal

Prepared on behalf of Mayfields Market Towns Ltd

November 2019

Land West of Meadow View, Sayers Common: Landscape and Visual Appraisal

Prepared on behalf of Mayfields Market Towns Ltd

Project Ref:	23510/A5/LT
Status:	Final
Issue/ Rev:	V1
Date:	November 2019
Prepared by:	LT
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CONTENTS

1.0 Introduction 1

2.0 Methodology 3

3.0 Relevant Policy 5

4.0 Landscape and Visual Context 8

5.0 Landscape and Visual Appraisal15

6.0 Conclusions20

ILLUSTRATIVE MATERIAL

- Figure 1: Site Context Plan
- Figure 2: Topography Plan
- Figure 3: Landscape Character Plan
- Figure 4: Site Appraisal Plan
- Figure 5: Visual Appraisal Plan 1
- Figure 6: Visual appraisal Plan 2
- Site Appraisal Photographs A - E
- Site Context Photographs 1 – 22

1.0 INTRODUCTION

Overview

- 1.1 Barton Willmore Landscape Planning and Design (BWLPD) was commissioned by Mayfields Market Towns Ltd to undertake a Landscape and Visual Appraisal of the Land West of Meadow View, Sayers Common, Mid-Sussex, (the 'Site'), in relation to, and in support of, its suitability for residential development in the context of the review of the Mid Sussex Local Plan (2011-2029) and the Call for Sites for the Site Allocations Development Plan Document (DPD).
- 1.2 The Site is located on the western edge of the settlement of Sayers Common, to the immediate south of Reed's Lane and adjoining existing residential development in Meadow View to the immediate east. Existing substantial office, commercial and industrial development is located to the north of Reed's Lane.
- 1.3 The objectives of this study are to:
 - Assess the landscape characteristics and quality of the Site and its surrounding and their function within the landscape;
 - Assess the visibility of the Site and the nature and quality of the existing views from the surrounding area;
 - Identify opportunities and constraints to development on the Site, from a landscape and visual perspective.
- 1.4 Supporting illustrative information is presented in the following plans and photographs:
 - Figure 1: Site Context Plan;
 - Figure 2: Topography Plan;
 - Figure 3: Landscape Character Plan;
 - Figure 4: Site Appraisal Plan;
 - Figure 5: Visual Appraisal Plan 1;
 - Figure 6: Visual Appraisal Plan 2;
 - Site Appraisal Photographs A - E; and
 - Site Context Photographs 1 – 22.
- 1.5 The Site comprises Site 857: Land West of Meadow View Sayers Common, as identified in the Mid Sussex Site Allocations Development Plan Document. All sites are assessed against 17 criteria, with Criterion 8 covering landscape and Criterion 9 covering trees/Tree Preservation Orders (TPOs).

- 1.6 With regard to Criterion 8 Landscape, the Site is graded as having a Low/Medium constraint to residential development, going on to state that *"the development of this site has the potential to have an impact on the landscape. There are long distance views from the site to the south, and no strong defensible boundary or subsequent screening to the south. Development of the site would represent an incursion into the countryside"*.
- 1.7 The landscape and visual appraisal of the Site aims to identify, contrary to the above, that the potential landscape and visual effects arising from residential development on the Site would be limited to the immediate locality of the Site, with no significant effect on the wider landscape and visual context.

2.0 METHODOLOGY

Landscape and Visual Appraisal

- 2.1 The Landscape and Visual Appraisal has been prepared with reference to the guidelines as set out in the Guidelines for Landscape and Visual Impact Assessment 3rd Edition, prepared by the Landscape Institute and the Institute of Environmental Management and Assessment.
- 2.2 A desktop review of the study area was undertaken, including a review of the published landscape character information, landform, landscape features, relevant landscape and visual policy and landscape designations. This information was used as the initial basis against which to appraise the Site. A visit to the Site and surroundings was subsequently undertaken in November 2019 to verify the desk-based review findings and add further information to the landscape and visual context of the Site.
- 2.3 A description of the existing land use of the Site context is provided and includes reference to existing areas of settlement, transport routes and vegetation cover, as well as local landscape designations. These factors combine to provide an understanding of landscape value and sensitivity and provide an indication of key views and viewpoints that are available to visual receptors.
- 2.4 To determine the extent of visual influence, a visual appraisal was undertaken of the Site to consider the nature of existing views from publicly accessible viewpoints including roads, Public Right(s) of Way (PRoW) and public open spaces. Consideration was given to private views, however access to private properties was not obtained. Views were considered from all directions and from a range of distances. The viewpoints chosen are not intended to be exhaustive, but rather to represent the potential views obtained towards the Site.
- 2.5 The inherent sensitivity of the Site is considered in terms of the following:
 - Landscape Character: i.e. landform, vegetation cover, land use, scale, state of repair of individual elements, representation of typological character, enclosure pattern, form/line and movement;
 - Landscape Value: i.e. national designations, local designations, sense of tranquillity/remoteness, scenic beauty and cultural associations; and
 - Visual Influence: i.e. landform influences, tree and woodland cover, numbers and types of residents, numbers and types of visitors and scope for mitigating potential for visual impacts.

- 2.6 The landscape appraisal of the Site, in combination with the wider visual appraisal, assists in the identification of opportunities and constraints that would assist in successfully integrating new development with the existing landscape and visual context of the Site.

3.0 RELEVANT POLICY

National Policy

National Planning Policy Framework (NPPF), 2019

- 3.1 The National Planning Policy Framework (NPPF), which was first published in March 2012, was updated and published in July 2018 and most recently revised in February 2019. The NPPF promotes a presumption in favour of sustainable development, defined as *"meeting the needs of the present without compromising the ability of future generations to meet their own needs"*. Development proposals must also be in accordance with the relevant up-to-date Local Plan and policies set out in the NPPF, including those identifying restrictions with regard to designated areas, such as National Parks, Areas of Outstanding Natural Beauty (AONB) and Green Belt.
- 3.2 The NPPF states that *"the purpose of the planning system is to contribute to the achievement of sustainable development"*, with Paragraph 8 going on to state that to achieve this the planning system has three overarching objectives: economic, social and environmental. The environmental objective is described as: *"to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy"*.
- 3.3 Paragraph 38 relates to decision making and states:
- "Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible."***
- 3.4 Section 11 is concerned with making effective use of land, with Paragraph 117 stating: *"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions..."*.
- 3.5 Paragraphs 124-132 focus on achieving well-designed places and promote good design of the built environment. This approach is set out in Paragraph 127, which states:

"Planning policies and decisions should ensure that developments:

- a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;***
- b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;***
- c) Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);***
- d) Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;***
- e) Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and***
- f) Create places that are safe, inclusive and accessible and which promote health and well-being with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."***

3.6 Section 15 of the NPPF relates to the conservation and enhancement of the natural environment, with Paragraph 170 setting out that planning policies and decisions should look to achieve the above by *"protecting and enhancing valued landscapes... (in a manner commensurate with their statutory status or identified quality in the development plan)"* and *"recognising the intrinsic character and beauty of the countryside"*.

3.7 Paragraph 171 goes on to state that:

"Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries."

3.8 Paragraph 172 then states that:

"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also

important considerations in these areas, and should be given great weight in National Parks and the Broads."

4.0 LANDSCAPE AND VISUAL CONTEXT

Site Context

- 4.1 As shown in **Figure 1: Site Context Plan**, the Site is located on the western edge of Sayers Common, to the immediate south of Reed's Lane and adjoining existing residential development in Meadow View to the immediate east. Existing substantial office, commercial and industrial development is located to the north of Reed's Lane, with King Business Park located to the north, immediately opposite the Site, and Valley Farm Business Park located to the west of the Site, off Reeds Lane.
- 4.2 The Site is therefore set on the edge of the existing settlement of Sayers common, within an area largely influenced by both existing residential development, and office, commercial and industrial development.

Topography

- 4.3 The Site is located in the shallow valley created by the River Adur, between the higher ground of the South Downs to the south and the High Weald to the north, as illustrated on **Figure 2: Topography Plan**. The land within the vicinity of the Site is gently undulating, lying predominantly at elevations of between 15 - 40m Above Ordnance Datum (AOD). The Site is broadly flat located at an elevation of 15m AOD. To the south, within the undulating landscape there are areas of slightly more elevated land, at 30 – 40m AOD, such as around Albourne Green and Albourne.
- 4.4 Further to the south, the land rises steeply through the north scarp of the South Downs, to up elevations of 150m + AOD. To the north, the land rises up to the High Weald more gradually, up to elevations of 130m+ AOD.

Water courses and drainage

- 4.5 Cutlers Brook flows through land to the south of the Site and links to a number of ponds. The route of the watercourse is lined in some places by mature vegetation and areas of scrubby land. Other, smaller tributaries of the River Adur cross the land surrounding the Site and generally follow field boundaries.
- 4.6 A drainage ditch runs along, and forms, the southern boundary of the Site. This drainage ditch forms part of a wider drainage network. West Sussex County Council has recently undertaken improvements to this drainage network within the vicinity of the Site, including works along Reeds Lane and the B2116, Henfield Road, to improve the performance of surface water management.

Although the water courses can present a constraint to development, they also present an opportunity to meet the requirements of policies relating to access and recreation, green infrastructure, landscape character, biodiversity and flooding.

Landcover

- 4.7 The landscape pattern of the Site and surrounding area is generally small-scale and enclosed, with an intricate mix of field boundary vegetation that divides the irregular arable land and pasture that is generally devoid of substantial tracts or areas of woodland.

Access and Public Rights of Way (PRoW)

- 4.8 The Site immediately adjoins Reeds Lane, which forms the northern boundary of the Site.
- 4.9 PRoW 1/1A1 runs from Reeds Lane through the Site, predominantly along the eastern boundary of the Site. This connects with PRoW 11 Hu to the south, which in turn connects with the B2118, and a Sustrans route that runs along the B2118, as illustrated on **Figure 1: Site Context Plan**. There is a wider network of PRoWs within the surrounding landscape.

Infrastructure

- 4.10 The linear road corridor of the B2118 and the A23 passes in a north to south direction to the east of the Site, with Reeds Lane, which forms the northern boundary of the Site, connecting with the B2118. The B2116, Henfield Road, passes to the south of the Site, connecting with the B2118 and Reeds Lane.

Designations

- 4.11 The Site is not covered by any national, regional or local landscape designations.
- 4.12 There are no Listed Buildings in the immediate locality of the Site. Two Listed Buildings are located within Sayers Common, to the north of the Site, but separated from the Site by intervening existing residential development. Numerous Listed Buildings are located with Albourne and Hurstpierpoint, to the south; and scattered within the surrounding landscape.
- 4.13 There are no Conservation Areas in the locality of the Site.
- 4.14 No Ancient Woodland is located on, or adjoining, the Site. Several small blocks of Ancient Woodland occur in the surrounding landscape, to the east, along the A23/B2118 road corridor and to the north of Valley Farm Business Park.

Landscape Character

- 4.15 The landscape character assessment approach is a descriptive approach that seeks to identify and define the distinct character of landscapes that make up the country. This approach recognises the intrinsic value of all landscapes, not just 'special' landscapes, as contributing factors in people's quality of life, in accordance with the European Landscape Convention. It also ensures that account is taken of the different roles and character of different areas, in accordance with the NPPF Core Principles.
- 4.16 In order to inform the potential opportunities and constraints relating to the siting and design of new development so that it may be successfully accommodated and assimilated within the existing landscape and visual context, it is necessary to review published landscape character assessments and establish the key landscape characteristics of the Site. This includes the pattern of land cover, the pattern and distribution of existing built form, and the character of any key views, in particular from the South Downs National Park and High Weald.
- 4.17 The description of each landscape is used as a basis for evaluation in order to make judgements to guide, for example, development or landscape management. The extent of published landscape character areas are illustrated on **Figure 3: Landscape Character Plan**.
- 4.18 All of the Landscape Character Assessments at national, county and district levels identify that the Site generally falls within a Low Weald landscape, which then rises up through footslopes to the South Downs south of the Site, and up through Wealden fringes to the High Weald landscape north of the Site. The long views to and from the steep downland scarp of the South Downs National Park south of the Site, and the High Weald fringes of the Area of Outstanding Natural Beauty north of the Site are key features of the local landscape.

National Landscape Character

- 4.19 At a national level, Natural England has produced a Countryside Character Map of England. Volume 7: South East and London, of their Countryside Character describes the different landscape character areas covering Sussex. The Site falls within National Character Area 121: Low Weald, with National Character Area 125: South Downs, to the south and National Character Area 122: High Weald, to the north.

County Landscape Character

- 4.20 As identified by the West Sussex Landscape Character Assessment (2003), the Site falls within Landscape Character Area LW10: Eastern Low Weald.

District Landscape Character

- 4.21 As identified in the Landscape Character Assessment for Mid Sussex, (2005), the Site is falls within Landscape Character Area 4: Hickstead Low Weald.
- 4.22 Landscape Character Area 4: Hickstead Low Weald is summarised as a lowland mixed arable and pastoral landscape with a strong hedgerow pattern, lying over low ridges and clay vales drained by the upper Adur streams. In the east, the area has experienced high levels of development centred on Burgess Hill.
- 4.23 Key characteristics include:
- *Alternating west-east trending low ridges with sandstone beds and clay vales carrying long, sinuous upper Adur streams.*
 - *Views dominated by the steep downland scarp to the south and the High Weald fringes to the north.*
 - *Arable and pastoral rural landscape, a mosaic of small and larger fields, scattered woodlands, shaws and hedgerows with hedgerow trees.*
 - *Quieter and more secluded, confined rural landscape to the west, much more development to the east, centred on Burgess Hill.*
 - *Biodiversity in woodland, meadowland, ponds and wetland.*
 - *Mix of farmsteads and hamlets favouring ridgeline locations, strung out along lanes.*
 - *Crossed by north-south roads including the A23 Trunk Road, with a rectilinear network of narrow rural lanes.*
 - *London to Brighton Railway Line crosses the area through Burgess Hill.*
 - *Varied traditional rural buildings built with diverse materials including timberframing, weatherboarding, Horsham Stone roofing and varieties of local brick and tile-hanging.*
 - *Principal visitor attraction is the Hickstead All England Equestrian Showground.*

Landscape Capacity*Mid Sussex District Council Landscape Capacity Study (July 2007)*

- 4.24 Mid Sussex District Council Landscape Capacity Study (July 2007) provides a finer grain of landscape character assessment for Mid Sussex and an assessment of the capacity of the Landscape Character Areas to accommodate development. The Landscape Capacity Study aims to identify where strategic development might be accommodated in the district without unacceptable impact on landscape character or the setting of outstanding assets.

- 4.25 The Landscape Capacity Study is based on the assumption that development would be largely 2 or 3 storeys in height with occasional landmark buildings of 4-5 storeys, and that there would be open space provision and an appropriate scale landscape framework to ensure that the development achieves a good fit in the landscape. The Landscape Capacity Study considers the sensitivity and value of the landscape in order to determine its capacity to accommodate development.
- 4.26 The Landscape Capacity Study identifies that the landscape between the South Downs and High Weald, formed by the Low Weald, High Weald Fringes and Ouse Valley and including the Site, is a more gentle and less dramatic landscape. Whilst these landscapes are not of such a high quality as the National Park and AONB, they are considered to be distinctive landscapes that provide a context for the setting of the National Park and the AONB as well as to settlements within the District.
- 4.27 It is of note, as stated in the Landscape Capacity Study that around 60% of Mid Sussex is under national landscape protection designations, with 50% in the High Weald AONB in the northern part of the District and 10% in the South Downs National Park covering the southern corner of the District.
- 4.28 With regard to the capacity of the Site to accommodate residential development, as identified in the Landscape Capacity Study, the Site is located in the LCA 63: Albourne Low Weald, but on the very northern edge of LCA 63; and immediately adjoins the LCA 62: Hickstead-Sayers Common Low Weald which includes Sayers Common. LCA 63 has a Low/Medium capacity to accommodate residential development, whilst the immediately adjoining LCA 62 has a Medium capacity to accommodate development.
- 4.29 Many of the Landscape Character Areas assessed in the Landscape Capacity Study are considered to have a Negligible, Negligible to Low, or Low capacity with very few areas of the district identified as having a Low to Medium, Medium, Medium to High or High capacity for residential development. Therefore, the Site is relatively well suited to accommodate development when compared with the wider district.
- 4.30 The Landscape Capacity Study recommends that any new development promoted within the district should take account of the inherent character of the LCA it is located within, and consider:
- *Features or characteristics that give an area its special identity and local distinctiveness,*
 - *The need to protect or enhance special or valued characteristics within the local landscape,*

- *The importance of the character of adjacent landscape character areas, particularly highly valued and high quality landscapes, and views to and from these landscapes.*

4.31 In addition, the specific landscape opportunities and constraints of areas promoted for development should be identified and addressed. The Landscape Capacity Study recommends that this is achieved with the preparation of the following:

"A Landscape strategy which is consistent with local landscape character, taking into account identified landscape sensitivities,...

A land use strategy and built form which is characteristic of, and compatible with, the existing settlement pattern, Proposals which avoid landscape and visual impacts on surrounding landscape character areas or the setting to the District's outstanding assets, and Development proposals which have regard for the setting of, and separation between, existing settlements." (p55)

The Capacity of Mid Sussex District to Accommodate Development (June 2014)

- 4.32 The Capacity of Mid Sussex District to Accommodate Development (June 2014) provides an update to the Landscape Capacity Study (2007).
- 4.33 The Site remains within LCA 63, remaining with a Low/Medium capacity to accommodate residential development, whilst the immediately adjoining LCA 62 remains with a Medium capacity to accommodate development.
- 4.34 The majority of areas assessed in the district are considered to have a Low/Medium or Low Landscape Capacity, with only small pockets Medium and Medium/High Landscape Capacity located around the large settlements. The Capacity Study has not identified any areas within the district as having a High capacity. Therefore, the Capacity Study continues to identify the Site as being located within one of the least constrained areas of the district; and in an area considerably less sensitive than much of the rest of the district, a large proportion of which remains is covered by the national level landscape designations for the High Weald AONB and the South Downs National Park.
- 4.35 The Capacity Study states that *"a Low/Medium capacity rating indicates that development is likely to have an adverse effect on most of the character area and while smaller development may be possible in a very few locations within the character area, it will not be suitable for strategic scale development"* and that *"a Medium capacity rating indicates that there is the potential for limited smaller-scale development to be located in some parts of the character area, so long as there is*

regard for existing features and sensitivities within the landscape”, and paragraph 1.15 of the Capacity Study states that “it is possible to mitigate and compensate for the impacts of development in such a way as to ensure that environmental capacity is not breached.”

Mid Sussex Site Allocations Development Plan Document (December 2018)

- 4.36 The Site comprises Site 857: Land West of Meadow View Sayers Common, as identified in the Mid Sussex Site Allocations Development Plan Document. All sites are assessed against 17 criteria, with Criterion 8 covering landscape and Criterion 9 covering trees/Tree Preservation Orders (TPOs).
- 4.37 With regard to Criterion 8 Landscape, the Site is graded as having a Low/Medium constraint to residential development, going on to state that *“the development of this site has the potential to have an impact on the landscape. There are long distance views from the site to the south, and no strong defensible boundary or subsequent screening to the south. Development of the site would represent an incursion into the countryside”*.
- 4.38 With regard to Criterion 9 trees/TPOs, the Site is graded as having a Low/Medium constraint to residential development. The accompanying Methodology for Site Selection notes that this equates to *“parts of sites affected by trees, [which] will limit the developable area of the site”* and that the *“Tree Officer concludes that impacts can be mitigated”*.
- 4.39 The Methodology for Site Selection, accompanying the Site Allocations Development Plan Document, notes that a Low/Medium Landscape Capacity/Suitability for residential development is *“based on landscape evidence, [with] low/medium potential in landscape terms”*, and that the conclusions are drawn for each site dependant on which Landscape Capacity Area they are within (as determined by the landscape capacity studies, based on their assessment methodology) or comments received from specialist advisors.

5.0 LANDSCAPE AND VISUAL APPRAISAL

Overview

- 5.1 The Site and its surroundings were visited in November 2019, with **Site Appraisal Photographs A - E** illustrating the existing character of the Site. The locations from which the Site Appraisal Photographs were taken are shown on **Figure 4: Site Appraisal Plan**. The visual context of the Site is illustrated by **Site Context Photographs 1 - 22**, the locations of which are illustrated on **Figure 5: Visual Appraisal Plan 1** and **Figure 6: Visual Appraisal Plan**.

Landscape Appraisal

- 5.2 A landscape appraisal has been undertaken to ascertain the existing character of the Site. This is accomplished through recording and analysing the existing landscape features and characteristics, the way the landscape is experienced, and the value or importance of the landscape and visual resources in the vicinity of the Site. The elements of the landscape that contribute to landscape character include the built and natural form, the pattern of features, detailing, scale, planting, land use and human perception. In this regard, landscape character is derived as a result of the perception of, and action and interaction of, natural and human factors.
- 5.3 The Site comprises a single field of rough pasture is approximately 3 hectares (ha) in size, as illustrated in **Figure 4: Site Appraisal Plan**. The landform across the Site is relatively flat, as illustrated by **Site Appraisal Photographs A – E**, and is located broadly at an elevation of 15m AOD. The northern boundary adjoins Reeds Lane; the eastern boundary adjoins the rear garden boundaries of existing residential properties in Meadow View; and the southern boundary is delineated by the drainage ditch that runs from the southern corner of the Site of the Site to the western corner of the Site, at Reeds Lane.
- 5.4 PRoW 1/1A1 runs from Reeds Lane along the eastern boundary of the Site, connecting to PRoW Hu 11 to the south, and then the wider PRoW and Sustrans network, as illustrated on **Figure 4: Site Appraisal Plan**.
- 5.5 The Site is largely devoid of vegetation, with vegetation limited to its boundaries and fringes. A trimmed uniform hedge runs along the northern boundary of the Site, on the southern side of Reeds Lane, as illustrated in **Site Appraisal Photograph B**. Scrubby vegetation runs along the eastern boundary of the Site, as illustrated in **Site Appraisal Photographs A, B, C and D**. Vegetation along the drainage ditch delineating the southern boundary is limited to scattered clumps of scrubby vegetation, as illustrated in **Site Appraisal Photographs E**.

- 5.6 The Site is bounded by existing residential development in Meadow View, to the immediate east of the Site, and which is visible in **Site Appraisal Photographs A, B, and E**.
- 5.7 King Business Park is located to the immediate north of Reeds Lane; and the associated office and commercial buildings are visible across the Site, as illustrated in **Site Appraisal Photographs C, D and E**.
- 5.8 Whilst the Site is largely devoid of vegetation, the surrounding landscape has a strong framework of mature treebelts, hedgerows and individual trees; particularly to the north, south and immediate west of the Site, which combined with the undulating topography, provide enclosure to the Site, to the north, south and west, as illustrated in **Site Appraisal Photographs B, C and D**.
- 5.9 The Site is set within an existing edge of settlement context; is subject to the influence of the surrounding existing residential, office, commercial and industrial development; and is, therefore, within a more developed part of **Landscape Character Area 4: Hickstead Low Weald**. The Site's connection with the wider landscape is largely restricted; with the combination of boundary vegetation, and vegetation in the immediate locality of the Site, generally limiting views to the immediately surrounding landscape. The exception is for a short length of the southern boundary, where views out to the landscape to the south are obtained, as illustrated in **Site Appraisal Photographs A, B and C**, and where there are distant glimpses of the South Downs, to the south, seen above the intervening landform and vegetation.

Visual Appraisal

- 5.10 A visual appraisal has been undertaken to determine the relationship of the Site with its surroundings and its approximate extent of visibility within the wider landscape from publicly accessible locations. The visual context of the Site is illustrated by **Site Context Photographs 1 – 22**, the locations of which are illustrated on **Figure 5: Visual Appraisal Plan 1** and **Figure 6: Visual Appraisal Plan 2**.
- 5.11 The potential visibility of the Site is largely determined by the intervening landform, as topographic features such as ridgelines and subtle undulations may block or curtail views towards the Site. In addition, land cover has an important role in determining potential visibility as woodland, tree-belts or built forms may contribute to additional screening, filtering or curtailing of views.
- 5.12 The effectiveness of vegetation as a screen depends to a considerable extent on its scale. A large mature feature will form a substantial screen throughout the year, but a hedgerow or intermittent tree-belt may only be effective during the summer months. Whilst small features, such as hedgerows and individual trees can be very important, particularly when their combined

effect is taken into account, they can be less effective screening features or visual barriers due to the seasonal nature of their effect.

- 5.13 **Site Context Photographs 1 – 9** illustrate views towards the Site from the locality of Sayers Common. **Site Context Photographs 1 – 9** illustrate that views of the Site are limited to the immediate vicinity of the Site. The residential, office, commercial and industrial development immediately adjoining the Site curtails views of the Site from within Sayers Common, as illustrated by **Site Context Photographs 1 and 2**.
- 5.14 **Site Context Photographs 3, 4 and 6** illustrate the views from Reed's Lane, in the immediate locality of the Site. **Site Context Photograph 3**, taken from the entrance to King Business Centre, illustrates the views looking south-west towards the Site, with views of the Site only becoming available on nearing the Site. The existing view is characterised by residential properties and buildings associated with King Business Centre, and potential residential development would be set within this context.
- 5.15 **Site Context Photograph 4**, taken from Reeds Lane immediately adjoining the Site, illustrates the open views of the Site that are only obtained from the short length of Reeds Lane, where it adjoins the northern boundary of the Site. The existing residential development within Sayer Common is visible within the view. Potential residential development would be visible, curtailing views out across the Site, and the replacing the existing views of residential development which forms the backdrop to part of the existing view. This view of potential residential development on the Site would be limited to the immediate length of Reeds Lane immediately adjoining the Site.
- 5.16 **Site Context Photograph 6** illustrates the view from Reeds Lane to the immediate west of the Site, looking east on approach to Sayers Common. This view demonstrates the well vegetated character of the immediate surroundings to the Site, providing screening to the Site, such that views of the Site are, and potential residential development on it would be, limited to its immediate locality.
- 5.17 **Site Context Photograph 5** illustrates the view from PRoW 1A1 to the north of the Site, looking south-east towards the Site. This again demonstrates the well vegetated character of the immediate surroundings of the Site, which combined with the relatively flat topography, result in views of the Site largely screened by intervening hedgerows and mature trees. The existing office and industrial buildings associated with King Business Centre are visible; and there are glimpses of the existing residential development within Meadow View. Potential residential development would be seen within this context, and would set behind, and filtered by, the vegetation along Reeds Lane.

- 5.18 To the further north, the combination of woodland cover, vegetation and relatively gentle topography curtails views of the Site.
- 5.19 In addition, the Site is, and potential residential development on the Site would be, screened in views from the High Weald AONB, through the combination of gently rising topography and increasing woodland cover to the north of the Site.
- 5.20 **Site Context Photograph 7** illustrates the view from PRoW 3/1A1 looking south. The dense treebelt to the west of the Site curtails views of the Site, and any potential development on it. Potential residential development on the Site would be well contained by the dense treebelt, limiting the encroachment of development into the immediate surrounding landscape. **Site Context Photograph 7** also illustrates the open views of the landscape to the south, which would remain unaffected by potential development on the Site.
- 5.21 **Site Context Photographs 8 and 9** illustrate the views from PRoW Hu 11 to the south of the Site. Again, these views illustrate how the combination of woodland cover, vegetation and relatively gentle topography curtails views of the Site, and thus potential residential development on it.
- 5.22 **Site Context Photograph 10**, taken from PRoWs 11A1 and 3/1A1, is representative of the views from more elevated land to the south of the Site in the vicinity of Albourne Green. The view illustrates the pattern of the landscape to the south of the Site, being an intricate mix of field boundary vegetation that divides the irregular arable land and pasture, combined with undulating topography. The buildings within the Valley Farm Business Park, to the west of the Site, are visible in the view; however, the Site is, and proposed development on the Site would be, screened from view by the combination of intervening vegetation and landform.
- 5.23 **Site Context Photographs 11, 12 and 13** illustrate the range of views from PRoWs 15/1A1, from elevated land to the south of Albourne, looking north towards the Site. The views illustrate the undulating character of the topography to the south of the Site, before rising up to the South Downs to the further south, as also illustrated on **Figure 2: Topography Plan**.
- 5.24 **Site Context Photograph 11 and 12** illustrates how the intricate mix of mature trees and vegetation, combined with undulating topography, screen views of the Site, and would screen potential residential development on the Site. The village of Albourne is glimpsed in views, as illustrated by **Site Context Photograph 11**, set within a framework of vegetation, which is characteristic of the pattern of settlement in the landscape.
- 5.25 **Site Context Photographs 14, 15 and 16** illustrate the sequence of views from PRoW 22A1 looking north towards the Site. The views are taken from land rising up to an elevated location where PRoW 22A1 joins 23A1, as illustrated on **Figure 2: Topography Plan**. Again, these

views illustrate how the combination of intervening vegetation and undulating landform prevent views of the Site; and would prevent views of potential residential development on the Site. There are glimpses of settlements, scattered farms and buildings in the landscape; set within the framework of mature vegetation and landform, which is again characteristic of pattern of settlement in the landscape.

- 5.26 **Site Context Photographs 17 – 22** illustrate the expansive views of the Low Weald landscape from elevated vantage points within the South Downs National Park. Scattered settlements, such as Henfield, Albourne, Hurstpierpoint and Hassocks, set within a strong complex landscape framework of mature woodlands, treebelts, trees and hedgerows, form a characteristic component of the panoramic views from the South Downs. The Site is not discernible in these views, and neither would potential residential development on the Site be discernible in these views. However, if potential development on the Site was visible, it would form a very small characteristic component in the views, with no overall change to the character of the views.

6.0 CONCLUSIONS

- 6.1 The Site is located on the western edge of the settlement of Sayers Common, to the immediate south of Reed's Lane and adjoining existing residential development in Meadow View to the immediate east. Existing substantial office, commercial and industrial development is located to the north of Reed's Lane, with King Business Park located to the north, immediately opposite the Site, and Valley Farm Business Park located to the west of the Site, off Reeds Lane.
- 6.2 The Site is located in the shallow valley created by the River Adur, within a Low Weald landscape, which then rises up through footslopes to the South Downs south of the Site, and up through Wealden fringes to the High Weald landscape north of the Site. The Site specifically falls within the Landscape Character Area 4: Hickstead Low Weald, as identified in the Landscape Character Assessment for Mid Sussex (2005), which is summarised as a lowland mixed arable and pastoral landscape, with a mix of scattered farmsteads and hamlets, with a strong hedgerow pattern, lying over low ridges and clay vales drained by the upper Adur streams. Consequently, the landscape pattern of the surrounding area is generally small-scale and enclosed, with an intricate mix of field boundary vegetation that divides the irregular arable land and pasture that is generally devoid of substantial tracts or areas of woodland.
- 6.3 However, the Site comprises a single pastoral field immediately adjoining the settlement of Sayers Common to the north-east and east, and Reed's Lane to the north, with substantial office, commercial and industrial development to the north-west of the Site; and is therefore within a more developed part of the character area.
- 6.4 Furthermore, there are no noteworthy features within the Site, with any vegetation limited to the existing boundaries of the Site; with a scrubby vegetation along the eastern boundary, a trimmed uniform hedgerow along the northern boundary with Reed's Lane, and with some scattered scrub along the southern boundary.
- 6.5 The Site does not exhibit any particular special or valued characteristics; and is located in an area exhibiting a higher degree of existing development than the wider landscape character area. Being located immediately adjacent to, and influenced by its proximity to, the existing settlement of Sayers Common, potential development of the Site would relate well to, and be compatible with the existing characteristic settlement pattern, reflecting the character of the immediate locality of the Site.
- 6.6 The most noteworthy features are the vegetation, hedgerows and trees on the Site, which, being located along the Site boundaries, would be largely retained, protected and enhanced in any event.

- 6.7 The Site's connection with the wider landscape is largely restricted, with the combination of boundary vegetation, and vegetation in the immediate locality of the Site generally limiting views to the immediately surrounding landscape.
- 6.8 Potential residential development on the Site would be well contained by the surrounding existing development and vegetation, limiting the encroachment of development into the immediate surrounding landscape to the east, north and west. The southern boundary is more open; however, with the appropriate landscape strategy, a sensitive transition from settlement edge to the immediate landscape to the south, characteristic of the existing settlement pattern in the landscape, would be created; successfully assimilating development into the immediate and wider landscape, with limited encroachment.
- 6.9 It would, therefore, be possible to accommodate residential development on the Site, retaining, protecting and enhancing the existing vegetation and trees on the eastern and southern boundary of the Site, with loss of any landscape features generally limited to a length of trimmed uniform hedge along Reed's Lane to facilitate access into the Site. The enhancement to the southern boundary would create a robust defined boundary to residential development on the edge of Sayers Common. As trees are limited to the boundaries of the Site, these would not pose a constraint to development within the Site, and would be retained, with any root protection areas accommodated within the proposals. PRoW 1/1A1 would also be accommodated within the proposals along the eastern boundary.
- 6.10 With regard to views from the Site to the south, these can be retained in part through the design of the layout of the development and would still be available from the southern boundary of the Site.
- 6.11 There are no designated Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, Registered Park and Gardens or nature conservation sites within, or in close proximity to the Site, and as such, it is relatively unconstrained by landscape, heritage or nature conservation designations.
- 6.12 Furthermore, the Site is not located close to any particularly highly valued or high quality landscapes, such as the High Weald AONB or South Downs National Park. The Site is, and potential residential development on the Site would be, screened in views from the High Weald AONB, through the combination of gently rising topography and increasing woodland cover to the north of the Site.
- 6.13 From elevated vantage points within the South Downs National Park, there are expansive views across the Low Weald landscape. Scattered settlements, such as Henfield, Albourne, Hurstpierpoint and Hassocks, set within a strong complex landscape framework of mature

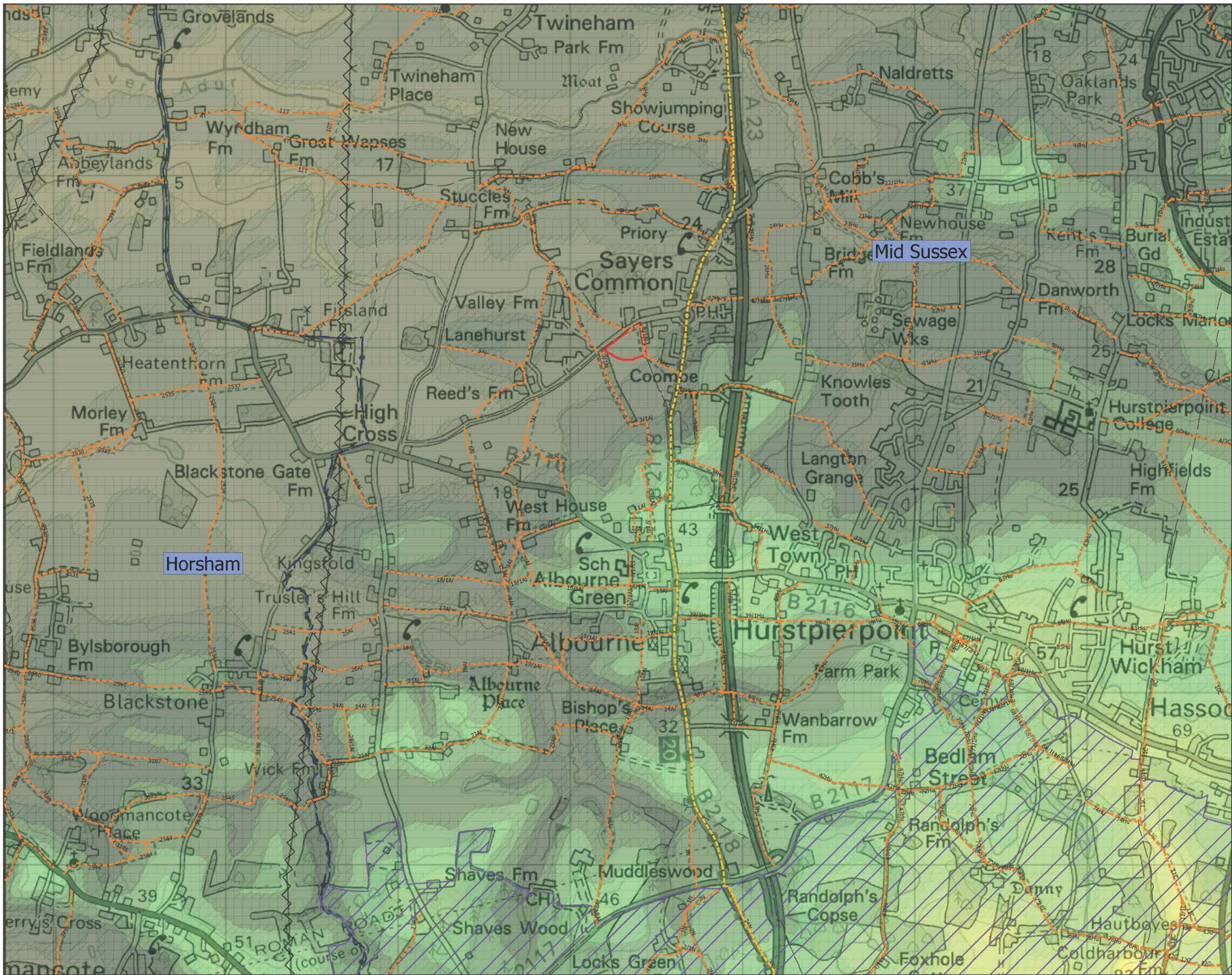
woodlands, treebelts, trees and hedgerows, form a characteristic component of the panoramic views from the South Downs. The Site is not discernible in these views, and neither would potential residential development on the Site be discernible in these views. However, if potential development on the Site was visible, it would form a very small characteristic component in the views, with no overall change to the character of the views.

- 6.14 Therefore, the Site is not conspicuous in any long distance views from the South Downs National Park or High Weald AONB, and is set in the context of the existing settlement Sayers Common, was would potential residential development on the Site.
- 6.15 Views of the Site, and potential residential development on the Site, would generally be limited to the immediate vicinity of the Site; in particular to the short length of Reeds Lane adjoining the northern boundary of the Site. In the locality of the Site, the well vegetated character of the immediate surroundings of the Site and surrounding existing development, combined with the relatively flat topography, limit views of the Site and would also screen views of potential residential development on the Site.
- 6.16 To the south, whilst the land rises, and there are elevated locations with views out to the north, the intricate mix of mature trees and vegetation, combined with undulating topography, screen views of the Site, and would screen potential residential development on the Site
- 6.17 In considering the landscape capacity of the Site to accommodate residential development, with reference to the Mid Sussex capacity studies, and the Site Allocations Development Plan Document, the Site is located on the very edge of LCA 63: Albourne Low Weald, immediately adjoining LCA 62: Hickstead – Sayers Common Low Weald, the latter of which has a higher capacity to accommodate residential development; the Site adjoins the existing edge of Sayers Common and is set within a more developed context than the wider landscape; such that the Site also has a higher capacity to accommodate residential development than the wider LCA 63.
- 6.18 Furthermore, many of the Landscape Character Areas assessed by the Capacity Study are considered to have a Negligible, Negligible to Low, or Low capacity with very few areas of the district identified as having a Low to Medium, Medium, Medium to High or High capacity for residential development. Therefore, the Site is relatively well suited to accommodate development when compared with the wider district.
- 6.19 With regard to Criterion 8 Landscape, the Site is graded as having a Low/Medium constraint to residential development, going on to state that ***"the development of this site has the potential to have an impact on the landscape. There are long distance views from the site to the south, and no strong defensible boundary or subsequent screening to***

the south. Development of the site would represent an incursion into the countryside”.

- 6.20 However, contrary to the above, the landscape and visual appraisal of the Site and the potential for residential development on the Site has demonstrated that incursion into the countryside will be very limited, and that the Site is, and potential development on the Site would be, screened in elevated views from the south, by the combination of the intricate mix of mature trees and vegetation and undulating topography. Therefore, the potential landscape and visual effects arising from residential development of the Site would be limited to the immediate locality of the Site, with no significant effect on the wider landscape and visual context.
- 6.21 The Site can therefore be considered to have a Medium capacity to accommodate residential development which, as defined in the Capacity of Mid Sussex District to Accommodate Development (June 2014), identifies that the Site would have the ***“potential for limited smaller-scale development to be located in some parts of the character area, so long as there is regard for existing features and sensitivities within the landscape”***, the latter of which can be successfully achieved, such that, on considering the limited extent of any landscape and visual effects, and the opportunities to mitigate them, ***“it is possible to mitigate and compensate for the impacts of development in such a way as to ensure that environmental capacity is not breached.”***
- 6.22 In summary, the Site immediately adjoins the settlement of Sayers Common, in an area of greater development than the wider landscape; and adjoins an area of ‘Medium’ landscape capacity to accommodate residential housing. Potential residential development on the Site would respond positively to the inherent character of its immediate locality, with very limited effects on landscape features or views. Therefore, considering the highly constrained nature of much of the District of the Mid Sussex, in landscape terms, the Site is one of the more suitable sites in Mid Sussex to accommodate residential development, such that it can be considered to have capacity for a small urban extension, being closely related to, and having regard for, the setting and form of existing settlement; existing features and sensitivities; and the character and sensitivity of adjacent landscape character areas.

ILLUSTRATIVE MATERIAL



The scaling of this drawing cannot be assured

Revision Date Dwn Cld

LEGEND

- Site Boundary
- Mid Sussex District Boundary
- Contours/Spot Heights (Metres AOD) ^
- Public Rights of Way *
- Sustrans Cycle Route +
- South Downs National Park #

Elevation (metres aOD)

- 100 to 105
- 095 to 100
- 090 to 095
- 085 to 090
- 080 to 085
- 075 to 080
- 070 to 075
- 065 to 070
- 060 to 065
- 050 to 055
- 045 to 050
- 040 to 045
- 035 to 040
- 025 to 030
- 020 to 025
- 015 to 020
- 010 to 015
- 005 to 010
- 000 to 005

Sources:
OS Mapping
Natural England GIS Data Set
Historic England National Monument Project GIS Data Set
Basset & West Sussex County Council GIS Data Set
Sustrans National Cycle Network GIS Data
Department for Transport Cycle Network Model
Department for Communities and Local Government GIS Data
Mid Sussex District Plan 2014-2021 - Adopted March 2020

Data collated for contours and analysis mapping is based on publicly available sources at the time of preparation and is not intended to be a definitive statement of fact. It is not a guarantee of accuracy and shall not be liable for the accuracy of data derived from external sources.

FIGURE 2

Project
Land West of Meadow View,
Sayers Common

Drawing Title
Topographic Features Plan

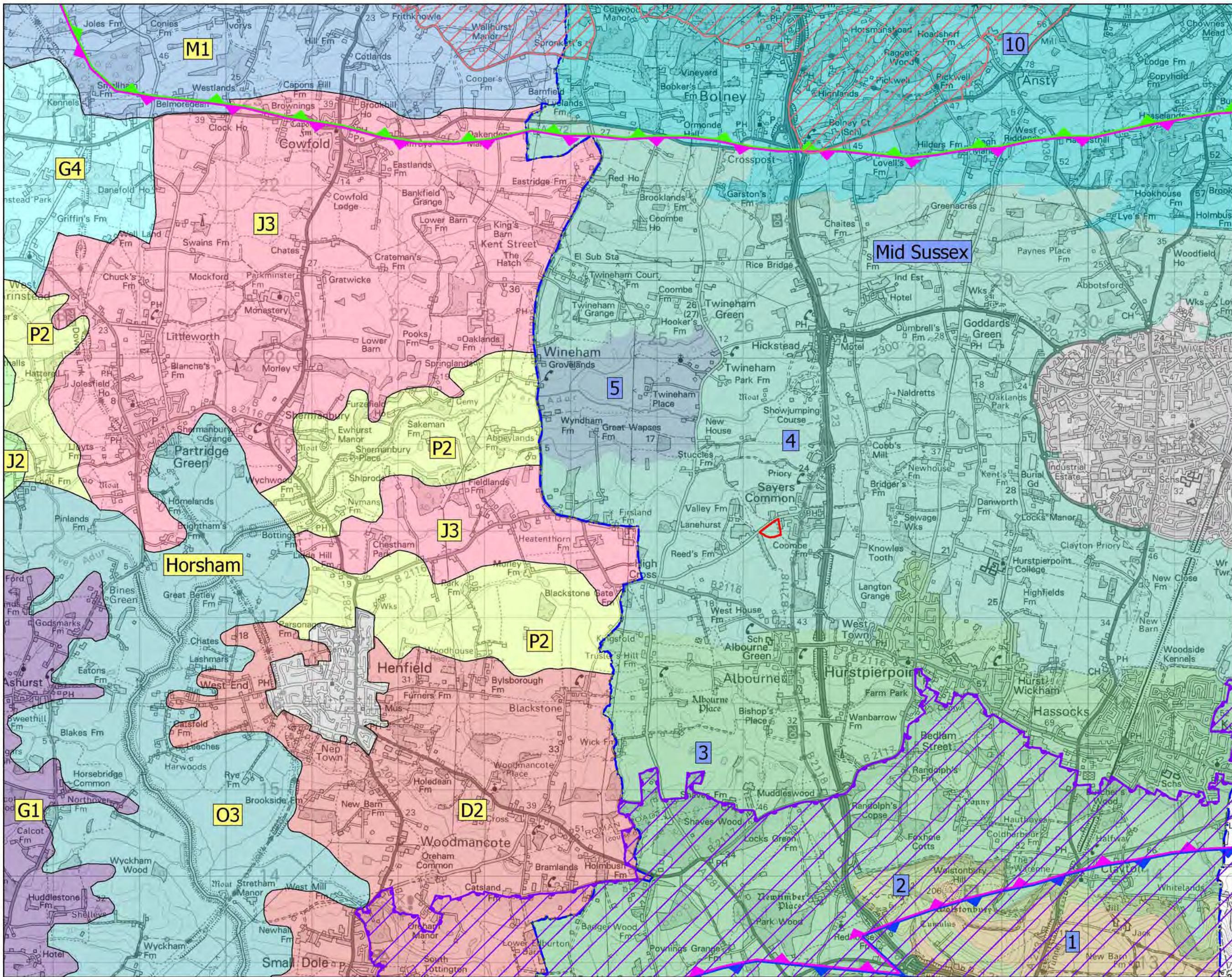
Date	Scale	Drawn by	Check by
19.11.2019	1:10,000 (B1)	LH	LT
Project No	Drawing No	Revision	
23510	RG-LP-105		

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The scaling of this drawing cannot be assured

Revision _____ Date _____ Dm _____ Cld _____

LEGEND

- Site Boundary
- Mid Sussex District Boundary
- Contours/Spot Heights (Metres AOD) ^
- South Downs National Park #
- High Weald Area of Outstanding Natural Beauty #
- National Landscape Character Profiles
 - 121, Low Weald
 - 122, High Weald
 - 125, South Downs
- Mid Sussex District Landscape Character Areas
 - 1 Area 1: Devil's Dyke and Clayton Downs
 - 2 Area 2: Fulking to Clayton Scarp
 - 3 Area 3: Hurstpierpoint Scarp Footslopes
 - 4 Area 4: Hickstead Low Weald
 - 5 Area 5: Upper Adur Valley
 - 10 Area 10: High Weald
- Horsham District Landscape Character Areas
 - D2 D2 Henfield & Small Dole Farmlands
 - G1 G1 Ashurst & Wiston Wooded Farmlands
 - G4 G4 Southwater & Christs Hospital Farmlands
 - J2 J2 Broadford Bridge to Ashington Farmlands
 - J3 J3 Covfold & Shermanbury Farmlands
 - M1 M1 Crabtree & Nuthurst Ridges & Ghylls
 - O3 O3 Steyning & Henfield Brooks
 - P2 P2 Upper Adur Valleys
- Urban Areas

Source:

- OS Mapping
- Natural England OS Data Set
- Mid Sussex Landscape Character Assessment
- Horsham Landscape Character Assessment

Data collected for constraints and analysis mapping is based on publicly available sources at the time of preparation and is not intended to be used for any purpose other than the intended purpose of the plan. The accuracy of the data is not guaranteed.

FIGURE 3

Project:
Land West of Meadow View,
Sayers Common

Drawing Title:
Landscape Character Plan

Date: 15.11.2019	Scale: 1:20,000 (A3) 1:40,000 (A4)	Drawn by: LH	Check by: LT
Project No: 23510	Drawing No: RG-LP-102	Revision: -	

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The scaling of this drawing cannot be assured

Revision Date Drn Cld

LEGEND

- Site Boundary
- Mid Sussex District Boundary
- Contours/Spot Heights (Metres AOD) ^
- Public Rights of Way *
- Sustrans Cycle Route +
- Listed Buildings ~
- Ancient Woodland #
- Local Gap Prevention of Coalescence ##
- Rampion Offshore Windfarm Substation and Cable Route Boundary
- Location of Photographic Viewpoints (Site Appraisal Photographs: A-E)

Sources:

- OS Mapping
- Natural England GIS Data Set
- Historic England National Monument Record GIS Data Set
- East & West Sussex County Council GIS Data Set
- Sustrans National Cycle Network GIS Data
- Department for Communities and Local Government GIS Data
- Mid Sussex District Plan 2014-2031 - Adopted March 2020

Data collected for constraints and analysis mapping is based on publicly available sources at the time of preparation. It is not intended to be used for any purpose other than the purpose for which it was collected and is not to be relied upon for the accuracy of data derived from external sources.

FIGURE 4

Project
**Land West of Meadow View,
Sayers Common**

Drawing Title
Site Appraisal Plan

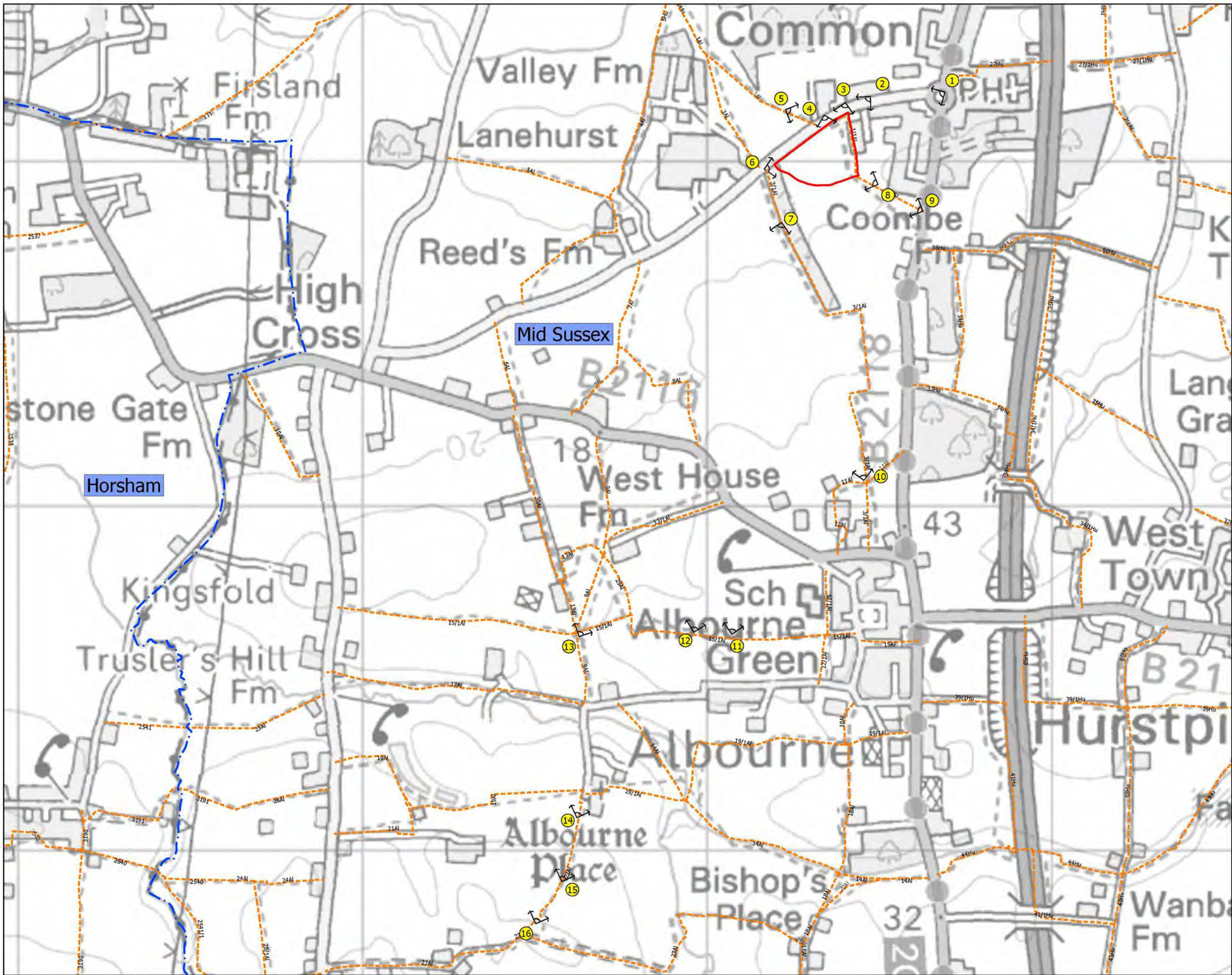
Date 11.11.2019	Scale 1:5,000 (A4) 1:10,000 (A3)	Drawn by LH	Check by LT
Project No 23510	Drawing No RG-LP-103	Revision -	

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Revision _____ Date _____ Drn _____ Cld _____

LEGEND

- Site Boundary
- Mid Sussex District Boundary ^
- Contours/Spot Heights (Metres AOD) ^
- Public Rights of Way *
- National Trails / Long Distance Walks #
- South Downs National Park #
- Area of Outstanding Natural Beauty #
- Location of Photographic Viewpoints (Site Context Photographs: 1-16)

Sources:
- OS Mapping
- Natural England GIS Data Set
- East and West Sussex County Council GIS Data Set
Data collected for context and analysis mapping is based on publicly available sources at the time of preparation and is not intended to be used for legal purposes. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

FIGURE 5

Project:
**Land West of Meadow View,
Sayers Common**
Drawing Title:
Visual Appraisal Plan 1

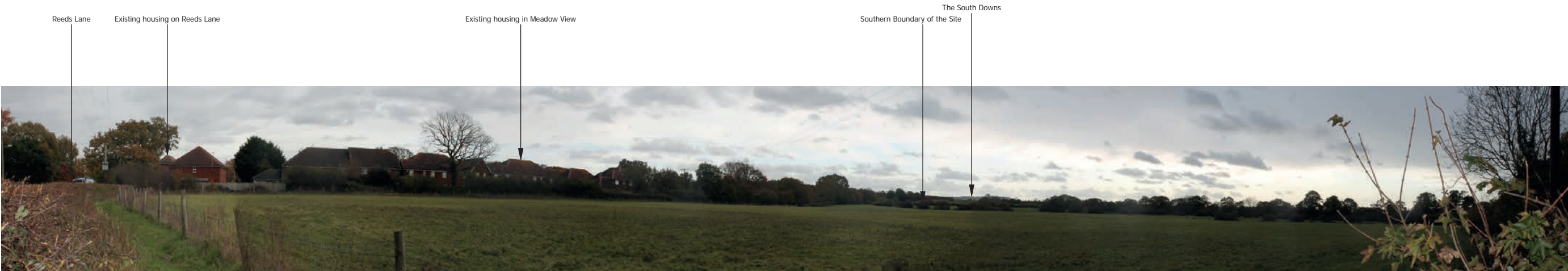
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Project No: 23510	Drawing No: RG-LP-104	Revision: -	

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SITE APPRAISAL PHOTOGRAPH A: TAKEN FROM PUBLIC RIGHT OF WAY 1/1AI ON THE NORTHERN BOUNDARY OF THE SITE



SITE APPRAISAL PHOTOGRAPH B: TAKEN FROM THE NORTH-EASTERN CORNER OF THE SITE LOOKING SOUTH-WEST



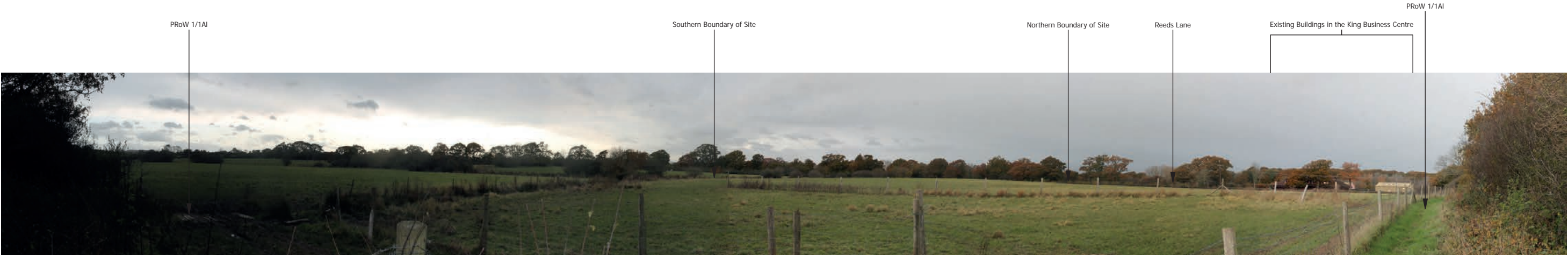
SITE APPRAISAL PHOTOGRAPH C: TAKEN FROM THE EASTERN BOUNDARY OF THE SITE LOOKING WEST

LAND WEST OF MEADOW
VIEW,
SAYERS COMMON
SITE APPRAISAL
PHOTOGRAPHS: A - C

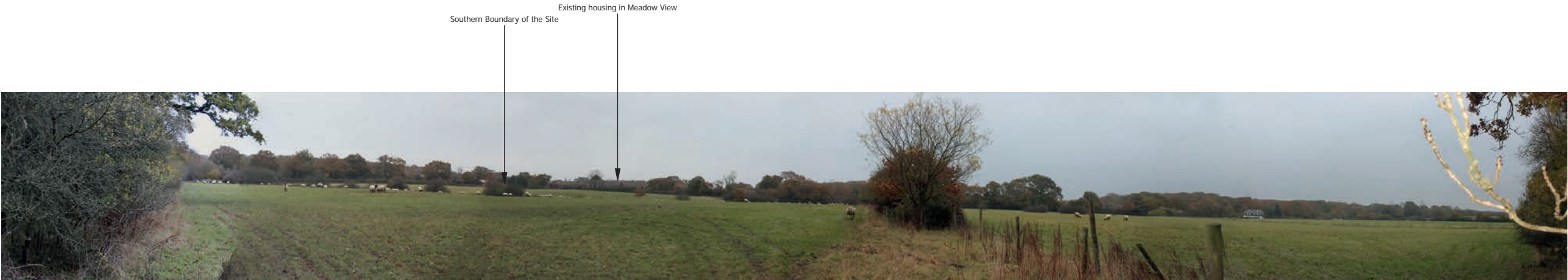
RECOMMENDED VIEWING
DISTANCE: 20CM @A1

DATE TAKEN: NOV 2019

PROJECT NUMBER: 23510



SITE APPRAISAL PHOTOGRAPH D: TAKEN FROM THE SOUTHERN CORNER OF THE SITE LOOKING NORTH-WEST



SITE APPRAISAL PHOTOGRAPH E: TAKEN TO THE SOUTH OF THE SOUTHERN BOUNDARY LOOKING NORTH-EAST TOWARDS THE SITE



SITE CONTEXT PHOTOGRAPH 1: TAKEN FROM THE JUNCTION OF REEDS LANE AND THE B2118, LOOKING WEST TOWARDS THE SITE



SITE CONTEXT PHOTOGRAPH 2: TAKEN FROM REEDS LANE LOOKING WEST TOWARDS THE SITE



SITE CONTEXT PHOTOGRAPH 3: TAKEN FROM ENTRANCE TO KING BUSINESS CENTRE LOOKING SOUTH-WEST TOWARDS THE SITE

LAND WEST OF MEADOW
VIEW,
SAYERS COMMON
SITE CONTEXT
PHOTOGRAPHS: 1 - 3

RECOMMENDED VIEWING
DISTANCE: 20CM @A1

DATE TAKEN: NOV 2019

PROJECT NUMBER: 23510



SITE CONTEXT PHOTOGRAPH 4: TAKEN FROM REEDS LANE LOOKING SOUTH ACROSS THE SITE



SITE CONTEXT PHOTOGRAPH 5: TAKEN FROM 1AI LOOKING SOUTH-EAST TOWARDS THE SITE



SITE CONTEXT PHOTOGRAPH 6: TAKEN FROM REEDS LANE AND PROW 3/1AI LOOKING WEST TOWARDS THE SITE

LAND WEST OF MEADOW
VIEW,
SAYERS COMMON
SITE CONTEXT
PHOTOGRAPHS: 4 - 6

RECOMMENDED VIEWING
DISTANCE: 20CM @A1

DATE TAKEN: NOV 2019

PROJECT NUMBER: 23510



SITE CONTEXT PHOTOGRAPH 7: TAKEN FROM PROW 3/1AI LOOKING SOUTH



SITE CONTEXT PHOTOGRAPH 8: TAKEN FROM PROW 11 Hu LOOKING NORTH TOWARDS THE SITE



SITE CONTEXT PHOTOGRAPH 9: TAKEN FROM FOOTWAY ALONG THE B2118 (SUSTRANS ROUTE) AT START OF PROW 11 Hu, LOOKING NORTH-WEST TOWARDS THE SITE

LAND WEST OF MEADOW
VIEW,
SAYERS COMMON
SITE CONTEXT
PHOTOGRAPHS: 7 - 9

RECOMMENDED VIEWING
DISTANCE: 20CM @A1

DATE TAKEN: NOV 2019

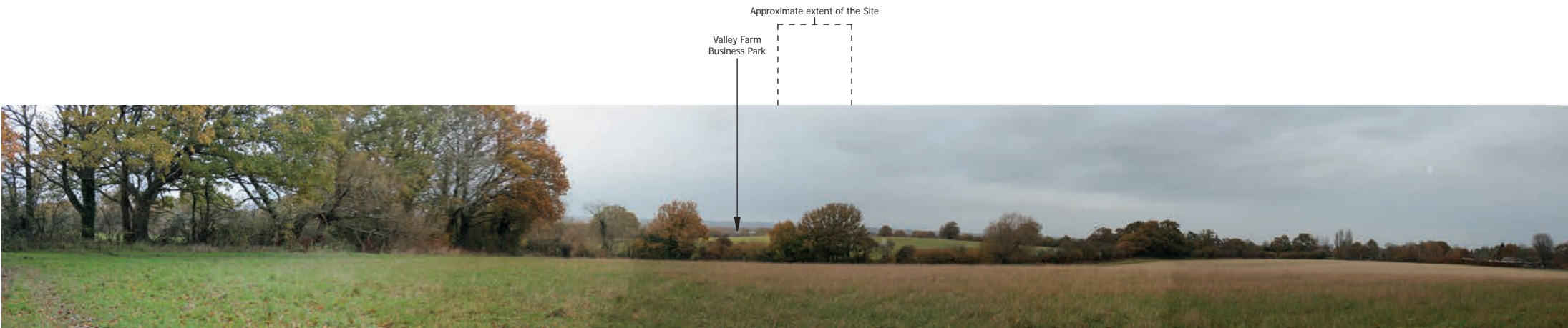
PROJECT NUMBER: 23510



SITE CONTEXT PHOTOGRAPH 10: TAKEN FROM PROWs 11AI AND 3/1AI LOOKING NORTH TOWARDS THE SITE



SITE CONTEXT PHOTOGRAPH 11: TAKEN FROM PROW 15/1AI LOOKING NORTH TOWARDS THE SITE



SITE CONTEXT PHOTOGRAPH 12: TAKEN FROM PROW 15/1AI LOOKING NORTH TOWARDS THE SITE

LAND WEST OF MEADOW
VIEW,
SAYERS COMMON
SITE CONTEXT
PHOTOGRAPHS: 10 - 12
RECOMMENDED VIEWING
DISTANCE: 20CM @A1
DATE TAKEN: NOV 2019
PROJECT NUMBER: 23510



SITE CONTEXT PHOTOGRAPH 13: TAKEN FROM JUNCTION OF PROWs 13A, 9A AND 15/1A LOOKING NORTH-WEST TOWARDS THE SITE



SITE CONTEXT PHOTOGRAPH 14: TAKEN FROM PROW 22AI LOOKING NORTH-EAST TOWARDS THE SITE



SITE CONTEXT PHOTOGRAPH 15: TAKEN FROM PROW 22AI LOOKING NORTH TOWARDS THE SITE

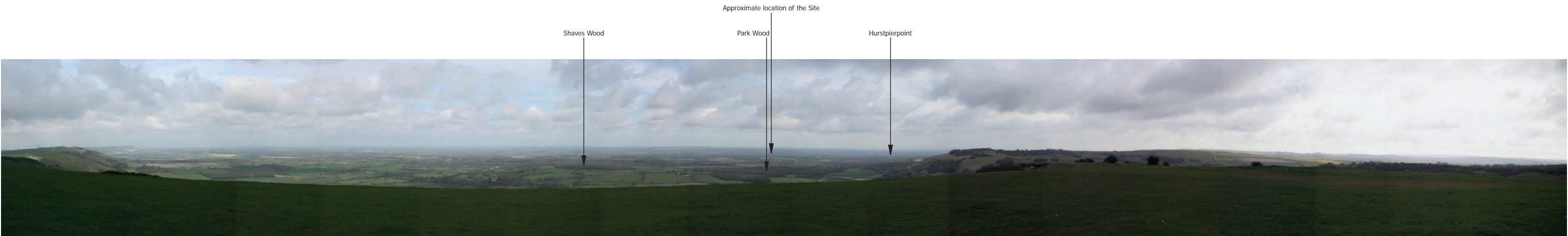
LAND WEST OF MEADOW
VIEW,
SAYERS COMMON
SITE CONTEXT
PHOTOGRAPHS: 13 - 15
RECOMMENDED VIEWING
DISTANCE: 20CM @A1
DATE TAKEN: NOV 2019
PROJECT NUMBER: 23510



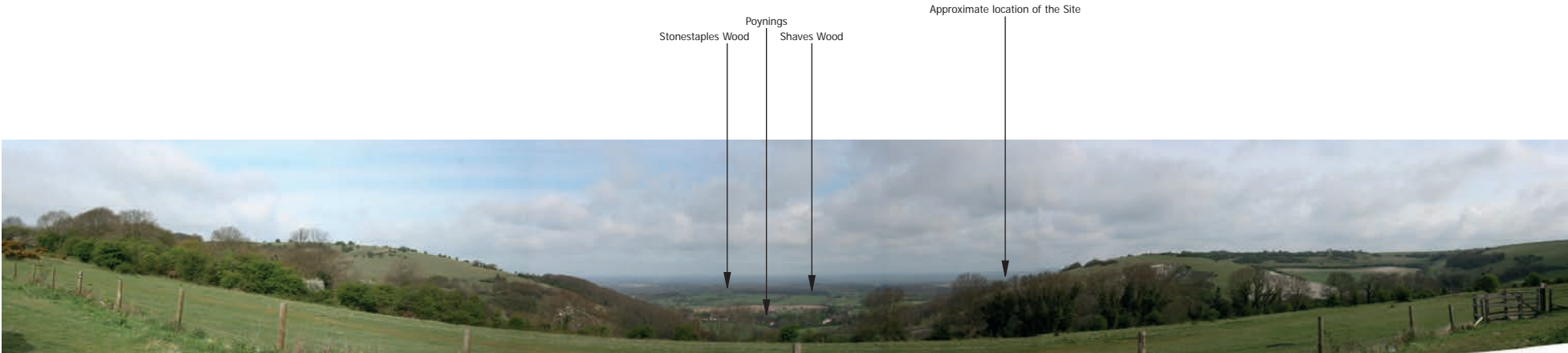
SITE CONTEXT PHOTOGRAPH 16: TAKEN FROM PROW 22AI LOOKING NORTH TOWARDS THE SITE



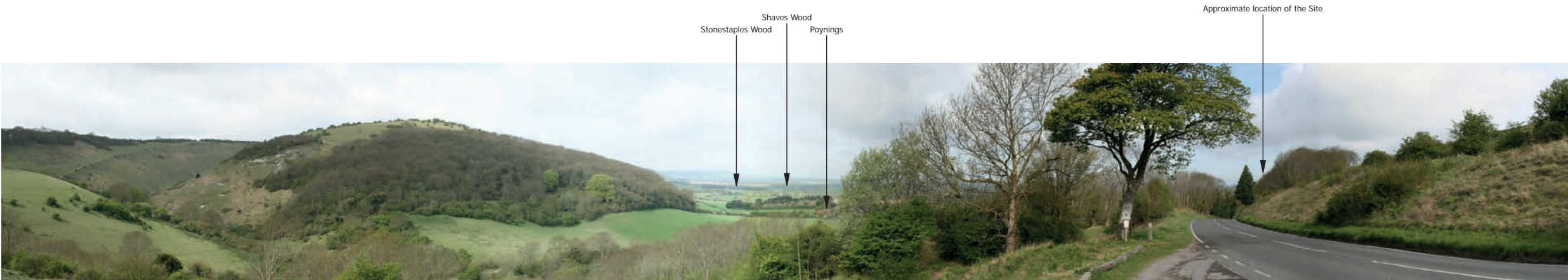
SITE CONTEXT PHOTOGRAPH 17: VIEW FROM DEVIL'S DYKE VIEWPOINT



SITE CONTEXT PHOTOGRAPH 18: VIEW FROM DEVIL'S DYKE CAR PARK



SITE CONTEXT PHOTOGRAPH 19: DEVIL'S DYKE, SUMMER DOWN VIEWPOINT



SITE CONTEXT PHOTOGRAPH 20: VIEWPOINT SOUTH OF POYNINGS



SITE CONTEXT PHOTOGRAPH 21: VIEW FROM A23 OVERBRIDGE AT PYECOMBE

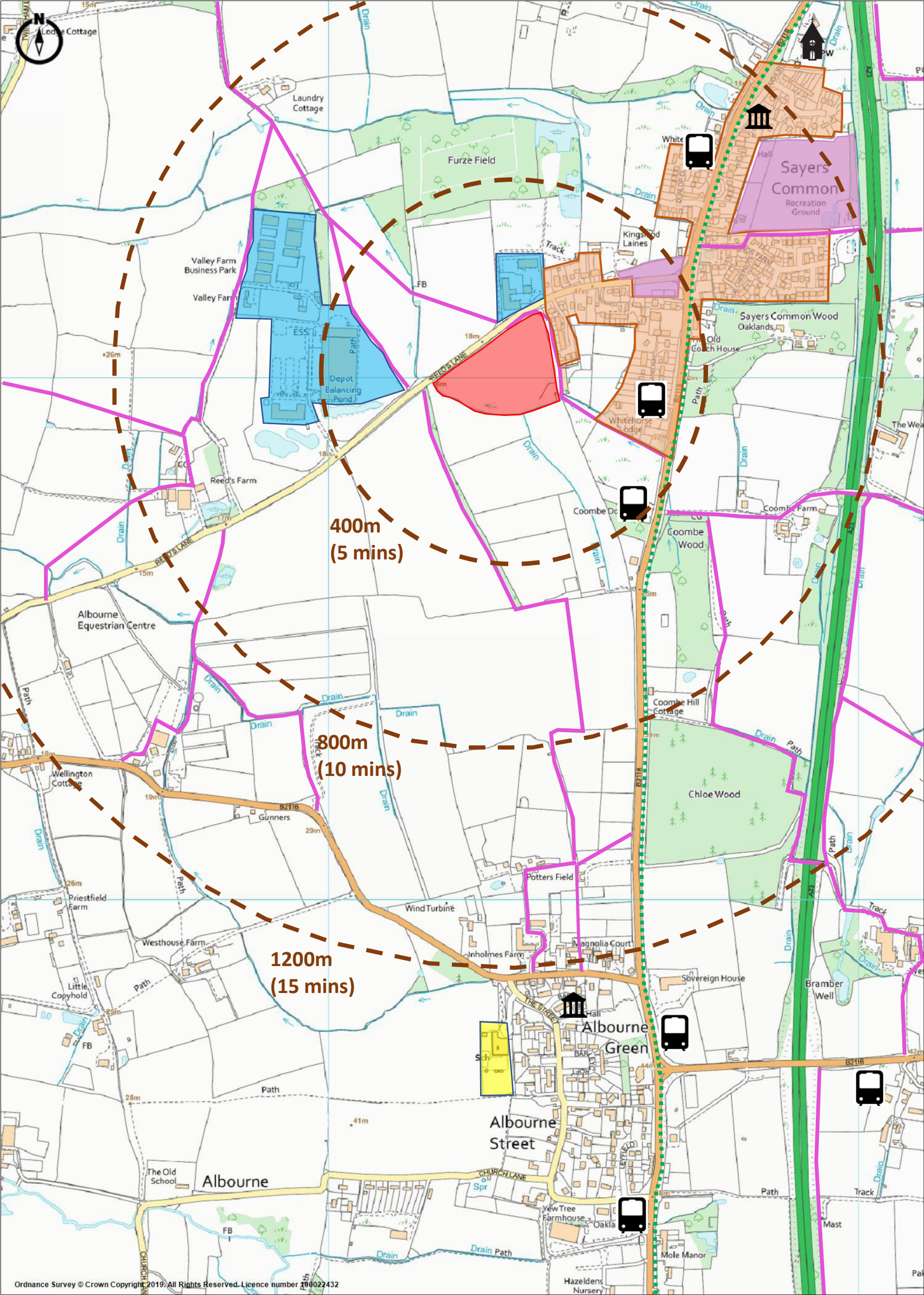
LAND WEST OF MEADOW
VIEW,
SAYERS COMMON
SITE CONTEXT
PHOTOGRAPHS: 19 - 21
RECOMMENDED VIEWING
DISTANCE: 20CM @A1
DATE TAKEN: MAY 2010
PROJECT NUMBER: 23510



SITE CONTEXT PHOTOGRAPH 22: VIEW FROM CLAYTON WINDMILLS

APPENDIX 5

ACCESSIBILITY PLAN



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Sayers Common Built Up Area

Land west of Meadow View (Ref. 857)

Employment Land

School

Recreation / Sport Ground

Public Right of Way

Sustrans Cycle Route

400 metre (5 min walk) distance

Village Hall

Bus Stop

Bus Route 100 – Hourly service from 0655 to 1820 Monday to Friday and from 7.55 to 18.20 on Saturday

Bus Route 273 – Every 2.5 hours from 0519 to 1323 Monday to Friday, then from 1646 to 18.06, and every 1.5 hours from 0802 to 1759 on Saturday

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 710

Response Ref: Reg19/710/7

Respondent: Mr N Burns

Organisation: Natural England

On Behalf Of:

Category: Statutory Consultee

Appear at Examination? x

Date: 28 September 2020
Our ref: 324095



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

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Sir / Madam

Planning consultation: Mid Sussex District Council Site Allocations DPD - Regulation 19 Consultation

Thank you for your consultation on the above dated 03 August 2020 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcomes the approach taken by your authority to consult with Natural England at various stages in the preparation of the Site Allocations Development Plan Document. We are pleased that our engagement has resulted in our comments/concerns being addressed in this version of the plan. In particular, we welcome the positive engagement by Mid Sussex District Council with both Natural England and the High Weald AONB Unit in the assessment of the Regulation 19 proposed site allocations within the High Weald Area of Outstanding Natural Beauty (AONB).

From this assessment, we recognise and welcome that a conclusion has been reached that none of the proposed site allocations (Policies SA7, SA8, SA25, SA26, SA27, SA28, SA29, SA32) constitutes major development within the AONB.

Our comments on your Regulation 19 Site Allocations Development Plan Document (DPD) Site allocations and development policies, followed by general comments are as follows.

Comments on specific allocations

SA 7 - Cedars, Brighton Road, Pease Pottage

We support the requirement of this allocation to undertake a Landscape and Visual Impact Assessment (LVIA) to consider potential impacts on the special qualities of the High Weald AONB.

SA 8 - Pease Pottage Nurseries, Brighton Road, Pease Pottage

We support the requirement of this allocation to undertake a Landscape and Visual Impact Assessment (LVIA) to consider potential impacts on the special qualities of the High Weald AONB.

We also support the requirements regarding nearby ancient woodland in line with Natural England's [standing advice](#).

SA 18 - Former East Grinstead Police Station, College Lane, East Grinstead

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

SA 19 – Land south of Crawley Down Road, Felbridge

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We support the requirement of this allocation to provide suitable SuDS and greenspace to address potential impacts on the Hedgecourt Lake SSSI.

SA 20 – Land south and west of Imberhorne Upper School, Imberhorne Lane, East Grinstead

We support the requirements of this allocation to provide an appropriately managed strategic Suitable Alternative Natural Greenspace (SANG) to mitigate increased recreational disturbance on Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC); such a SANG proposal must be considered in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We also support the requirement for potential impacts of development on Hedgecourt Lake SSSI to be understood and adequately mitigated.

We also support the requirements regarding nearby ancient woodland in line with Natural England's [standing advice](#).

SA 22 – Land north of Burleigh Lane, Crawley Down

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

SA 25 – Land west of Selsfield Road, Ardingly

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We support the requirements of this allocation to undertake a LVIA to consider potential impacts on the special qualities of the High Weald AONB.

SA 26 – Land south of Hammerwood Road, Ashurst Wood have

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We support the requirements of this allocation to undertake a LVIA to consider potential impacts on the special qualities of the High Weald AONB.

SA 27 – Land at St. Martin Close, Handcross

We support the requirements of this allocation to undertake a LVIA to consider potential impacts on the special qualities of the High Weald AONB.

SA 28 – Land South of The Old Police House, Birchgrove Road, Horsted Keynes

We recommend a requirement be included for this development to contribute to existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We support the requirements of this allocation to undertake a LVIA to consider potential impacts on the special qualities of the High Weald AONB.

SA 29 – Land south of St. Stephens Church, Hamsland, Horsted Keynes

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We support the requirements of this allocation to undertake a LVIA to consider potential impacts on the special qualities of the High Weald AONB.

SA 32 – Withypitts Farm, Selsfield Road, Turners Hill

We recommend a requirement be included for this development to contribute to the existing strategic solution in accordance with District Plan Policy **DP17: Ashdown Forest SPA and SAC**.

We support the requirements of this allocation to undertake a LVIA to consider potential impacts on the special qualities of the High Weald AONB.

Comments on Development Policies

SA38: Air Quality

Whilst we support the requirement of this policy for applicants to demonstrate there is not an unacceptable impact on air quality resulting from their proposals we recommend the following change in wording to strengthen the protection of designated sites.

*“Development proposals that are likely to have an impact on local air quality, including those in or within relevant proximity to existing or potential Air Quality Management Areas (AQMA)s or **designated nature conservation areas sensitive to changes in air quality**, will need to demonstrate measures/ mitigation that are incorporated into the design to minimise any impacts associated with air quality.*

We recognise there is specific wording established for air quality impacts for Ashdown Forest and this suggestion is additional for any other relevant sites which could be potentially impacted by changes to air quality.

General comments

Biodiversity net gain

We strongly support the requirements of all allocations to ensure there is a net gain to biodiversity as well as the general principle for site allocations to: *“Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity, using the most up-to-date version of the Biodiversity Metric. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where it is not possible, mitigate and as a last resort compensate for any loss. Achieve a net gain in biodiversity (measured in accordance with Government guidance and legislation), for example, by incorporating new natural habitats, appropriate to the context of the site, into development and designing buildings with integral bat boxes and bird nesting opportunities, green/brown roofs and green walling, in appropriate circumstances in accordance with District Plan Policy”.*

We would still however recommend that your DPD should include requirements to monitor biodiversity net gain. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

We recommend that Mid Sussex District Council works with local partners, including the Local Environmental Record Centre and Wildlife Trusts, to share data and consider requirements for long term habitat monitoring. Monitoring requirements should be clear on what is expected from landowners who may be delivering biodiversity net gains on behalf of developers. This will be particularly important for strategic housing allocations, and providing as much information on monitoring upfront as possible will help to streamline the project stage.

Water efficiency

Your Authority contains areas of Serious Water Stress as designated by the Environment Agency. For developments in Southern Water Services drinking water supply area Natural England recommends water efficiency policies should be developed to support Southern Water's "Target 100".

This target, of 100 litres per person per day by 2040 has been identified by Southern Water to avoid the need for water supply options that are likely to damage biodiversity or/and effect protected landscapes. For development in other companies' supply areas Natural England supports the Environment Agency's recommendation of a maximum of 110 litres per person per day.

Water efficiency measures will help reduce the current impact of water resources on the natural environment and thereby contribute to more resilient landscapes and seas, one of the aims in Natural England's 'Building partnerships for nature's recovery: Action Plan 2020/21'¹. Reducing the water we use will also contribute to the Government's 25 Year Environment Plan aspirations for clean and plentiful water and to restore sustainable abstraction.

Soil

Soil is a finite resource, and fulfils many roles that are beneficial to society. As a component of the natural environment, it is important that soils are protected and used sustainably.

The DPD should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process.

Soils of high environmental value (e.g. wetland and carbon stores such as peatland) should also be considered to contribute to ecological connectivity, as such these soils should be conserved and protected from negative impacts.

We recommend that allocation policies refer to the [Defra Code of practice for the sustainable use of soils on construction sites](#).

Comments on HRA

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of this DPD in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process.

Your appropriate assessment concludes that your authority is able to ascertain that the implementation of this DPD will not result in adverse effects on the integrity of any of European sites in question.

Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, chiefly changes in air quality and increased recreational disturbance, Natural England advises that we concur with the assessment conclusions, providing that all required mitigation measures are appropriately secured in any future planning permissions given.

Comments on SA

We have no specific comments to make regarding our statutory remit and your sustainability appraisal.

If you have any queries relating to the advice in this letter please contact me on 07554226006 OR 02080266551.

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906289/natural-england-action-plan-2020-21.pdf

Should the DPD change significantly, please consult us again.

Yours faithfully

Nathan Burns
Area Team 14 - Kent and Sussex

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 714

Response Ref: Reg19/714/1

Respondent: Mrs B Cox

Organisation: Ardingly Parish Council

On Behalf Of:

Category: Town & Parish Council

Appear at Examination? x



ARDINGLY PARISH COUNCIL

RESPONSE

TO

SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT

REGULATION 19

28th September 2020

Ardingly Parish Council
37 High Street
Ardingly
West Sussex
RH17 6TB
clerk@ardingly.org

Mid Sussex District Council
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

28th September 2020

Dear Sir or Madam,

Thank you for the opportunity to respond to the Site Allocations Development Plan Document Regulation 19 Consultation.

Ardingly Parish Council has reviewed the details of the Site Allocation 25, The Land west of the Selsfield Road, Ardingly (SA25) and its impact on the soundness of the Site Allocation Development Plan Document (DPD) and has found that the inclusion of SA25 in its current form in the DPD makes it unsound with regards to the tests of soundness.

In this response we have detailed our reasons why we believe each test of soundness has not been met due to different criteria. However, we would like to highlight one key point which is that Ardingly Parish Council believe that Mid-Sussex District Council (MSDC) has incorrectly, and without justification or explanation decided that SA25 is not a Major development in the AONB in the normal sense of the word (MAJOR).

The proposed SA25 is an increase of 15% in dwellings and 18% in area compared to the current built-up area of the village (ref. MSDC SA DPD Major Development in the High Weald AONB Topic Paper, P 44), Ardingly Parish Council believe this demonstrates that this is a MAJOR development.

Ardingly Parish Council believe that this alone demonstrates that the inclusion of SA25 in its current form makes the DPD not sound and that a further reduction of dwellings is required to meet the test of not MAJOR.

As the representative of the Parish of Ardingly and as this proposed development has the potential to cause a significant impact on our small rural village, we would appreciate the opportunity to make our representation at the oral part of the examination.

Yours sincerely,

Councillor Derek Stutchbury (Chairman)
On behalf of Ardingly Parish Council

Positively prepared – NOT SOUND

1. The significant over allocation of dwellings, 38% above the objectively assessed need, to address the residual housing requirement of the district plan indicates that MSDC has not followed an objective strategy in line with the District Plan. The District Plan sets out in Chapter 1 para 1.4 that “.... a particular feature of the Plan is the desire of the District Council to involve Town and Parish Councils in its preparation and delivery. It is vital that there is local influence over where and what development happens, and the infrastructure that is provided over the next 17 years.”

Ardingly Parish Council held a Parish survey to understand the views of the village. The result of this survey is that 89% of respondents believe the current size of the development is too large, with 41% wanting no housing on this site and 63% wanting less than 30 dwellings.

DP 12: Protection and Enhancement of Countryside also states that, “The primary objective of the District Plan with respect to the countryside is to secure its protection by minimising the amount of land taken for development and preventing development that does not need to be there.”

Ardingly Parish has contributed 53 houses in the plan period to October 2019. The inclusion of SA25 on AONB land outside of the built-up area, with a further 70 houses goes far beyond the adopted Ardingly Parish Neighbourhood plan, which set out a local need for approximately 30 houses which was delivered through a previous site allocation (Standgrove field) and windfall. The Neighbourhood plan also sets out in Policy ARD 2: A Spatial Plan for the Parish: “The Neighbourhood Plan directs future housing, economic and community-related development within the parish to within the revised built-up area boundary...”.

The above demonstrates that the DPD has not been positively prepared in accordance with the strategy of the Mid Sussex District Plan.

Justified – NOT SOUND

1. There is no local need for the housing – Ardingly Neighbourhood plan identified a need of “approximately 30 houses” in the plan period; Ardingly has delivered 53 houses up to October 2019. Policy ARD 3: Housing Supply & Site Allocation: The Neighbourhood Plan provides for the development of at least 37 homes in the period 1 April 2013 to 31 March 2031 through a combination of a site allocation (Standgrove field) and of windfall sites.

The Ardingly Neighbourhood plan directs development to within the built-up area and any build in the AONB is required to demonstrate how they conserve the AONB, Policy ARD 2: A Spatial Plan for the Parish.

2. As per NPPF - 15. Conserving and enhancing the natural environment para 172; There is no justification for MSDC to allocate a “Major” development on AONB land when there is no local need.

MSDC has defined SA25 as not Major without justification or explanation (reference: MSDC SA DPD Major Development in the High Weald AONB Topic Paper page 48). Ardingly Parish Council dispute this classification based on the size of this development as a proportion of the current settlement size, the legal opinions as set out by Maurici (2011 & 2014) and Fisher (2017) and especially to the regard to the normal meaning of the word Major.

The proposed SA25 is an increase of 15% in dwellings and 18% in area compared to the current built-up area of the village, Ardingly Parish Council believe this demonstrates that

this is a major development in the normal sense of the word. There are example precedents which support this; Tunbridge Wells Borough Council as a decision maker has put a threshold of 5% increase to define major and a site at Newton Poppleford, Devon, a settlement of similar size to Ardingly, was designated a major development which was a proposed increase of 5.7% on the current settlement size.

3. There is no justified need for such a large over-supply of housing to deliver the residual requirement of the objectively assessed need (OAN) of 16,390 dwellings within the plan period 2014-2031. The OAN already includes an additional 20% buffer to safeguard against under-delivery and an allocation of 1,498 to address the unmet need in the Northern West Sussex Housing Market Area.

As of 1st April 2020, there is a residual housing requirement of 1,280 which the DPD Site Allocations seek to address. This plans to deliver 1,764 dwellings in the plan period. An over-supply of 484 (38%) dwellings. Therefore, there is no justification for developing a site outside of the Ardingly Parish built up area that lies totally within the AONB and is open green space used regularly by local residents.

The lack of local requirement or justification for a major development in the AONB demonstrates that the inclusion of SA25 in its current state makes the DPD not sound.

Effective – NOT SOUND

1. SA25 is Agricultural land that has been laid to grass since the South of England Agricultural Society was donated the land. From our paper-based investigations we believe that the classification of this land for agriculture would likely be Graded 3a or better (ref: LandIS and ALC classification criteria). NPPF - 15. Conserving and enhancing the natural environment Para 170 and DP 12: Protection and Enhancement of Countryside both require the nature and quality of the land to be considered.

The risk that SA25 will not pass through planning due to the Agricultural land classification and the requirement for sustainable development, as per the MSDC District Plan demonstrates that the inclusion of SA25 in the DPD makes it not sound.

Consistent with national Policy – NOT SOUND

1. NPPF - 15. Conserving and enhancing the natural environment para 170 requires planning policies and decisions to contribute to and enhance the natural and local environment.

There is no local economic benefit that outweighs the development of open space and versatile agricultural land.

NPPF - 15. Conserving and enhancing the natural environment para 172 requires Planning permission to be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.

The public interest for inclusion of a major development cannot be demonstrated as indicated by the survey conducted by Ardingly Parish Council where 89% of respondents were against a development of this size on this site. (reference; SA25 APC survey results.pdf)

2. NPPF - 9. Promoting sustainable transport Para 103 requires significant development to be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

The location of SA25 is on a rural B-road and north of Ardingly High Street which has limited services (a village shop, baker, pub and takeaway) and there are limited opportunities for employment within the Parish there is therefore a need for residents to travel for essential services and work. There is an infrequent bus service and no opportunity to develop safe cycling routes due to the nature of the rural roads around the village, therefore the only genuine choice of transport is by personal motor vehicle.

The above points demonstrate that the inclusion of SA25 in the Site Allocation Development Plan Document is not consistent with national policy and there is no local justification of why a departure from national policy is required. Therefore, the inclusion of SA25 in its current form makes the DPD not sound.

731

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 731

Response Ref: Reg19/731/1

Respondent: Mr & Mrs & Miss J James

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x



Mid Sussex District Council,
Oaklands Road,
Haywards Heath,
West Sussex RH16 1SS

Sent by e-mail to: LDFconsultation@midsussex.gov.uk

28th September 2020

Dear Sir/Madam,

I am writing on behalf of my family to outline why we believe that the Regulation 19 draft Development Plan Document is unsound due to the inclusion of the Site Allocation in Ardingly village, the land west of the Selsfield Road, Ardingly (SA25).

This land is outside of the built up area of Ardingly Parish and sits wholly within the High Weald Area of outstanding natural beauty (AONB). The land is a field laid to grass with public rights of way and is adjacent to the village recreation ground and borders the conservation area of the village. The land is owned by the South of England Agricultural Society and used for some events such as horse shows and as an overflow carpark a few times a year for larger shows put on by the Agricultural Society. The land is also used extensively by residents as local green space for dog walking and recreation.

The building of a substantial development of 70 houses, which is an increase of 18% on the current built up area of the Parish and an increase of 15% on the number of dwellings on this site is neither justified nor consistent with national planning policy and there are no exceptional circumstances that would justify why development would be allowed on this land.

DPD Illegal

We believe that MSDC are not discharging their responsibility as the local authority which under the CROW Act, they must make sure that all decisions have regard for the purpose of conserving and enhancing the natural beauty of the AONB. Indicators of this breach of responsibility are:

- a) 70 houses on a greenfield open space site that boundaries a conservation area – which has rights of public way and is used by local residents for dog walking and recreation.
- b) The development would seal in the village recreation ground that is open to the west an north
- c) its prominent position will impact on the local countryside and the dark skies through light pollution.

The inclusion of SA25 in the DPD makes it illegal.

DPD Justified test – Not Sound

We believe that the soundness test for Justified fails in regard to SA25 and makes the DPD not sound for the following reasons.

1. There is no local need for this housing.
 - a. Mid Sussex District Council have identified affordable housing as a rational for the local need. However, there is not an identified local need for affordable housing and when ten affordable houses were built as part of the Standgrove site allocation this housing was predominantly offered to people from outside of the parish.
 - b. The Ardingly Neighbourhood plan identified a need for approximately 30 houses during the plan period and this was to be delivered through a combination of a site allocation (Standgrove) and windfall sites. As at 1st October 2019 Ardingly have commitments and completions of 53 dwellings with more coming through the planning stage. Ardingly Parish council have not identified any new need for housing above the current version of the neighbourhood plan.
 - c. As per the NPPF paragraph 172 – Great weight should be given to the conserving and enhancing of the landscape and scenic beauty within AONB land and afforded the highest protection and that planning permission should be refused for major developments other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.
 - i. Following the first consultation MSDC determined that the development of 100 houses was “Major” with no exceptional circumstances or public interest that would justify an exception to developing land in the High Weald AONB. The reduction to 70 houses does not change the MSDC determination of no exceptional circumstances or public interest.
 - ii. We believe that in the normal sense of the word of major, which according to the legal opinions of Maurici (2011 & 2014) and Fisher (2017) should be given great weight, that this development is “Major” and should be refused at the planning stage in line with MSDC policy DP16. The definition of Major is simply demonstrated by the 15% increase of housing and 18% increase of area over the current built up area in the parish. There is also precedent for smaller but similar sites to be deemed Major by MSDC and other councils/boroughs.
 - d) There is no justification to override MSDC Policies DP 12: Protection and Enhancement of Countryside and DP 15: New Homes in the Countryside as there is no need local essential need for accommodation and a substantial development of this nature does not enhance the intrinsic beauty and tranquillity of the countryside. In fact due to the position and aspect of this site it will cause further light pollution and therefore go against the High weald’s Management Plan for dark skies.
2. There is no need for building on High Weald AONB land when there is such a level of over supply of housing in the MSDC SA DPD (484 over-supply above the Objectively Assessed Need which already includes a 20% buffer to safeguard against under delivery) and when it is demonstrated in the Sustainability Appraisal that there are sites outside of the AONB that would meet the sustainable development criteria.
3. MSDC policies DP 20: Securing Infrastructure and DP21: Transport require necessary infrastructure to support development of sustainable communities and the provision of efficient and sustainable transport networks. The inclusion of SA25 when neither of these policies can be met economically makes the inclusion unjustifiable.

DPD Consistent with national policy test – not sound

The inclusion of SA25 is not consistent with national planning policy and as described above there is no justification for departing from national policy as there is no local requirement or district requirement for building in the High Weald AONB.

1. NPPF chapter 9 - *Promoting sustainable transport Para 103 - The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.*
 - a. Ardingly is a rural village connected by B roads that are narrow by nature and there is an infrequent bus service where the bus schedule does not facilitate round trips to essential services.
 - b. There are limited opportunities for employment within the Parish and the majority of residents need to travel for work.
 - c. There are limited services in the village (two pubs, takeaway, Baker, village shop and primary school), therefore all residents need to travel for essential services.

Ardingly Parish is not a sustainable location due to the above constraints and it is not economically feasible to make it sustainable due to the location and nature of the road infrastructure that serves the village.

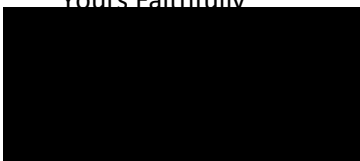
2. NPPF chapter 15 – para 170 requires planning policies and decisions to protect and enhance valued landscapes. AONB land has the highest protection (NPPF ch 15 para 172) regards to these issues. The inclusion of SA25 in the DPD shows that MSDC are not consistent with national policy and they have not demonstrated any exceptional requirement or local need for this departure.
3. NPPF chapter 15 – para 172
 - a. MSDC demonstrated during the first consultation that there is no exceptional need for allowing a major development on AONB land
 - b. The Sustainability Appraisal shows there are alternative sites outside of the AONB that could be developed to meet the district need.
 - c. A development on this site will have a detrimental effect on the environment, through light pollution and changing a greenfield site with good quality agricultural land into a brownfield site; the landscape will be irreversibly changed for the worse with high density housing changing the village aspect for good and the recreational opportunities will be lost for future generations.

As detailed above the current form of SA25 is a major development in the normal sense of the word and by including this SA in the DPD there is a clear departure from national policy without any justification.

What needs to change

To ensure that the DPD is sound SA25 should be removed entirely from the DPD.

Yours Faithfully



Jeremy James

On behalf of myself, Rachel James (spouse), Sasha James  Sophie James 

877

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 877

Response Ref: Reg19/877/1

Respondent: Mr P Kelly

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
23rd September 2020

Planning Policy
MSDC
Oaklands
Haywards Heath
RH16 1SS

Dear Sirs,

Response to Site Allocation Plan, SA 25 - SEAS Showground, Ardingly

I wrote about my concerns about the above proposed development last November. This letter reiterates my concerns, now that I have seen the revised and reduced planning application.

I remain concerned that the the proposal as it stands is for too many houses. Ardingly has had at least 50 (fifty) new dwellings built in the last ten years. The community has absorbed this increase, even though it is very high in proportion to the number of dwellings already in the village.

The proposed development of 70 houses is still too large. My feelings in favour and against development are outlined below (largely repeated from my letter of November last year).

In favour:

- Ardingly as a village could sustain a limited amount of new housing. This could benefit the community **if** it made it possible for more families to move in, as it would make the **village school more sustainable**, and provide **more custom for the shops** and other services in the village.
- It would help the village **if** provision was made for **more playground space** for the primary school, **more and better-sited parking** for the school and **a new site for the scout hut**.

Against:

The proposed development of 70 homes is still too large. My concerns are as follows:

- **Traffic:** we are already choked with traffic, especially at morning and evening rush hour and school pick-up and drop-off times. The High Street is frequently very difficult to get through, which contributes significantly to air pollution. While many vehicles from the new development might go north to Turners Hill, many would probably also go south through the village towards Haywards Heath. (One of the reasons for permitting the development of Monks Meadow [Standgrove Field] by the college was that the traffic would not go through the centre of the village, because it would go southwards – it is naïve to think that some traffic from the showground development would not go south through the High Street and College/ Lindfield Roads.) We already have a major problem with the high frequency and excess speed of traffic. Currently **no effective measures** have been put in place **to calm traffic** and **reduce its speed** (indeed I am writing this a few days after one resident's car parked on College Road was written off and another's badly damaged in the early hours of the morning).
- **Foul waste drainage:** I believe that the waste treatment system for the village, sited below the south end of the village, is not capable of coping with the extra load of big events at the showground. I suspect that the addition of 70 homes would put the system under too much pressure. As it is, residents on the High Street, College Road and Lodgelands (in particular) have to put up with extra water treatment lorries making their way to and from the treatment works at certain times.
- **Public transport:** currently public transport provision is limited, which makes it difficult for individuals and families who are unable to run a car to get to Haywards Heath or Crawley. A more frequent bus service would be needed if we had more affordable housing.
- **SEAS's Reason for development:** I have heard that the South of England Agricultural Society's plan is to raise money for the building of an events arena. If that is the case we will, I expect, find even more traffic channelled through the village, with the attendant noise and air pollution which goes with it. However much of a hole the SEAS might

be in financially it seems extraordinary a society dedicated to the countryside, its inhabitants and the environment should be prepared to go down the route of damaging the community in which it is situated.

Conclusion:

I believe that a limited development of, say, **30 homes (maximum 40)** on a section of the show ground site **contiguous with the current recreation ground** would, on balance, be beneficial to the community, as long as **at least 25%** were made available at **affordable** rents to people with historic links to the community, or people on low incomes from outside, and extra provision made for the primary school – see above under 'in favour'.

More than that would have a detrimental effect on the infrastructure of the village and the quality of life of people living on the main through routes.

Yours sincerely,
Philip Kelly

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 887

Response Ref: Reg19/887/1

Respondent: Mr G Bills

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Gareth Bills
Address	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25, Land West of Selsfield Road, Ardingly.
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound

Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD

I object the proposal and believe it to be unsound.

The amount of properties (70) is in my opinion far too great for the area. Ardingly is unable to support the current amount of traffic that it faces. Ardingly is already heavily used by the commuters of Mid Sussex and suffers considerable amounts of traffic. The pinch points on the High Street often cause traffic to come to a standstill at peak times causing excess pollution. The road infrastructure both in the village and surrounding lanes struggles to cope with the large amount of traffic travelling through them. To add another 70 dwellings would increase the traffic to unmanageable levels.

The development is in an area of outstanding natural beauty and is outside of the villages built up area. The site also borders a conservation area and would have a significant impact on the local flora and fauna.

There are no health care facilities in the village to support another 70 homes putting increased pressure on the already oversubscribed health services in the surrounding area.

The village has a local shop, bakers and a takeaway but no facilities to accommodate another 70 houses. All residents would need a car or to use public transport to reach a supermarket or convenience store.

Public transport links to and from the village are not sufficient with no direct rail link and a bus service that does not operate to cater for commuters, any commuters would potentially have to commute by car.

In recent years a number of properties have been built including a development of near 40 homes (Standgrove Fields). A recent pocket of homes that were built remained unoccupied for a long period and are now rentals proving that the demand is not there for a large number of homes.

In a recent neighbourhood plan it was determined that Ardingly would need to supply approximately 30 houses, MSDC required 73 houses from Ardingly. 53 properties have already been completed or committed.

I do not believe there is a localised demand for social housing as a large majority of the social housing on my development in Ardingly is occupied by people who are not originally from the local area. The local housing requirements have already been met through recent new developments.

Funding from my development (Standgrove field) is still yet to be spent on improving the local infrastructure etc and is tied up in red tape.

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.

The area of outstanding natural beauty will suffer if the proposal goes ahead and will cause irreversible damage.

I would consider another large reduction of properties to be the only way to make the proposal compliant and sound. I believe that even with a smaller number of houses the road network, public transport links, health care facilities and shopping facilities would need a vast amount of improvement. This amount of improvement would be too much of an impact to the local area.

I would urge the planning inspector to carry out an investigation into the current impact that traffic through Ardingly has on the local community and their health before considering the proposal.

If you wish to provide further documentation to support your response, you can upload it here	
If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	No, I do not wish to participate at the oral examination
Please notify me when-The Plan has been submitted for Examination	yes
Please notify me when-The publication of the recommendations from the Examination	yes
Please notify me when-The Site Allocations DPD is adopted	yes
Date	27/09/2020

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 946

Response Ref: Reg19/946/1

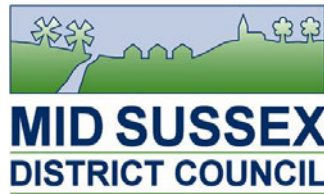
Respondent: Mr & Mrs R & R Browne

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x



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

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Richard"/>
Last Name	<input type="text" value="Browne"/>
Job Title (where relevant)	<input type="text"/>
Organisation (where relevant)	<input type="text"/>
Respondent Ref. No. (if known)	<input type="text"/>
On behalf of (where relevant)	<input type="text" value="Mr & Mrs R J and R A Browne"/>
Address Line 1	<input type="text" value="██████"/>
Line 2	<input type="text" value="██████████"/>
Line 3	<input type="text" value="██████"/>
Line 4	<input type="text" value="████████████████████"/>
Post Code	<input type="text" value="██████"/>
Telephone Number	<input type="text" value="████████"/>
E-mail Address	<input type="text" value="██████████████████"/>



Information will only be used by Mid Sussex District Council and its employees in accordance with the Data Protection Act 1998. Mid Sussex District Council will not supply information to any other organisation or individual except to the extent permitted by the Data Protection Act and which is required or permitted by law in carrying out any of its proper functions.

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:

Richard and Rita Browne

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

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.

I believe the DPD is unsound as my understanding is that the proposal for 70 houses on the Ardingly Showground site is increase of 15% of the total dwellings in the village and is in excess of the current outstanding requirement of 20+ houses for the parish.
Currently there is a major traffic congestion problem on the B2028 particularly South bound through the village, any development would cause this to worsen and therefore the over-supply make this even worse..

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.

If the housing allocation were reduced to 25 houses the traffic problem would be reduced but not eliminated.

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:

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: R Browne

Date:

21st September 2020

Thank you for taking time to respond to this consultation

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 968

Response Ref: Reg19/968/1

Respondent: Mrs J Lewis

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Janice Lewis
Address	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25, Land West of Selsfield Road, Ardingly
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound
Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	<p>The SA25 makes the DPD Unsound because:</p> <ol style="list-style-type: none"> 1. It has not been positively prepared in line with the Neighbourhood Plan under which 53 houses have already been built or are committed to being built, thus a further 70 houses is well over the requirement for a further 22 to complete our quota. This already fulfils any local need and alters the size of the village. 2. It constitutes a major development in an AONB and will dramatically alter the character of the village and surrounding area, in appearance and the generation of traffic on an already busy B road through the High Street. This is not in line with DP 12 'Protection and Enhancement of the Countryside' which seeks to 'minimise' and 'preventing development which does not need to be there' 3. There is no justification for the number of houses in SA25 in terms of need, which was already identified in the Ardingly Neighbourhood Plan. As per NPPF -15, there is therefore no justification for a Major development on AONB land without local justification, so this is unsound. 4. It is not effective either, as the Land Classification of the site as DP 12 require the nature and quality of the land to be considered for sustainability purposes. 5. There is no public interest to this development and therefore it does not fulfil the requirements for any exemption to conserving and enhancing the natural environment in NPPF -15 Para 172. Therefore it should be rejected. 6. It is clear that the proposed SA25 is a major development for Ardingly and that the addition of a further
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.	<p>The Site Allocations DPD SA25, should be limited to the additional number of houses (22) in line with the already agreed Ardingly Neighbourhood Plan and not turned into the Major development proposed. Also it should be in line with NFFP- 19 regarding the provision of sustainable transport. At present the B road through the village is dominated by through traffic, traffic to the major school Ardingly College, the South of England Showground, the National Trust's Wakehurst Place and Hanson Ardingly Works, which are all in the parish and render it a particularly busy road. A dedicated cycle route into Haywards Heath, for example would be an example.</p>
If you wish to provide further documentation to support your response, you can upload it here	

If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	No, I do not wish to participate at the oral examination
--	--

Please notify me when-The Plan has been submitted for Examination	yes
--	-----

Please notify me when-The publication of the recommendations from the Examination	yes
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Date	28/09/2020
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Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 975

Response Ref: Reg19/975/1

Respondent: Mr J Rich

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	John Rich
Address	[REDACTED]
Phone	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	Yes
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound

Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD

SA 25 is unsound because it is disingenuous, bordering dishonest, in its endeavour to achieve positivity.

Objective: "...which conserves and enhances the landscape character of High Weald AONB...." . It fails in this regard because it takes an area of open space in quasi agricultural use and proposes dense residential development.

UDP: It cannot "positively address existing... open space" when it proposes to allow a large piece of it to be developed.

AONB: It cannot "conserve and enhance the landscape" while at the same time proposing its development. It can merely mitigate damaging effects.

Social and Community: It proposes to engage with the Local Planning Authority, presumably Ardingly Parish Council, rather than itself (MSDC) whilst having encouraged the former to prepare a Neighbourhood Plan (completed March 2015) which it choses to reject by proposing this site.

Biodiversity and Green Infrastructure: Landscape features and conservation of wildlife cannot be achieved by dense residential development. The best that can be achieved is mitigation. To suggest a gain in biodiversity overall flies in the face of any possible reality unless cats, dogs and domestic pets are added to the list. Likewise with plant species.

Highways and Access: To "enhance the existiing network.." whilst overlooking existing traffic problems in Ardingly is again disingenuous. Traffic is constantly, throughout the day, reduced to single lane in High Street through on street parking. Tailbacks can extend North to the Showground Red Car Park entrance frequently. Likewise to the South, tailbacks can extend to College Road and beyond. College Road suffers similarly, being reduced to single lane through on street parking from Ardingly College east to the village. At peak school times this road is yet further congested in both directions with tailbacks to High Street in the East and Copyhold Lane to the West.

Street Lane is mainly single lane from Oaklands to College Road at all times.

Basically there is insufficient residents parking in the village even now as identified in the Neighbourhood Plan.

Ardingly Neighbourhood plan was prepared in the years leading up to 2015. For traffic statistics it relied on data reported 2001. In the South East the AVERAGE number of cars per household was reported as being 1.4 in 2017/18 by Statistica.com. racfoundation.org report that the number of households (all of UK) with 2 or more cars had risen to 58% in 2017 . From this it could reasonably be expected that this development could give rise to an additional 100 cars or more in the village, yet SA25 makes no effort address this issue.

Justified: In view of the over "positivity" emphasised in SA25 one has to question if it is justified. It is not. The site is in an AONB and nothing in SA25 enhances or protects this.

The Objectively Assessed Need for Mid Sussex was 16,390 houses which included a 20% buffer. At 1.4.2020 it had achieved 15,110. The SADP identifies 1,764 house which therefore gives rise to an excess of 484 i.e 38% oversupply, to which could reasonably be added a good part of the buffer. Inclusion therefore of SA25 at the proposed density is not justified.

Effective: The plan "must be...flexible... to deal with changed circumstances". Circumstances have changed and probably long term. Covid 19 has changed the economic outlook for the UK with some dramatic impacts on the local area covered by SADP. In particular Gatwick Airport is to lose BA and employment prospects in the Crawley area and beyond have deteriorated significantly even before one takes into account the long term implication for air travel and the tourist industry. In view of this the excess provision under SADP is unjustified.

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.

One must recognise that the South of England Agricultural Society (SEAS) has itself been very seriously financially affected by Covid 19. In any event, nationally agricultural shows have proved to suffer increasingly from on line shopping and the viability of many is in question. The Royal Agricultural Show at Stoneleigh is a case in point. If SEAS fails and becomes financially unviable, a vacant site with limited alternative uses is left. A profitable sale of the site would offer some life support to SEAS.

A much reduced plan for SA25 of maximum 30 houses, more in line with the Ardingly Neighbourhood Plan should be more acceptable and would mitigate some of the worst effects envisaged by SA25 as presently proposed. It is essential that traffic and parking issues are directly addressed, given that the existing situation is already unacceptable and is only made worse by what is proposed.

If you wish to provide further documentation to support your response, you can upload it here

If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination

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

Date

27/09/2020

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 988

Response Ref: Reg19/988/2

Respondent: Mr D Reeves

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? ✓

Name	David Reeves
Address	<div></div>
Email	<div></div>
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound

Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD

It is illegal because

1. When the land was transferred to SEAS ownership c1967 it was to be used consistent with the SEAS Charter and if not then restrictive covenants require it to be returned to Agricultural use
2. SEAS is a registered charity and it's Charter does not allow for property development
3. The original planning approvals for the construction of the Showground in the 1960s required that no other development would be approved to the north of the Recreation ground
4. Construction directly to the north the Recreation Ground knowingly introduces danger to property and persons as a consequence of cricket balls and footballs and is thus in contravention of Health and Safety legislation. Mitigation to this danger would either constrain the villagers from enjoying their sporting pastimes that have been carried out for over 100 years or would require unsightly and costly to maintain high fencing.
5. It contravenes the ANOB visual impact requirements because the western end of the proposed development sits on a high ridge plateau 120m AOD making it very visible from all points of the compass.
6. The development significantly exceeds the DPD requirement for only 22 further new houses in the parish of Ardingly
7. The village is poorly served by public transport leaving private vehicles the only means for many of the residents. There is little employment in the village as it is, so probably all of the residents will need to commute in their own transport each day and also for any 'social and domestic pleasure' as Insurers would put it. Traffic at commuter times especially is high with Ardingly College day pupils and Hanson trucks from the yard by the old station, another 70 homes would cause greater delay travelling through the village with resulting extra pollution and increased danger to pedestrians and cyclists. Pupils of Oathall Community College have to cross the High Street each day to get the bus which is difficult and dangerous enough as it is, especially in the dark winters
8. Local secondary schools are at bursting point with little room for more pupils
9. The Haywards Heath Sixth Form College has recently re-opened in September 2020 but demand will soon exceed supply if previous years are anything to go by
10. Houses in Ardingly are not selling, some have been on market for over a year and many taken off unsold, also many were left unsold in last large development at Monksfield for many months. Most recent build behind the old garage in College Road sold at a very slow pace. Therefore, demand for new housing in the village certainly does not warrant 70 new homes nor anywhere near that number
11. Local infrastructure is at its limit
12. Local Doctors' surgeries are full and it is very difficult to get an appointment also the Princess Royal Hospital is full to bursting
13. Demand for water will increase at a time when the local reservoir that supplies large parts of the county gets low every summer, not just hot ones with this year seeing the lowest level since I moved to the village in 1983 and probably since it was constructed in the mid 1970s
14. Further strain will be put on the sewage system and rubbish disposal.
15. The recreation ground could not be enlarged

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.

There can be no compliance with points 1, 2 and 3 above without legal recourse to change covenants, the SEAS Charter and previous planning agreements

There can be no compliance with points 1, 2 and 3 above without legal recourse to change covenants, the SEAS Charter and previous planning agreements

The best idea would be to simply cancel the whole application, then there will no legal complications

If you wish to provide further documentation to support your response, you can upload it here

If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination

Yes, I wish to participate at the oral examination

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

I have lived in the village for 37 years and through my past involvements with various village organisations, I have certain amount of local knowledge that can benefit the enquiry

Date

28/09/2020

Name	David Reeves
Job title	Retired
Address	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Sustainability Appraisal
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound

Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD

SA25 is illegal because it is not in compliance with the Council's Statement of Community Involvement and not consistent with the National Planning Policy Framework

The Council's Statement of Community Involvement key contacts list was last updated October 2011 and does not include the Ardingly Village Club, the umbrella organisation for assisting in Ardingly village community activities.

Inconsistency with the National Planning Policy Framework as it does not provide for the delivery of sustainable development (section 15) and in particular departs from AONB policy. The Landscape and Visual Appraisal report prepared by Huskisson Brown on behalf of the developers is flawed and inaccurate. It makes statements where there is evidence to the contrary and makes references that are patently wrong. It works backwards from the SA25 policy to make conclusions consistent with that policy. Some examples are

Para 2.11 - to provide a permeable layout and seek to enhance connectivity of the site with Ardingly Village ; The fact is that the site sits on a high ridge that is isolated from the village.

Para 2.18 refers to the East of England Showground; This is obviously a cut and paste exercise and not a unique study of the site in question

Para 2.25 states that the land is used for overflow parking but otherwise has an informal recreational use. It should say that the west of the site is used for overflow parking and that the east of the site is fallow ground used for general visitor and village recreational use.

Para 2.28 describes the site as being on a plateau at 120m AOD with slight fall to the south west. It fails to draw the obvious conclusion that this makes any development on the plateau to be visible from all points of the compass.

Para 2.29 says that the B2028 is a ridge top road running through the village but fails to draw the conclusion that this makes any development on the plateau to be visible when passing

Para 2.40 says that there is open access land in the vicinity of the site but fails to mention that the east end of the site is immediately north of the recreational ground.

Para 2.45 mentions views across the countryside but fails to say that any development when viewed from the recreational ground will be totally obliterated by a development to the north of the recreation ground.

Para 2.51 describes a faulted landform of clays, sands and soft sandstone. It fails to draw conclusions as how this affects drainage. It is known that the cricket table and football pitch suffered worsening drainage when the SEAS made a bund from spoil in the 1960s. Further disturbances of the fallow land to the north of the recreation ground will have unknown consequences.

Para 2.57 states that land management guidelines are to avoid skyline development. Well the proposed development does exactly that

Para 2.60 confirms that the proposed development sits on a plateau

Para 2.64 refers to a non-existent school playing field. Another inaccurate cut and paste

Para 2.84 states that the flatness of the site and the artificial bund make it inconsistent with the High Weald characteristics. This is disputable as the land is integral to the High Weald.

Para 2.87 is totally wrong. The site is visible from all around.

Para 2.95 correctly calls for a visual impact assessment. However, this must be before a scheme proposal comes forward and after.

Para 3.6 The conclusions drawn here that the baseline and visual considerations identified in the report support residential development are most definitely one-eyed. How?

Para 3.10 bullets 12, 13 and 14 are matters that should be followed up and determined before planning approvals are given. Ditto para 3.13.

Para 4.4 has some lovely words but fails to mention 'how'

Para 7.2 mentions gaps. Hapstead and Ardingly settlements have been mentioned in the report but the proposed development would also link Ardingly to Little London. Do the same arguments apply?

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.

Simply to cancel the whole application, then there will no legal complications

If you wish to provide further documentation to support your response, you can upload it here

If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination

Yes, I wish to participate at the oral examination

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

To observe and give my support to other villagers of the same opinion and aim.

Please notify me when-The Plan has been submitted for Examination

yes

Please notify me when-The publication of the recommendations from the Examination

yes

Please notify me when-The Site Allocations DPD is adopted

yes

Date

28/09/2020

1001

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1001

Response Ref: Reg19/1001/1

Respondent: Ms F Rocks

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

FIONA ROCKS

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

26 September 2020

Dear Sirs,

As an Ardingly resident I would like to object to the Draft Site Allocation Development Plan Document (DPD). I am writing about the site SA25, land West of Selsfield Road, Ardingly.

I believe that this site has been incorrectly put forward without justification or explanation by MSDC.

I do not think that MSDC can say this is not a major development within an AONB.

I also do not think that the DPD meets the test of “soundness” that has been set out in the NPPF, the national Planning Framework.

I will try to put forward some points that show this is not a sound or legal proposal.

1) Positively Prepared NOT SOUND

Justification NOT SOUND

There has been a total over allocation of dwelling on this site. According to the Sustainability Appraisal report 2018 Table 3

Ardingly was required to take 16 dwellings not the 70 that are in this proposal.

The proposed planning in SA25 would increase the village housing by 15% and the overall housing area in the village by 18% that must be thought of as a Major development.

In the District Plan Chapter 1 Para 1.4 it refers to the inclusion of parish councils in the preparation and delivery of housing saying that it is vital that there is local influence over and where and what development happens.

With this in view the Parish Council did a survey in which 89% of villagers wanted less than 70 houses and over 40% wanted no housing at all on this site. At no time have our District Councilors consulted with villagers on this subject. I realize that this document was on line but I do not think it reaches the public in any significant way.

As a village we have contributed 53 houses in the planning period up to October 2019. The inclusion of SA25 goes far beyond the numbers in the Adopted Neighborhood Plan, which set out the local need for housing after extensive research.

DP12. Enhancement and protection of the countryside. The District Plan clear states “with respect to the countryside the primary objective is to secure its protection by minimizing the amount of land taken for development and preventing development that does not need to be there”.

AONB also states that building of housing on AONB land should be the last resort after ALL other options have been considered. I do not feel this has been the case of SA25.

As stated in NPPF5 planning policies should reflect local need that clearly has not been taken to account with SA25.

2) Effective NOT SOUND

The DPD does not show how strategy, vision or objectives can or will be delivered.

As a village we are being “dumped on’ as an easy option. The appalling lack of infrastructure in Ardingly, we have just lost our post office and the bakery is currently trying to move location, we have no doctors and the fact we have a very poor bus service, terrible traffic problems have NOT been taken into consideration. We are unable to widen roads or provide alternative routes for the inevitable increase of traffic if SA25 goes ahead.

SA 25 is land that was donated to the South of England Agricultural Society to be used for agriculture and has been land to grass since then. It was given AONB status to protect it as an area of outstanding natural beauty. It is clear that such land should only be built on if all other avenues are exhausted and if there was a local need. Neither of these criteria are the case.

The DPD has provided a buffer of 484 houses excess to need so the houses on SA 25 are not needed locally or in the wider area.

3) Consistent with National Policy NOT SOUND

NPPF 9 Very limited Public Transportation is available which is not in line with this policy, which promotes sustainable transport.

NPPF 5 Para 172 Conserving and enhancing the natural environment. It states that planning permission should be refused for a major development other than exceptional circumstances and local need. This application is an increase in size to our village of 18% in area and 15% in houses, which must be considered Major. As already stated there is no local need for these houses.

In conclusion I strongly feel that the DPD is not legally compliant in its current form. I do not believe that the DPD meets the test of “soundness” against any of the following: positively Prepared, Justified, effective or consistent with national Policy that was set out in the NPPF.

SA25 should be removed from this document,

One final comment in closing I have found it extremely difficult to ensure in writing this letter that I cover all the points in the form you require. I have the benefit of having previously served on the planning committee of Ardingly Parish Council (plus having a Masters degree!!!) so I have some experience in these matters but have found this nearly impossible to complete. There should be an easier way for concerned residents to submit their views. I appreciate there is an on line form but I found it equally complex.

This process should be more transparent and assessable to all .

Yours Faithfully,

Fiona Rocks.

.3

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1014

Response Ref: Reg19/1014/1

Respondent: C Fleming

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

1. Has SA25 been legally prepared?

If a major development in an ANOB without exceptional grounds is illegal, then SA25 as proposed is illegal. The assertion contained in Site Allocations Development Plan Document - Major Development in the High Weald ANOB Topic Paper that SA25 is not a major development is incorrect.

To state that a development 70 dwellings and an 18% increase in the built-up area of Ardingly is not a major development is to ignore the context of its location. It might not be major in a small or mid sized town, but in a mid sized village in the HWANOB it is a major development.

The Topic Paper comments on a series of objectives from G1 to OQ4 which seek to show how SA25 will address these various objectives and then concludes that SA25 is not a major development. The comments abound with “may be” and “should” terminology suggesting there is no legally binding obligation to these objectives. If the recent development of Stangrove field is a guide, most of these will not materialise and so are invalid and cannot be considered in concluding SA25 is not a major development.

It is misleading to suggest that the SA25 site is a car park. In fact, it is open green field space which, on a few occasions each year, is used as an overflow car park.

Conclusion: SA25 is a major development in the HWANOB green space and so SA25 has not been legally prepared.

2. Is the DPD Sound

2.1 Was it positively prepared?

On the face of it, the DPD would seem to meet MSDC housing needs up to 2031. In fact it exceeds the outstanding need by some 40% or by nearly 500 houses.

Ardingly has committed to or completed 53 of the 73 houses MSDC allocated to the village. Furthermore Ardingly is being expected to provide substantially more additional houses than any other mid size village in the DPD area.

Also, it is unclear how 70 houses in a village with minimal employment opportunities and inadequate public transport will help meet local employment needs, unless the occupiers are sufficiently well paid to have independent transport. SA25 fails to address the transport needs of the occupants of affordable housing.

So, it may be positively prepared under the narrow definition used by MSDC, but it is by no means well prepared given other factors that should be taken into account.

2.2 Is it justified?

The nearby village of Balcombe has a main line railway station, providing public transport to employment centres in Haywards Heath, Burgess Hill, Crawley, Brighton and London. Furthermore Balcombe has better direct access to the M23 than, say, Ardingly or West Hoathly. Yet there is no provision for additional housing in this considerably more appropriate location. Thus the DPD fails to allocate housing to the most appropriate sites and so cannot be considered justified.

Without specific details of the measures MSDC will implement to mitigate the additional impacts on Ardingly's arising from limited public transport, traffic congestion, parking needs, GP access, increased pollution and noise, biodiversity, etc., MSDC cannot demonstrate that SA25 is a sustainable development. Comforting assurances based on "may be" and "should" need to be converted into specific measures that will be conditions of any planning approval. Until this is done SA25 cannot be considered sustainable and therefore, is not yet justified.

The DPD does not give details of the replacement location for overflow parking for the South of England Show Ground. If SA25 is approved as proposed, where will 5 Ha of overflow parking be located? How is the loss of 5 Ha of overflow parking sustainable?

2.3 Is it consistent with national policy?

As the DPD fails to provide a clear and specific strategy for sustainable housing development on land covered by SA25, it cannot be considered to be consistent with national policy.

3. Suggested Changes

SA25 should be modified by confining the development to between 30 and 40 dwellings on that part of the site north of the Rec and adjacent to the Selsfield Road. It would then not be a major development in the HWANOB and would afford considerably greater scope to achieve sustainability. The sense of open space that is critical to protecting the ANOB would be maintained by having open spatial continuity from the Rec across the western portion of the site to the countryside to the west.

The plan should be modified by, or the Inspector should prescribe, inclusion of specific mitigating measures to cover:

- increased traffic congestion within the village and its environs
- the problem that has arisen at Stangrove field where College Road is being used as overflow parking, thereby increasing congestion and pollution within Ardingly
- the present infrequent and sometimes unreliable public transport which, unless addressed, could result in village residents being excluded by excess demand
- lack of affordable housing for people now resident in Ardingly
- planting of at least 1 Ha of native woodland in the western triangle of the site to provide wildlife habitat, increase biodiversity and enhance the western conservation area centred on St. Peter's church
- alternative overflow parking at the South of England Showground
- measures to reduce noise from the South of England Showground

These measures should be detailed and, where possible, quantified. The DPD should specify that they will be conditions apply to any planning approval for development of no more than 40 houses on the eastern portion of the SA25 site. Failure to do this in the DPD stage risks a repeat of the inadequate planning control that occurred with development of Stangrove field.

C Fleming

[REDACTED]
[REDACTED]
[REDACTED]

1015

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1015

Response Ref: Reg19/1015/1

Respondent: Ms E Fleming

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Elizabeth Fleming
Address	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound
Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	<p>As this proposal is a major development in an ANOB it is legally unsound and inconsistent with national planning policy.</p> <p>There is a failure to demonstrate sustainability and cannot be considered to be positively prepared nor effective.</p>
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.	<p>30 houses set on land to the north of the recreation ground would fulfil Ardingly\'s outstanding commitment for housing and would not constitute a major development.</p> <p>SA25 should include protection of existing green and natural spaces. Demonstrate how biodiversity will be protected and further developed.</p>
If you wish to provide further documentation to support your response, you can upload it here	
If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	No, I do not wish to participate at the oral examination
Please notify me when-The Plan has been submitted for Examination	yes
Please notify me when-The publication of the recommendations from the Examination	yes
Date	28/09/2020

1029

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1029

Response Ref: Reg19/1029/1

Respondent: Ms E Cairns

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Elizabeth Cairns
Respondent ref. number	SA25
Address	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound
Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	The site is in an ANOB and as a major development with the amount of proposed dwellings is not within legal guidelines.
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.	<p>A much smaller development would be acceptable at some level.</p> <p>Commitment to traffic control and limit of further pollution must be addressed clearly.</p> <p>Current green space and biodiversity must be clearly protected.</p>
If you wish to provide further documentation to support your response, you can upload it here	
If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	No, I do not wish to participate at the oral examination
Please notify me when-The Plan has been submitted for Examination	yes
Please notify me when-The publication of the recommendations from the Examination	yes
Please notify me when-The Site Allocations DPD is adopted	yes
Date	28/09/2020

1071

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1071

Response Ref: Reg19/1071/1

Respondent: Ms M Meldrum

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

September 28, 2020

Sent by Email to: LDFconsultation@midsussex.gov.uk

REFERENCE: Site Allocations DPD; SA25 Land west of Selsfield Road, Ardingly

To whom it may concern,

I wish to register my concern that the Site Allocations DPD as it pertains to SA25 is NOT SOUND. I outline below my rationale based on the criteria set out as tests for soundness. What I find most disappointing is that the motivations behind the support for SA25 are purely for financial gain for an organisation which has no connection with the village other than its location, and yet this will have permanent impact on the village and our surrounding natural environment. Within clause 2 of the 1988 legal agreement between the South of England Agricultural Society and Mid Sussex District Council it clearly states what the land was to be used for. There was no mention of selling the land for development purposes.

In fact it is clearly stated in clause 8: 'If for a reason other than a national emergency the Society shall cease to hold its shows on the Show Ground all car parks buildings structures or other erections and ancillary works (except as mentioned in sub-clause (b) hereof shall be removed and any accesses made after August 2nd 1967 shall be closed and the whole of the Show Ground except as aforesaid shall be reinstated to its former conditions so as to be fit for immediate agricultural use to the satisfaction of the Minister of Agriculture Fisheries and Food within twelve months (or such other period as may be agreed) after the service of a notice by the Council upon the Society requiring the Society so to do.' Clearly this land was intended by all to be preserved as land supporting agriculture and preserving the countryside. It was never intended to be developed at such a scale. The proposed Development will lead to the suburbanisation of this rural village.

1. SA25 is not positively prepared.

To be positively prepared it requires meeting the housing needs of our village. These needs were identified within the Ardingly Neighbourhood plan as approximately 30 new houses. These were delivered within the development of Monks Meadow, 37 new build houses, and the village has gone further to provide a total of 53 toward the Mid Sussex District Housing Allocation. An additional 70 houses are not required by our village. This will offer quite the opposite effect of decreasing our available green spaces, increasing traffic on rural roads and increasing light and air pollution.

2. SA25 is not justified.

The proposed site is fully within the High Weald Area of Outstanding Natural Beauty. It completely contravenes The High Weald AONB Management Plan as set out in Policy DP16. Moreover, it directly borders the conservation area with a grade1 listed ancient village church and grade 2 listed houses. The Mid Sussex Design Guide states, 'The relationship of dwellings to the landscape is important within village settlements with views to the open countryside and trees an importance feature and densities generally reducing towards the settlement edge.' This guidance has also been ignored.

According to NPPF – 15 for there to be a development in an AONB there needs to be no other available lesser land and it needs to be in exceptional circumstances. The proposed development is neither of these. In fact, it is merely contributing to an already planned over supply of housing for Mid Sussex.

NPPF – 15 also states that Conserving and enhancing the natural environment Para 172 states, “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.” In this instance, given the over-supply, there are no “exceptional circumstances” and therefore the development is not in line with NPPF – 15.

3. SA25 is not effective

To be effective, the development needs to be deliverable. The infrastructure of Ardingly is not sufficient to support another 70 households. There is already not sufficient parking throughout the village and the traffic would become disruptive to our rural village. There is a limited bus service and no bicycle paths so it would not support these additional households.

4. SA25 is not consistent with National Policy

According to NPPF - 15. Conserving and enhancing the natural environment para 170 requires planning policies and decisions to contribute to and enhance the natural and local environment. There is no local economic benefit that outweighs the development of open space and versatile agricultural land. Again, there is no reason to consider such a large scale development within an AONB.

To make the development of SA25 sound, I believe it should not be part of a housing development, but a part of a development to create a new parkland and natural space. During the Covid-19 lock down there was dramatic increase in visitation to the area of the Showground. People needed a place to walk which had firm paths to accommodate prams, mobility scooters, elderly who were uncertain of their footing, children learning to ride a bike and the land where this development is being proposed was where they came to find it. Wildlife would also benefit from allowing this area to be slightly more developed into a lovely park for people to get outside.

I do hope this provides sufficient input to help get SA25 removed from the DPD.

Please notify me when the plan has been submitted for examination and when the publication of the final recommendation from the examination occur.

Thank you for your consideration.

Kind regards,



Margaret Meldrum

1076

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1076

Response Ref: Reg19/1076/1

Respondent: Mr W Meldrum

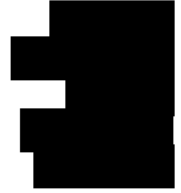
Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Will Meldrum



Mid Sussex District Council
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

28 September 2020

Sent by email to: LDFconsultation@midsussex.gov.uk

Dear Sir / Madam

To Whom It May Concern

REFERENCE: Site Allocations DPD; SA25 Land west of Selsfield Road, Ardingly

I am writing to respond to the Site Allocations Development Plan Document Regulation 19 Consultation with regards to Site Allocation 25, The Land west of the Selsfield Road, Ardingly (SA25).

I have reviewed the documents in detail and would like to **OBJECT** to the proposal on the grounds that it is **NOT SOUND**. The reasons for my objection are as follows:

The allocation of SA25 is **NOT SOUND AS IT IS NOT JUSTIFIED** as it is not an appropriate site:

Traffic. Ardingly is a small village with a narrow high street that always has parked cars running down its length. It is often difficult to drive up and down it as cars have to wait at either end to wait until it is safe to proceed. Adding 70 houses to the north of the high street will only increase the traffic running through the village as the majority of the residents will be driving towards Haywards Heath to go to the train station, supermarkets, schools, doctors, hospital, garages etc. 70 houses will increase the amount of traffic by an estimated

500 movements a day, taking into consideration a likely number of cars per house of two. As such, this proposal does not support NPPF 9, paras 103 and 108 that seek to promote sustainable transport.

Infrastructure. More broadly Ardingly has weak infrastructure for such a large set of additional houses. As key examples (i) the sewage works are not big enough for the village and regularly have to have sewage taken away in tankers to operate properly (ii) there is only a sporadic bus service (iii) we have few shops – and the post office we did have has recently closed down (iv) there is no doctor's surgery.

The allocation is NOT POSITIVELY PREPARED as it is not required in order to meet the housing needs of Mid-Sussex up to 2031:

Neighbourhood Plan. I worked hard on our Neighbourhood Plan which was approved by Mid-Sussex District Council – one of the first villages in Mid-Sussex to do so. The plan was voted on by our parishioners and approved. It covered the period from 2013 to 2031.

As part of the plan we agreed to take approximately 30 houses – in line with what Mid-Sussex had asked. In the event we immediately delivered 37 homes as part of Monk's Meadow and an additional 16 homes as part of windfall development. In summary we have over delivered on our Neighbourhood Plan – this development is therefore not required by the village. In any event, we understand the Mid-Sussex plans already include an over supply of houses for their plan, in which case this development is simply not required by Mid-Sussex either. NPPF 5 para 77 makes clear the need for development outside of the built-up area in order to deliver a sufficient supply of homes – in this case, this is not true and therefore does not align with the NPPF.

The allocation of SA25 is NOT CONSISTENT WITH NATIONAL POLICY as the development is not sustainable:

Area of Outstanding Natural Beauty. The land in question is in the Area of Outstanding Natural Beauty and is outside the built-up area. I understand that there is much discussion on whether the development would be considered “major” but as yet AONB does not agree with the Mid-Sussex designation. Given there is much evidence against Mid-Sussex, e.g. various legal opinions including by James Maurici in 2011 and 2015, I can only conclude that this is a major development and as such this development proposal is not sound. In any event this proposal does not support NPPF 15, paras 170 and 172 that seek to conserve and enhance the natural environment.

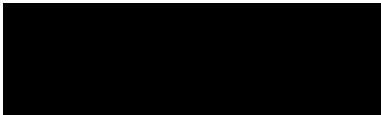
Separately in our Neighbourhood Plan, we clearly laid out Policy ARD 19 which specifically is at odds with the development proposal being put forward on a number of counts (e.g. increase in noise; adherence to the original agreement; the special character, appearance and landscape setting is enhanced).

Original agreement. The original agreement with the showground – and the one that was given to Ardingly villagers when the showground was set up – was that if the land was no

longer needed for the South of England Agricultural Society, it should return to agricultural land. This application is a breach of this agreement that has been the foundation of the Showground for many years. Further, the Showground is moving further away from its founding agreement and now is developing more non-agriculture based events, some which are in clear breach of its agreement with mid-Sussex (e.g. music festivals).

Thank you for considering this feedback.

Yours faithfully



Will Meldrum

1088

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1088

Response Ref: Reg19/1088/1

Respondent: Mrs S Simpson

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: Sheri Simpson [REDACTED]
Sent: 26 September 2020 15:44
To: ldfconsultation
Subject: SA25 Land to west of Selsfield Road, Ardingly

I am writing to OBJECT to the inclusion of the above site for proposed development of 70 houses for the following reasons, as they make the proposal UNSOUND.

1. The land is situated on a high ridge which would make any development highly visible from all directions around the village. It is also located within the High Weald AONB and adjoins a conservation area.
2. The site lies outside of the built up area boundary of the village and would set a precedent for further development outside the built up area in future.
3. The size of the development must be considered 'major' relative to the size of the current number of dwellings that make up the village. It also considerably exceeds the number of new house allocation required for the village.
4. The argument that it will support businesses in the village is weak. We have two tailors, a dive shop, a Chinese takeaway, a cafe, bakery, and a post office which is about to close. 50% of these businesses are can hardly be considered supportive of daily living. The bus service is extremely poor, necessitating travel by car to Hayward's Heath or Lindfield for daily shopping needs and post office services.

For the above reasons I consider the proposal to be totally UNSOUND.

S Simpson (Mrs)

Sent from my iPad

1090

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1090

Response Ref: Reg19/1090/1

Respondent: Ms K Surgeoner

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Katherine Surgeoner



27 September 2020

Dear Sirs

Formal Representation on the Submission Draft Site Allocation Development Plan Document

I am writing in order to make a formal representation on the Submission Draft Site Allocations Development Plan Document (“**DPD**”). My representations concern SA25, Land West of Selsfield Road, Ardingly. I am an Ardingly resident as you will note from my address at the top of this letter.

I should be grateful if this letter could be passed to the Planning Inspector who will be examining the DPD.

I will address two issues in this letter. First, whether the DPD is legally compliant. Secondly, whether the DPD meets the test of ‘soundness’ set out in the National Planning Policy Framework 2019 (“**NPPF**”). I do not believe that SA25 is legally compliant nor that it meets the test of soundness. I therefore believe that SA25 should be removed from the DPD. To take these points in turn.

Issue 1: Is the DPD Legally Compliant?

Has Mid Sussex District Council (“MSDC”) ensured consistency with the NPPF?

1. NPPF 2 ‘Achieving Sustainable Development’ Para’s 12 – 14 provide that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making, and where a planning application conflicts with an up to date development plan (including any neighbourhood plans) **permission should not usually be granted**. SA25 breaches this provision of the NPPF, and paragraph 14 of the same.
2. NPPF 5 ‘Delivering a Sufficient Supply of Homes’. Para 77 provides that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.
3. NPPF 9 ‘Promoting Sustainable Transport’. Para 103 provides that development should be focused on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes. SA25 cannot do this. Public transport is abysmal. A previous planning application for Butcher’s Field in Ardingly was thrown out as public transport was rated as ‘poor’ even on MSDC’s criteria. It has not improved. It is not possible to provide efficient and sustainable transport networks. The road which would feed into SA25 is narrow, congested and dangerous.

4. NPPF 15 'Conserving and Enhancing the Natural Environment'. Para 172 states that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty ("AONB") which have the **highest status of protection**. Planning permission should be refused for major development other than in exceptional circumstances. Whether or not a development is defined as 'major' will obviously be a source of contention in relation to SA25. However, the point in issue is actually a very simple one. It is unarguable that AONB land, in particular that which borders a conservation area with a Grade 1 listed church and Grade 2 listed properties within sight, has the highest status of protection. Such land should only be built on if all other avenues have been exhausted and there is local need or need by Mid-Sussex in order to meet its housing requirement. The DPD provides for a buffer in terms of an over-supply of homes of 484. There is no need for the 70 houses in SA25 either locally or by Mid-Sussex. There is no justification for building on this land, in contravention of not only s.172 of the NPPF but a multiplicity of other parts of the NPPF, the Ardingly Neighbourhood Plan ("ANP"), Mid Sussex District Plans and MSDC's Statement of Community Involvement.
5. **MSDC has not ensured either consistency or compliance in relation to SA25 with the NPPF on any of the above bases.**

MSDC's Statement of Community Involvement dated March 2019 ("SCI")

1. P. 19 of the SCI provides that in relation to 'Neighbourhood Planning' the Government's preference is that the location and nature of additional development should be identified through Neighbourhood Plans which reflect the localism agenda. Ardingly prepared its own Neighbourhood Plan in 2014, within which it identified a **local need for 30 additional houses** and directed all future development to the built-up area of the village. See Policy ARD2: A Spatial Plan for the Parish
2. SA25 rides roughshod over the ANP, in clear contravention of the SCI.

Legal Agreement

1. A Legal Agreement between the South of England Agricultural Society ("**the Society**") and Mid Sussex District Council dated 15 November 1998 provided, inter alia, that the Society shall use the Showground in accordance with the provisions of the Schedule **but for no other purposes whatsoever** (emphasis added).
2. No sale of land for development is permitted. Ardingly residents have a legitimate expectation that Mid Sussex will abide by and enforce the terms of this Agreement.

Mid Sussex District Plans

1. Policy DP6: Settlement Hierarchy provides that the amount of development should take into account local development needs (there are none). Moreover, outside built-up area boundaries the primary objective of the District Plan is to secure its protection by minimising the amount of land take for development and preventing development that does not need to be there.
2. Policy DP15: New Homes in the Countryside. Such homes should only be permitted where special justification exists. SA25 does not meet any of the criteria laid down therein.

3. Policy DP16: High Weald Area of Outstanding Natural Beauty. Development within the AONB area will only be permitted where it conserves or enhances natural beauty. SA25 cannot do this.
4. **Allowing SA25 to go forward as part of the DPD would contravene the District Plan as the site is not allocated in the ANP, it is not contiguous with an existing built up settlement and it cannot be demonstrated to be sustainable.**

Issue 2: Does the DPD meet the Test of 'Soundness' set out in the NPPF?

Is it:

Positively Prepared – Not Sound

1. I do not believe that the inclusion of SA25 is necessary in order to meet the housing needs of Mid-Sussex up to 2031. The ANP identified a **local need** for approximately 30 houses. As of 1 October 2019 53 had been committed or completed. MSDC has not followed its own strategy in line with the District Plan (Ch.1, para 1.4) wherein they state it is the desire of the District Council to involve Towns and Parish Councils.
2. The District Plan 2014-31 has an over-supply of 484 houses, some 38%. DP12 provides: "The primary objective of the District Plan with respect to the countryside is to secure its protection by minimising the amount of land taken for development and preventing development that does not need to be there. SA25 provides for development in an area of outstanding natural beauty, which borders a conservation area with a Grade 1 ancient church and Grade 2 buildings adjoining it. Such land has the highest status of protection. The site is not needed either locally or by Mid-Sussex in order to meet its housing requirement.
3. The Major Development in the High Weald AONB Topic Paper prepared for the Scrutiny Committee in March 2020 ("**AONB Topic Paper**") considers the question of determining 'major development' (NPPF footnote 55). It emphasises the need (Objective G3) for the site to encourage sustainable transport. This is impossible. The roads are very narrow, congested and highly dangerous for cyclists. Cars frequently mount the pavements in order to pass each other. Public transport is very poor with one bus every 2 hours. The nearest village with shops, a Post Office and Doctor's is 3 miles away by road without pavements. The only way to move around is by car. Selsfield Road to the east of the site is a historic lane and Street Lane to the south of the site is a historic drove route. They cannot take any more traffic.
4. Whilst MSDC do not regard SA25 as 'major development' this is not a view shared by CPRE Sussex or the local community. The AONB unit have not opined on this question. They have simply agreed the methodology which is set out in the Topic Paper (about which see more below). The proposal to build 70 houses on SA25 will increase the size of the village by 18% in the built-up area of Ardingly and lead to an increase of 15% in the number of dwellings. This is clearly 'major' within the ordinary meaning of the word. Tunbridge Wells put a threshold of a 5% increase to define 'major' development.

Justified – Not Sound

1. I do not believe that SA25 should form part of the DPD. It is not an appropriate site for inclusion. There is no local need for housing. MSDC has undertaken and published a Sustainability Appraisal Report ("SAR") dated July 2020. In order to assess the contribution the DPD will make towards achieving sustainable development, a range of sustainability objectives have been developed. These objectives are based on the three strands of sustainability: Social, Environmental and Economic. The Sustainability Appraisal must test the policies and potential sites within the Site Allocations DPD against the sustainability objectives. SA25 fails on each of these factors.
2. *Social factors*: there is no local housing need. The nearest Doctor is 3.5 miles away - a 10 minute drive or 1.5 hour walk with no pavements. SA25 would not provide any improvement to health facilities. There are no leisure facilities within walking distance. The nearest secondary school is a bus ride away (3.5 miles). The only local shop is a bakery. The local Post Office shut down in September 2020. All other facilities are a minimum of 3.5 miles away. Proceeding with SA25 in the DPD would lead to the loss of a community facility, namely land which is heavily used by local people to dog walk and to play and cycle with children.
3. *Economic factors*: SA25 will not lead to any discernible benefits for Ardingly village. There is no village centre to support and there is virtually no employment in Ardingly. The working population (pre-covid) almost exclusively commuted.
4. *Environmental factors*: there are Grade 1 and Grade 2 listed buildings on Street Lane, itself a conservation area which will border SA25. The stated aim of reducing road congestion and pollution levels by improving travel choice, and reducing the need for travel by car, thereby reducing the level of greenhouse gases from private cars and their impact on climate change cannot be met. Quite the reverse. None of SA25 will be within a 5 minute walk (approx. 400m) of a bus stop with frequent service (3+ an hour). None will be within a 15 minute walk (approx. 1.2km) of a train station. Further development will inevitably lead to further private car use and further pollution as public transport in Ardingly is abysmal. Previous planning applications have been rejected on this basis alone.
5. The AONB Topic Paper (p.44 in relation to SA25) proceeds on the basis that 'there may be local employment opportunities and opportunities to provide suitable housing for land-based workers, such as space to store vehicles and materials, as well as provision of affordable housing. The site may help to foster rural community life by the provision of a replacement scout hut. It also states that there may be opportunities to promote the land-based economy and related rural life through the adjacent South of England Showground. The Topic Paper stipulates that the site should seek opportunities to contribute to local communities and community services and posits that the site may help support rural services and amenities such as bus services, village shops and the post office through the additional people that the housing will bring.
6. The reality is that SA25 is being sold to provide funds to build an Indoor Arena for concerts. There is no local infrastructure to support this.
7. **The Sustainability criteria have not been met under any of the headings of social, economic or environmental.**

Effective – Not Sound

1. The DPD does not show how the vision, objectives and strategy will be delivered.
2. The traffic in Ardingly is appalling and will significantly worsen should SA25 go ahead, as it will inevitably bring more cars and pollution to this small rural village. This cannot be mitigated. No roads can be widened or alternative routes provided. There is a total lack of infrastructure.
3. SA25 comprises of agricultural land. Building on it would breach NPPF 15 para 170 and DP12: Protection and Enhancement of the Countryside which both require the nature and quality of land to be considered.

Consistent with National Policy – Not Sound

1. The DPD with SA25 forming part of it is not consistent with either national or local policy. There is no local economic benefit that can outweigh the development of agricultural land which is of community benefit and which, as AONB designated land, enjoys the highest level of legal protection.
2. It does not enable the delivery of sustainable development and there is no opportunity to promote sustainable transport. The only safe method of transport is vehicular. There is no local evidence to justify a departure from national policy in this regard.

Conclusion

I do not believe that the DPD is legally compliant in its current form. I do not believe that the DPD meets the test of 'soundness' set out in the NPPF. It fails on a multiplicity of bases and SA25 (which comprises of land with the highest status of protection) must be removed from it.

Yours faithfully

Katherine Surgeoner

1091

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1091

Response Ref: Reg19/1091/1

Respondent: Mr S Surgeoner

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? ✓

Name	Stephen Surgeoner
Job title	
Address	
Email	
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound

Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD

LEGALLY COMPLIANT

1. The Site Allocations DPD in its current form is not legally compliant. It breaches national planning guidance in relation to a multiplicity of the provisions of the NPPF.
2. SA25 conflicts with the Ardingly Neighbourhood Plan which set out the local need for housing (which has been satisfied) and directed that future development should be within the built up area of the village. This breaches NPPF2 and MSDC's Statement of Community Involvement which provides that additional development should be identified through Neighbourhood Plans.
3. SA25 also breaches NPPF5. It does nothing to promote sustainable transport as per the requirement in NPPF9.
4. SA25 also breaches NPPF15, Para 172. The proposed site is in an area of outstanding natural beauty and borders the conservation area with a Grade 1 church and Grade 2 buildings within sight of it. The proposal constitutes 'major' development within the normal meaning of the word. This should not be permitted where there is no local need for housing. The site is of community benefit to local families and dog walkers.
5. SA25 also breaches the Mid Sussex District Plans (DP6, 15 and 16).
6. The site falls under the terms of a Legal Agreement between MSDC and the South of England Agricultural Society dated 15 November 1998. This does not envisage or allow for the development of this land. The residents of Ardingly have a legitimate expectation that MSDC will abide by and enforce the terms of this Agreement.

SOUNDNESS

The DPD is not sound on any of the four tests:

A. POSITIVELY PREPARED - NOT SOUND

There is no local housing need and MSDC have an over-supply of 448 homes in the DPD.

Allowing SA25 to go forward would lead to an increase in the size of the village of 18% in the built up area. This is clearly 'major' development within the normal meaning of the word - and as per legal precedent and the approach taken to this issue by Tunbridge Wells District Council who I understand set a bar of a 5% increase to denote 'major' development.

There is no justification for building on AONB land which is of community benefit in contravention of NPPF15 para 172.

SA 25 cannot encourage sustainable transport. Public transport in Ardingly is abysmal and the Butcher's Field site was thrown out on this basis alone.

B. JUSTIFIED - NOT SOUND

The Sustainability Appraisal Report prepared by MSDC tests SA25 against the sustainability objectives of social, economic and environmental. SA25 fails on each of these objectives.

There is no local housing need. There are no local health facilities - the nearest Doctor is 3.5 miles away. There is only one shop. Developing SA25 would lead to the loss of land used for community benefit. There is very little local employment. The environmental impact of more cars will necessarily lead to an increase in pollution and traffic.

C. EFFECTIVE - NOT SOUND

Building on agricultural land breaches para 170 of the NPPF and DP12. SA25 cannot deliver on the vision, objectives and strategy for housing supply in Mid Sussex. Its inclusion in the DPD runs contrary to the Ardingly Neighbourhood Plan.

Ardingly Parish Council undertook a survey of local residents in relation to SA25 and 89% objected to it.

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.	The necessary change is the removal of SA25 from the Site Allocations DPD.
If you wish to provide further documentation to support your response, you can upload it here	
If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	Yes, I wish to participate at the oral examination
If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary	<p>It is important that the issues identified in this response and others are fully argued before the Planning Inspector.</p> <p>The proposal to build on this land (SA25) will lead to the sub-urbanisation of this rural village and adversely affect its inhabitants for generations.</p>
Please notify me when-The Plan has been submitted for Examination	yes
Please notify me when-The publication of the recommendations from the Examination	yes
Please notify me when-The Site Allocations DPD is adopted	yes
Date	28/09/2020

1098

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1098

Response Ref: Reg19/1098/1

Respondent: Mrs H Smith

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Dear Sir,

LDF Consultation.

My name is Hilary Smith and I am commenting on site:

DPD SA25 Land West of Selsfield Road, Ardingly.

This site falls within the AONB, it is outside the village boundary and borders a conservation area. It is an open space used by the community and it is also used as an overspill car park.

Although this proposed development is for 70 houses, it is not considered a major development. Mid Sussex council have developed their own assessment and mythology for defining their proposed developments within the AONB.

- My first concern is the size of the proposed development and how MSDC defines the word major.

NPPF -172 - *'The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.'*

In MSDC **Major Development in the High Weald AONB Topic Paper they quote ' Mr Fisher's 2017 legal opinion that 'The assessment will be carried out at the plan-making stage (Site Allocations DPD)' 'Such an assessment is matter of planning judgement to be decided by the decision maker and needs to take into account the common sense meaning of the word 'major' and the local context.'**

This development is certainly a large development for this AONB village to assimilate. In the past this would have been considered a major development due to it size, the impact it would have on all aspects of the surrounding environment and infrastructure. These impacts have not changed only the definitions. Does the MSDC interpretations of the NPPF facilitate more pressure on our AONB which degrades their need to protect and enhance? An estate of this size would certainly add to the *urbanisation* of this protected area.

MSDC interpretation of major was negative in relation to this development and their guide lines stated that *'development within these designated areas should be limited'* A development of this size should never have been proposed for this site in the first place. This is unjustified.

- My second concern is the lack of consistent applications of the DPD effecting the AONB

Ardingly is a category 3 medium size, AONB Village. The the Ardingly Local Plan identified app 30 houses which were needed for local need, Mid Sussex then demanded 73 houses to be built in Ardingly. 53 have already been built or have been committed. This leaves a shortfall of 20 houses. Far less then the proposed development.

The size of this proposed development would substantially increase the built up area of the village from 10% to 18% and dwellings from 12% to 15%. It has been noted that many of the AONB villages have had no developments or very small developments. This shows an inconstancy in selecting sites, putting a greater weight and pressure on Ardingly as an AONB village.

There is no identifiable local need for a development of this size. This is unjustified.

- Further concerns about this proposed development site

DP21

'The NPPF requires that developments should not result in' "severe residual cumulative (transport) impacts."

Congestion along the High Street is problematic and all traffic travelling south will have to use this route. This cannot be mitigated against and was sighted as one of the reasons for having a development to the south of the village.

Parking in the village, due to its expansion, has become problematic.

This proposed development is not supported by a good public transport system and there has been no improvements despite a new housing development already built.

Ardingly and Haywards Heath is not safe to cycle and it would be difficult to make the two routes safer. This will be a high car dependent development.

DP17

We are in close proximity to Ashdown Forest, an SPA and SAC so any development will impact on this. We do not know what our air quality is during peak times of activity. We are a very busy village due to several large businesses and car dependent activities. It has been noticed, due to increased traffic movements, the air quality has deteriorated in the village. This does not appear to be monitored or of concern in the DP. This should be looked at before any large development is given the go ahead.

DP29

'Mid Sussex has a high quality environment and its residents value tranquillity and freedom from unpleasant noises, smells or light glare.'

This site will have a high exposure to noise during day time, at different times of the year, which would be difficult to mitigate against because of the activities of the neighbouring show ground.

Utilities

There is a Utility issue which needs to be addressed before the village expands any more. Our sewerage is taken out by tankers and expansion of the village will mean more tanker movement which greatly affects the south of the village. This needs to be resolved.

All these concerns question whether this site is sustainable as many of these issues cannot be mitigated against.

DPD site 25 does not meet many of their own DP criteria so therefore this development is unsound.

Kind Regards

Hilary Smith



1099

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1099

Response Ref: Reg19/1099/1

Respondent: Mr & Mrs B Gass

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

OBJECTION TO SA25, LAND WEST OF SELSFIELD ROAD, ARDINGLY
26/09/2020

Firstly, we do not understand the complex wording of the consultation form and what is required of us to object to the proposed development. We attended our Parish Council's Open Information Day, on 12/09/2020 to have the SA25 objection process explained to us. There was nobody there from the Parish Council that could explain the form adequately or the process of objection; therefore, we perceive the whole process to be fundamentally flawed.

It is woefully deficient of you for you to present a document that your council tax payers cannot understand. For instance, how can we say what impact this development will make to the village, if we do not know if the houses are going to be one, two, three, four or five bedroom houses? This would make a significant difference to the village, as it is not just the amount of houses, but the amount of people, vehicles, visitors' vehicles, deliveries, etc.

We are therefore unable to put the objection on the form and cannot understand the format you require. However, based on the information provided, please see our objections to the development below:

The allocation of the showground site makes the DPD unsound for the following reasons

a) Positively Prepared – Unsound.

The overall strategy of the plan to meet the housing needs of Mid-Sussex up to 2031 is unsound. Ardingly has already met the minimum allocation of 22 houses, set by MSDC District Plan 2014 – 2031. In fact, this has been surpassed, with 53 houses already committed/completed. There have also been several other small housing developments in the village. This is more than double the amount of housing required and has provided MSDC with a buffer in Ardingly. Why is MSDC insisting that Ardingly supply an extra 70 houses and not targeting other towns/villages or sites in the area, that are not in an AONB.

MSDC has incorrectly and without justification or explanation decided that SA25 is not a major development in the AONB. In fact there are at least two councils Tonbridge Wells and Devon that have ruled that a development in excess of 5% and 5,7% respectively is a major development and therefore set a president. We dispute this classification based on the size. This demonstrates that the inclusion of SA25 in its current form makes the DPD unsound. The proposed development has the potential to cause a significant impact on our small village.

The inclusion of SA25 on AONB land outside the built up area with an extra 70 homes goes far beyond the adopted Ardingly neighbourhood plan which set out a local need for approximately 30 homes which was delivered by a previous site allocation (Standgrove field) and windfall sites.

Dp12 protection and enhancement of countryside also states that the primary objective of the district plan with respect to the countryside is to secure its protection by minimising the amount of and taken for development and development on AONB. This is not being complied with and is therefore unsound.

We perceive this to be only the beginning of a long term strategy by MSDC and SEAS to overdevelop Ardingly and unfairly force the village to over-deliver houses with this development. We foresee that the whole of the showground is earmarked for housing development over the next few years, with no thought or concern for the people living in the village.

b) Justified – Unsound.

The plan should allocate the most appropriate sites. The site is totally unsuitable for development as it is an AONB and for all the reasons listed in this objection below.

c) Effective – Unsound.

The plan needs to be deliverable. The plan will not deliver any of the needs of the village, as it is an AONB and for all the reasons listed in this objection below.

d) Consistent with national policy – Unsound.

The plan is not consistent with policy as it singles out Ardingly which is an AONB where there are other more suitable sites elsewhere. Ardingly is an AONB and for all the reasons listed in this objection below.

Objections/Comments on MSDC 17 Criteria Rating

Part 1 – Planning Constraints

1 – AONB

We do not agree with your rating that the site will only have a Moderate Impact on the area. 70 new homes is a significant development and should be re-classified as Very Negative Impact. This would inevitably lead to more of the showground's land being developed in the future and the loss of more of the AONB.

Points 2 – 4

No Comment.

5 - Listed Buildings & 6 – Conservation Area

This is rated as Neutral Impact. We believe that this rating should be changed from Neutral Impact to Very Negative Impact.

The proposed site would have a significant impact on the conservation of the area. The area nearby St. Peter's Church (Grade 1 listed building) and the ancient route in Street Lane, would all become suburbanised.

7 – Archaeology & 8 – Landscape

See point 1 above.

9 - Trees/TPO

This has been rated as none.

Even though there may be no TPO or ancient trees on the site, there are, however, a number of very old trees on or within a few meters of the proposed site. These trees should be protected at all costs.

Part 2 – Deliverability Consideration

10 - Highways – Not Rated by MSDC

MSDC has not rated this item; we rate it as Very Negative Impact. Why was this not taken into account when selecting the showground as the MSDC ideal site in Ardingly? No mention is made of the traffic problems currently experienced on the High Street and College Road.

This is a massive bottleneck, due to the parked cars and volume of traffic, causing traffic to be reduced to one lane. This has already led to accidents, one of which I witnessed in College Road recently. These roads are constantly used as a thoroughfare for traffic, which is exacerbated, in the rush hour in early morning and late afternoon, causing large traffic jams. These roads are already too small for the volume of traffic and the addition of potentially 300 - 400 vehicles (new residents, visitors and deliveries) would be a disaster for the village. The current roads could not handle the extra volume of traffic! There is also concern about the safety of pedestrians, due to the increased traffic. There would also be a significant deterioration in the air quality for all those living in the village.

11 - Local Road/Access

We cannot agree with your rating of Positive Impact, this has to be Very Negative Impact. There is no clarity on whether the development will include Street Lane as entry and exit points. Street Lane is a very narrow lane and can only handle single lane traffic. We have already had several near misses along this lane, when a large vehicle is coming in the other direction, there is nowhere to go. As Street Lane nears the centre of the village, the situation deteriorates, due to amount of parked cars. There is also a severe parking problem in the village, with cars parked all over the place. The MSDC car park, opposite the bakers, is always full and it is virtually impossible to find parking there. The recent addition of five houses, built in Southdowns Place, has also added to the parking problem, as there is insufficient parking and these residents are already parking in the road outside the pub or wherever they can. Incidentally, the developer could not sell these houses and ended up renting them, so why does MSDC want to build more houses that no one will want to buy? Another area of concern is Balcombe Road, which runs from the village, past the reservoir, through to Haywards Heath. This is an extremely narrow, winding road, with no pavements, where it is only just possible for two cars to pass each other. This road is not suitable and cannot handle any extra traffic. We have been almost run off the road on several occasions when using this road to Balcombe. If the only entrance and exit to the proposed development is in Selsfield Road, then this will cause traffic congestion at this intersection, just before entering the village, as well as single lane traffic in Main Road, in the area of the Post Office, due to parked cars. An addition of 70 houses would mean bottlenecks that the local roads cannot handle. The intersection of Main Rd and Street Lane (three way) is very dangerous to motorists and pedestrians alike. A pedestrian in the village has to look in several directions before attempting to cross the road. The air quality in the village will be severely affected by the increase in the number of vehicles.

12 - Deliverability

This should be updated, as the site is not being marketed in 2019.

13 - Infrastructure

This is rated as Very Positive Impact; we have no idea what the wording “Developer Questionnaire-normal contributions apply” mean. We would have to have this wording explained to us further before we could comment.

Part Three – Sustainability/Access to Services

It must be noted that MSDC have made no comments whatsoever on this section. This is a very important section, but no effort has been made to validate the ratings

14 – Education

We do not agree with your rating of Very Positive Impact - we think this should be rated as Negative Impact. There is no secondary school and only one primary school in Ardingly. Anyone with older children would have to use a vehicle to take their children to school, which will increase daily car journeys through the village. Any increase in traffic would increase the danger to school children crossing the roads. The current school's facilities are inadequate for any extra children and would need development and extension. If the school is currently undersubscribed it shows that there is no need for a school in the village.

15 - Health

This has to be changed from Negative Impact to Very Negative Impact. There is no doctors' surgery in Ardingly; the nearest surgery is in Lindfield, which is considerably more than a 20 minute walk. There is no pavement for most of the way and anybody walking there would be taking their life into their hands. The buses are approximately every two hours and therefore, the only viable way to get to the doctors would be by car or taxi. Furthermore, doctors' surgeries in the area are already over prescribed and the addition of possibly 300 (conservative estimate) people would be impossible to accommodate.

16 - Services

Your report states that the services are Very Positive, this is ludicrous, it needs to be changed to a Very Negative Impact.

The only services currently in the village are:

Post Office – The Post Office has been sold and will close. It is unknown if the new owners will retain the shop or turn it into living accommodation.

Scuba shop – None or limited use to people in the village.

High end bakers – The bakers needs a new roof, which is a considerable cost and it is unknown if the bakery can afford to have this done. Therefore, there is no guarantee that this business is sustainable and will remain in Ardingly.

Small Café – This is mainly used by people outside the village.

Pub – There have been two pubs that have closed in recent years, the Avins Bridge and The Oak. With the current economic climate, it is unlikely that this business will survive in the long term.

Chinese restaurant - which is closing soon, owing to the owner retiring.

Hairdressers – Fairly well patronised.

The services are already insufficient for the village, at present; the nearest shopping and Post Office would be in Lindfield or Haywards Heath, both of which are a significant distance away. Neither of these is within walking distance and could only be reached by car, taxi or very poor bus service.

The nearest petrol station is in Haywards Heath.

The mobile library has been discontinued by MSDC, so the nearest library access would also be in Haywards Heath.

The nearest bank is in Haywards Heath - in fact, the nearest services that a normal family/person would require, would be in Haywards Heath and definitely not less than 10 minutes' walk, as stated by MSDC.

17 - Transport

Your report states that the transport is fair, of Neutral Impact. That is totally incorrect. In fact, it is very poor, and should be stated as Very Negative Impact. The only public transport in the area is the 272 bus, which runs approximately every two hours (this frequency decreases considerably in the evening) with NO service at all on Sunday (this definitely cannot be rated Fair). We have been informed by the operators that there is no chance of the bus services ever being improved even if the development is allowed to go ahead. There is no train station in Ardingly, the nearest train station is in Haywards Heath. In fact, it is almost impossible to live in the area without owning a car.

Conclusion

In conclusion, we strongly object to any development on the showground's in the AONB and do not support this development in any way whatsoever, based on the fact that Ardingly have already met and surpassed the required amount of housing required (22) in Ardingly between 2014 and 2031, with 53 houses already committed or completed. The proposed development of 70 houses would increase the size of the parish (compared to built up area) 18% in area and 15% in dwellings. Compared to the whole parish 10% in area and 12% in dwellings, which would suburbanise the area and destroy the village forever. The small village of Ardingly cannot handle any extra development of the proposed size, for the above reasons. We do not believe that there is any local need for a development of this size. As previously mentioned, five brand new houses were very recently constructed (Southdowns Place), which the developer could not sell and was forced to rent out, so, if this developer could not sell five houses, how is the developer proposing to sell 70 houses?

Empty Properties in Ardingly

There is absolutely no need for any more housing in Ardingly. There are already several empty properties in Ardingly that cannot be sold or rented.

- There is a two storey house in Church Road that has been empty for over two years.
- There is a two storey house (Horsewood House), on the B2028, which has been empty for over a year.
- There are four, two storey terraced cottages in Street Lane that were completely refurbished and put up for rent, shortly before Christmas 2019. These took approximately six months to let. They are now causing a traffic hazard with several cars parked in the lane, reducing the traffic flow to one lane.
- There have been five new two storey houses, built in Southdown Place, off of College Road, within the last year and the property developers have not been able to sell any of them. They had to resort to putting them up for rent. It took almost a year to let all of these properties.
- There is a property on the corner of College Road and Street Lane, which was on the market for over two years.
- Dwellings are being built on the site of the old Oak pub.
- The garages next door to the Oak have had plans approved for housing.
- Street Lane (opposite Holmans) Planning permission for housing has been applied for.

This demonstrates that there is no need for any further housing in Ardingly, as the current properties available cannot be sold or rented.

There is no justification to allocate a major development on AONB land where there is no local or regional need.

The Ardingly neighbourhood plan directs development to within the built up area and any built in the AONB is required to demonstrate how they conserve the AONB. This has not been done and therefore SA25 is unsound.

This would appear to be a SEAS driven initiative, in order to gain funds, which will not stop until the whole of the showground is developed. This would be an easy option for MSDC, as they can flood Ardingly with houses, which would be an unfair allocation of housing in the area.

Residents of Ardingly village should not be sacrificed so that SEAS can provide themselves with a long term sustainable future. SEAS have been silent on this issue and had little interaction with the villagers to inform us of their intentions.

The district plan is five years old and therefore out of date. The Showground's is not suitable for development and there are more suitable sites for smaller development (if we have to have more houses) that would have much less impact on the village. Therefore we need to have another planning assessment done.

Please note that we are pensioners and only have access to a printer and scanner in the MSDC library. These facilities are closed at present so we are unable to print, sign and scan this document to send.

Barry and Josephine Gass

[REDACTED]

[REDACTED]

[REDACTED]

Submitted by eMail to: LDFconsultation@midsussex.gov.uk

Submitted on: 26/09/2020

1105

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1105

Response Ref: Reg19/1105/1

Respondent: Mrs S Holley

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	S Holley
Address	[REDACTED]
Email	[REDACTED]
Name or Organisation	S Holley
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Sound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Sound
Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	<p>We consider the allocation of the site unsound due to being unjustified and/or ineffective. Specifically, the number of proposed dwellings is too great for the transport infrastructure in and through the village:-</p> <ol style="list-style-type: none"> 1. The High Street and Street Lane are too narrow for significantly increased traffic levels; <ul style="list-style-type: none"> • It will result in even more unsafe walking conditions for pedestrians (including school children), as the narrow roads mean that even more cars will mount the pavements. • It will result in even more vehicle congestion. 2. The public transport service for the village is inadequate, meaning that anyone living in the development will need to have vehicles, exacerbating the issues noted above. <p>Lastly, the identified site is on the Showground and this is currently used for parking for events at the Showground. A development cannot be allowed to go ahead if it will result in inadequate parking for events meaning that attendees then park in and around the village. This has in the past caused significant disruption for village inhabitants and this absolutely cannot happen again.</p> <p>We are not against a development of an appropriate size, as the village needs expansion in order to ensure the village school and shops remain viable, however the village cannot safely accommodate additional traffic without appropriate and serious consideration being given to pedestrian safety, vehicle congestion and adequate public transport.</p>
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.	<p>The site needs a significant reduction in dwellings to ensure that there are fewer vehicles needing to drive through the village, and fewer individuals needing to use an inadequate public transport service. Fewer dwellings also means that there will be space remaining for parking for Showground events.</p>
If you wish to provide further documentation to support your response, you can upload it here	

If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	No, I do not wish to participate at the oral examination
Please notify me when-The Plan has been submitted for Examination	yes
Please notify me when-The publication of the recommendations from the Examination	yes
Please notify me when-The Site Allocations DPD is adopted	yes
Date	25/09/2020

1109

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1109

Response Ref: Reg19/1109/1

Respondent: Mr D Smith

Organisation:

On Behalf Of: Family

Category: Resident

Appear at Examination? x

The Smith Family

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

27th September 2020

E-mail to: LDFconsultation@midsussex.gov.uk

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

Re: SA25 - Land to the West of Selsfield Road, Ardingly

Dear Sir / Madam,

We wish to collectively register our opinion that the current proposal for the development of 70 houses on the above land is **unsound**.

It cannot be refuted that the DPD has been positively prepared as it would undoubtedly make a major contribution to the level of housing development required by MSDC, and nationally. This presumes that the housing need for MSDC to 2031 is the sole consideration when judging whether a DPD has been positively prepared.

However, it is **not justified** as the proposed development is much too large for the village. Ardingly's residual requirement is 22 dwellings. How can it possibly be justified, therefore, to build 70 dwellings on a pristine, Greenfield site that is entirely within an AONB and adjacent to a rural village? It would appear that the number of planned dwellings has been decided solely for commercial reasons as the landowners need to maximise income, and the interests of Ardingly village and its community have been overlooked for this reason.

Furthermore, we are unable to understand how this development is not classified as 'Major' within an AONB, by MSDC. No doubt this will become apparent, later in the planning process.

The development in its current form would represent an increase in dwellings in Ardingly of over 13%, without any associated provision or plans for the alleviation of the problems it would bring. Most notably it will create more traffic and parking issues for the village, particularly in the already problematic and dangerous High Street area.

However, if we concede that Ardingly does still have to provide space for 22+ dwellings, we do agree that this site appears to be the most suitable available in the Parish. It is adjacent to a relatively large, open road and has logical and easy access to that road. It is adjacent to the

village and would not involve the compulsory purchase or demolition of any existing homes, nor the destruction of any woodland. It would be the least disruptive option of all sites in Ardingly. If it was reduced to a proportionate development of 25 to 30 dwellings, we would be in broad agreement with this.

We would also like to register that we cannot understand how it came to pass that Ardingly Parish Council approved this to be put forward at 70 dwellings, in June 2020, when some 89% of villagers declared that they did not view the reduction from 100 to 70 dwellings as being 'substantial enough': <http://www.ardingly.org/wp-content/uploads/2020/06/SA25-Survey-Results-Public.pdf>

Finally, please note that there is a concern among many villagers that this could merely be the first stage of developments on Ardingly showground, if the landowners are able to sell off parcels of land for development each time an injection of income is needed.

Signed (electronically) by all adult members of this household:

Duncan Smith

Duncan Smith
27th September 2020

Diane Smith

Diane Smith
27th September 2020

Joseph Smith

Joseph Smith
27th September 2020

1321

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1321

Response Ref: Reg19/1321/1

Respondent: Mrs J Sanders

Organisation:

On Behalf Of:

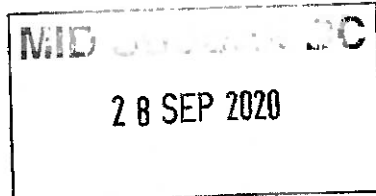
Category: Resident

Appear at Examination? x

26th September 2020

BY HAND

Planning Policy
Mid Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 6SS.



Dear Planning,

For what it's worth, I would like to comment on the inclusion of the South of England's Showground's red car park in the July 2020 Site Allocations DPD document recently published by Mid Sussex District Council. My comments are as follows:-

1. Merits. I appreciate the need for housing in this area, and understand MSDC's requirement to meet the demands of the Planning Inspector, who recently approved the District Plan. However, despite the welcome reduction, the proposed development of 70 houses for the village of Ardingly, is still oversized, excessive, and unsustainable. I suspect that the owner/developer would always have accepted 70 houses, and putting in for 100 at the outset was merely a pretty obvious tactic, in the hope that everyone would be taken in.
2. Car parking. The area to be developed will still detract greatly from the Showground's parking needs at peak times, and will inevitably increase the pressure on parking in and around the village during events. Over the years, there has been a big increase in the number of events held by the Showground, and it follows that if a large area of car park is removed, the parking will have to go somewhere else. This is especially so during wet weather, when people are reluctant to park anywhere on the Showground.



3. Housing need. As with many other developments in Mid Sussex, I am unclear as to what housing need will be satisfied by such an oversized development. The bulk of the housing will no doubt be 3, 4 and 5 bedroom executive housing, much sought after in Mid Sussex by already wealthy people who wish to cash in on city prices and move to the country. It is local people who need affordable housing, and although some may be provided, it is still a pretty token amount. It seems therefore that planning continues to be led simply by high land prices and the desire of landowner/developer profit.
4. Access. Any suggestion that access might go out onto Street Lane should be firmly resisted. This is a narrow, country lane, with a dangerous bend by the primary School, and the aim must surely be to keep as much traffic off this road as possible.
5. Transport and infrastructure. Access to and from the site will exclusively be by way of yet more car use, and will just add to the commuter pressure at Haywards Heath, which is already acknowledged as a mere dormitory town. There is a very limited bus service, and there are no safe cycle routes going either north or south from the village. Such car use will simply add to the already dangerous pinch points in the High Street. The nearest doctors' surgery is in Lindfield, which is already heavily oversubscribed. There have been recent examples where the Water Authority has not been able to cope with even existing demand, and residents had their supply cut off, with bottled water deliveries having to be made. In recent years, there has been a vast increase in private housing provision in this part of Mid Sussex, but with virtually zero infrastructure provision, apart from developer contributions, which rarely get translated into anything useful, and are often just eventually handed back unused. The District cannot simply keep building over its green and pleasant land, without any of these basic issues been thought through and addressed, or will that only be done when it's too late.
6. District Plan policies. The proposal breaches just about every DP policy in a Plan, which has only just been approved and made, e.g. development in the Countryside, effect on heritage assets, effect on the nearby conservation area, and most importantly, effects on the High Weald AONB. The idea that a



development of 70 houses could "conserve or enhance" these features is quite frankly ludicrous. It is like saying that a moustache would enhance the Mona Lisa. How is that much more modest proposals, including applications to build even one house in a large garden, often get turned down on these very grounds? If every policy can always just be claimed to be mitigated, then frankly, having a District Plan becomes a pointless exercise. Planning just becomes demand led. Even the new Planning White paper recognises the need for "*allocating land for development in the right places.*" A development of this size in Ardingly is demonstrably not in the right place.

7. Neighbourhood Plans. I am aware generally, of the failure of Neighbourhood Plans in Mid Sussex to influence planning decisions, but this proposal is not in the Ardingly Neighbourhood Plan, and certainly not to the extent of imposing 70 houses on the village. The pressure on the Council to provide the uplift required by the District Plan Planning Inspector should be spread evenly across neighbourhoods so far as possible, and in more appropriate areas. It remains unclear why other smaller, sustainable sites in other Parishes resulting from the recent call for sites, should have been so readily dismissed. It seems that the policy is to achieve the uplift across the fewest number of sites possible, and this is surely an unfair approach to take. The burden should be shared by all communities (albeit in line with the village/town hierarchy). Again, even the new Planning White Paper appears to respect the democracy of those communities that have worked hard to bring forward and make NPs.

In conclusion I would continue to suggest that a much smaller development (of say 30 houses) would be much more appropriate, and would help towards (but not mitigate) many of the above concerns. It would be more likely to command the support of local residents. It would still resolve the issue of the Showground's finances, which is of course the reason why the site has been put forward in the first place, but leave the rural character of the village (and the Showground) largely intact.

Yours sincerely,

Jan Sanders

Jan Sanders



1570

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1570

Response Ref: Reg19/1570/1

Respondent: Ms R Goulding

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

From: Rosemary Goulding [REDACTED]
Sent: 20 September 2020 15:12
To: ldfconsultation
Subject: SA25, Land west of Selsfield Road, Ardingly

With reference to the proposal for the development of SA25, Land west of Selsfield Road, Ardingly

The SA25 site is wholly within the Area of Outstanding Natural Beauty (AONB), it borders the Conservation Area and is outside of the built-up area of Ardingly village. Section 85 of the Countryside and Rights of Way Act requires local authorities to have regard to

“the purpose of conserving the natural beauty of AONB”
in making decisions that affect a designated area.

The MSDC Site Allocations DPD includes an oversupply of 455 dwellings. There are alternative locations for schemes outside the High Weald AONB and there are no exceptional circumstances in relation to the need for this particular development – it is not justified.

The residual requirement for housing as set out in the DPD for Ardingly (1 October 2019) is for 22 dwellings and the current SA25 proposal requires more than three times that amount. There is no local need for a development of this size, which would adversely affect the village and which would outweigh any perceived benefits of the scheme. It would represent an 18% increase in area and 15% in dwellings in the parish, it would negatively affect the character and the longer- term development of the village.

The current proposal for 70 dwellings is by any reasonable criteria a “major” development within the AONB. The decision maker should consider whether the proposed development has the potential to cause a significant adverse impact on the purposes for which the area has been designated or defined. The ordinary sense of the word ‘major’ is important and the decision maker should take a common-sense view.

The proposed development of this scale fails to take into account the impact on the existing village of Ardingly. Health services, all of which are located at a distance from the village, are already under significant strain in meeting the needs of local residents. An increased population of the size resulting from the SA25 proposal would adversely affect the availability of GP and clinic appointments, dental and hospital services.

The proposal also fails to take into consideration the impact of increased traffic in the village. Public transport is already poor with one limited bus route during the week and no Sunday service at all. The speed and volume of traffic currently experienced by residents on the High Street is already of great concern, without any pedestrian crossings to assist the elderly, mobility impaired or those with young children. Based on previous requests to better manage congestion, WSCC Highway’s Authority informed Ardingly Parish Council that Ardingly Village High Street is not suitable for traffic calming measures. Any suggestions that developers might subsequently make in planning proposals to mitigate the impact would be rejected and this should be taken into consideration in relation to this proposal, it is not effective.

Noise and pollution levels are significant; the potential large increase in private transport and delivery vehicles resulting from a development of this scale would have a very negative impact on the health and quality of life of residents in the village.

Overall, this proposed development is neither sound, effective nor justified and should be rejected. It would significantly adversely affect the village and outweigh any perceived benefits of the scheme.

Rosemary Goulding 20.09.2020
Resident of Ardingly Village

1571

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1571

Response Ref: Reg19/1571/1

Respondent: Mr C Goulding

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: Colin Goulding [REDACTED]
Sent: 20 September 2020 15:01
To: ldfconsultation
Cc: [REDACTED]
Subject: SA25 site development considerations

Importance: High

From
Colin Goulding
[REDACTED]

Planning constraints

Site is wholly within the Area of Outstanding Natural Beauty (AONB).
Site borders the Conservation area and is outside the built-up area.
Current land use is local open space and showground facility.

Deliverability

Access to this site will be difficult and potential dangerous.
With the potential an extra 210 cars, delivery vans etc. exiting and returning at least twice a day Ardingly high street will become untenable and based on recent Ashdown Forest testing pollution levels already exceed safe levels over a wider area than previously thought. Noise levels must also be considered.
Before any planning approval, an environmental impact study of current and future conditions should be done and published.
There is already extremely limited public transport in the village.
There is also no health provision near the village. Such provisions are almost full due to numerous other local developments already underway. For example, to get cancer treatment this involves daily trips to Brighton.

Housing requirement and community

Based on the MSDC plan only 22 homes are required in Ardingly to 2030. This ignores the 484 oversupply outside the AONB in the plan.
70 houses are 13% of the built-up area of the Village. Please note Ardingly is a village and this development by any normal stretch of the imagination is a major development.
Developers are required to provide allocated funds for developments of this nature. Any allocated funds if approved must be audited and spent on local needs and not the county.
There are unlikely to be exceptional circumstances in relation to the need for the development because there are alternative locations outside the High Weald AONB.
This plan is not positively prepared, justified, or effective.

Regards
Colin Goulding

1583

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1583

Response Ref: Reg19/1583/1

Respondent: Ms M Stinson

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Meriel Stinson
Address	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	Yes
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound
Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	<p>I object to SA25 on the basis it is unsound:</p> <p>I do not consider it is positively prepared as it fails to take into account:</p> <ul style="list-style-type: none"> - the nature of the village and disposition of the east/west/north/south axis that will be upset by SA25, - the damage that will be wrought to an area of outstanding natural beauty, - and the scale factors that should merit its consideration as a major development. <p>I do not consider it sound in its justification as there is already sufficient housing site allocation in the MSDC bank to meet its requirements for new housing - considering this as a further envelope for possible expansion flies in the face of local democracy;</p> <p>There is also no soundness to its proposed efficacy as the volume of housing will add to traffic congestion, noise and environmental damage locally without commensurate upside for anybody other than the developer and SEAS.</p> <p>There are gaping gaps in its soundness for meeting national planning policy guidance</p>
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.	<p>I query whether the soundness of justification can be rectified by anything other than a total withdrawal of SA25. If this housing allocation is not needed, as there is sufficient development proposed to meet housing requirements, then SA25 is not needed.</p> <p>If this is needed for the most this site could reasonably bear would be a max of 10 houses, the majority of which should be affordable homes offered as first priority to local families.</p> <p>This would reduce its impacts in size and scale to a point where it did not overbalance existing village layout nor render it necessary for consideration as a major development in an AONB</p>
If you wish to provide further documentation to support your response, you can upload it here	

If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination No, I do not wish to participate at the oral examination

Please notify me when-The Plan has been submitted for Examination yes

Please notify me when-The publication of the recommendations from the Examination yes

Please notify me when-The Site Allocations DPD is adopted yes

Date 21/09/2020

1630

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1630

Response Ref: Reg19/1630/1

Respondent: Mr H Garrood

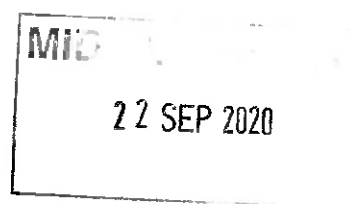
Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



11th September 2020

The Chief Planning Officer
Mid Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Dear Sir

Ref: MSDC Local Plan SA25 (Ardingly) Land west of Selsfield

I wish to formally object to Site SA25 of MSDC Local Plan for the following reasons:

Following the recent Government statements regarding changing planning law in England by Boris Johnson, Prime Minister and the subsequent document Planning for the Future which states that development would be restricted in protected zones. Protected would include Green Belt, SSSI's, AONB, National Parks (Conservation Areas) will be protected.

The site (DA25) of the Local Plan is contrary to the National Planning Policy Framework which Mid Sussex District Council state in the district plan that it " supports NPPF presumption in favour of sustainable development".

The underlying strands is that development must be socially sustainable, environmentally sustainable and economically sustainable. The village of Ardingly has only 2 retail shops (1 PO and village store) and (1 Bakery). But perhaps you consider One Hairdresser, One Chinese Takeaway and One Diving Enterprise socially beneficial to the community. The village has two Public houses with a cafe attached to one. The village has a Primary School plus nursery. It has a large independent private 11-18 school which includes boarders.

For Secondary Education busing is used. The village has no doctors surgery or medical facilities nor dentist. For pre and post natal facilities have to be found outside the village. For access to social services that too can be found outside the village. Therefore the village of Ardingly is NOT sustainable socially.

The proposed development is not environmentally sustainable. The High Street is in a Conservation Area and Local Plan Site 25 (area in question) is in an Area of Outstanding Natural Beauty (AONB). The High Street has 8,000 vehicle movements a day (2004 figures – that's 16 years ago) and no up-to-date figures are available.

The High Street is built on both sides providing a tunnel effect, plus cars are parked on one side.

In order to pass and re-pass vehicles have to stop at each end of the parked cars thus emitting Nitrogen Dioxide. People live in these properties, both sides of the High Street, and in some live very young children or people aged 65+. They are protected by EU law soon to be written into English Law. The MSDC has a duty to protect its citizens from pollution such as this (DP29). The European Convention on Human Rights Protocol Section 1 (Article 8) provides that "every natural or legal person is entitled to the peaceful enjoyment of his possessions".

Nitrogen Dioxide causes asthma in children and strokes and heart conditions in older people (read Heart Foundation leaflet). How many children or over 65's live in this area and remember that MSDC have a higher duty of care responsibility for children. I am also mindful of the consequences of a new inquest set for November or December 2020 into the death of Ella Kissi-Debrah. I am informed, as is Jerry Quinn MP, by the Chief Executive for MSDC that air quality testing is due to start in January 2021.

This proposed development should have access to employment opportunities within the area. There is an extremely poor bus service plus no rail service. It is interesting to note that of the three scoping sites in Ardingly two were identified as having very poor bus service by the Planning Office. One was not – site DA25. It is the same bus, same route. Was the planning officer being equitable – I think not. In fact this statement must be corrected before scrutiny by the Planning Inspector.

Employment in this day and age is 24/7 and as the bus provides 9 bus services Mon-Fri, 6 services on Saturday and none on Sunday access to employment can only be by car. The three major employers in Haywards Heath area are Supermarkets, The Princess Royal Hospital and MSDC. All three are operating 24/7. This development should provide employment access for all but MSDC are limiting this to those who can afford a road vehicle. This is a great indictment of the planning policy of MSDC and is certainly contrary to Government Policy. I consider that for these reasons MSDC should remove Ardingly site SA25 from the Local Plan and that Government should call this in for consideration. MSDC "need to achieve sustainable development" but the local economy is influenced by the car as local access to employment is by the car.

This proposed development is contrary to Mid Sussex District Council policies:

DP12 - Protection and Enhancement of the Countryside

DP16 - High Weald Area of Outstanding Natural Beauty

DP17 - The Ashdown Forest Buffer Zone

DP29 - Noise, Air and Light Pollution and

DP37 - Trees, Woodlands and Hedgerows

In addition, the sewer infrastructure of Ardingly: the scoping document of MSDC DA25 clearly states that attention must be given to the sewer infrastructure. The Ardingly sewer infrastructure was laid down in pre-1970s. The size of the sewer pipe used would be 225mm and if the sewer infrastructure was laid pre-1970s the sewer pipe would probably be an asbestos-cement pipe. If this is the case, it is known that the asbestos-cement sewer pipes are liable to breakdown and disintegrate from a chemical reaction with the waste water.

Moreover, the application submitted in the Local Plan does not contain:

- an environment impact assessment,
- an economic viability assessment

The Local Planning Authority must be mindful of the Town and Country Planning Act 1990 Section 70 (subsection 3) (1) has an effect

The proposed development access road onto the B2028. The proposed access road onto the B2028 Ardingly Road is very near the large repeater sign from 30mph to 40mph. Therefore traffic leaving the proposed site will meet accelerating traffic especially if turning right. For children going to school it will involve crossing heavy and speeding traffic. If people are accessing the road by bicycle the answer should be don't but then the signs on Beachy Head says don't jump but people do with fatal consequences. This proposed site will increase the propensity for accidents. MSDC, West Sussex CC (Highways) and the West Sussex Police (statutory consultee) need to be made aware of their duty of care to all other road users in this situation. It is also very easy for these groups to say we will monitor this situation. It is a fallacy

It is for the above reasons that MSDC Local Plan site DA25 should be removed from the Local Plan.

Yours sincerely

A black rectangular box containing a handwritten signature in dark ink. The signature appears to be 'Hayden Garrood'.

Hayden Garrood

1640

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1640

Response Ref: Reg19/1640/1

Respondent: Ms H Duncan

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	helen duncan
Address	[REDACTED]
Email	[REDACTED]
Name or Organisation	helen duncan
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound
Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	<p>SA25 - land west of Selsfield Road, Ardingly</p> <p>I object to the Site Allocations DPD in terms of unsustainability</p> <p>This small village does not have the resources to sustain more housing</p> <p>The High Street traffic flow through gets halted and jammed on a daily basis at present and cannot withstand further increase in traffic which would lead to further congestion and unsafety.</p> <p>Further large housing development would also seriously compromise and put untenable strain on water supplies. We are running out of water.</p> <p>The plan is not consistent with national Policy and does not enable delivery of sustainable development.</p> <p>Ardingly village does not at present have a village store for fruit, veg, meat, etc which would allow more residents to walk to shop rather than drive.</p> <p>More houses means more driving. More strain on water supply.</p>
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.	Reduce greatly the amount of housing allocated in the SA25 or cancel the proposal SA25
If you wish to provide further documentation to support your response, you can upload it here	
If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	No, I do not wish to participate at the oral examination
Please notify me when The Plan has been submitted for Examination	yes

1693

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1693

Response Ref: Reg19/1693/1

Respondent: Mr A Bridge

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

MI 100 JFX DC

23 SEP 2020

H.S.D.C.

Site SA 25

Dear Sirs,

I am writing to you
in response to your draft site
allocations development plan
document for Site S.A. 25.

In my opinion 70
houses on the site Adingy Showper
(Red cow park) is still too many
in the village to sustain. If
we do have to have a development
then 30-40 houses, I feel, would
be more appropriate.

One of the biggest impacts

on the village would be the
amount of extra traffic the
houses would create through
village, the High Street is
narrow & causes a "bottle-neck"
with amount of traffic passing
through.

Yours faithfully

1694

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1694

Response Ref: Reg19/1694/1


Respondent: Mr and Mrs R & J Planterose

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x



Planning Policy

Mid Sussex District Council

Oaklands Road

Haywards Heath RH16 1SS

23rd September 2020

Dear Sirs,

DPD Consultation and SA25 (Ardingly Showground)

I write to object to the inclusion of SA25 (Ardingly Show Ground development, land west of Selsfield Road, Ardingly) in the MSDC DPD plan. Alternatively if the site is to be developed, the number of new dwellings should be reduced from the 70 proposed.

There are many reasons why this development should not proceed and should be excluded from consideration at this stage.

Key among them are the following:

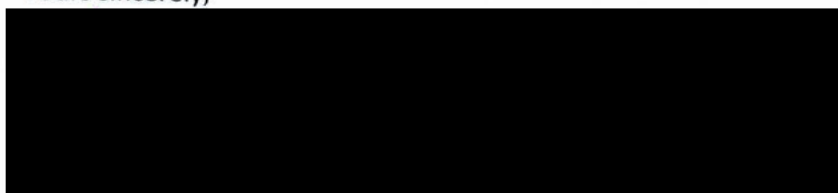
- The proposed development is unjustified. There is no housing need in the village. Following the Village and District Plans there is at most a residual need for only 22 dwellings in the village between now and 2031. Over 50 have been provided in the last 5 years, already an increase of more than 13 over the original Village Plan (See Policy ARD 3). The Mid-Sussex housing need is more than met by the other proposed sites;
- On any basis the proposed development is substantially disproportionate to the size of the existing village. It is wrong not to regard 70 houses as a Major Development in respect of an increase in built up area of 18% and in dwellings of 15%;
- The proposed development lies wholly within the High Weald AONB. Such AONBs exist, of course, precisely for the purpose of protecting our countryside from substantial development. There is a strong presumption against Major Development in an AONB and

justification needs to be high. Additionally the proposed development contravenes Mid-Sussex's own District Plan (DP16) in the following respects. The proposed development would:

- not conserve or enhance the natural beauty of the area, but rather do the precise opposite;
 - not enhance the setting of the AONB;
 - not conserve wildlife or cultural heritage;
 - not be of the type of small scale proposal contemplated as acceptable provided compatible with support of conservation and enhancement of natural beauty;
 - detract from the visual qualities and essential characteristics of the AONB;
 - affect adversely the views into and out of the AONB.
- The proposed development lies outside the present built-up area of the village and outside that proposed by the Village Plan (Policy Ard 2);
 - In the absence of effective public transport in the village, many households in the proposed development will have more than one car. The village roads, in particular the High Street, Selsfield Road and College Road, are already busy, and the proposed development will inevitably add to congestion.

For the above reasons, the proposed inclusion of this site in the DPD is unsound.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

Rowan Planterose

Julia Planterose

1792

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1792

Response Ref: Reg19/1792/3

Respondent: Ms J Edwards

Organisation: Sport England

On Behalf Of:

Category: Statutory Consultee

Appear at Examination? x

From: Jo Edwards <Jo.Edwards@sportengland.org>
Sent: 25 September 2020 10:28
To: ldfconsultation
Subject: Mid Sussex District Council Site Allocations DPD - Regulation 19 Consultation

Dear Sir / Madam,

Thank you for consulting Sport England on this DPD.

Sport England has the following comments:

SA16 St Wilfrid's Catholic Primary School, Burgess Hill

The Council's Playing Pitch Strategy (PPS) indicates a projected shortfall in junior pitches and therefore Sport England would expect that the playing field and pitches lost would need to be compensated for to at least equivalent quality and quantity in an appropriate location in accordance with NPPF paragraph 97 and Sport England's Playing Field Policy. Suggest that at the end of the Social and Community section after 'to the satisfaction of the Council and Sport England', *'in accordance with the NPPF and Sport England's Playing Field Policy'* is added.

SA20 Land to the south and west of Imberhorne Upper School, East Grinstead

The site allocation appears to clip part of the school playing field and part of one of the existing football pitches on the field. Clarification is requested tht the existing school provision will not be adversely affected or that any loss will be adequately mitigated in accordance with the NPPF paragraph 97 and Sport England's Playing Field Policy.

SA25 Land west of Selesfield Road, Ardingly

Urban Design Principles: it may be prudent to acknowledge presence of cricket pitch on adjoining playing field and any potential, albeit slight risk of ball strike to be considered in respect to housing layout, removal of existing bund and any boundary trees/ hedges.

Please do not hesitate to contact me if further clarification on any of these matters is required.

Yours Faithfully,

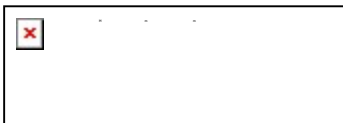
Jo Edwards
Planning Manager

T: 07826354343

M: 07826354343

F: 020 7273 1704

E: Jo.Edwards@sportengland.org





We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Louise Hartley](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Louise Hartley, Sport England's Data Protection Officer directly by emailing DPO@sportengland.org

1821

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1821

Response Ref: Reg19/1821/3

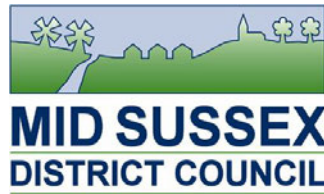
Respondent: Mr G Dixon

Organisation: Savills

On Behalf Of: Charterhouse Land - SA25

Category: Promoter

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/

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

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Guy"/>
Last Name	<input type="text" value="Dixon"/>
Job Title (where relevant)	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Savills"/>
Respondent Ref. No. (if known)	<input type="text"/>
On behalf of (where relevant)	<input type="text" value="Charterhouse Land"/>
Address Line 1	<input type="text" value="Mocatta House"/>
Line 2	<input type="text" value="Trafalgar Place"/>
Line 3	<input type="text" value="Brighton"/>
Line 4	<input type="text"/>
Post Code	<input type="text" value="BN1 4DU"/>
Telephone Number	<input type="text" value="01273 200098"/>
E-mail Address	<input type="text" value="gdixon@savills.com"/>



Information will only be used by Mid Sussex District Council and its employees in accordance with the Data Protection Act 1998. Mid Sussex District Council will not supply information to any other organisation or individual except to the extent permitted by the Data Protection Act and which is required or permitted by law in carrying out any of its proper functions.

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:

Savills

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

25

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

☒☐

(2) Justified

☐☒

(3) Effective

☒☐

(4) Consistent with national 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**.

Please see accompanying Representations

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.

Allocation SA25 is not soundly justified given the artificially reduced site boundary and the identified residual housing figures for Category 3 settlements not being appropriately met.

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.

We wish to see amendments to Policy SA25. Please see accompanying Representation for full details

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:

We are representing one of the draft allocations, and should therefore be able to address any comments in support or against the policies that affect it. Please see accompanying representations for full details

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:

24/09/2020

Thank you for taking time to respond to this consultation

Representations to the Site Allocations DPD

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
	Appendices	15
	Appendix 1.0 Proposed 100 Unit Scheme for Site SA25	16

1. 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.



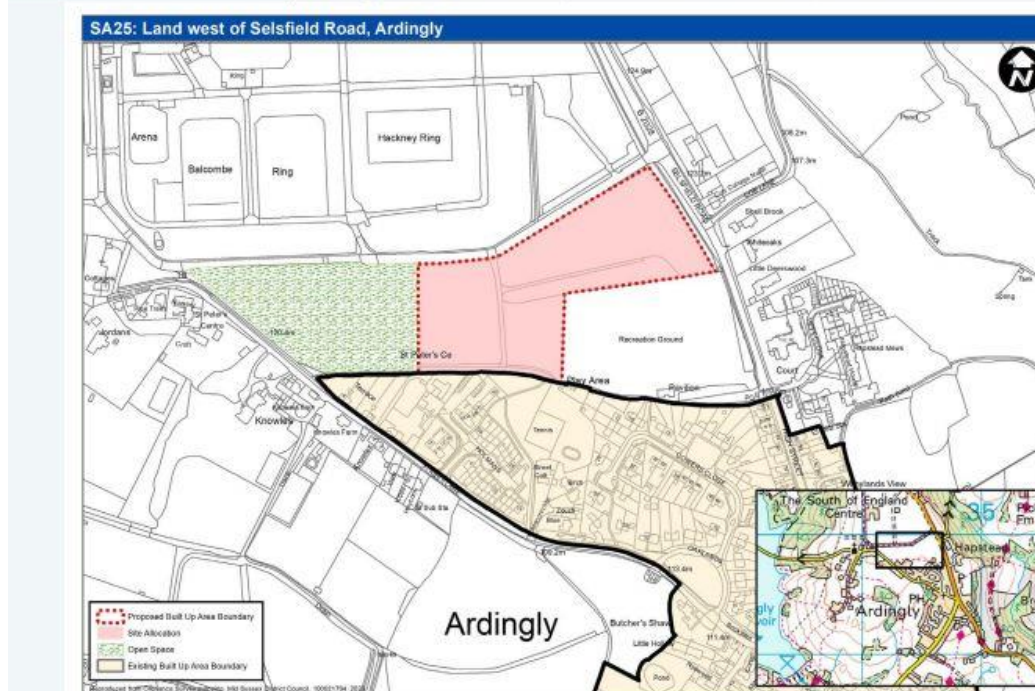
- 2.3. In terms of a general location, the Site is bordered to the east by the B2028, to the north by the showground, to the west by Street Lane, and to the south by the existing residential development of Ardingly village. The Site is within easy access of the local road network which provides easy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

SA 25 Land west of Selsfield Road, Ardingly			
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.

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.

Appendices

Appendix 1.0

Proposed 100 Unit Scheme for Site SA25

Sketch Illustrative Masterplan

Land West of Selsfield Road, Ardingly



- Key Features**
- ① Central Green around existing tree
 - ② Attenuation feature
 - ③ Car free frontage onto conservation area
 - ④ Play area
 - ⑤ Shared Private Drive
 - ⑥ Footpath along the southern edge
 - ⑦ Replacement Scout Hut and Parking
 - ⑧ POS
 - ⑨ Primary Vehicle Access
 - ⑩ Emergency Access Only
 - ⑪ School drop-off
 - Conservation Area
 - Listed Building
 - ← Vista to the Church Tower

Scale NTS @ A3
title Illustrative Masteplan

project Ardingly
client Charterhouse Land
job no 450456
drawing no MP001
revision -
date Feb 20
drawn by CO
checked by CO

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Graham Wilson MRTPI
Planner

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1857

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 1857

Response Ref: Reg19/1857/1

Respondent: Mr D O'Leary

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

From: Dave O'Leary [REDACTED]
Sent: 27 September 2020 22:01
To: ldfconsultation
Subject: SA25 Land west of Selsfield Road , Ardingly objection

SA25 Land west of Selsfield Road, Ardingly.

To whom it may concern,

I wish to make it clear that we are very much against the new development at the red car park of the south of England Showground Ardingly.

This is a clearly a major development and far too large for this small village.

In our opinion it is completely unsound and not justified.

It goes completely against the district plan that was agreed after so much work and careful consideration.

We need to provide only 22 houses as a minimum requirement after 53 have already been completed or committed. Including the 20% buffer.

This is a windfall development, this village has already provided enough housing.

There are far better areas that could take the smaller amount of houses needed in Ardingly, but out of the sites selected, which would have had a lesser impact, the largest one has been chosen. This is for financial gain only.

There has been no consideration for the village, the residents or the location or it's impact.

This village will be changed irrevocably.

The south of England show ground is struggling financially due to shockingly poor management so they feel forced to sell land.

The next time they start to struggle again they will sell more and this is the thin edge of the wedge. This piece of beautiful and unspoilt countryside is a magnet for so many visitors for this village. It should be preserved and valued.

This land is wholly within the AONB.

This clearly means nothing to the showground, the developers and mid sussex district council.

It borders the conservation area and is outside of the built up area of the village.

These constraints are in place for a reason, to rightly protect the land and the village and the quality of life for the villagers and to protect this beautiful area.

Why then is there any question that developers should be permitted to trample all over these protections when it suits?

This appears as usual to be only for financial gain ?

This development may not seem major or large, to those comparing it to Haywards Heath or Burgess Hill for example, but for a village of about 2000 residents , it is huge !

There are no facilities here for families or those with no transport. The bus service is poor.

What kind of sustainable transport will be provided ?

There is now no post office. No food shops no doctors or dentist and only a small primary school.

The only thing provided for residents is a hairdressers , a scuba diving shop, two tailors shops a bakers and a Chinese takeaway.

There is very limited parking in the village now, and by adding at the very least 70 more cars if each family only have one per household, (it would be fair to at least double this amount) , this impact will be enormous and extremely detrimental to the character of the village the air quality, let alone chaos and traffic congestion on the roads.

There is one road through the village, The High Street the B2028, is already badly congested and extremely busy, 70 plus cars along with current traffic situation is not acceptable. There will also be a need for school transport / buses to add to the mix.

All secondary schools being too far away to walk.

Anyone moving here will NEED a car. This does not support sustainability and the environmental impact has been completely overlooked and ignored.

We are located mid way between Haywards Heath and East Grinstead ... these are not within walking distance and there are no footpaths ! Even to get to Lindfield is not walkable due to no footpaths and narrow and dangerous country roads.

The current pavements in the high street are very small and unsafe and it is a frightening experience trying to walk up or down the high street at the moment.

The high street is jam packed with cars and parking already with the houses that line the road. They have no other parking options.

The show ground via CEO Ian Nichol , (now resigned)intimated they wanted bigger shows and more events at the showground to attract more people to make more money ! They wanted more parking as they apparently struggle now and need more space. They need to pay to rent land in the surrounding fields for the large shows now. So to sell off the red car park is counter productive.

There is insufficient drainage in this village and the local sewage facility is already overwhelmed and it's not fit for purpose. The extra housing will put far far too much pressure on this already struggling facility.

There is also a flooding issue where Cobb Cottages already face drainage issues and rain flood water coming at them right off the red car park area now. How will developers negate this problem ?

We really feel strongly that this development is unsound. Not thought through and will be detrimental to this village and it's residents. It will have a huge ecological impact and will destroy an ancient village and its surrounding countryside. It will be desperately close to Wakehurst and Kew in the country as it is described. The most bio diverse place on this plant so close by should be preserved and valued not built upon and destroyed.

Please look at smaller sites with less impact for less houses. Butchers field for example.

This development as it stands will cause outrageous destruction to this beautiful area. We need to be conserving the natural environment and enhancing it, not covering it in concrete with no infrastructure available.

Yours faithfully

Mr O'Leary
Ardingly

Sent from my iPhone

Site Allocations DPD: Regulation 19 Consultation Response**Policy:** SA25**ID:** 1948**Response Ref:** Reg19/1948/1**Respondent:** Mr B Sansom**Organisation:****On Behalf Of:****Category:** Resident**Appear at Examination?** x



27th September 2020

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

Dear Sir/Madam,

Draft SAS DPD Consultation: SA25, Land west of Selsfield Road, Ardingly

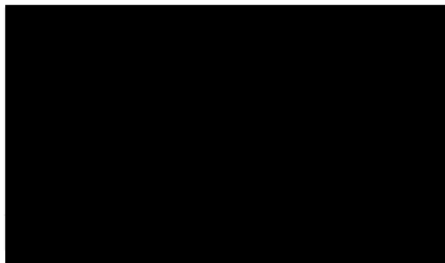
I am writing in response to the consultation stage of the Draft SAS DPD in relation to proposed development site SA25 (Land west of Selsfield Road, Ardingly). Based on the available information I do not consider SA25 to support the DPD as a being Sound for the following reasons:

- 1) The neighbourhood plan for Ardingly determined a local need for 30 houses. MSDC responded with a request for 73 houses from Ardingly. As of 1st October 2019, 53 new houses were already completed or committed within the village through a new housing estate in Stangrove Fields and in-fill housing development. As a consequence, the village only requires an additional 22 houses to meet its obligations (see also NPPF -5. Delivering a sufficient supply of homes – Para 77).
- 2) The proposed development site is within an Area of Outstanding Natural Beauty. In addition to this, the site is designated a National Habitat Network Enhancement Zone 1. There is no referral to Making Space for Nature within the DPD or how developments will be assessed against the new Environment Bill and proposed changes to the English Planning Regulations to protect the environment. The argument that benefits of development to Ardingly outweigh the negative impacts of development within the Wealden AONB will be rendered null and void if the new housing stock does not meet the very highest standards of sustainable construction e.g. near passive house standards, low water demand, renewable energy etc. None of the developments in the village in the past 10 years get anywhere near to meeting these standards and there is precious little in Government planning policy to ensure developers actually meet these standards. See NPPF-15 Conserving and enhancing the natural environment, para 170 and 172.
- 3) NPPF-9 Promoting sustainable transport, para 103 and 108. There is a very poor public transport network in Ardingly and there is no provision for developing a

suitable public bus service, or provision of a safe cycle route to Haywards Heath where most people work or commute from. Exceeding the additional 22 houses will only increase the number of private vehicles within the village, which has no capacity for additional on street parking.

- 4) There is no recognised provision for a safe green space within the grounds of St Peter's CofE Primary School within SA25. The school has capacity, however a new housing estate will box in the school playground and significantly reduce the rural aspect of the school which only has a hardstanding playground. This is detrimental to promoting a healthy and safe community and school environment. As a minimum, the school should be provided with a parcel of land which can be accessed from the playground and used as a safe sports field.

Your sincerely,



Benedict Sansom

2013

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2013

Response Ref: Reg19/2013/1

Respondent: Ms H McLellan

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Henrietta McLellan
Job title	
Address	
Email	
Name or Organisation	Henrietta McLellan
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound

Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	<p>1. LEGALLY COMPLIANT I do not think the Site Allocations DPD is legally compliant as it breaches national planning guidance in the NPPF. SA25 conflicts with the Ardingly Neighbourhood Plan in breach of NPPF2 and MSDC's Statement of Community Involvement which provides that additional development should be identified through Neighbourhood Plans. We do not need 70 houses here. SA25 breaches NPPF 5. It does nothing to promote sustainable transport in contravention of NPPF 9. SA25 also breaches NPPF Para 172. The proposed site is in an area of outstanding natural beauty. It should not be built on where there is no local need for housing. The inclusion of SA25 in the DPD also breaches the Mid Sussex District Plans (DP5, DP 15 and DP16). There are no local development needs, there is no justification for new homes in this area of outstanding natural beauty which has the highest level of protection.</p> <p>2. SOUNDNESS I do not believe the DPD is sound in relation to any of the four tests. a. POSITIVELY PREPARED - there is no local housing need. There is an over-supply of homes by 448 in the DPD as a whole. SA25 is a major development within the normal meaning of the word. It would increase the size of the village by 18% in the built up area. There is no justification for building on AONB land which is of community benefit in contravention of para 172 of NPPF 15. SA25 cannot encourage sustainable transport. Public transport is woeful. b. JUSTIFIED - the Sustainability Appraisal Report prepared by MSDC tests SA25 against the sustainability objectives of social, economic and environmental. It fails on each of these objectives. There is no local housing need. There are no health facilities within walking distance, there is only one shop and developing SA25 would lead to the loss of land used for community benefit. The working population largely commutes. There is very little employment in Ardingly. The environmental impact of yet more cars would increase pollution levels and road congestion. c. EFFECTIVE - building on agricultural land breaches para 170 of the NPPF and DP12. SA25 cannot deliver on the vision, objectives and strategy for housing supply in Mid Sussex. Its inclusion in the DPD runs contrary to the Ardingly Neighbourhood Plan and the wishes of the residents of Ardingly as given to Ardingly Parish Council when surveyed about the proposal. 89% objected to SA25.</p>
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.	The change that is necessary in order to make the Site Allocations DPD legally compliant and sound is the removal of SA25 from the DPD.
If you wish to provide further documentation to support your response, you can upload it here	
If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	No, I do not wish to participate at the oral examination
Please notify me when-The Plan has been submitted for Examination	yes
Please notify me when-The publication of the recommendations from the Examination	yes
Please notify me when-The Site Allocations DPD is adopted	yes

2064

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2064

Response Ref: Reg19/2064/2

Respondent: Mr S Rocks

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Sean Rocks

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

September 26th, 2020

Dear Sirs,

**Site Allocation Development Plan Document (DPD)
SA25 Land West of Selsfield Road, Ardingly**

Please accept this letter as my formal representation in respect of the Submission Draft Site Allocations DPD, with particular reference to SA25 “Land West of Selsfield Raod, Ardingly”. I would like to set out my representations as a long-time resident of Ardingly parish, and, in wife’s case especially very actively involved in the Ardingly community.

I understand that for my concerns as respects SA25 to be considered a relevant representation this letter must address two criteria, namely whether the PDP is legally compliant, and, does it pass the test of soundness, as defined by National Planning Policy in their policy framework? It is my contention that SA25, as it currently stands meet neither test.

The National Planning Policy Frameworks (“NPPF”), sets out a number of criteria that should be met when considering new development sites, vis:

- Achieving Sustainable Development; notes that where an application is in conflict with an up to date development plan, including for this purpose a neighbourhood plan, then permission would not normally be granted.

Similarly, the NPPF, under the paragraph heading “delivering a Sufficient Supply of Homes”, notes that in rural areas, any planning policies and decisions should recognise local circumstances and needs

Following a request from MSDC, and in common with many other parishes, Ardingly Parish produced it’s own Neighbourhood Plan in 2014, such Plan identified the need for 30 additional houses and that all future development should be contained within the built up area of the village.

SA25 is clearly at odds with the Ardingly Neighbourhood Plan in both of the above.

- The NPPF in its section “Promoting Sustainable Transport” notes that planning and development should be focused on areas where sustainability can be achieved by limiting the need for travel and where there is a choice of transport options available. I do not believe that SA25 can or will achieve this. Previous larger scale planning applications, albeit smaller than SA25, for example in Butcher’s Field, Ardingly, have been refused partly because public transport was rated as poor or insufficient and much of the roads around the village are small and narrow and often congested with resident parking.
- The area that SA25 covers falls into an Area of Outstanding Natural Beauty (“OANB”) such that the development would appear to fall foul of the NPPF policy on “conserving & Enhancing the Natural Environment”, which notes that permission should be refused for major development other than in exceptional circumstances. While the definition of “major” will always be somewhat subjective, I believe that it is difficult to argue that a development of the scale that will increase the size of the village by around 15% in terms of both land area and number of dwellings could be considered anything other than major. The AONB speaks for itself and should be protected from future development. Nor do I believe that an exception for SA25 is justifiable as “exceptional circumstances” given that the PDP provides for an excess supply of homes than are needed. As such, again, there is no justification for the development of the land in contravention of the NPPF.

In addition to various conflicts with NPPF that SA25 throws up, there is also a question of covenants in the original agreement between the South of England Agricultural Society and MSDC, wherein the agreement provided limited use of the land and that no sale of the land for development is allowed.

Finally, SA25 seems to contradict MSDC’s own District Plan Policy, which notes that development in the High Weald ANOB should only be permitted where it conserves or enhances the natural beauty. It is clear that SA25 will not do so.

Turning to the second major point; Does SA25 meet the test of soundness as defined by the NPPF? Many of the points echo those above as they apply to both the legality of SA25 and whether the inclusion of SA25 in the DPD meets the soundness test.

I have already touched on the 2014 Ardingly Neighbourhood Plan, which concluded that there was a local need for 30 houses. At the same time MSDC noted that 73 houses were required from Ardingly. Since then 53 new dwellings have been completed, the majority as part of the Stangrove development on College Road. It is my understanding that the District Plan 2014-31 has outlined potential developments within the MSDC area in excess of that required by some 484 houses, or approximately 37%. SA25, with its proposal to build 70 dwellings, is not only way in excess of the 20 remaining (requirement of 73 less 53 completed) as set out by MSDC previously but, as stated earlier, will also increase the size of the village and overall number of dwellings by approximately 15%.

This increase is proposed in a village, situated in an area of outstanding natural beauty, that currently has very poor transport links, with narrow roads which are already congested and

dangerous for pedestrians and cyclists. Public transport is very limited with a poor and inadequate bus service such that the only practical mode of transport is by car. Traffic passing through the main street of the village very often mounts the pavement to pass oncoming vehicles, and several of the roads bordering the SA25 site are historic routes and cannot possibly take any more traffic than they currently do.

It is clear that SA25 is not sustainable and therefore does not meet the soundness test.

On other questions of social, economic and environmental factors, it is clear that there is no local housing need. Services in the village, social or otherwise are very limited. The nearest medical practice is over 3 miles away. It is questionable that SA25 would provide any improvement to local health facilities. While there are primary school facilities in the village secondary school aged children will need to travel to Haywards Heath or similar. The village post office is due to close this week leaving just the bakery as the one remaining local shop.

It is difficult to see SA25 providing any discernible economic benefits to the village as there is no village centre to support or any major employer in Ardingly. In all likelihood residents who occupy those dwellings anticipated by SA25 will be commuters.

Similarly as regards environmental factors given the points noted above it is impossible to envisage that SA25 will positively contribute toward improving the environment in any way. Quite the opposite, an inevitable increase in traffic on already narrow and congested roads will only serve to increase pollution levels. I am led to understand that previous applications for development in the village have been declined primarily for this reason.

I am personally astounded that SA25 has got this far given the very strong and pertinent arguments against. It is clear that the proposal does not meet the various tests set out in the NPPF, and, also seems contrary to MSDC's own District Plan. There are legitimate questions as to whether SA25 meets either the legally compliant or soundness test, it is neither justified nor consistent with national policy. At the same time, it is clear that there is little to no social, economic or environmental benefits, in fact quite the contrary, and as such SA25v also fails to meet the sustainability criteria.

I have to question why SA25 was included in the overall MSDC DPD at all given the excess of dwellings available. The story locally is that the SA25 site is simply being sold to provide funds to build an indoor arena for music concerts and similar to be held in the Showground, which would simply add even more congestion.

Yours faithfully

Sean Rocks

2068

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2068

Response Ref: Reg19/2068/1

Respondent: M, P & S Holman

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: Sarah Holman [REDACTED]
Sent: 27 September 2020 18:35
To: ldfconsultation
Subject: Site Allocations DPD Consultation Response – Policy SA25 Land West of Selsfield Road, Ardingly

To The Inspector,

Policy SA25 of the MSDC Draft Site Allocations Development Plan Document (DPD) dated July 2020 proposes 70 new dwellings at Land West of Selsfield Road, Ardingly. In contrast, the Mid Sussex District Plan specifies an allocation of 29 new dwellings for Ardingly; this number is based on the general character of the village and the ability of the services within the village to support that level of development. Therefore the 70 new dwellings proposed in the DPD appears to be unsound and not justified as this is an excessive and inappropriate number given the size of the village, its associated infrastructure and its location within the High Weald AONB.

Given these considerations, we believe that a maximum of 50 new dwellings would be a more appropriate number (provided that no further housing would be required for Ardingly at the very least within the District Plan period).

Unlike the recent Monks Meadow Ardingly development where the appearance of the houses was out of character for the village and the vast majority of dwellings were large and completely unaffordable for local residents, the proposed development at Land West of Selsfield Road should comprise as many small, affordable houses as possible, based in appearance on the High Weald Design Guide, prioritising green infrastructure as befits such a rural location as this. We would also propose that this development is an exemplar of biodiversity, including such features as bat bricks and swift/swallow boxes to encourage the return of such species that have been lost from the village in recent decades due to development that was inconsiderate (and perhaps ignorant) of local wildlife value.

Kind regards,

Mark, Pat and Sarah Holman
[REDACTED]

2079

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2079

Response Ref: Reg19/2079/15

Respondent: Mr A Black

Organisation: Andrew Black consulting

On Behalf Of: Vanderbilt Homes - Hurstwood HH

Category: Promoter

Appear at Examination? x



Mid Sussex District Council

Draft Site Allocations DPD (Regulation 19)
Consultation

Representation on behalf of Vanderbilt Homes –
Land at Junction of Hurstwood Lane and Colwell
Lane, Haywards Heath

September 2020

option (e) which is not constrained by a conservation area, but would have a less than substantial harm (high) on Gullege Farm (Grade II listed) and Imberhorne Farm and Imberhorne Cottages (Grade II listed). As this is a large site, there is potential to still achieve the yield whilst providing necessary mitigation to lower the impact on these heritage assets.*

- 5.31 Notwithstanding the significant constraints to delivery from this site it is notable that the delivery of 550 in 6-10 years as set out in the SADPD is particularly optimistic and would need to be revised in order to be realistic on the constraints to delivery including the requirement for provision of education on the site.

SA 22 Land north of Burleigh Lane, Crawley Down

- 5.32 No comments.

SA 23 Land at Hanlye Lane to the east of Ardingly Road, Cuckfield

- 5.33 The site is within close proximity to the High Weald AONB. Previous comments made in relation to the requirements of the NPPF in relation to AONB for other allocations apply equally to this site.

SA 24 Land to the north of Shepherds Walk, Hassocks

- 5.34 The access for this site is through an adjacent parcel of land which has a ransom strip over this land. The deliverability of this site is therefore in doubt unless a right of access can be confirmed by the site owners.

SA 25 Land west of Selsfield Road, Ardingly

- 5.35 This site is located within the AONB and comments made in this regard to other proposed allocations apply to this site. The SA references this impact as follows:

There is a 'Very Negative' impact against objective (9) due to its location within the High Weald AONB, however the AONB unit have concluded that there is Moderate Impact as opposed to High Impact

- 5.36 The conclusions of the AONB unit have not been provided as part of the evidence base and requires further scrutiny in order to assess the impact of development of this site in this regard.

SA 26 Land south of Hammerwood Road, Ashurst Wood

- 5.37 The site is within the AONB and it is considered it is inappropriate to allocate this site for development without thorough appraisal of reasonable alternatives as previously set out.

SA 27 Land at St. Martin Close, Handcross

- 5.38 No comments.

SA28 Land South of The Old Police House, Birchgrove Road, Horsted Keynes

- 5.39 No comments.

SA 29 Land south of St. Stephens Church, Hamsland, Horsted Keynes

- 5.40 The site is within the AONB and it is considered it is inappropriate to allocate this site for development without thorough appraisal of reasonable alternatives as previously set out.

2080

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2080

Response Ref: Reg19/2080/27

Respondent: Mr A Black

Organisation: Andrew Black consulting

On Behalf Of: Vanderbilt homes - CDR

Category: Promoter

Appear at Examination? x



Mid Sussex District Council

Draft Site Allocations DPD (Regulation 19)
Consultation

Representation on behalf of Vanderbilt Homes –
Land South of 61 Crawley Down Road, Felbridge

September 2020

17 For these reasons, the proposal would not be a suitable site for housing in terms of location and would cause significant harm to the character and appearance of the area. It would therefore conflict with Policy C1 of the LP and Policies E5 and E9 of the HHNP. In addition to the requirements set out above, these policies also require new development to be permitted where it would protect, reinforce and not unduly erode the landscape character of the area. There would also be some conflict with Policies DP10 and DP24 which, seek to protect the countryside in recognition of its intrinsic character and beauty and promote well located and designed development.

- 6.35 Overall it is not considered that the site represents a logical, justified or deliverable site and should not be considered for allocation within the Sites DPD.

SA 22 Land north of Burleigh Lane, Crawley Down

- 6.36 No comments.

SA 23 Land at Hanlye Lane to the east of Ardingly Road, Cuckfield

- 6.37 The site is within close proximity to the High Weald AONB. Previous comments made in relation to the requirements of the NPPF in relation to AONB for other allocations apply equally to this site.

SA 24 Land to the north of Shepherds Walk, Hassocks

- 6.38 The access for this site is through an adjacent parcel of land which has a ransom strip over this land. The deliverability of this site is therefore in doubt unless a right of access can be confirmed by the site owners.

SA 25 Land west of Selsfield Road, Ardingly

- 6.39 This site is located within the AONB and comments made in this regard to other proposed allocations apply to this site. The SA references this impact as follows:

There is a 'Very Negative' impact against objective (9) due to its location within the High Weald AONB, however the AONB unit have concluded that there is Moderate Impact as opposed to High Impact

- 6.40 The conclusions of the AONB unit have not been provided as part of the evidence base and requires further scrutiny in order to assess the impact of development of this site in this regard.

SA 26 Land south of Hammerwood Road, Ashurst Wood

- 6.41 The site is within the AONB and it is considered it is inappropriate to allocate this site for development without thorough appraisal of reasonable alternatives as previously set out.

SA 27 Land at St. Martin Close, Handcross

- 6.42 No comments.

SA28 Land South of The Old Police House, Birchgrove Road, Horsted Keynes

- 6.43 No comments.

SA 29 Land south of St. Stephens Church, Hamsland, Horsted Keynes

- 6.44 The site is within the AONB and it is considered it is inappropriate to allocate this site for development without thorough appraisal of reasonable alternatives as previously set out.

2140

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2140

Response Ref: Reg19/2140/7

Respondent: Mr C Hough

Organisation: Sigma Planning Services

On Behalf Of: Rydon Homes Ltd

Category: Promoter

Appear at Examination? ✓



MID SUSSEX DISTRICT COUNCIL
SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT

REGULATION 19
SUBMISSION DRAFT
SEPTEMBER 2020

REPRESENTATIONS
ON BEHALF OF
RYDON HOMES LTD

September 2020



CONTENTS

1. Housing numbers and distribution
2. Proposed Allocations that are supported
 - 2.1 SA24 Land North of Shepherds Walk, Hassocks
 - 2.2 SA29 Land South of St Stephens Church, Hamsland, Horsted Keynes
3. Proposed Allocations the subject of objection
 - 3.1 SA15 The Brow and St Wilfred's School, Burgess Hill
 - 3.3 SA18 East Grinstead Police Station
 - 3.4 SA20 Land South and West of Imberhorne Upper School, East Grinstead
 - 3.5 SA21 Land at Rogers Farm, Fox Hill, Haywards Heath
 - 3.6 SA25 Land West of Selsfield Road, Ardingly
 - 3.7 SA26 Land South of Hammerwood Road, Ashurst Wood
 - 3.8 SA27 Land at St Martin's Close, Handcross
4. Sites omitted from the Draft Plan that justify being allocated for housing
 - 4.1 Land South of Edinburgh Way, East Grinstead
 - 4.2 Land South of Chalkers Lane, Hurstpierpoint

I.0 Housing Numbers and Distribution

1.1 The Plan states that the remaining residual requirement from 2019 is 1280 units following updated completions, commitments and windfall figures. However, the total allocations in the plan amount to 1764 dwellings – an additional 484 units. This confirms that the Plan is positively prepared and compliant with the Framework because :-

- the remaining residual requirement will include some housing that is already delivered.
- the District Plan housing target is a minimum figure and Government policy seeks to boost rather than cap housing provision.
- the allocation need to compensate for slow delivery from strategic allocations which may be delayed towards the latter end of the plan period to 2031, or even beyond
- the windfall figure has been increased but there is no compelling evidence that the level will continue to prevail. Also the increased figure is simply a statistical adjustment to include sites of 1-9 units rather than 1-5 units.
- adjoining local authorities at Brighton, Crawley and Tandridge are under-delivering on their housing requirements and will increasingly need assistance in meeting their housing requirements. Mid-Sussex is comparatively less constrained and should be anticipating being able to assist in addressing unmet need from adjoining authorities.

1.2 The overall supply from Table 2.3 is 16,874 which aims to exceed the District Housing requirement by 484 dwellings by the end of the plan period, but there is bound to be slippage and the flexibility of a 2.7% over-provision is supported in principle. However, the figures are not precise and it is considered that this is still a fragile margin to compensate for non-delivery – particularly in the strategic housing allocations. The margin should be greater and a 10% non-delivery margin is standard practice. An over provision of 1639 dwellings is therefore justified and can be achieved by further allocations of sites that do not raise serious adverse impacts and are able to be confidently expected to deliver housing in the plan period to compensate for non-delivery elsewhere.

1.3 The identification of further allocations to increase the Plan's robustness and flexibility would still be within reasonable parameters of consistency with the District Plan housing targets, which were in any event not fully meeting objectively assessed needs, particularly for affordable housing.

1.4 In terms of distribution the substantial majority of new housing is focussed on the three main towns of Burgess Hill, East Grinstead and Haywards Heath (80% of the minimum District Plan requirement) with the 2nd tier settlements of Copthorne, Crawley Down, Cuckfield, Hassocks and Keymer, Hurstpierpoint and Lindfield contributing a further 18%). This emphasis should be maintained in order to conform with the District Plan and deliver new housing in the most sustainable locations. The

proposed DPD allocations however only propose 6% of the housing is directed to 2nd tier settlements and 13.5% is directed to 3rd tier settlements, many of which are located in the AONB where great weight should be given to conserving landscape and scenic beauty. There are a number of 2nd tier settlements, including Cuckfield and Hurstpierpoint where there are “limited” or no DPD allocations. Such settlements do have the capacity to deliver more housing in the current Local Plan and would be suitable candidates to accommodate any additional provision or provide sites to compensate for less suitable and more constrained sites that are currently proposed allocations but should be deleted from the Plan.

- 1.5 The SADPD allocates a total of 238 new dwellings to Category 3 villages, 183 of these are in the AONB which should be afforded the highest level of protection. Sites should only be released in the AONB in settlements that have a residual requirement to meet, i.e. Horsted Keynes, to recognise the need to sustain and maintain the vitality of these settlements and meet the demand and need for housing, especially affordable housing in these locations. However, in villages that have already met their target, the Council should not be releasing further AONB sites before exhausting non AONB sites, even if it is ‘passed up’ to Cat 2 settlements (Para. 2.4.5 Site selection paper) such as Hurstpierpoint.

2.0 Proposed Allocations that are supported

2.1 Policy SA24 Land north of Shepherds Walk, Hassocks (support with conditions)

This proposed housing allocation is supported. It enjoys outline planning permission for 130 dwellings and it has been demonstrated that the criteria set out in the policy can be fully met.

However, the following comments are made concerning the criteria set out in the Policy:-

1. The wording of the criteria in relation to Biodiversity and Green Infrastructure requires clarification/amendment. It is not clear what is meant by the term “net gain” to biodiversity and it is not possible to avoid any loss of biodiversity. The following alternative wording is therefore proposed.

“ Ensure that there is an overall gain to biodiversity and that any loss is mitigated or, as a last resort, compensated”.

A separate SPD is necessary to format and identify any bio-metric approach to the calculation of net gains to biodiversity.

The criteria in this policy go beyond what is required of Strategic Sites allocated in the District Plan and such an inconsistency is not justified.

The proposed development will be delivered within the five year period to 2025/2026. Rydon would welcome the opportunity of meeting with Officers to discuss how the criteria might be improved.

2. The Brick Clay Resource Mineral Safeguarding Area covers a very extensive area from Petersfield in the west to Burgess Hill in the east and includes most of the northern part of the County of West Sussex. Policy M9 of the West Sussex Joint Minerals Local Plan (2018) seeks to prevent non-mineral development throughout the whole of this very wide area unless minerals are extracted pre-development or there is an overriding need for the development that outweighs the safeguarding of the mineral. Compliance with Policy M9 is a common requirement for most, if not all, housing allocations in the SADPD. It must be assumed that the allocation of a site for housing in the Plan demonstrates an overriding need that achieves compliance with the Policy. It should not be left to be considered as a criteria post-allocation. There is no special suitability for mineral extraction demonstrated by the land north of Shepherds Walk. Therefore the Minerals Criterion should be omitted from Policy SA24, and all other allocations covered by the widespread generic safeguarding area, unless there is a local/known special requirement for safeguarding.

3. Archaeological evaluation has already been carried out on this site and the criterion for evaluation should be changed to “pre-commencement” to allow for the grant of outline consent subject to conditions without a policy requirement to repeat the exercise with associated wasted costs.
4. The Landscape Considerations criteria are too onerous in requiring that all mature trees, as well as protected trees, shall be retained. The TPOs will protect important trees and the landscaping scheme will reflect Policy DP37 Trees, Woodland and Hedgerows of the adopted District Plan in order to be approved. A further policy provision is therefore superfluous and unnecessary, proscriptive and onerous in requiring the retention of all existing hedgerows and mature trees.
5. The criteria are generally unnecessarily detailed for a policy of the adopted development plan and stifle the scope for high quality design and creativity. The criteria need to be re-visited in order to be less proscriptive in detail and concentrate only on the main, more important, planning considerations. This point includes criteria related to drainage strategy.

2.2 Policy SA29 Land South of St Stephens Church, Hamsland, Horsted Keynes (support with conditions)

- 2.2.1 This proposed housing allocation is supported conditionally. The site could be optimised to provide 30 two storey dwellings, internal open space, playspace, surface water attenuation, ecological considerations together with landscaping to soften the external edge of the built area. The site could sit comfortably into the existing pattern of development and align with adjoining residential curtilages.
- 2.2.2 Subject to appropriate conditions, the landscape impact from the development of this site would be low, as recognised by the High Weald AONB Unit in their October 2018 report which assessed the landscape impact from thirteen respective SHEELA sites considered by Mid Sussex District Council. The High Weald AONB Unit concludes that this Site is one of only two sites (out of the thirteen considered) that has the potential to be developed with only low impact on the AONB (as opposed to moderate or high impact).
- 2.2.3 West Sussex Highways Authority have confirmed at the pre application scoping stage, that the site can achieve a safe and suitable means of access for all modes of transport and the development would not materially impact on the operation of the local highway network. Support is also given to the proposed allocation requirement for the improving of local traffic conditions by setting back the existing on-street parking spaces in Hamsland Road into the verge, opposite the site.
- 2.2.4 Support is given to the proposed allocation requirement to enhance important landscape features, including the existing mature hedgerows and trees bordering the adjacent fields. The site is deliverable comfortably within a five year period.

However, there are some concerns with regard to the proposed criteria within the policy.

1. The wording of the criteria in relation to Biodiversity and Green Infrastructure requires clarification/amendment. It is not clear what is meant by the term "net gain" to biodiversity and it is not possible to avoid any loss of biodiversity. The following alternative wording is therefore proposed:-

"... ensure that there is an overall gain to biodiversity and that any loss is mitigated or, as a last resort, compensated".

A separate SPD is necessary to format and identify any bio-metric approach to the calculation of net gains to biodiversity.

The criteria in this policy go beyond what is required of Strategic Sites allocated in the District Plan and such an inconsistency is not justified.

This is a small site with less potential for conflict with NPPF but greater potential for viability to be compromised.

2. The requirement under the heading of Flood Risk and Drainage to provide SUDS in the southern part of the site is too prescriptive and unnecessary. It is also an unnecessary duplication of the Biodiversity criteria elsewhere in the draft policy. Flexibility is required to enable a surface water drainage solution to be tailored to site conditions to provide the optimum drainage solution. This is not a development brief and it is too prescriptive at this stage. The detail can be addressed at the application stage.

Rydon would welcome the opportunity of meeting with Officers to discuss how the criteria might be improved.

3.0 Proposed allocations the subject of objection.

3.1 Policy SA15 Land south of Southway, Burgess Hill

This site is allocated as a Local Green Space in the adopted Burgess Hill NP. Para. 101 of the NPPF states that Policies for managing development within a Local Green Space should be consistent with those for Green Belts. SA does not assess the loss of LGS when determining the sustainability of the site.

3.2 Policy SA16 Land at St Wilfred's School

The SA has not assessed the impact of the loss of the school in a town centre location, sustainable location, close proximity, walking distance to catchment area. Policy DP25 of the LP states that "Where proposals involve the loss of a community facility (including those facilities where the loss would reduce the community's ability to meet its day-to-day needs locally) evidence will need to be provided that demonstrates:-

- that the use is no longer viable; or
- that there is an existing duplicate facility in the locality which can accommodate the impact of the loss of the facility; or
- that a replacement facility will be provided in the locality

The delivery of this site is uncertain. The relocation of a number of public and community facilities has not been settled and the number of residential units may have to be adjusted. At best the site is likely to be delayed and potentially may not come forward at all.

3.3 Policy SA18 East Grinstead Police Station

There are deliverability issues, restrictions on title/covenants that could prevent development of this site. There are heritage assets in the vicinity that will be adversely affected and apartments are not in character with the local area. Numbers of dwellings that can be delivered may reduce as a result. No clear timescale for delivery.

3.4 Policy SA20 Land south and west of Imberhorne Upper School

3.4.1 This site has a long history of non-delivery. The West Sussex Structure Plan 2001-2016 (now revoked) allocated a wider area of land to the west and south-west of East Grinstead for circa 2,500 homes.

3.4.2 The South East Plan 2006-2026 (now revoked) noted that land west and south-west of East Grinstead should be brought forward for circa 2,500 homes.

3.4.3 The East Grinstead Strategic Development Area Action Plan 2006 (which would have formed part of the Local Development Framework if it had been adopted – it was later abolished) set out the detail for the allocation of land west and south-west of East Grinstead.

- 3.4.4 East Grinstead has suffered from large volumes of traffic for many years, with persistent calls for a bypass to be provided from as far south as Forest Row all the way to the north and west of the town since 1988. However, these proposals have not come to fruition and the town remains as a significant location along the A22 between the coast and London.
- 3.4.5 Previous traffic study reports have advised that the existing highway network at the junctions of the A22/A264 and the Imberhorne junction is over capacity during the morning and evening peak periods on a typical weekday and that scope for physical improvements at key junctions is constrained.
- 3.4.6 The site is located immediately adjacent to these two junctions and, given its distance from the town centre, it is considered likely that most day to day retail, community, leisure and commuter trip generation (e.g. Doctors, leisure facilities and access to the main line railway station) will involve vehicular trips movements adding increased volumes of traffic into East Grinstead.
- 3.4.7 The Sustainability Appraisal that accompanied the District Plan concluded that “*there are severe transport constraints within East Grinstead which is likely to limit the amount of strategic development that would be appropriate within the town unless significant mitigation is proposed.*”
- 3.4.8 Any capacity improvements have been exhausted at the two key junctions and further improvements require third party land. The policy is not clear on how the impact on the local highway network will be mitigated and merely states the following :-
- “Provide any necessary capacity and safety improvements to junctions impacted upon by the development in the vicinity of the site after all relevant sustainable travel interventions have been fully explored and their mitigation accounted for.”*
- 3.4.9 At this stage of the process, the deliverability of the sites allocated need to have been fully investigated. The SAD document fails to do this, appendix one refers to Safeguarding of Land for Strategic Highway Improvements, but only includes a picture of the junctions with a red box but no clear strategy for improvements.
- 3.4.10 Mid-Sussex has updated its Transport Study to test the impact of proposed development on the strategic and local transport network and upon significant routes in Ashdown Forest (adjacent to but outside of Mid-Sussex District).

The report concludes the following:-

“Felbridge junctions The A264/A22 junction is not identified as having severe impacts in the Scenarios. However, it should be noted that this junction is flagged as severe in the Reference Case and operates over capacity; the Scenarios generate slightly more traffic passing through the junction, which increases these impacts further, but not enough to result in severe impacts for the Scenarios”.

3.4.11 This suggests that improvements to these junctions will not be required as the impacts from additional traffic will not result in severe impacts but this is a contrived and unreliable conclusion that runs contrary to Paragraph 109 of the NPPF.

3.5 Policy SA21 Land at Rogers Farm, Fox Hill, Haywards Heath

3.5.1 The Policy states that this site is open space. It is a peripheral location with significant landscape and heritage constraints, together with Flood Risk considerations. The site should only be allocated if the constraints have been fully investigated and can be appropriately mitigated.

3.6 Policy SA25 land West of Selsfield Road, Ardingly

3.6.1 Ardingly is environmentally constrained due to its location wholly within the AONB. The remaining residual requirement for the settlement is 22 dwellings. In reaching the overall requirement in the Local Plan DPD the Council, in its Sustainability Appraisal that accompanied the DPD, has had regard to the advice in the NPPF. The Council has examined the evidence to identify the point at which the adverse impacts would significantly and demonstrably outweigh the benefits, particularly when considering numbers to settlements constrained due to the AONB which indicated that development in these locations should be restricted. In the accompanying Settlement Sustainability Review May 2015 the Council concluded that future development in Ardingly should therefore be primarily to meet local needs. However, the SADPD proposes a site for 70 units, which is a major allocation in the AONB. A balance needs to be struck to ensure the positive benefits (social/economic) of allocating a major site within the AONB are not markedly outweighed by the negative impacts (particularly environmental), great weight should be afforded to protect the AONB and the scale and extent of development within these designated areas should be limited, Para. 172 NPPF).

3.6.2 Furthermore the site forms part of the South of England Show Ground and offers cultural and recreational facilities, the loss of which has not been assessed in the SA. This allocation should be fully assessed against the District Plan Policy.

3.6.3 Policy DP24 which refers to proposals that involve the loss of cultural facilities, open space, sports and recreational buildings and land, including playing fields, will not be supported unless :-

- an assessment has been undertaken which has clearly shown the cultural facility, open space, sports land or recreational building to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss

3.7 Policy SA26 Land South of Hammerwood Road, Ashurst Wood.

- 3.7.1 The settlement of Ashurst Wood is environmentally constrained due to the settlement being washed over with the AONB. There is no remaining residual requirement from the District Plan for additional dwellings for the settlement. In reaching the overall requirement in the Local Plan DPD the Council (in its Sustainability Appraisal that accompanied the DPD), has had regard to the advice in the NPPF. The Council has examined the evidence to identify the point at which the adverse impacts would significantly and demonstrably outweigh the benefits, particularly when considering dwelling numbers to settlements constrained due to the AONB, which indicates that development in these locations should be restricted. In the accompanying Settlement Sustainability Review (May 2015), the Council concluded that future development in Ashurst Wood should be primarily to meet local needs. However, the SADPD proposes a site for 12 units. A balance needs to be struck to ensure the positive benefits (social/economic) of allocating a site within the AONB is not markedly outweighed by the negative impacts (particularly environmental). Great weight should be afforded to protecting the AONB and the scale and extent of development within these designated areas should be limited. (Para. 172 NPPF).

4.0 Sites omitted from the Draft Plan that justify being allocated for housing.

4.1 Land south of Edinburgh Way, East Grinstead

- 4.1.1 Rydon have an option over the land as identified in Appendix (A). The site SHELAA reference 598 was considered as suitable in the SHELAA stage 1 as suitable for 60 units, in the medium to long term. Following further detailed site assessment, through the Site Selection Paper 3, the site has subsequently been found to be unsuitable for allocation in the SA DPD. The assessment concluded that the site will have high impact on the AONB.
- 4.1.2 This site is located on the south eastern edge of East Grinstead, adjoining existing residential development that was built in the 1970s and 1980s. The site forms a small triangular parcel of open countryside comprising a single horse paddock which is contained by a tall hedgerow, tree and a post and rail/wire fence. The site is approximately 1.8 hectares in total.
- 4.1.3 The site is located to the east of Harwoods Lane which extends alongside the western site boundary and is defined by a hedgerow. The north and western boundary of the site also contains a line of mature trees. Harwoods Lane currently connects the site to residential development to the north. Beyond the boundary to the west and north of the site is residential development on Chesterton Close, Collingwood Close and Edinburgh Drive.
- 4.1.4 The site is located in the AONB, the land slopes generally southwards and the undulating topography together with the existing strong hedgerows, belts of trees and blocks of woodland in the immediate area surrounding the site provides enclosure and containment to views within the landscape.
- 4.1.5 The site has the potential to be delivered as a standalone site, subject to access or as part of the Great Harwoods Farm development that has been promoted by Thakeham Homes during previous District Plan consultations.
- 4.1.6 The Site Selection Paper 3 : Housing Sites October 2019, concludes that the site is not suitable for further consideration due to its location within the AONB. As such the site has not been assessed in the Sustainability Appraisal accompanying the Site Allocation DPD. With regard to the site's AONB location, it should be acknowledged that, as set out in the LUC document entitled " Capacity of Mid Sussex District to accommodate development", Mid Sussex District is heavily constrained by environmental designations such as Area of Outstanding Natural Beauty (AONB) and the South Downs National Park as well as other constraints. As a result, a balance needs to be struck between locating development in the most sustainable locations and those which have the least environmental constraints. Whilst constraints may apply, there is no reason why such constraints could not be overcome and addressed, as they have elsewhere, particularly if there is no other reasonable alternative.
- 4.1.7 Subject to appropriate mitigation, there are no constraints to development at the wider site, including Great Harwoods. The site is well contained within its surroundings and will therefore not result in an adverse landscape impact. The proposal by Thakeham

Homes includes up to circa 300 dwellings and the provision of a significant area of public open space in the form of a SANG therefore respecting the site's location within the AONB. The proposal will therefore result in significant environmental and social benefits without resulting in unacceptable impacts on the wider landscape.

- 4.1.8 East Grinstead is one of the three main towns in Mid Sussex and offers a range of services and facilities and a mainline railway station, all within a reasonable walking distance from the site, approximately 1 kilometre. As such, the development will be less car dependant than that at Imberhorne Lane to reach day today facilities and consequently less likely to impact on the problematic junctions along the A22. The SHELAA assesses the site as relatively unconstrained, development will not have a negative impact on the Conservation Area or Area of Townscape Character and it is not subject to the risk of flooding. It lies in the AONB but impact to the wider landscape can be mitigated. It has been identified as suitable in the SHELAA and therefore the site should be assessed in the SA and considered to be a reasonable alternative to meet housing need in the town.

4.2 Land south of Chalkers Lane, Hurstpierpoint

- 4.2.1 Rydon have an option over the land as identified on the enclosed plan. The site, SHELAA Ref. 575, was identified in the Council's SHELAA stage 1 as suitable for 200 units, in the medium to long term. Following further detailed site assessment through the Site Selection Paper 3, the site has subsequently been found to be unsuitable for allocations in the SA DPD. The assessment concluded that the site is 'large' and the proposals will result in harm to the Listed building of the college and harm to the special character of the Conservation Area.
- 4.2.2. The site has an area of 27 ha (67 acres) but a large proportion of this will be left undeveloped providing the strategic buffer of open land separating the development from Hurstpierpoint College and Hurst Wickham to the east. This land offers the opportunity to extend the area of Country Open Space which formed part of the package accompanying the delivery of the residential development that is now being carried out by Bovis and indeed Rydon's small development to the south. The capacity of the site taking account of these buffer areas would be 220/260 units based on 30/35 dpa. There is the potential for land ownership to be transferred to the Parish Council so that this mitigation will endure in the long term. There is potential to extend the Country Park.
- 4.2.3 The attached plan prepared by Richards Urban Design drawing 1263.02 shows the full extent of the land by red edging. Also attached is an Opportunities and Constraints plan drawing 1263.03 which shows how the above concept could be put into practice. The attached photographs on drawing 1263.01 will give some idea of the physical characteristics of the land concerned.
- 4.2.4 The opportunity to extend the Country Open Space Area needs to be taken into account in relation to this Assessment. The current Assessment of impact upon both Hurstpierpoint College and Hurst Wickham Conservation Area is classified as being less than substantial harm. With mitigation as described above there would be no material impact. The open space will preserve the countryside setting to

Hurstpierpoint College to the east and this is already despoiled by buildings and sports pitches within the grounds. Hurst Wickham Conservation Area is a considerable distance away and there will be no material impact. A High Level Heritage Setting Statement prepared by Orion Heritage Ltd is attached which assesses the impacts and confirms that they would be nugatory.

- 4.2.5. There are no landscape quality designations on the site or in the immediate vicinity. The National Park boundary lies some 3km away to the south and distant views towards the site encompass the whole of the existing settlement of Hurstpierpoint, with which this development would appear in context. There is also potential for provision of strategic landscape buffers to the east and south of the site as part of the sensitive design of the Country Park and this will provide mitigation. Whilst the countryside is not unattractive, it is certainly not special and the site is relatively flat, featureless and not prominent in the wider landscape.
- 4.2.6. Trees/TPOs – the existing trees are located within boundary hedgerows and will be retained and enhanced. A suitable buffer to small areas of adjoining ancient woodland will be incorporated within any layout. There will be extensive new tree planting as part of the strategic landscaping proposals described above. This is a positive scenario for trees and the assessment should reflect that.
- 4.2.7 This is a sustainable, deliverable and developable development opportunity which should be included as a site allocation to meet strategic housing needs across the District. The original SHELAA assessment was not fair or accurate in a number of ways. The latest, February 2020, Assessment which is included in the Site Selection paper 3: Housing Sites Update does not take account of the representations made by Rydon at the Regulation 18 Consultation stage. The representations explained how the Country Park could be extended to the east to protect the wider gap between Hurstpierpoint and Hurst Wickham and the setting of the Hurst Wickham Conservation Area and that land at the northern end of the site could be left open to protect the setting of Hurstpierpoint College. The land is believed to be Grade 3b and therefore is not best and most versatile. The SHELAA correctly concludes that the site accords with the overall development strategy but the Detailed Site Assessment has not fully taken into account the evidence base, which shows how matters of separation of settlements and setting of heritage assets can be suitably addressed whilst still providing a net developable area to provide up to 200 sustainably located dwellings in accordance with the development strategy. The site assessed is for 540 dwellings and this does not take account of the Rydon masterplan which shows a smaller net developable area (around 200 dwellings) together with extensive open space areas to ensure the separation of settlements and protect the setting of heritage assets. This site should be considered in the SA in this context and would prove to be a suitable candidate as one of the additional allocations required to be provided in the Plan.

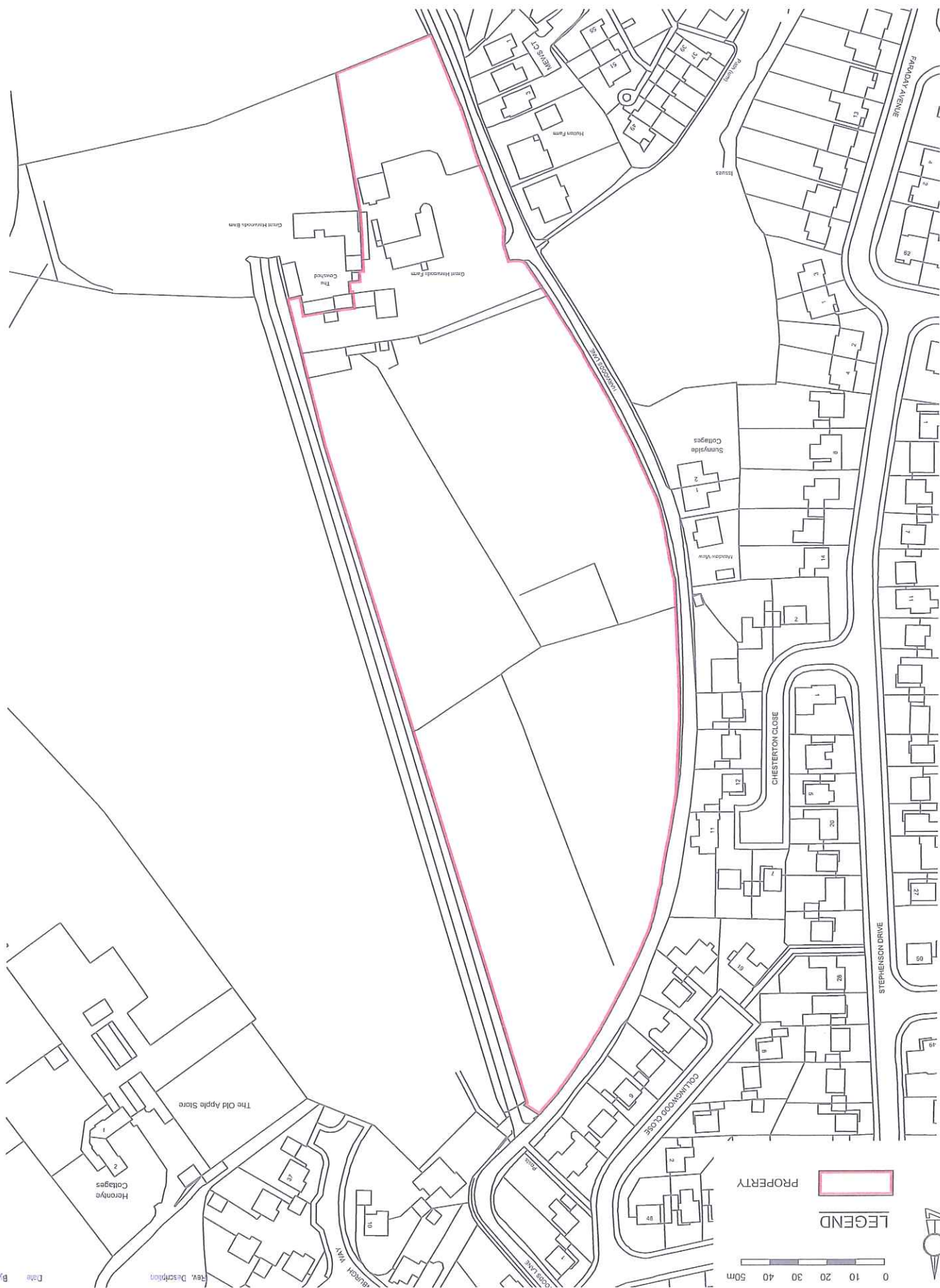
**REGULATION 19 SUBMISSION DRAFT
SEPTEMBER 2020**

**LIST OF APPENDICES ACCOMPANYING REPRESENTATIONS
OF BEHALF OF RYDON HOMES LTD**

- APPENDIX A** - Land under control of Rydon Homes Ltd
 South of Edinburgh Way, East Grinstead
-
- APPENDIX B** - Little Park Farm, Hurstpierpoint
 1263.01 – Site photos
 1263.02 – Site Location and land under control of
 Rydon Homes Ltd
 1263.03 – Opportunities and Constraints Plan

 High Level Heritage Setting Statement - Orion

APPENDIX A

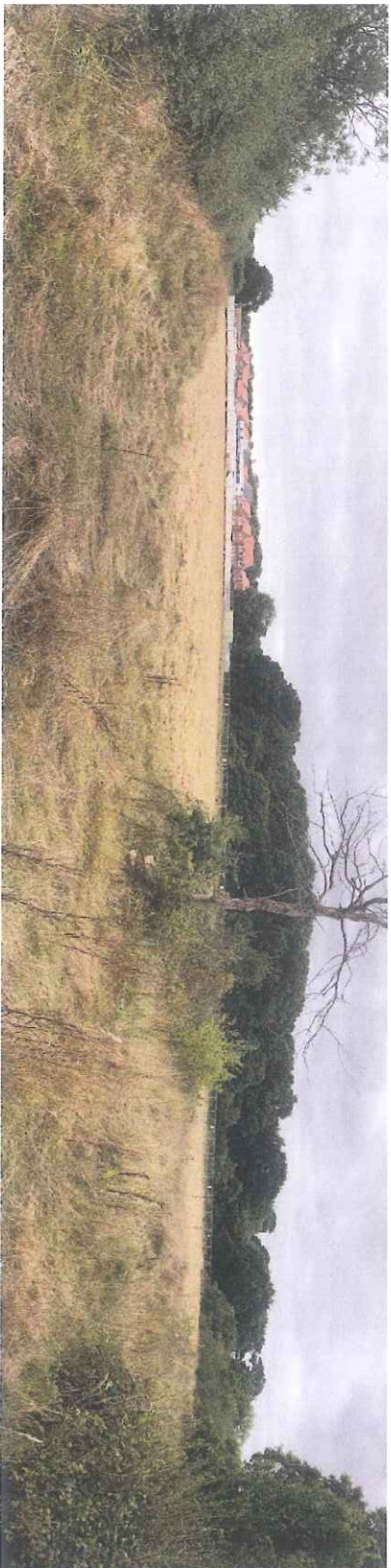


APPENDIX B

Total	
NIS	
Date	03.05.19
	estimated at 1263.01



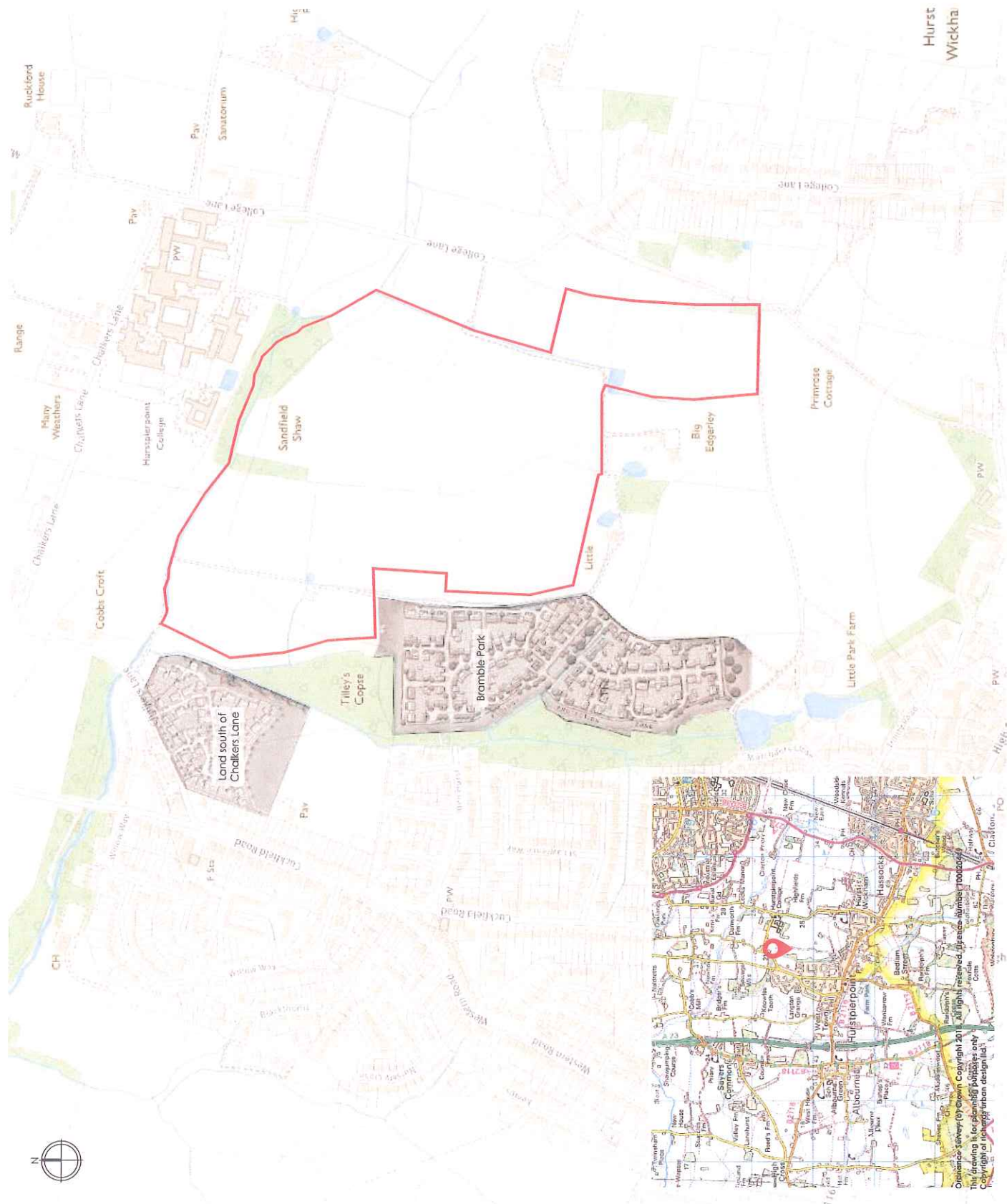
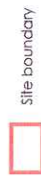
1. View looking north from the centre of the site with new housing south of Chalkers Lane on the left and Hurstpoint College on the right



2. View looking south east from the centre of the site with the new housing development at Bramble Park (left) and Tilley's Copse (right) in the background



3. View looking south with Bramble Park in the distance on the right.



LITTLE PARK FARM, HURSTPIERPONT

Drawing
Opportunities and constraints plan

Scale
NTS

Date
03.05.19

Drawing no
1263.03

KEY

Site boundary

Hurst Country Open Space

Existing Public Right of Way

Potential access to site

Contour

Existing mature tree/hedge boundaries enclosing land parcels to be retained, reinforced where appropriate & periodically traditionally lobl.

No development zone associated with Tiley's Copse to protect Ancient Woodland

Listed Building

Hurst Wickham Conservation Area

Potential extension to Hurst Country Space

Potential area for residential development

Potential new public open space / play area

Potential new looppath routes

Potential link to college

Potential children's play area

Low density landscaped edge

Potential location for SuDS drainage feature



Little Park Farm, Hurstpierpoint
High Level Heritage Setting Statement
May 2019

Little Park Farm, Hurstpierpoint
High Level Heritage Setting Statement
May 2019

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Report

Little Park Farm, Hurstpierpoint

Site

High Level Heritage Setting Statement

Client

Rydon Homes

Date

May 2019

Planning Authority

Mid-Sussex District Council

Prepared By

Rob Bourn BA MA MCIfA

Approved By

Dr Rob Smith MCIfA

Report Status

Final

Orion Ref

PN2213/1

1.0 Introduction

- 1.1** The purpose of this report is to present a high level assessment of the potential effect on the setting and significance designated heritage assets of residential development on land to the south west/south of Hurstpierpoint College. This is to support the promotion of residential housing in the western area of study site. It is not a full statement of significance report or a heritage statement.
- 1.2** The site is located to the south east of Chalkers Lane, to the east/north east of Bramble Park housing scheme that is currently under construction and to the south west/south of Hurstpierpoint College at grid ref at grid reference TQ 28529 17530 (Fig. 1).
- 1.3** The development of the study site has the potential to affect the settings and significance of two grade II listed buildings (Hurstpierpoint College and Star House at Hurstpierpoint College) and to the north west of the Hurst Wickham part of Hurstpierpoint Conservation Area (Fig. 2).

2.0 Planning Policy Framework

- 2.1** The Mid Sussex District Plan 2014 – 2031 contains two relevant policies relating to listed buildings and Conservation Areas.

DP34: Listed Buildings and Other Heritage Assets

Listed Buildings Development will be required to protect listed buildings and their settings. This will be achieved by ensuring that:

- *A thorough understanding of the significance of the listed building and its setting has been demonstrated. This will be proportionate to the importance of the building and potential impact of the proposal;*
- *Alterations or extensions to a listed building respect its historic form, scale, setting, significance and fabric. Proposals for the conversion or change of use of a listed building retain its significance and character whilst ensuring that the building remains in a viable use;*
- *Traditional building materials and construction techniques are normally used. The installation of uPVC windows and doors will not be acceptable;*
- *Satellite antennae, solar panels or other renewable energy installations are not sited in a prominent location, and where possible within the curtilage rather than on the building itself;*
- *Special regard is given to protecting the setting of a listed building;*
- *Where the historic fabric of a building may be affected by alterations or other proposals, the applicant is expected to fund the recording or exploratory opening up of historic fabric.*

Other Heritage Assets

Development that retains buildings which are not listed but are of architectural or historic merit, or which make a significant and positive contribution to the street scene will be permitted in preference to their demolition and redevelopment.

The Council will seek to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the character and quality of life of the District. Significance can be defined as the special interest of a heritage asset, which may be archaeological, architectural, artistic or historic.

Proposals affecting such heritage assets will be considered in accordance with the policies in the National Planning Policy Framework (NPPF) and current Government guidance.

DP35: Conservation Areas

Development in a conservation area will be required to conserve or enhance its special character, appearance and the range of activities which contribute to it. This will be achieved by ensuring that:

- New buildings and extensions are sensitively designed to reflect the special characteristics of the area in terms of their scale, density, design and through the use of complementary materials;
- Open spaces, gardens, landscaping and boundary features that contribute to the special character of the area are protected. Any new landscaping or boundary features are designed to reflect that character;
- Traditional shop fronts that are a key feature of the conservation area are protected. Any alterations to shopfronts in a conservation area will only be permitted where they do not result in the loss of a traditional shopfront and the new design is sympathetic to the character of the existing building and street scene in which it is located;
- Existing buildings that contribute to the character of the conservation area are protected. Where demolition is permitted, the replacement buildings are of a design that reflects the special characteristics of the area;
- Activities such as markets, crafts or other activities which contribute to the special character and appearance of the conservation area are supported;
- New pavements, roads and other surfaces reflect the materials and scale of the existing streets and surfaces in the conservation area.

Development will also protect the setting of the conservation area and in particular views into and out of the area.

New buildings of outstanding or innovative design may be acceptable in conservation areas provided that their impact would not cause material harm to the area.

3.0 Designated Heritage Assets

Hurstpierpoint College (grade II List number 1194726)

- 3.1** The Hurstpierpoint College complex is located immediately to the north east of the study site (Fig. 2). The main college building is grade II listed. The listing describes it as follows:

St John's College, Hurstpierpoint, was the second school established by Nathaniel Woodard, founded in 1849. In 1850 it was established in The Mansion House Hurstpierpoint and in 1853 moved into its permanent buildings. These were designed by R.C. Carpenter but largely built after his death by his partner, William Slater, and his son, R.H. Carpenter. They are in Gothic style and built of flints with tiled roofs. They form 2 quadrangles, the southern one open on the south side, with narrow pointer or trefoil-headed ws. The chapel and Hall form the north side of the north quadrangle. The Chapel at the east end has 7 bays, 4 of them projecting beyond the east side of the quadrangle. Pointed w. of Decorated type flanked by buttresses. At the west end of the Chapel are short transepts which form an ante-chapel, lit by a larger similar w. and above a tower added in 1929. The interior has very beautiful intern stalls. To the west again is a small covered passage, also added in 1929 to join the Chapel to the Ball. the latter is on the first floor with the dining room beneath it. These have 5 bays flanked by buttresses. The ws. on the first floor have flatter pointed heads, those on the ground floor consist of pairs of trefoil-headed lancets.

- 3.2** The significance of the college resides in its architectural, historical and artistic (i.e. aesthetic) interest. It forms the both the main building and core of the college complex and has group value with the immediately adjacent Star House. The setting of

the listed college building will be considered in brief below along with Star House as they form part of the setting of each other and share the same setting.

Star House (grade II List Number 1025664)

- 3.3 Star House is located on the east side of the main college building fronting College Lane. The listing describes the building as follows:

Built in 1873 in matching style to the College and probably designed by R.H. Carpenter. Three storeys. Three windows. Faced with flints with stone dressings and quoins. Tiled roof. Two gables and gabled dormer between casement windows. Two bays on ground and first floors, each with 5 trefoil-headed lights. Wide porch between with 7 similar lights.

- 3.4 As with the college building, the significance of the house resides in its architectural, historical and artistic (i.e. aesthetic) interest. It has group value with the immediately adjacent listed college building. The setting of the Star House will be considered in brief below along with the main college building as they form part of the setting of each other and share the same setting.

Setting of Hurstpierpoint College & Star House

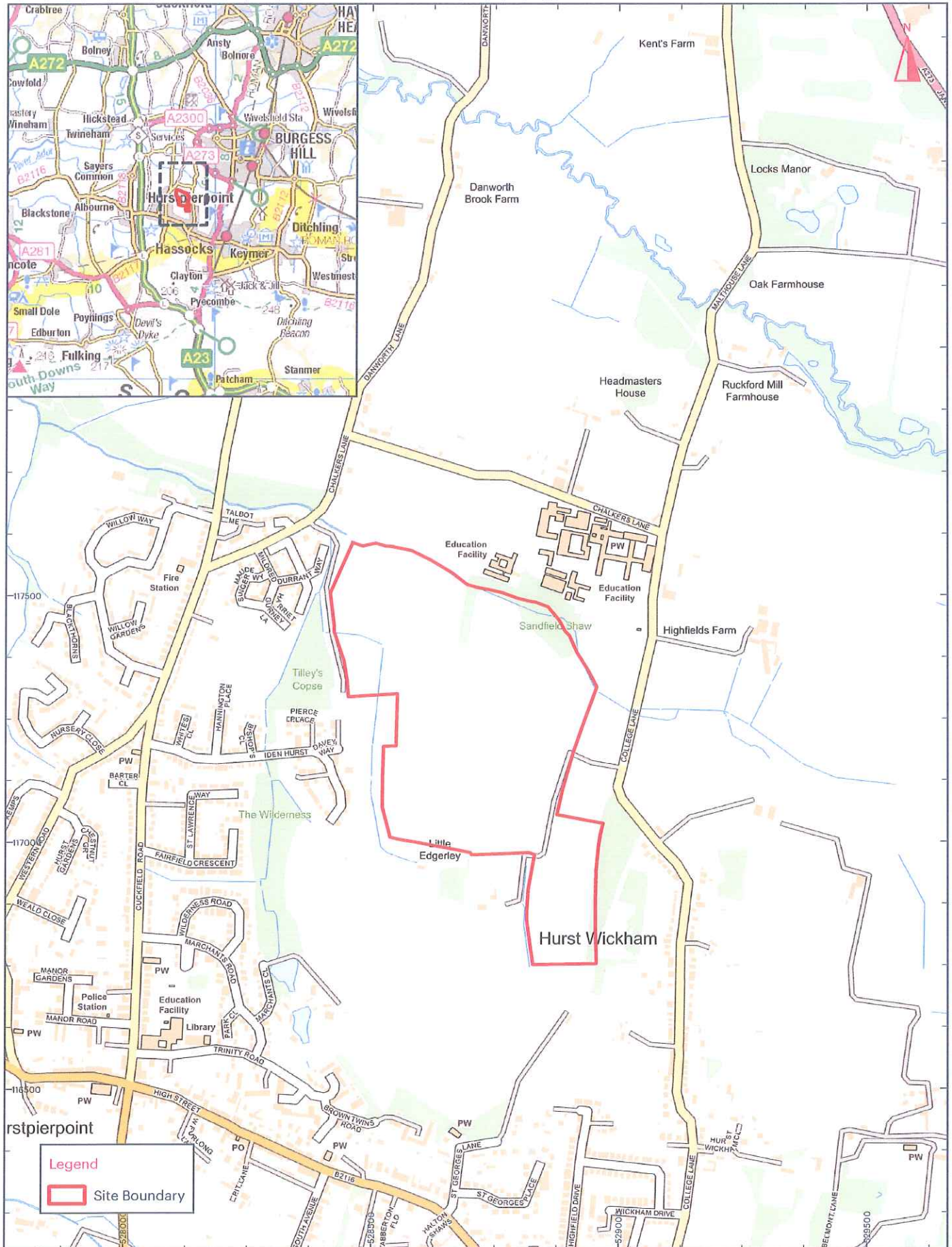
- 3.5 The two listed buildings occupy the main central and eastern area of the college complex. They dominate the grass sports pitches and facilities immediately to the north the buildings and the artificial grass sports pitches immediately to the south of the buildings. There are a series of pre-WWII, 1970s and later school buildings immediately to the west and south west of the main listed college building, with car parking and further artificial surface sports facilities to the west of the school buildings. It is within this area that the setting has a very strong positive contribution to the significance of the two listed buildings in functional, visual and historic terms. The later buildings, while not of the same architectural quality as the listed buildings, are sympathetic and subservient to the main building and the mix of style and date adds a very perceivable time depth to the experience of the school setting. The car parks and artificial sports pitches on the western side of the school complex contain a number of visually prominent lighting stands and fencing with a line of overhead electricity cables and wooden pylons cutting north south immediately to the west of the school grounds. The car parks, lighting stands, fencing and electricity cables detract from the experience of the listed buildings and have a slight negative contribution to their significance.
- 3.6 The College and Star House also have a wider landscape setting beyond the college complex. It is located on a relatively high spot on the landscape and so can be seen from and has at least partial views out over the lower land to the east and the south/south east. This aspect has a mildly positive contribution to the significance of the college as it places it within its wider rural context and enables it to be appreciated in various glimpsed and full views from within the wider area.
- 3.7 The setting to the west/south west of the school is more limited in extent and in its contribution to the significance of the main listed college building. The later school buildings block clear views in to and out from the listed buildings. The tower on the chapel can still be seen in many views due to its height but the main body of the listed buildings cannot be experienced, even at close quarters to the school boundaries, from the west and south west. Consequently, the land to the west/south west does not contribute visually to the significance of the college buildings. The land has historically been fields and so it does have a slight positive contribution to the historic interest significance of the listed buildings. The two new and under construction housing schemes (Land South of Chalkers Lane & Bramble Park) are recent visible changes within this aspect of the setting on the west side of the college which have introduced modern residential form.

Impact Assessment

- 3.8** The study site is being promoted for up to c. 260 residential units located in western and south western area of the site and a substantial area of open space. The layout on the constraints and opportunities plan (Fig. 3). The development parameters have been designed to preserve and enhance the setting of the college to the south west and west of the listed buildings. The layout has been designed to respond to the setting of the college and its contribution to the significance of the listed buildings. The main bulk of the proposed housing area will be screened from view from the college behind existing mature tall hedges and trees and so will have no effect on the setting college as they will not be experienced from college and vice versa.
- 3.1** The north western field of the study site is currently a field which forms a small part of the wider rural context within which the college is experienced. This field is currently an arable field split into two by a north-south orientated footpath. The eastern 2/3 of the field will be retained as public open space with high quality housing in the area of the field to the west of the footpath. By bringing the edge of the built form c. 140m closer to the college complex than it currently is, there will be a slight visual change within this part of the setting. The recently constructed Chalkers Lane residential scheme has already introduced modern houses into this aspect of the setting. Consequently, the proposed high quality housing within this area of the study site will not change the character of the setting. The eastern half of the north western field of the site will be retained as public open space. This will ensure that the views of the tower of the college chapel that are currently possible from the site will be retained. There are no views of the site currently from the listed buildings anyway, as described above. Consequently, views from the listed buildings will be unaffected. The later school buildings to the west of the listed college buildings block all views of the site from within the core of the setting of the college. Therefore, the experience of the listed buildings as they are now, will be unaffected.
- 3.2** The area of the site to the south of college will be retained as an extension to the Hurst Country Space. This will ensure that the setting to the south of the college will be protected and conserved.
- 3.3** In conclusion, the development of the site as proposed in the illustrative concept masterplan, will result in the loss of about 1/3 of a field that has a slight contribution to the significance of the listed college buildings. This will primarily be a slight visual change. The college will still be separated from the edge of the built area of Hurstpierpoint by open space. The aspects of the setting of the college that have a clear and strong positive contribution to significance of the listed buildings will be unaffected. Consequently, the development of the study along the parameters as outlined in the constraints and opportunities plan (Fig. 3) will not result in harm to the significance of Hurstpierpoint College or Star House.

Hurst Wickham Conservation Area

- 3.4** The area of the proposed housing is considered to lie beyond the setting of all three blocks of the Hurstpierpoint Conservation Area. There is one vista point identified on the significant views map of the Hurstpierpoint Conservation Area from just north of St Georges Lane that is toward the study site. However, the proposed developable area of the site is 0.5km to the north and is screened from the view by intervening hedges, trees and other vegetation. Consequently, there will be no effects on this view. The southern part of the proposed potential extension Country Space would be within this view but there will be no effect on this view. Consequently, the development of the study along the parameters as outlined in the illustrative masterplan will not result in harm to the significance of any of the three blocks of Hurstpierpoint Conservation Area.



Title:
Figure 1: Site Location
Address:
Little Park Farm, Hurstpierpoint

Scale at A4: 1:10,000

0 300m

orion.

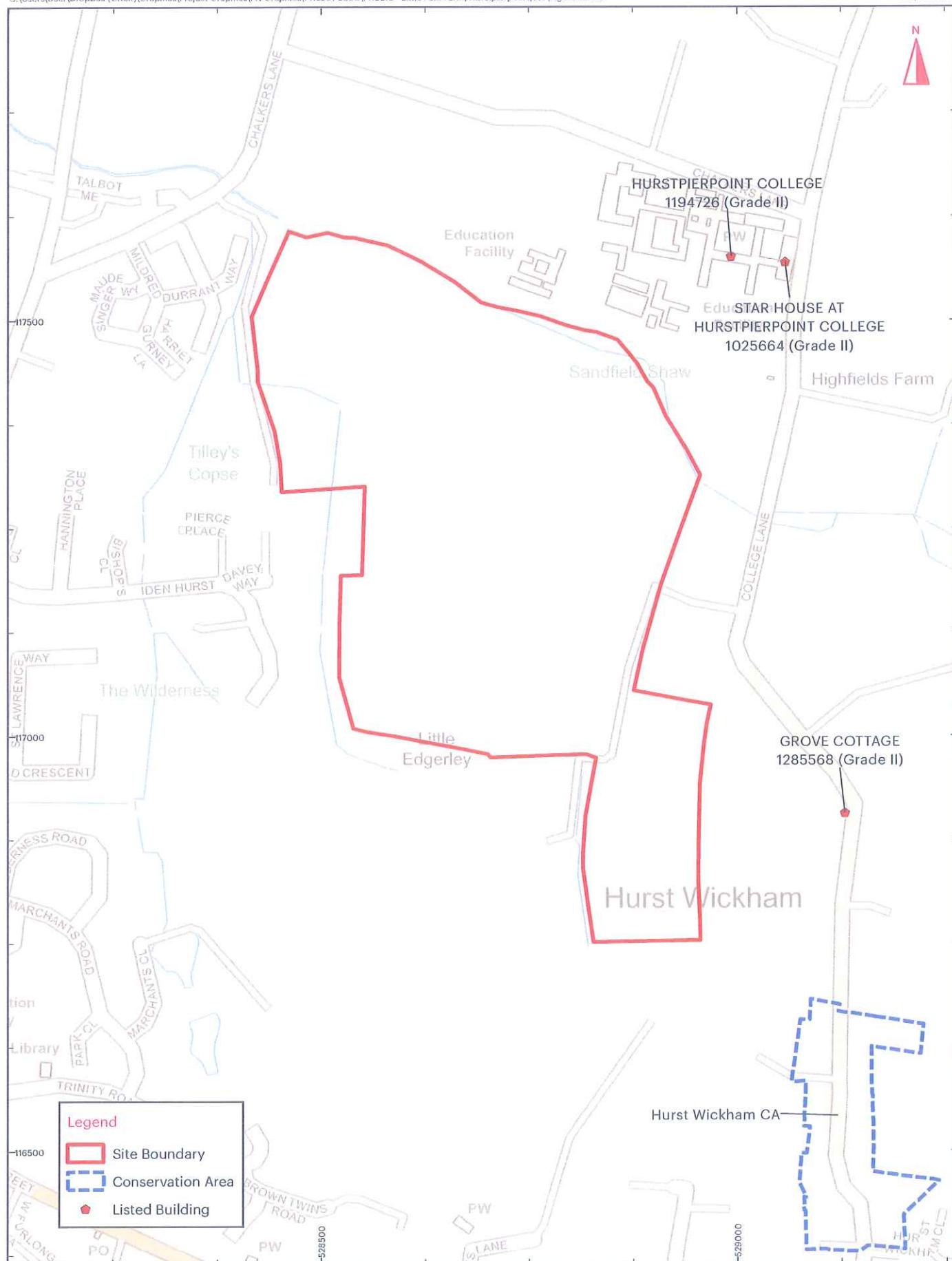
**Title:**

Figure 2: Location of Designated Assets

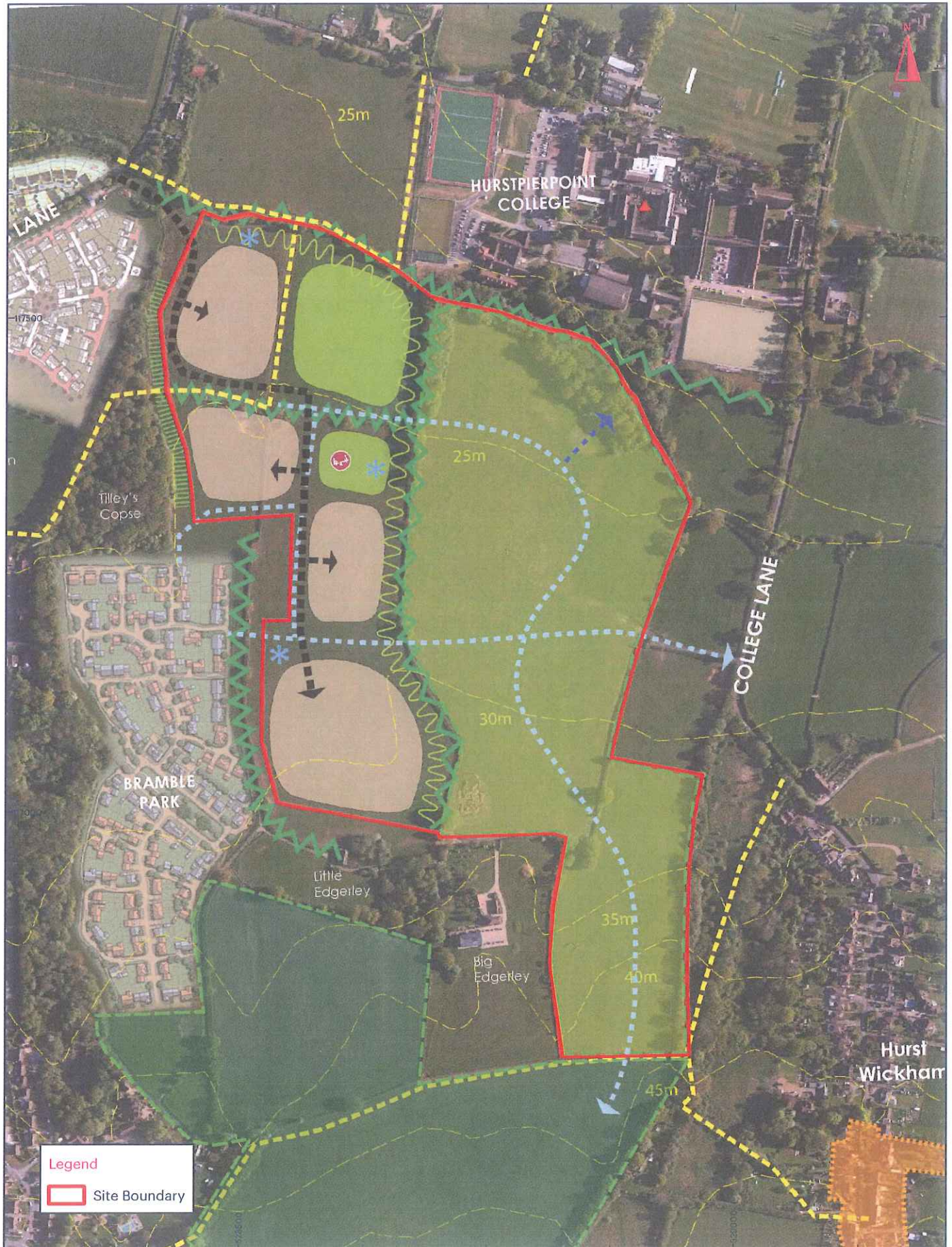
Address:

Little Park Farm, Hurstpierpoint

Scale at A4: 1:6,000

0 180m

orion.



Title:
Figure 3: Opportunities and constraints plan
Address:
Little Park Farm, Hurstpierpoint

Scale at A4: 1:5,000



orion.

2174

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2174

Response Ref: Reg19/2174/2

Respondent: Ms M Stafford

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: Melanie Stafford [REDACTED]
Sent: 28 September 2020 18:54
To: ldfconsultation
Subject: Fwd: Proposed Development of the Ardingly Showground Green Field site (SA25)

Just to add, I fully support the response from Ardingly Parish Council on Sa25 in that all categories of the DPD are not sound.

Regards Melanie Stafford
[REDACTED]

Sent from my iPad

Begin forwarded message:

From: Melanie Stafford [REDACTED]
Date: 27 September 2020 at 20:49:30 BST
To: "LDFconsultation@midsussex.gov.uk" <LDFconsultation@midsussex.gov.uk>
Subject: **Proposed Development of the Ardingly Showground Green Field site (SA25)**

I will start with some facts, the District plan 2014-2031 (as at 01/10/2019) was for 16,390 houses, 15,110 has been accounted for leaving 1,280 houses still required. MSDC has **1,764** houses proposed which is **484 (38%) over supplied** against the plan. **This proposal SA25 can be denied without any impact to the District plan .**

- **Is the DPD positively prepared .**
- I say **NO**,
- There is **NO** housing need in Ardingly, nor businesses that require a work force. Our **village neighbourhood plan** has a **balance of 22** houses from the original 73, which more than meets our future needs and was supported by a recent village poll.
- This development **does not enhance the local area.**
- **Public transport** is extremely poor, use of privately owned vehicles is essential in this rural village to get to work or for social & domestic needs. **You can't improve public transport if there's little demand for it.**
- Any extra traffic thru the village has environmental issues
- The local roads are in need of repair, the high street thru the village is narrow and heavy goods vehicles cause bottle necks and traffic delays, parked cars are frequently damaged along the high street.
- The local **telephone exchange** is in need of an upgrade to cope with demand for internet services.
- Mobile phone signals are patchy in certain areas of the village, i can only get 2G.
- The local school is nearly at capacity
- The village has a small bakery, small cafe. The Post office is **closing end of this September.**
- **Water shortages** are becoming more frequent
- The village is prone to **power cuts.**
- The community facilities are adequate for the current population ,

- The village has very limited parking, so passing trade is restricted , there is no space to expand parking. Even residential parking is a growing issue.
- The village cannot support the infrastructure required for such a **Major plan of this size.**
- A housing estate right next to our recreation ground would **spoil the peace and tranquillity** and nature we all currently enjoy

The proposed 70 houses added to this small village is **wholly inappropriate** for our current infrastructure. It is within **an area of AONB and within the boundry of the Ashdown Forest area of conservation which is continually being eroded away by the encroachments of more housing.**

This proposed **urban sized development** would just continue to contribute to the **never-ending erosion** of the areas protected environments, and will have a huge negative and material long term impact to the immediate surrounding environment, ***the biodiversity and our peace and tranquillity of the village.***

Under the National and local Biodiversity Action Plan (**BAP**) priority species, the Parish is home to ,for example dormouse, bat, barn owl, nightjar, great crested newt and pearl-bordered fritillary and others. We cannot keep urbanising the countryside and losing habitats .

- **Do i think its justified ,**
- **NO this development is not justified** . The proposed development is outside of the normal village community . It would take away a very popular and safe **well used green recreational space.**
- The village largely supports the neighbourhood plan of maximum 22 houses.
- The SA25 site is prone to waterlogging, the water just sits on top of the Cuckfield stone so could be a flood risk.

There is already a large development under way on **High Beech Lane** approx 3miles south of the village and at Turners hill, so I see **no justification in further erosion of the countryside and green belt land that are the lungs of the planet**

I am just a resident of Ardingly, I don't fully understand all the context of the meanings in the planning DPD, I have tried to be factual having lived here over 50 years. I hope that my points are valid and given due consideration .

If have any questions then please get back to me.

regards Melanie Stafford

[Redacted signature]

2193

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2193

Response Ref: Reg19/2193/1

Respondent: Ms and Mr D Harris / Graves

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: Dani [REDACTED]
Sent: 27 September 2020 20:30
To: ldfconsultation
Cc: [REDACTED]
Subject: SA25, Land West of Selsfield Road, Ardingly

We believe that the site allocations development plan document is unsound in relation to site SA25.

It is not justified:

The inclusion of SA25 is not an appropriate strategy to meet local housing need. In its neighbourhood plan, Ardingly identified a need for approximately 30 additional houses. We understand that 53 new houses have already been committed or completed so the local need for the village has already been met. In its District Plan, MDSC identified a need for 73 additional houses in Ardingly, leaving a shortfall of 20. The proposed building of 70 houses on SA25 is over three times this need.

Building on SA25 would be building on existing open space which is used for recreation by many villagers and those from the surrounding area. The part of SA25 between the recreation ground and the proposed new designated open space to the west of SA25 is an important green corridor. The proposed southern boundary of SA25 appears to remove public access along the path between St Peter's School and the recreation ground and the children's playground.

Development of SA25 would significantly increase the amount of vehicular traffic in and through Ardingly. There would be issues with parking for residents of the new development and those who have to drive to access the recreational facilities on the remaining SEAS land. Although developers seek to include sufficient parking within new developments, it should be noted that the recent Monks Meadows development off College Road has led to frequent parking on College Road itself, causing a danger to traffic since this is on the approach to a bend in the road. Ardingly High Street is already difficult for traffic to negotiate safely and the proposed development would continue the problem along part of Selsfield Road.

The proposed development is outside the existing built up area boundary and would not maintain the quality of the rural and landscape character of the district, or conserve or enhance the natural beauty of the High Weald ANOB.

It is not consistent with national policy and there is no local justification for this:

The proposed development would not be consistent with:

Para 77 of the National Planning Policy Framework (NPPF) which states that, in rural area, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs;

Para 97 of the NPPF which states that existing open space should not be built on except in certain circumstances. Since para 97 (b) and (c) do not apply, the only relevant circumstance would be that the land is surplus to requirements and We do not agree that this is the case;

Para 98 of the NPPF which states that planning policies and decisions should protect and enhance public rights of way and access;

Paras 102 and 103 of the NPPF which require transport issues to be considered from the earliest stages of development proposals and that significant development should be focused on locations which are or can be made sustainable,

Para 171 of the NPPF which requires plans to take a strategic approach to maintaining and enhancing networks of green infrastructure;

Para 172 of the NPPF which requires the scale and extent of development to be limited in an Area of Outstanding Natural Beauty;

DP12 of the Mid Sussex District Plan which provides that development will be permitted in the area outside of built up area boundaries provided it maintains the quality of the rural and landscape character of the district and is either necessary for the purposes of agriculture or is supported by a specific policy reference. SA25 does not meet these conditions. Nor is there special justification for the proposed development as required for new homes in the countryside by DP15. Further, We do not believe that the proposed development will be in accordance with DP16;

Policy Ard 2 in the Ardingly Neighbourhood Plan which directs future housing within the parish to be within the proposed built up area boundary, and Policy Ard 3 Housing Supply and Site Allocation in the Ardingly Neighbourhood Plan;

Para 172 of the NPPF which requires that planning permission should be refused for major development in AONBs other than in exceptional circumstances. We believe the proposed development to be major and that no exceptional circumstances exist. The development is major in the normal meaning of the word on the basis of the proposed increase to the current size of the built up area of the parish (an increase of 18% in area).

Necessary changes in order to make the Site Allocations Development Plan sound:

We believe SA25 should be dropped completely as it is not justified or consistent with national or local policy.

Alternatively, the number of houses should be reduced to 20 or lower and the site reduced to the area north of the recreation ground.

Danielle Harris



Kevin Graves



2194

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2194

Response Ref: Reg19/2194/1

Respondent: Mrs K Burchnall

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: [REDACTED]
Sent: 28 September 2020 20:38
To: ldfconsultation
Subject: Proposed development the show ground red car park SA25 Ardingly

Categories: [REDACTED]

My name is Kira Burchnall and I believe the proposed development SA25 is not sound .
I have lived in Ardingly for 9 years . My children went to the local primary school , St Peters and we have embraced village life since arriving .

Since in 2011 we have seen the village grow as new houses have been built to meet the NPPF requirements and I believe we have now more than met the agreed amount of housing required .

With these new developments , have come new problems that didn't exist before .

Traffic has increased , therefore so has noise and pollution .

Parking is problem

Areas of natural beauty have already been interrupted.

The infrastructure is already being pushed to its limit

it is very difficult to get a doctors appointment

There seems to be constant sewage / water problems

There are more than enough children to fill the local school , 9 years ago there was a waiting list to get in and that was before all the new housing was built .

This is not in line with promoting a healthy and safe community or protecting and enhancing our countryside

Local transport is minimal

Kind Regards

Kira Burchnall

Kira Fincke

[REDACTED]



kira fincke

2196

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2196

Response Ref: Reg19/2196/1

Respondent: Mr S Brown

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: Stephen Brown [REDACTED]
Sent: 27 September 2020 19:45
To: ldfconsultation
Subject: SA25, Land west of Selsfield Road, Ardingly

I am writing in response to the SA25 proposed development which is included in the MSDC Site Allocations DPD. I have a number of concerns with the proposed development in Ardingly which I would like taken into account when MSDC is reviewing the proposal.

a. Has the plan been positively prepared?

The development is proposing 70 new dwellings on the site. I think this should be considered as a large development for a village the size of Ardingly and do not agree with it being classified as NOT 'Major'. Many new houses have recently been built or committed in the village. These developments have fulfilled the majority of MSDC's requirement for new housing in Ardingly by 2031. To fully meet the MSDC requirement, a further 22 new houses are needed. Additionally, Ardingly has already exceeded the new housing needs identified in its Neighbourhood Plan. Therefore, I think that 70 new houses is a disproportionate number for the area and would have a detrimental impact on the High Weald AONB. On this basis, I believe that including this development as currently proposed is unsound.

b. Is the plan justified?

I do not think that it is a suitable site for 70 new houses. Some new housing is needed locally but this large number would create an imbalance in the village and also have significant impact on local infrastructure and services. I believe that other sites outside the AONB would be better placed to accommodate a larger development and would be more appropriate. In its current state, I do not think that the planned development can be justified, so on this basis is unsound.

c. Is it an effective plan?

Such a large development on an open landscape would have detrimental environmental impacts on the area. Ardingly is located in a rural setting in the High Weald AONB and a development of 70 new houses on this site would destroy a large grassed area and create additional noise, light and air pollution. It would also add considerably to local traffic on roads which are not suited to it. On this basis, I do not think that it is an effective plan and is therefore unsound.

In summary, I think that the SA25 proposed development is too large for the site and village and will have a detrimental impact on Ardingly and the local area. Some additional housing in the village is needed but 70 is far too large for the area in my opinion. A maximum of 25 houses would exceed MSDC's requirement as specified in the District Plan and significantly reduce any detrimental impact.

Yours sincerely

Stephen Brown

[REDACTED]

2215

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2215

Response Ref: Reg19/2215/1

Respondent: Ms R Mcnamara

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: Rachel Mcnamara [REDACTED]
Sent: 25 September 2020 22:05
To: ldfconsultation
Subject: Fwd: SA25 planning development consultation wholly within AONB in Ardingly village , next to conservation area, south of England society showground proposal.

Sent from my iPhone

Begin forwarded message:

From [REDACTED]
Date: 20 November 2019 at 19:25:46 GMT
To: Planning Consultation <LDFconsultation@midsussex.gov.uk>
Cc: Sussex Bat Group <contact@sussexbatgroup.org.uk>, Bat Conservation Trust <enquiries@bats.org.uk>, Richard Cobden <enquiries@sussexwt.org.uk>, Rachel Mc [REDACTED]
Subject: SA25 planning development consultation wholly within AONB in Ardingly village , next to conservation area, south of England society showground proposal.



Green field site that is wholly within AONB, currently used by local schools and groups as an exercise area, is popular with dog walkers, runners, hikers etc. Is used occasionally by South of England showground as an events car park near to their red gate entrance.



Mature hedgerows with Parkland and mature trees, bats roost in nearby trees and are recorded foraging regularly on this site. Species not identified and a survey should be undertaken. Very rare species are recorded near to this site.



Mature hedgerows and trees support a wide variety of wildlife on site. Bats are seen regularly and swallows are present all summer, showing that this habitat is insect rich and valuable for wildlife. Protected species on site and this is their foraging ground.





Popular public footpaths run next to the site, these are busy and are listed in many uk walking books. The paths are popular with walkers and ramblers, the views would be spoiled by development .





Long lines of mature hazel hedgerows support protected Dormice.

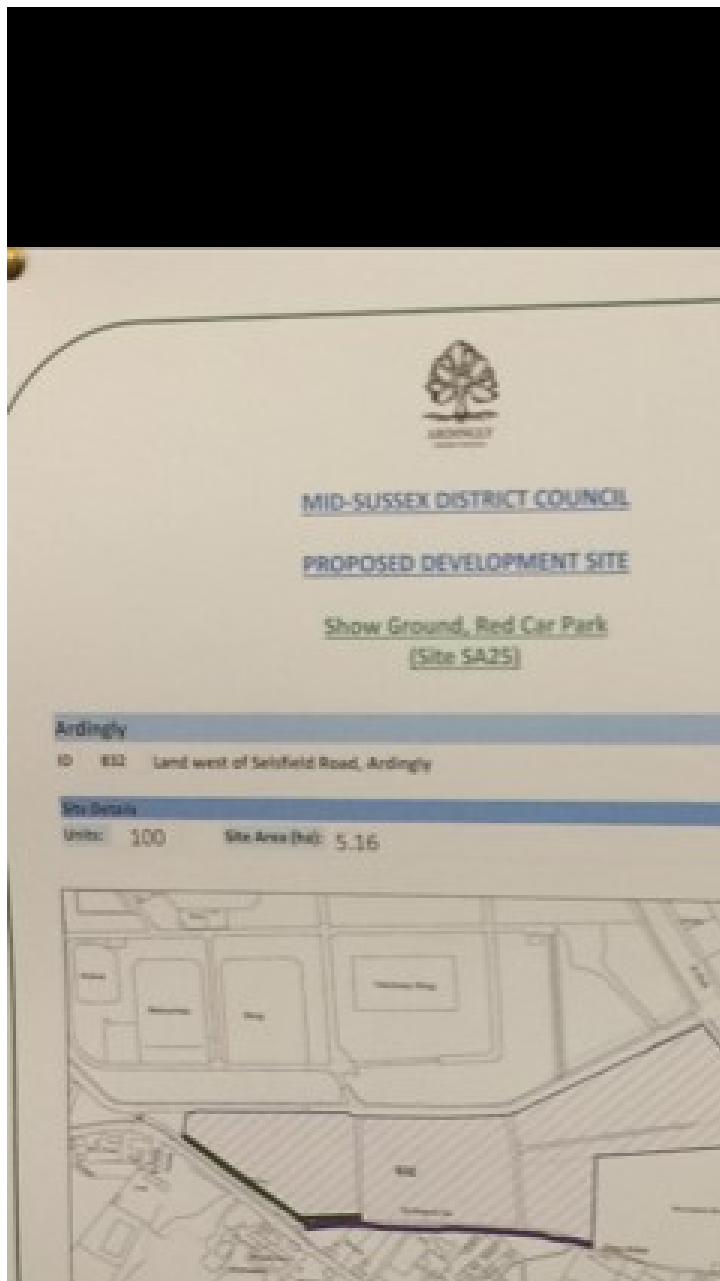


The current scout hut is not in good condition and is not large enough for the groups needs. They currently use the proposed development site for activities. They are next to the proposed development site and an application for development would have an adverse effect on them.



The Primary school currently use the proposed development site as an exercise/ activity and play area, this is because their current playground is not large enough for their needs. The school is nearly full and they could not take the number of pupils from the proposed development. The staff at the school were clearly and openly upset by the Showgrounds proposed development application. It's size shows a disrespect and disregard for local needs and the community as a whole. A new larger school with a large outdoor space would have been a more appropriate planning application for this site. The current school site would be more appropriate for housing. This would help relieve traffic issues caused by the school and also lessen environmental impact.





The district plan has stated 22 homes are needed to fit with Ardingly's infrastructure issues and needs (lack of services/ transport). The application is for 100+ dwellings. The village cannot accommodate the scale of development and has no services to support large scale development.



Bat roost in mature oak next to site.



Drainage installed due to run off water from the site.



Drainage installed due to run off water from site.

During heavy rain the properties at Holmans get flooded by run off water from the showground.

They flooded frequently, causing damage and access issues, so drainage was installed. During heavy rain flooding is still an issue due to clay soil and the fact the showground lays just above these buildings.



Flood drain installed in park below site to assist with flood problems.

**Due to lack of adult lea
1st Ardingly cub pack i
down after Ch**



CAN YOU

We meet Thursda

**The young people are a
you to keep their g**



Local cubs, beavers, scouts use this site as it is next to their building (as seen in their activities photos). They don't have enough room on their site to fulfil their needs. They are a large and popular group which is full and with waiting lists, children travel from outside the area to this group as it is very popular.

ITV REPORT

20 November 2019 at 12:02am

Hazel dormouse numbers down by since 2000, report warns



Dormouse conservation project next to site. There is a large scale dormouse conservation project at the nature reserve next to this site. There are also dormice in the hedgerows along the site and in nearby woods.

Noise from the site would have a negative impact on protected species and residents and users of the site.



Hearing loss and rapid
in heart rate are some
effects of noise polluti
animals. High intensity

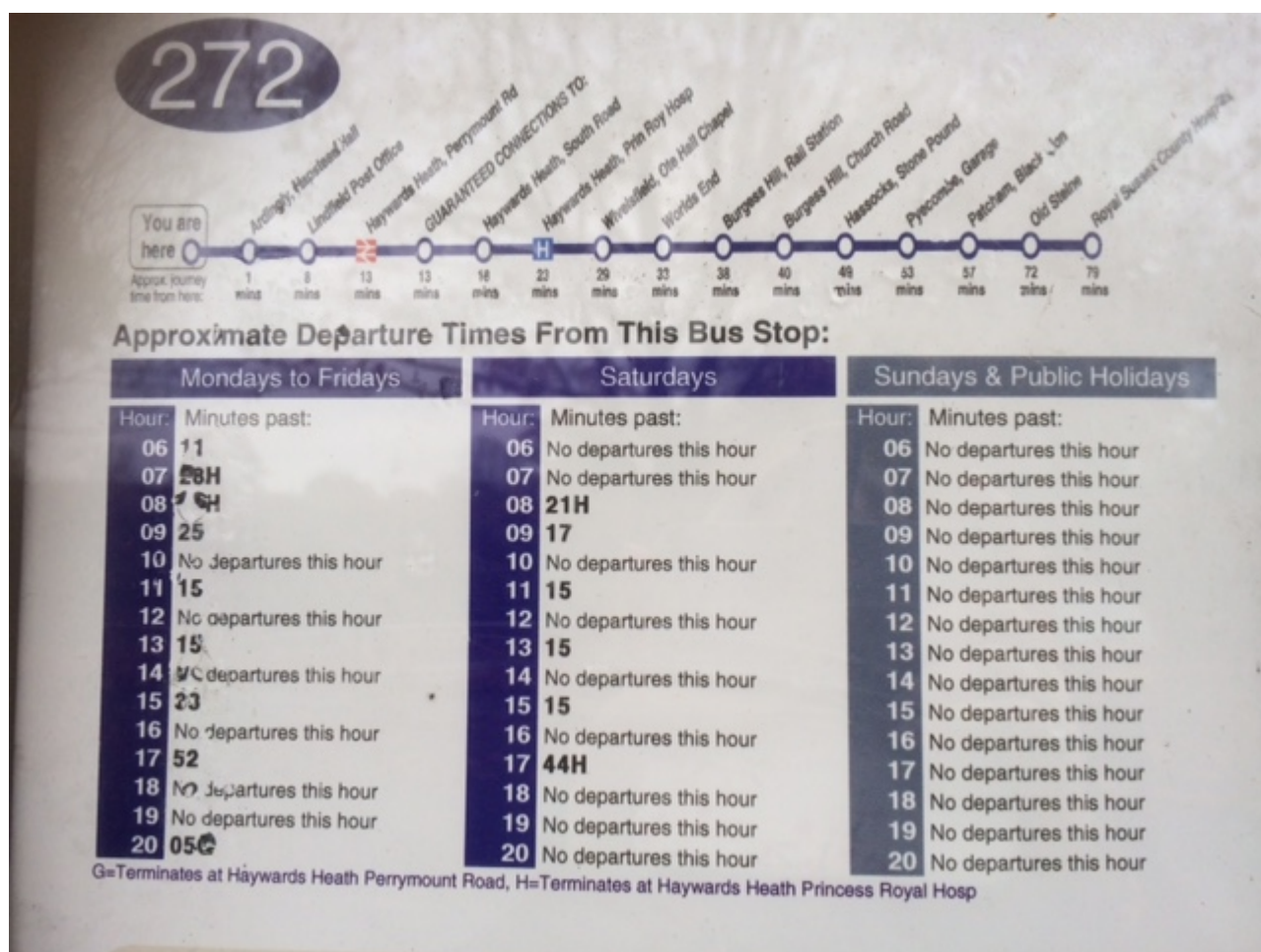
Dormice and bats are protected and are very noise sensitive.

The Loder valley nature reserve is next to and downhill from the site. Noise and pollution from run off water would endanger this conservation area. The dormouse conservation project is on this site. Other protected species are also present.



The nearest GP is full and is also a long distance away. It is not walkable as there are no pavements en route. The cross country route is muddy and has many stiles. The bus service is not reliable and is very infrequent. The village needs a GP surgery and an application for this would have been more appropriate for the site and less impactful. The community needs should come before anything else. A GP surgery is urgently needed as people cannot get to medical appointments from here via public transport links. There are no GP places to support new residents.





Timetable of the only bus that serves the village. This bus runs from Crawley to Brighton and back, it is a long route and so the bus often does not turn up due to problems en route. It is also rarely on time because it's a long and congested route. The transport links in the village are very poor. This has an adverse effect on those without transport. Teenagers are very bored here and there is petty vandalism linked to teenage boredom issues. Housing should go in areas with access to services as it is unfair to leave people without access to basic services.

To : Planning department at MSDC and those CCD who have an interest in this site and application, and community connections.

Re Planning proposals/ consultation SA25 of the greenfield site that sits wholly within AONB in Ardingly village. Currently used as an occasional events car park for the South of England show ground.

I am against the proposed application for the following reasons and also the above photographed reasons.

1: The site is unsuitable for the proposed large scale housing development. It is wholly within an AONB and in the centre of busy footpaths. It would ruin the character and look of the entire village. It would ruin walking tourism in the village. The walks are popular and are in most walking guides, this is a top walking route and probably one of the most popular in the region due to views of unspoilt countryside, wildlife, birdsong etc. The Norman church next to the site also uses the proposed development site as a car park for events, the church has no parking and so needs to use the site for parking at weddings and funerals. The village car park is too far away from the church. This is because Ardingly was once 2 villages, the church is in the original historic village of Ardingly

and the current village car park is in Hapsted where the main road runs through. The church should have continued parking access on the proposed development site, the village needs access to parking for funerals, weddings etc. The proposed development would remove church parking facilities. Without parking the church could fall out of use and into disrepair. The visual impact of a large housing estate in the centre of a small historic village would ruin it. The listed buildings next to the site would be adversely affected and the view of these would be blocked by the large housing estate.

2: Flood risk from run off water.

Extensive drainage was installed at Holmans due to run off water from the showground site. The showground sits above the properties at Holmans and they flood. During heavy rain run off water flooding is still an issue. The proposed development would increase flood risk of properties below it. Toxic run off water into the nature reserve and reservoir below site. There is a risk of toxins from any building site running into the nature reserve and conservation area below the proposed development site. This could endanger the ecology.

3: TPOs. There are several oaks of significant age and character adjacent to the site, there are also trees on the site and mature wildlife rich hedgerows surrounding the site. There are known bat roosts in the oaks in the park next to the proposed development site. It is likely there are bats in many of the trees around the site. Bats forage on this site for much of the year and can be seen here every evening during “ bat season “. Bat surveys need to be done particularly on the edge between the park and the showground as bats are always seen here and in good numbers. There are different types and some may be rare as very rare species are recorded nearby.

4: The Loder valley nature reserve is directly below the proposed development site. The proposed development would pose a risk to this site, from noise, chemical pollution, habitat losses. The reserve is an 150 acre reserve, supporting 300 plant species, including dormice, badgers, kingfishers, osprey, little egrets and Marsh tits. There is also a dormouse recovery program onsite and there are many nesting boxes in the vicinity of the proposed development site.

5: The Roman road that runs adjacent to this site and across the showground would be adversely affected by proposed development. This feature is under utilised and should be restored and signposted to encourage tourists, preserve history and enhance the village. The showground should take better care of the Roman road section on their site. This would boost the local economy and help the village attract more visitors and tourists.

----- Infrastructure issues

Roads: local roads are often congested. The roads here are country roads and are frequently dangerous and muddy/ slippery. In winter the roads are very poor around the village. Some of the routes out of Ardingly are single track lanes and are impassable in icy or bad weather.

Input from village as to its needs:

The showground should know better here and it would appear that they are being misled by developers who wish to gain maximum profits from their charity. A charity should consult its members before this proposal was put forward. The villages needs should go before the financial needs of developers.

The village needs are:

A GP surgery

A larger primary school with a playing field or just a new playing field.

A church car park

A transport service or regular 7 day transport service/ bus.

A youth group or activities for teenagers.

A new scout hut as the current one is decomposing and has broken windows and is too small.

-----/

The village currently has a post office but the owner is retiring and it is unlikely that the shop or post office will stay in the village long term. The place runs on Commission only and is not sustainable. Once this goes then there would be no services or shop.

Bus services here are very poor as described above. See timetable for details.

--////-

To conclude this proposed development site is unsuitable for many reasons. There are other more suitable sites in the village. There are many more suitable sites in the region I.

The hard standing site the other side and at the front of the showground would be less impactful and less damaging to the village. The needs of the village need to come before the profits of developers.

Regards

Rachel Mcnamara



Further notes: to add

The post office is now closed and this leaves the village with no amenities. The village cannot support new developments.

Teens are particularly isolated here and I often see them

in the park looking lost/ distressed and vandalising things. Teens are bored out of their minds because there is no public transport to go out in the evenings or weekends, the buses are rare here and only come in daytime hours . There is now evidence of serious drug taking in the park and unfortunately it is likely to be these bored teens because that is often a path bored young people in isolated villages take. I lost several friends to drugs, they were bored teens in isolated villages and are now dead because of drugs. So I do know what I'm talking about and you shouldn't be putting housing estates in isolated villages for this reason.

Noise: I forgot to add an important bit about noise. The showground is very noisy and disruptive often. I live nearby and actually go away when some of the events are on because they are unbearably loud and disturbing. There is one where dogs bark loudly 24/7 for several days and I can't sleep at all so I go and stay with friends. There are sometimes thousands of school children/ scouts and noise makers 24/ 7 for weeks at a time. There are loud fireworks most summer weekends and loud parties/ concerts or events. I am used to this and go and stay elsewhere when needed. I like fireworks and music/ concerts and parties but the dogs and children can be too much. Not everyone likes loud fireworks and parties and any proposed development would experience the excessive and loud showground noise.

The proposed showground housing would mean that the showground would have to close down permanently. The showground exceeds acceptable noise limits already and I find them very disruptive. I am further away than the proposed development. The showground and housing could not be compatible and any development would lead to the permanent loss of the south of England events centre and showground.

***I believe developers are aware of this and are encouraging the loss of the south of England showground so that they can build on the whole site. This would be a great loss to sussex. ***

Farming community importance of the site: The south of England showground has unfortunately gone a bit wrong in recent years and lost its way. The developers hold sway in the main buildings at the south of England show now , this is wrong as it is not what farming is all about.

The networks for the farming community are very important and this site needs to be protected.

I was fortunate to go to agricultural college and did some of my first public facing work the showground many years ago. Many of my friends are in agriculture / animal work and horticulture and this type of work is particularly important now.

The south of England showground is a vital resource for the community and sussex , putting housing in this site would likely lead to the loss of this showground and all the networks that rely on it.

Plumpton college and brinsbury have many long term links with the showground and the young people often go on to work via the support networks that connect from the south of England showground.

#

General comments about developments/

The developers cannot sell the local housing that they have built around here. This is because there are no jobs locally. Gatwick employment has crashed and all the local industry linked to that has collapsed. We won't need housing around here. Most people want to live by the sea and coastal developments are now popular. Don't ruin the county by building housing that people don't want.

Tourism/

We need tourism around here. Ardingly area is a tourist spot, it has a lot of untapped potential.

The council could very easily get a tourist garden pass scheme set up locally. We have some of the best gardens in the country here. " come visit the gardens of sussex" - set up a 3 visit pass to be used within a month or so, speak to Wakehurst/ borde hill/ nymans/ standen etc and organise something. Advertise the pass. It would be popular and bring visitors and money to the area.

The area needs tourist money and building housing estates is not conducive to gaining tourism. The council needs to get more proactive in encouraging tourism to the area.

Regards

Rachel Mcnamara

Sent from my iPhone

2244

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2244

Response Ref: Reg19/2244/1

Respondent: Ms J Galelli

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

From: Galelli, Joan [REDACTED]
Sent: 28 September 2020 14:06
To: ldfconsultation
Subject: SA25 Land West of Selsfield Road Ardingly

Good afternoon,

My name is Joan Galelli and I live at [REDACTED] My home is one of a few that are closest to the proposed development and, as such, I would expect my views to be given serious consideration.

I wish to register my strong objection to the proposed development at the Ardingly Showground and would not consider a reduction in the number of houses proposed acceptable. There should not be agreement to a development at this site, however many houses.

In summary

1. When the parish agreed the development of Ardingly College land into 35 houses, now known as Monks Meadow, we the parishioners were told that this would be sufficient to be considered our contribution to the local and national housing shortage. We certainly didn't believe that this pledge could be reneged upon within a matter of a couple of years.
2. This is beyond doubt a Major development. 70 houses in a village of 700 will change the village beyond recognition.
3. This plan cannot be considered sound as the site is not justified. There are other sites across the county which are not in a AONB and would not have the negative impact upon the immediate surroundings that this site would. The land is currently used by dog walkers and others within the village taking exercise, including families who use the area as a safe space in which to teach children to ride bikes etc.
4. I seriously doubt that the plan is deliverable in terms of the pledge to increase public transport available to the village. The increase in traffic through the already very tight High Street is unavoidable and unwanted.
5. The Mid Sussex housing need is more than met by other developments, recently completed and in the planning and development stage. The obligation to provide affordable housing is laughable. What is affordable by the majority of young people in this country is not housing which is in excess of £300,00.

Joan Galelli

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2277

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2277

Response Ref: Reg19/2277/1

Respondent: Mrs & Mr C & G Howarth

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? ✓

[REDACTED]

From: Charlotte Youdan [REDACTED]
Sent: 28 September 2020 20:19
To: ldfconsultation
Subject: Public response to SA25 proposed development Ardingly.

Dear Sirs,

We write as part of the public consultation on the proposed SA25 development at the South of England Showground, Ardingly. We would also like to formally express our wish to speak at the public hearing for this proposal.

We wish to register our objection to the proposed development on the following grounds to oppose the "sound" criteria of the same:

a) Ardingly is a small village with little infrastructure. There is one small village school, a small newsagent and a bakery.

Unlike surrounding villages such as Lindfield and Cuckfield there is no supermarket or GP surgery, which would support a larger population, (and in the case of Lindfield 2 x schools). As of October 2020, there will be no Post Office in the village, further limiting the ability of the local population to fulfil their activities without having to drive to neighbouring towns and villages. This then adds to increased traffic and unnecessary journeys.

b) the village is situated in an area of outstanding natural beauty and the showground is a much loved recreation space for the residents of the village as well as visitors from the surrounding area. The entire space is used by dog walkers, children and adults as a place to walk, play, cycle and exercise on a daily basis. It is a safe space away from the main road. The area is populated by deer and other wildlife such as foxes, owls and hedgehogs, whose natural habitat would be disturbed and lost.

The development would undoubtedly impact on the use of the showground for recreational use and in particular increase the safety risk for children due to an increase in traffic.

There are no objections to the Showground increasing the volume of shows/concerts etc that it puts on as an alternative way to generate income. In the past these have been well received by the village and enjoyed by the residents.

c) It is understood that the Developer would be required to provide funds to Mid Sussex Council to put back into the community as a condition of the development. However, such funds would not be earmarked specifically for use in Ardingly to improve the infrastructure of the village to take into account the increase in population.

This includes, but is not limited to the facts that there is no healthcare provider in the village, nor are there plans to create even a part-time surgery to accommodate additional residents. Nor is there provision to comprehensively improve the local school and its grounds which is suffering from older infrastructure and have to rely on the help of Ardingly College to use their sporting facilities. With an aging local population this is of unsound nature as they will suffer detrimentally.

d) Any development would see an increase in traffic volumes, especially for large vehicles. The parish has already been alerted to concerns by the residents about the volume of traffic through the village and the excess speed at which cars travel. The High Street is narrow and is a main thoroughfare for commuting traffic from Crawley/Turners Hill to Haywards Heath and vice versa, which can result in traffic backing up or cars mounting the pavement to squeeze their way through. This presents a risk for foot traffic and cyclists.

The main road to Ardingly from Haywards Heath (Portsmouth Lane, High Beech Lane, College Road) is already of poor quality over time with additional traffic this will deteriorate further. Again developer funding would not be guaranteed to improve this route which needs dire attention. This would make the main route to major local facilities of an unfit nature - no allocation of funding for this specific purpose cannot be justified. There have been deaths on this route, with more traffic this will sadly and likely happen again.

Furthermore, a large number of roadworks along with traffic to Ardingly College have taken to using Copyhold Lane which is a short-cut from the A23 to both the Hanson Aggregate plant and to the College, Showground and beyond for events. We have been involved in several incidents with cars going too quickly on a road of very poor quality and poor visibility. We have repeatedly damaged our cars due to the above. There is no justifiable reason why funding to West Sussex Highways of this development should not be explicitly allocated to these road improvements.

e) The village primary has a small playground, but does not have its own grass playing field or forest school. The area of the showground adjacent to the school provides the children with a space to explore the natural environment around them and extend their learning outside of the classroom to a safe location close to the school grounds. This opportunity would be lost if the development proceeds and the school would be required to navigate roads/traffic areas to provide a natural space for the children to explore and learn.

f) Local transport would not be guaranteed to be improved to support additional residents wishing to use it. We have needed to use this, but the times are impractical for being able to switch away from driving, so this must be doubly hard for those totally dependent on public transport.

g) Other proposed developments in the local area will probably be approved by 2031, why should a development in an AONB be sound, required and justified. As a member of Haywards Heath Golf Club until very recently, there was a planning application for the development of this site for a large number of homes. Arguably the number of which would nearly fully satisfy the current shortfall of 1,280 homes required by 2031. The discussions surrounding the proposed purchase, closure and development of the Golf Club have been ongoing for years. This application has been withdrawn but this will likely be reinstated once the Golf Club's lease ends in December 2022 and once Mid-Sussex District Councils revised Housing Plan is submitted and the land is marked as eligible for development given its proximity to Haywards Heath train station.

This means with respect to SA25, there would be no sound reason to approve the local development. To expand on this, there are likely to be several more planning applications across the district of sufficient size between now and 2031 that are not part of High Weald AONB.

Yours truly

Charlotte & Guy Howarth

Residents of [REDACTED]

2336

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2336

Response Ref: Reg19/2336/1

Respondent: Ms C Sansom

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: C Sansom [REDACTED]
Sent: 28 September 2020 19:00
To: ldfconsultation
Subject: SA25, Land west of Selsfield Road, Ardingly - Consultation Response.

Dear Sirs

I do not believe the proposals to meet the current plans for 70 houses to meet with the soundness criteria for the following reasons.

The proposals to build 70 residential units exceeds the calculated requirement for the village. Once infill units have been accounted for a requirement of 22 is sufficient to deliver these local needs. The addition of 70 houses would substantially alter the character of the village.

The development is close to the Conservation and needs to sit successfully within the characteristic two village format. Whilst the reduction of the development from 100 to 70 does help this, a further reduction would emphasise the distinction and prevent creeping development linking the two.

The development will deliver more vehicles into the village where the highways are already dangerous and with an excess of parked cars. There is no clear provision for alternative, low carbon methods, including better public transport provision enabling transport to school and work at appropriate times and safe cycle routes to Lindfield and Haywards Heath. My children are consistently late to school. The village is dangerous for pedestrians and it is understood that previous approaches to the Highways Agency have resulted in identified solutions being rejected and so further rejections should be anticipated, consequently it is expected that the current inadequate situation would be compounded.

If more affordable housing is constructed, then additional school spaces may reasonably be anticipated although no assessment of the community impact is available in the studies pack. There is discussion of the relocation of the Scout Hut, however no detail on how this would be implemented. In addition, the development would prevent any further extension of the recreational and school play areas. The documents provide no details regarding how the Scout Hut would be relocated and what the impact on school numbers or how this might be accommodated.

Local infrastructure, specifically sewerage, is already inadequate and so the construction of further load will result in additional pollution of the local surface waters.

To be proportionate to local needs 22 houses would be acceptable, providing it is supported by sufficient provision in infrastructure to support it and not to block potential future extension to the school and recreation ground.

Yours faithfully

Ceri Sansom
[REDACTED]

2357

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2357

Response Ref: Reg19/2357/1

Respondent: Ms R Molony

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

SA 25 Land
West of Selbyfield Road,
Ardingly.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Sept 25th 2020

Dear Planners,

I enclose my comments on
the above plan in this letter: as the form
has no suitable headings.

Infrastructure needs improving now,
water provision, e.g. enlarge Ardingly
Reservoir; water companies need to
improve management. Areas of Cuckfield
and Haywards Heath were without water
for days in August 2020, before more
building this issue must be addressed.

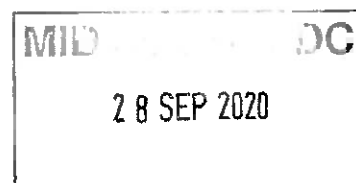
Sewage, there is often a smell of sewage
in College Road and the centre of the
village, so the drainage system needs
overhauling.

As this plan will add to more traffic

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

1. Personal Details

Title	MRS.
First Name	R.
Last Name	MOZONY
Job Title (where relevant)	Retired.
Organisation (where relevant)	Ardingly Resident.
Respondent Ref. No. (if known)	?
On behalf of (where relevant)	Myself.
Address Line 1	[REDACTED]
Line 2	[REDACTED]
Line 3	[REDACTED]
Line 4	[REDACTED]
Post Code	[REDACTED]
Telephone Number	[REDACTED]
E-mail Address	[REDACTED]



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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:

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 ☐

Not known by me.

4b. Sound

Yes ☒

No ☐

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

(1) Positively prepared

Sound

☐

Unsound

☐

Not known by me.

(2) Justified

☐☐

Possibly.

(3) Effective

☒☐

(4) Consistent with national policy

☒☐

Too much top down approach.

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.

it 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.

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.

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:

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:

[Redacted Signature]

Date:

Sept 25th 2020

Thank you for taking time to respond to this consultation

2384

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2384

Response Ref: Reg19/2384/1

Respondent: Mr R Hughes

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? ✓

[REDACTED]

From: [REDACTED]
Sent: 27 September 2020 22:42
To: ldfconsultation
Subject: Show ground development of 70 houses; why not 30 houses?

Follow Up Flag: Follow up
Flag Status: Completed

To whom it may concern

Should developers allocated funds be sufficient to make a substantial improvement to:

(St Peters C of E School)

safety of pedestrians and property frontages

services

and upkeep of the Recreation Ground

We should bite the developers hand off to get it!

If no believable offer of such funds is forth coming only the smallest, or no development can be tolerable to me or I suggest, the whole village.

Yours faithfully

Richard Hughes of [REDACTED]

Primary education

Traffic flow and

Public transport
Shops and

The improvement

2389

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2389

Response Ref: Reg19/2389/1

Respondent: Mr S Hooper

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Simon Hooper
Address	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound
Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	<p>The proposed development is outside the the built up area and within the AONB. The scale of development will take too much of this protected land, and is therefore against policy and is beyond that adopted in the Ardingly Parish Neighbourhood Plan, where the local need has already been delivered. There is therefore no residual requirement for such a large housing need.</p> <p>Having regard to the size of the built up area, the development must surely be considered a 'Major' development within the AONB and on land which is an important recreation area used by both villagers and other residents local to Ardingly.</p> <p>The vast majority of local residents are against a development of this size and therefore it is against public interest.</p> <p>Access to the development would be from an already busy 'B' road. The village has limited services and so residents will have to travel for employment and essential services. With an infrequent bus service and the lack of opportunity to develop safe cycle routes due to the nature of local roads and the terrain, the development will bring more cars onto the road to the detriment of the environment at a time when car use should be discouraged.</p>
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.	At present the inclusion of SA25 in the DPD is not consistent with national policy and therefore not sound. Any development here will therefore need to address the points raised above.
If you wish to provide further documentation to support your response, you can upload it here	
If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	No, I do not wish to participate at the oral examination
Please notify me when The Plan has been submitted for Examination	yes

Please notify me when-The publication of the recommendations from the Examination	yes
Please notify me when-The Site Allocations DPD is adopted	yes
Date	29/09/2020

2390

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2390

Response Ref: Reg19/2390/1

Respondent: Mrs L Davis

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Lydia Davis
Address	<div></div> <div></div> <div>United Kingdom</div>
Phone	<div></div>
Email	<div></div>
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25, Land West of Selsfield Road, Ardingly.
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	Yes
(1) Positively prepared	Sound
(2) Justified	Unsound
(3) Effective	Sound
(4) Consistent with national policy	Unsound

Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD

I would like to make the simple point that the SA25 makes the DPD Unsound for it is neither Consistent With National Planning Policy in failing to acknowledge that the SA25 it is a major development nor is it Justified in allocating this site for development.

The plan has not allocated an appropriate site in choosing the SA25 because this development resides within an Area of Outstanding Natural Beauty which is a large asset to West Sussex, and to the country. Furthermore, the proposed SA25 development is a major development and is not being acknowledged as such in the DPD which therefore does not accurately acknowledge the impacts that development of the SA25 would have on the community and natural landscape.

Soundness Criteria: Consistent with National Planning Policy

From the National Planning Policy Framework document (February 2019 Ministry of Housing, Communities and Local Government), the glossary entry on page 70 defines Major Development as: 'For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more...' The proposed SA25 is 70 dwellings on 3.41 hectares and therefore is a major development.

Definitions aside, the increase in dwellings is 15% of the entire size of the current dwellings in the built-up area of the parish which is a very large increase in dwellings to take place within such short amount of time. This sort of increase would normally occur over many years, giving the village time to adjust and accommodate the population increase. In simply looking at the size of the proposed development of the SA25 site it is clear that it would extremely disrupt the functioning of parish life in both its construction and simply in adjusting infrastructure to accommodate it.

Soundness Criteria: Justified

The Mid Sussex District Council Site Allocations Development Plan Document (July 2020, Regulation 19 Submission Draft pages 73-74) confirms that the SA25, Land West of Selsfield Road, Ardingly is located within an Area of Outstanding Natural Beauty (AONB). Mid Sussex District Plan 2014-2013 (Chapter 16, page 62) makes it clear that great weight must be given to conserve AONBs which have a high status of protection with regard to cultural heritage, beauty, and wildlife. It further acknowledges that National policy states that planning permission should be refused for a major development in AONBs

The Mid Sussex District Plan 2014-2013 (Chapter 1) furthermore claims that the natural environment, rich heritage, and conservation areas of Mid-Sussex are it's largest assets that make it attractive to visitors. Therefore, a development of the scale proposed for SA25 will immediately disrupt the character and charm of these very features of Ardingly (nationally renown) which include the Ardingly Reservoir Conservation Area, the South of England Agricultural Show, and the Area of Natural Beauty in itself with landscapes and public footpaths for all to enjoy. This small, charming village and its natural assets will be detracted from by a development way too large in scale for its surrounding area. It is a grave mistake to over-develop on an asset to English culture and tourism such as this.

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.

I would simply advise that if residential development were to happen on the SA25, Land West of Selsfield Road, Ardingly it simply must not be major development and therefore a number of houses proposed for building must be appropriate to the Area of Outstanding Natural Beauty that it resides upon. Less than 30 houses would be closer to appropriate when considering this.

If you wish to provide further documentation to support your response, you can upload it here

If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination

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

Please notify me when-The Plan has been submitted for Examination

yes

Please notify me when-The publication of the recommendations from the Examination

yes

Please notify me when-The Site Allocations DPD is adopted

yes

Date

29/09/2020

2399

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2399

Response Ref: Reg19/2399/1

Respondent: Mr & Mrs N & P Hucknall

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

From: eforms
Sent: 28 September 2020 21:00
To: ldfconsultation
Subject: Site Allocations DPD Consultation Response (Ref: DPDCon-1601323188)
Attachments: Site Allocations DPD Consultation Repsonse Form.pdf

Categories:

Name	Penelope Hucknall
On behalf of	Mr& Mrs Nigel Hucknall
Address	
Email	
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA 25
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound
Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	<p>Ardingly village has no need for further housing development . The traffic situation through the village is already quite out of control .</p> <p>There is no Doctor's surgery no Post Office and very little in local amenities. The field intended for building development is a very important and much used public open space. This space is used occasionally for overflow parking for the Agricultural Show ground this is quite acceptable on an occasional basis but where could these extra vehicles be parked if this facility is no longer available ?</p> <p>Ardingly High Street is already full of parked cars as most of the houses in the High Street do not have off street parking .</p> <p>The traffic situation is already very dangerous both for drivers and particularly for pedestrians , espacially children and parents making their way to the local school.</p>
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	I feel this plan should be implemented.

where this relates to soundness.

If you wish to provide further documentation to support your response, you can upload it here

If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination

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

Please notify me when-The Plan has been submitted for Examination

yes

Please notify me when-The publication of the recommendations from the Examination

yes

Please notify me when-The Site Allocations DPD is adopted

yes

Date 28/09/2020

2410

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2410

Response Ref: Reg19/2410/1

Respondent: Ms B Cox

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: Bernadette Cox [REDACTED]
Sent: 28 September 2020 23:56
To: ldfconsultation
Subject: SA25

Dear Sir/Madam

I do not believe that the proposed site allocation at SA25 (a 70-dwelling development in an AONB) is consistent with national planning policy and as such I believe the allocation of this site in the DPD renders the DPD in its current form “not sound”.

The proposed 70 dwelling development is an 18% increase in Ardingly’s overall built-up area, such an increase is “major” in the normal sense of the word and the development of a “major” site within the AONB when there is no local need is not supported within the NPPF unless exceptional circumstances can be proven and MSDC have previously acknowledged that no such circumstances can be proven in relation to the allocation at SA25.

Yours Sincerely

Bernadette Cox
[REDACTED]
[REDACTED]
[REDACTED]

2412

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2412

Response Ref: Reg19/2412/1

Respondent: Mr G Taylor

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Relating to SA25 portion of the DPD

Gary Taylor

[REDACTED]

Dear sir\madam

I would like to present my view on the proposal for SA25 and the fact that it makes the whole DPD unsound and does not meet the criteria set out to make the DPD so and contrary to the NPFF

In no way could the increase of the village by 15-18% proposed by this development, be classed as anything but Major in its size and impact to the village.

Positively prepared – (Failure\Non Compliant)

The proposal was not positively prepared, as it did not work with the village, the parish council or take into consideration the wishes\requirements of the village plan.

A village survey taken after the 1st representation showed that 89% believed that SA25 was a substantial development and wanted less housing and footprint allocated (63% wanted less than 30 houses).

Ardingly has already met the requirements that it set out to deliver housing in its plan. It is my understanding that SA25 allocation of 70 houses fover that number by a considerable amount.

The Neighbourhood plan specifies that housing should remain within the built up area. SA25 is proposed on AONB protected land. Increasing the village by 15-18% by any normal sense of the word would be classed as Major. I believe this is against rules in place for developing on AONB land.

SA25 as part of this DPD was not positively prepared as it appears that the primary factor for moving this forward was not taking into consideration local need, want, or protecting the rural environment within the AONB, but purely a land owner offering land with a large amount of potential properties, to create a large buffer\surplus of properties for the DPD.

Justified (Failure\Non Compliant)

SA25 is not justified as

- Ardingly village already exceeded its defined housing requirement from its village plan. There is no local need defined.
- What proof of there for local need for 70 houses on AONB land? I believe there is no requirement and this should be considered in conjunction with the Major scale of this

development in relation to the size of the village. A more realistic number would be less than 30 on a smaller parcel of land. This would be in line with local acceptance, not overtly and disproportionately impact the rural community, provide the Showground with required capital, protect AONB and the DPD.

- I believe there are covenants in place to protect the showground and return it to agricultural land rather than to housing. This should be considered when deciding if the development at this scale should go ahead, or a much smaller footprint.

The DPD is not sound due to the points above, especially that there is not the requirement and that the development is Major in any sense of the word.

Consistent with national policy (FAILURE\Non Compliant)

NPFF states that Planning decisions should enhance the local communities and be rejected where major unless there is a local need and it is in exceptional circumstances.

This development is major and there is no defined local need. Please reassess the numbers being proposed to make this DPD sound.

There was no justification for why this development was not classed as major within the DPD.

2426

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2426

Response Ref: Reg19/2426/1

Respondent: Mr P Lewis

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	PATRICK LEWIS
Address	[REDACTED]
Phone	[REDACTED]
Email	[REDACTED]
Name or Organisation	Patrick Lewis
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25 Land west of Selsfield Road, Ardingly
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	Yes
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound
Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	<p>POSITIVELY PREPARED -Not Sound There is a surveyed consensus in the Village that the proposed development will be too large. Local views need to be taken into account.</p> <p>JUSTIFIED -Not Sound Our carefully prepared plan which was initially accepted by MSDC allowed for reasonable development in the village and this development has now been exceeded. This is clearly a Major development. MSDC states it is not a major development.</p> <p>EFFECTIVE-Not Sound The housing will have an undue impact on infrastructure and services. The road access is limited and no sustainable alternatives such as bus or cycle paths are available or possible to install.</p> <p>CONSISTENT WITH NATIONAL POLICY-Not Sound This development does not contribute to and enhance the natural and local environment. It does not contribute to the village. It is located on a busy B road which already blights the village and is dangerous for pedestrians in the village.</p>
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.	This is another major development in an area of outstanding natural beauty. Street Lane as it is will not support the traffic particularly at school start and finish times. I appreciate the necessity for the Showground to raise funds but given what the College got for Butchers Field, 30 houses should be sufficient. This is not only the thin end of the wedge but Ardingly is moving from being a village community to being a town; current residents moved to be in a village.
If you wish to provide further documentation to support your response, you can upload it here	
If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	No, I do not wish to participate at the oral examination

Please notify me when-The Plan has been submitted for Examination	yes
Please notify me when-The publication of the recommendations from the Examination	yes
Please notify me when-The Site Allocations DPD is adopted	yes
Date	28/09/2020

2428

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA25

ID: 2428

Response Ref: Reg19/2428/1

Respondent: Mrs S Laker

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Sue Laker
Address	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA25
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	Yes
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound
Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	<ul style="list-style-type: none"> • I would like to register my objections to the creation of 70 new homes on the Southern edge of Ardingly Showground. 70 is far too many for a village which is already deemed to be a 'large village'. We will no longer have a sense of village community and we do not need more houses. • There were serious water shortages in the area this summer. 70 homes will take a lot more water from the supply available, creating much more serious problems for the villages South of Ardingly. • Traffic has hugely increased recently and 70 homes will potentially bring in another 140+ cars, causing even more wear and tear to our roads and country lanes, and danger to people trying to cross the road – not to mention cyclists, of which there are many. There are frequent traffic jams in the High Street as it is. • We have just lost our Post Office in Ardingly. This means that there are no facilities in the village to withdraw cash, buy foreign currency, post parcels, tax cars or do any of the other things which the Post Office services provided. This will mean that the new home owners would have to drive to neighbouring villages or towns. • The environmental cost will be great. • Local doctors and dentists are already full and not taking on new patients. Where are these new tenants going to get medical and dental care? Likewise, the Princess Royal hospital is under huge pressure from all the new housing in Mid Sussex. • The Ardingly Neighbourhood Plan which was drawn up some years ago following a survey of all villagers, stated that no further development would be necessary in the village after we agreed to the creation of Monk's Meadow. This SA25 plan is reneging on that. <p>I do understand that the Showground needs to sell some land in order to stay afloat financially, but a much smaller number of houses should be built on this land – 70 is far too many.</p>
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.	I would prefer no houses to be built on this site. If we must have any it should be no more than 30.
If you wish to provide further documentation to support your response, you can upload it here	

If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	No, I do not wish to participate at the oral examination
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Please notify me when-The publication of the recommendations from the Examination	yes
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Please notify me when-The Site Allocations DPD is adopted	yes
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Date	28/09/2020
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