

SA27: Land at St. Martin Close - Index by ID Number

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
49	Mrs T Large			Resident	<input type="checkbox"/>
50	Mr J Large			Resident	<input type="checkbox"/>
642	Ms C Tester	High Weald AONB Unit		Statutory Consultee	<input checked="" type="checkbox"/>
690	Ms L Bourke	Slaigham Parish Council		Town & Parish Council	<input type="checkbox"/>
697	Mr D Barnes	Star Planning	Welbeck - Handcross	Developer	<input checked="" type="checkbox"/>
710	Mr N Burns	Natural England		Statutory Consultee	<input type="checkbox"/>
730	Mr J Farrelly	Genesis	Wates - Park Road Handcross	Developer	<input checked="" type="checkbox"/>
765	Dr I Gibson			District Councillor	<input checked="" type="checkbox"/>
1424	Ms A Hunt			Resident	<input type="checkbox"/>
1425	Mr L Vandendyck			Resident	<input type="checkbox"/>
1426	Mr K Lewry			Resident	<input type="checkbox"/>
2054	Ms C Baldock			Resident	<input type="checkbox"/>
2140	Mr C Hough	Sigma Planning Services	Rydon Homes Ltd	Promoter	<input checked="" type="checkbox"/>
2307	Ms T Fenter			Resident	<input type="checkbox"/>
2449	Mr I Barden			Resident	<input type="checkbox"/>

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA27

ID: 49

Response Ref: Reg19/49/1

Respondent: Mrs T Large

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: teresa Large [REDACTED]
Sent: 27 September 2020 15:28
To: ldfconsultation
Subject: Site Allocations DPD - Regulation 19 Consultation
Attachments: Site Allocations DPD - Regulation 19 Consultation.docx

Hello,

I wish the attached objection to the inclusion of SA27 to be noted.

Kind regards,

Teresa Large

This Message was sent by :- Teresa Large

Mrs T J .Large

27 September 2020

Dear Sir,

I wish to object to the inclusion of SA27-land at St Martin Close, Handcross within the Mid Sussex DC Planning Policy - Site Allocations DPD Consultation (Regulation 19)

I have several justifications for my objection.

First and foremost; I would draw attention to the comments made by the **Inspector** of the Slaugham Parish Neighbourhood Plan who stated.....

7.105 “I have considered the tension between the policy and the supporting text. In doing so I have taken careful consideration of the representation made by Millwood Designer Homes and by the Parish Council in its response to my clarification note. I am satisfied that the St Martin Close West site should be considered as a reserve site. **There is no compelling evidence to suggest that there is a strategic need at this stage for the development of both the St Martin Close East and West sites.** Nevertheless, the potential for this site to be developed in conjunction with that of St Martin Close East is appropriate in general terms **in the event that the evidence justifies the need for its release for housing purposes”.**

Furthermore, including SA27 would be going against MSDC’s own District Plan...

- **The St Martin Close development is not a requirement of the Mid Sussex District Council (MSDC) strategic plan.** MSDC has stated in the current District plan, that as a result of the 600 housing units at Pease Pottage plus those for which planning consent has been granted, there will not be a requirement *“to identify further growth through the Plan*

process” There is “ZERO” REQUIREMENT FOR ADDITIONAL HOUSING IN HANDCROSS. However, whilst Slaugham Parish Council is not required to include any additional housing units it has chosen to do so to “boost housing supply”.

- Slaugham Parish Council **did not consult widely** with the Parish for its views to increase building over and above that which was required by MSDC **following** the announcement of the Pease Pottage and Hyde developments within Slaugham Parish. Local people have not been able to comment since these two large developments have been approved and so the Parish Council’s **EVIDENCE OF HOUSING NEED IS REDUNDANT AND OUT OF DATE.**
- The proposed development at St Martin Close received a range of objections including **Natural England** and the **High Weald AONB** Unit as it further degrades the **AONB**.
- The scale of building development in Pease Pottage and Handcross has already resulted in totally inadequate infrastructure provision, utilities are already failing with National Press coverage of water being cut off and power outages in Handcross means additional housing would further overstretch utilities. There will be more crowded and dangerous roads, extra pressure on the schools, stretched medical and care services, poor parking facilities for the shops in Handcross High Street, more pollution and damage to the environment.

For all of these reasons I hope any Inspector reviewing the MSDC and Slaugham Parish NHP decision will see that there is no need to include SA27 within the site allocation.

Kind regards,



Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA27

ID: 50

Response Ref: Reg19/50/1

Respondent: Mr J Large

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: Jason Large [REDACTED]
Sent: 27 September 2020 15:24
To: ldfconsultation
Subject: Site Allocations DPD - Regulation 19 Consultation
Attachments: Site Allocations DPD - Regulation 19 Consultation.docx

Hello,

I wish to object to the inclusion of SA27. I attach my objection. Please confirm receipt of this message.

Many thanks,

Jason Large

This Message was sent by:- Jason Large

Mr J.D.Large

27 September 2020

Dear Sir,

I wish to object to the inclusion of SA27-land at St Martin Close, Handcross within the Mid Sussex DC Planning Policy - Site Allocations DPD Consultation (Regulation 19)

I have several justifications for my objection.

First and foremost; I would draw attention to the comments made by the **Inspector** of the Slaugham Parish Neighbourhood Plan who stated.....

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Kind regards,

[Redacted signature]

[Redacted contact information]

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA27

ID: 642

Response Ref: Reg19/642/7

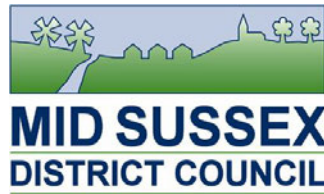
Respondent: Ms C Tester

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.testers@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 27	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.

The requirement under the Countryside and Rights of Way Act and the NPPF is that development should conserve and enhance the AONB.

'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.

Under 'Objectives'

Doesn't mention the AONB – suggest insert first bullet "To deliver a high quality, landscape led, sustainable extension to Handcross, which respects the character of the village and conserves and enhances the landscape of the High Weald AONB, and which is comprehensively integrated with the settlement so residents can access existing facilities".

Under 'AONB' first bullet point

"Ensure that the site layout, capacity and landscape mitigation requirements are informed by the recommendations of a Landscape and Visual Impact Assessment (LVIA), in order to conserve and enhance the landscape of the High Weald AONB, ~~and to 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: SA27

ID: 690

Response Ref: Reg19/690/1

Respondent: Ms L Bourke

Organisation: Slaigham Parish Council

On Behalf Of:

Category: Town & Parish Council

Appear at Examination? x

From: Laura Bourke <laura.bourke@dowsettmayhew.com>
Sent: 28 September 2020 17:18
To: ldfconsultation
Cc: planningpolicy; Slaugham Parish Clerk.
Subject: Re: Mid Sussex DC Planning Policy - Site Allocations DPD Consultation (Regulation 19)
Attachments: Planning Policy_200928.pdf

Dear Planning Policy

Please find attached representations, made on behalf of Slaugham Parish Council, for your kind attention.

I would be grateful if you could confirm safe receipt.

Kind regards
Laura

Laura Bourke
BA MSc MRTPI
Senior Planner

T: 01273 947776
E: laura.bourke@dowsettmayhew.com

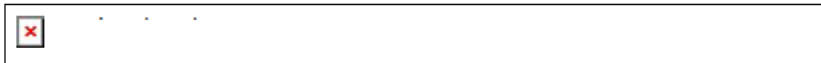
DOWSETTMAYHEW Planning Partnership
63a Ship Street | Brighton | BN1 1AE



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From: Mid Sussex District Council - Planning Policy <planningpolicy@midsussex.gov.uk>
Reply to: Mid Sussex District Council - Planning Policy <planningpolicy@midsussex.gov.uk>
Date: Monday, 3 August 2020 at 16:29
To: Laura Bourke <laura.bourke@dowsettmayhew.com>
Subject: Mid Sussex DC Planning Policy - Site Allocations DPD Consultation (Regulation 19)

[View this email in your browser](#)



Site Allocations DPD - Regulation 19 Consultation

3rd August 2020

Mid Sussex District Council has published the Site Allocations Development Plan Document for consultation from the **3rd August, closing midnight on the 28th September 2020.**

The Site Allocations DPD forms part of the Mid Sussex District Plan 2014-2031, which was adopted in March 2018. Its preparation is in response to the requirement by the Planning Inspector to meet the residual housing and employment needs up to 2031.

The Site Allocations DPD proposes a number of new housing and employment sites for allocation in order to meet this need. It also includes an allocation for a Science and Technology Park to the west of Burgess Hill, and a number of other strategic planning policies considered necessary for delivering sustainable development.

The Council must publish the version of the Site Allocations DPD that it intends to submit to the Planning Inspectorate for Examination. At this stage of consultation, the Council is seeking views on whether the Plan is legally compliant and meets the test of 'soundness' set out in the National Planning Policy Framework (NPPF). These are the broad areas that the Inspector will focus on in examining the Plan.

Comments will be considered by an independent planning inspector alongside the submitted Site Allocations DPD at a future Public Examination before deciding whether the Plan can be adopted by the Council.

The District Council will summarise the main issues from the consultation for

the Inspector. The Inspector will also receive copies of the representations submitted.

All of the consultation documents, Community Involvement Plan, Statement of Representations Procedure, and further information can be viewed online at:

www.midsussex.gov.uk/SitesDPD

Comments can be submitted:

Online: Online Form at www.midsussex.gov.uk/SitesDPD

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

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

Responses must be received by **midnight on the 28th September 2020**.

If you have any queries about this consultation, please e-mail:

planningpolicy@midsussex.gov.uk

Our address is:

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

planningpolicy@midsussex.gov.uk

You are receiving this email as you are either a Statutory Consultee, subscribe to the Planning Policy Update mailing list, or made a response to the Site Allocations DPD Regulation 18 consultation.

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EMAIL ONLY

Planning Policy

LDFconsultation@midsussex.gov.uk

63a Ship Street
Brighton
BN1 1AE

☎ 01273 947776

Email laura.bourke@dowsettmayhew.com

URL www.dowsettmayhew.com

28 September 2020

Dear Planning Policy

Submission Draft Site Allocations Development Plan Document - Regulation 19 Consultation

In response to the current consultation on the Draft Site Allocations Development Plan Document (DPDP) (Regulation 19) Consultation, I set out below, for and on behalf of, Slaugham Parish Council (SPC), comments in respect of SA11: Additional Housing Allocations and SA27: Land at St.Martin Close, Handcross.

Draft Site Allocations DPD

The District Plan, sets out the housing and employment needs for the district up to 2031. In addition, it committed the Council to preparing a Site Allocations DPD in order to find sufficient housing and employment sites to meet the remaining need. In light of such, the Draft Site Allocations DPD proposes the following allocations:

- 22 housing sites;
- 7 employment sites; and
- Science and Technology Park;

It also includes 5 strategic policies required to deliver sustainable development.

Policy SA11: Additional Housing Allocations identifies the sites required to meet the residual housing need. Land at St.Martin Close (West) (SA27) is identified within the parish of Slaugham. Comments are set out below in this regard.

No comments are submitted in respect of the proposed employment sites; Science and Technology Park; and/or the proposed 5 strategic policies.

SA11: Additional Housing Allocations

The Policy confirms development will be supported at the additional site allocations, through a comprehensive approach involving the community, local planning authority, developer and other stakeholders, where development meets the requirements set out within: Policy Requirements SA12 to 33; SA GEN: General Principles for Site Allocations; and are in accordance with the Development Plan read as whole.

Table 2.5 confirms how the required level of housing will be distributed. With respect to SA27: Land at St Martin Close (West), the table confirms the number of dwellings is 30 (65) and includes a footnote.

The footnote confirms *“Slaugham Neighbourhood Plan is now made and Land St Martin Close (east) for 35 units is now a commitment as at 1st April 2020. Therefore only 30 units are counted here to avoid double counting”*.

The Council’s approach in this regard is considered sound and is supported given the development status of the Slaugham Neighbourhood Plan.

The supporting text, para 2.34-2.41 confirms the section contains the site-specific policies for each housing site. These site-specific policies are set within a template for each site that identifies key objectives and site specific policy requirements. They are accompanied by a series of general principles which are common to all the sites and are set out in SA GEN: General Principles for Site Allocations.

Whilst it is acknowledged the supporting text confirms the site specific policies and the general principles should be read alongside the National Planning Policy Framework and Planning Practice Guidance and the Development Plan taken as a whole, given the large number of ‘made’ Neighbourhood Plans in the district, it is submitted this section should make specific reference to the detailed policies contained within ‘made’ Neighbourhood Plans.

SA27: Land at St.Martin Close, Handcross

Whilst the allocation of St.Martin Close (West) is supported and considered ‘sound’, SPC wish to highlight the pressure the allocation of the site will place upon the delivery of St.Martin Close (East) given proposals at St.Martin Close (East) are to enable future vehicular and pedestrian access to St.Martin Close (West).

Objectives: With respect to the trigger points, it is recommended this reflects paragraph 6.29 of the Slaugham Neighbourhood Plan which states:

‘... the trigger point for the consideration of the release of the site should be which ever of the following events occurs first- the review of the Neighbourhood Plan itself; the adoption of the emerging Mid Sussex Allocators DPD; the adoption of any review of the Mid Sussex District Plan; (MSDP) and a material delay in delivery of the Pease Pottage strategic delivery site in the adopted MSDP ‘

Urban Design Principle: The identified principles are supported and considered ‘sound’. In line with the requirements of Policy 10 recommend this section also details that design should positively respond to the prevailing character of the adjacent residential development.

Social and Community: The identified principles are supported and considered ‘sound’. In line with the requirements of Policy 10 (and Policy 9) recommend the development provides open space *“at least to the standards set out in the MSDC Development Infrastructure and Contributions Supplementary Planning Document”*.

Biodiversity and Green Infrastructure: The identified principles are supported and considered ‘sound’. In line with the requirements of Policy 10 recommend this section details that proposals allow for the retention of existing mature trees and hedgerows on the northern, southern and western boundaries.

Highways and Access: The identified principles are supported and considered ‘sound’. SPC support the provision of integrated access with St Martin Close (East). MSDC’s position in respect

of access from Coos Lane not being acceptable for highway and landscape reasons is also supported.

Conclusion

SPC consider the Site Allocations DPD has been positively prepared, is justified, effective and consistent with national policy and therefore considered 'Sound'.

Representations in respect of SA11: Additional Housing Allocations and SA27: Land at St.Martin Close, Handcross provide suggested amendments to ensure consistency with the Slaugham Neighbourhood Plan, having regard to the legal requirements and soundness tests.

Yours sincerely



Laura Bourke BA MSc MRTPI
Senior Planner

CC: Sally McClean, Clerk to Slaugham Parish Council

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA27

ID: 697

Response Ref: Reg19/697/3

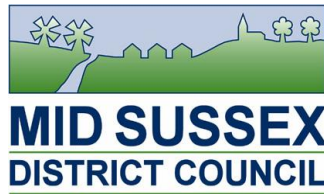
Respondent: Mr D Barnes

Organisation: Star Planning

On Behalf Of: Welbeck - Handcross

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.

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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.

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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="David"/>
Last Name	<input type="text" value="Barnes"/>
Job Title (where relevant)	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Star Planning and Development"/>
Respondent Ref. No. (if known)	<input type="text"/>
On behalf of (where relevant)	<input type="text" value="Welbeck Strategic Land III LLP"/>
Address Line 1	<input type="text" value="140 Brandwood Road"/>
Line 2	<input type="text" value="Kings Heath"/>
Line 3	<input type="text" value="Birmingham"/>
Line 4	<input type="text"/>
Post Code	<input type="text" value="B14 6BX"/>
Telephone Number	<input type="text" value="0121 444 7554"/>
E-mail Address	<input type="text" value="info@starplanning.co.uk"/>



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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: Welbeck Strategic Land III LLP

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	²⁷ <input type="text"/>	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:

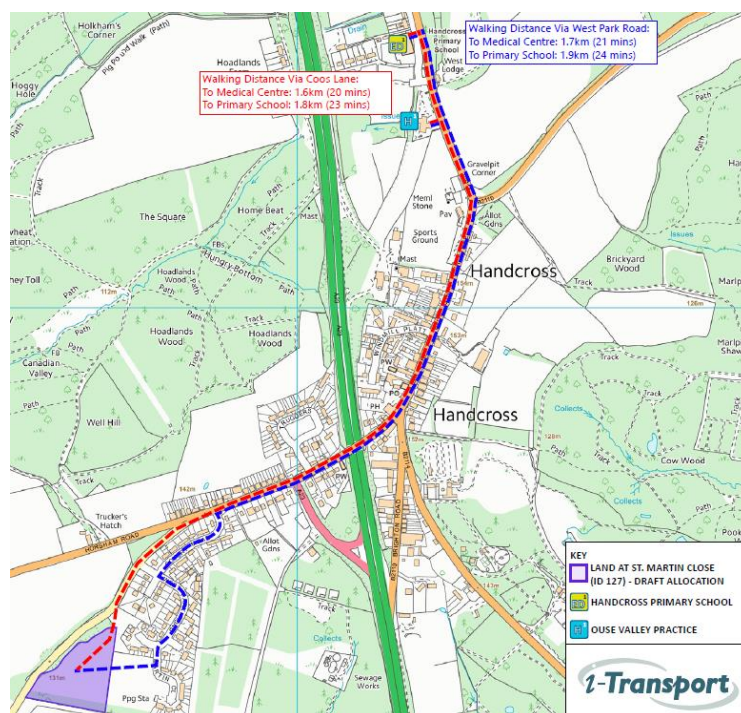
	Sound	Unsound
(1) Positively prepared	<input type="checkbox"/>	<input type="checkbox"/>
(2) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(3) Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>	<input 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.

1. Welbeck recognise that the Slaugham Neighbourhood Plan was made on 25 September 2019 and includes 2 sites for housing to the east and west of St Martin Close. The land to the east is a formal allocation in the Neighbourhood Plan. The land to the west is only a reserve site.
2. Policy SA11 refers to the reserve site and seeks to allocate it for housing purposes. However, Welbeck consider that there is the opportunity to review the planning circumstances of this site to determine whether it remains any part of the appropriate strategy for the DPD and is the best site for housing in Handcross. An objective assessment of the proposed allocation's distance to key services has been incorrectly scored by the Council as evidenced by Welbeck. This has led to the proposed allocation being awarded higher sustainability credentials through the Council's Site Assessment process than is accurate and is contrary to the Council's own stated methodology. Welbeck has pointed this failing out on several occasions to the Council.



3. It has poor public transport and is at least 20 minutes from key facilities, principally the healthcare centre and the primary school (see image above). The walk or cycle to these facilities is not commodious being uphill. Further, there is a sensate rural edge along Coos Lane which interfaces with what is a very rural and verdant character of the landscape associated with the Area of Outstanding Natural Beauty in this location.

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.

4. To be consistent with national policy, justified and effective, the DPD should not allocate St Martin Close (West) for housing purposes and at least make good the shortfall in the dwelling requirement at Handcross elsewhere at this settlement.

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:

Welbeck Strategic Land III LLP has extensive experience of critiquing Development Plan Documents and appearing at Examinations to articulate concerns about the drafting of such documents to assist the Inspector in understanding whether the document as a whole or individual policies or proposals are sound. Welbeck Strategic Land III LLP would make a valuable contribution to any discussion 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:

David Barnes

Date:

22 September 2020

Thank you for taking time to respond to this consultation

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA27

ID: 710

Response Ref: Reg19/710/9

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: SA27

ID: 730

Response Ref: Reg19/730/1

Respondent: Mr J Farrelly

Organisation: Genesis

On Behalf Of: Wates - Park Road Handcross

Category: Developer

Appear at Examination? ✓

LAND AT PARK ROAD, HANDCROSS

Mid Sussex District Council

Site Allocations

Development Plan Document

Regulation 19 Submission Draft Consultation

Representations on behalf of:

Wates Developments Limited and the
Blind Veterans UK Charity

September 2020



RTPI
Chartered Town Planners



LAND AT PARK ROAD, HANDCROSS

CONTENTS

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3.0	Comments on Soundness of the Draft Plan.....	7
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5.0	Summary and Recommendation	20

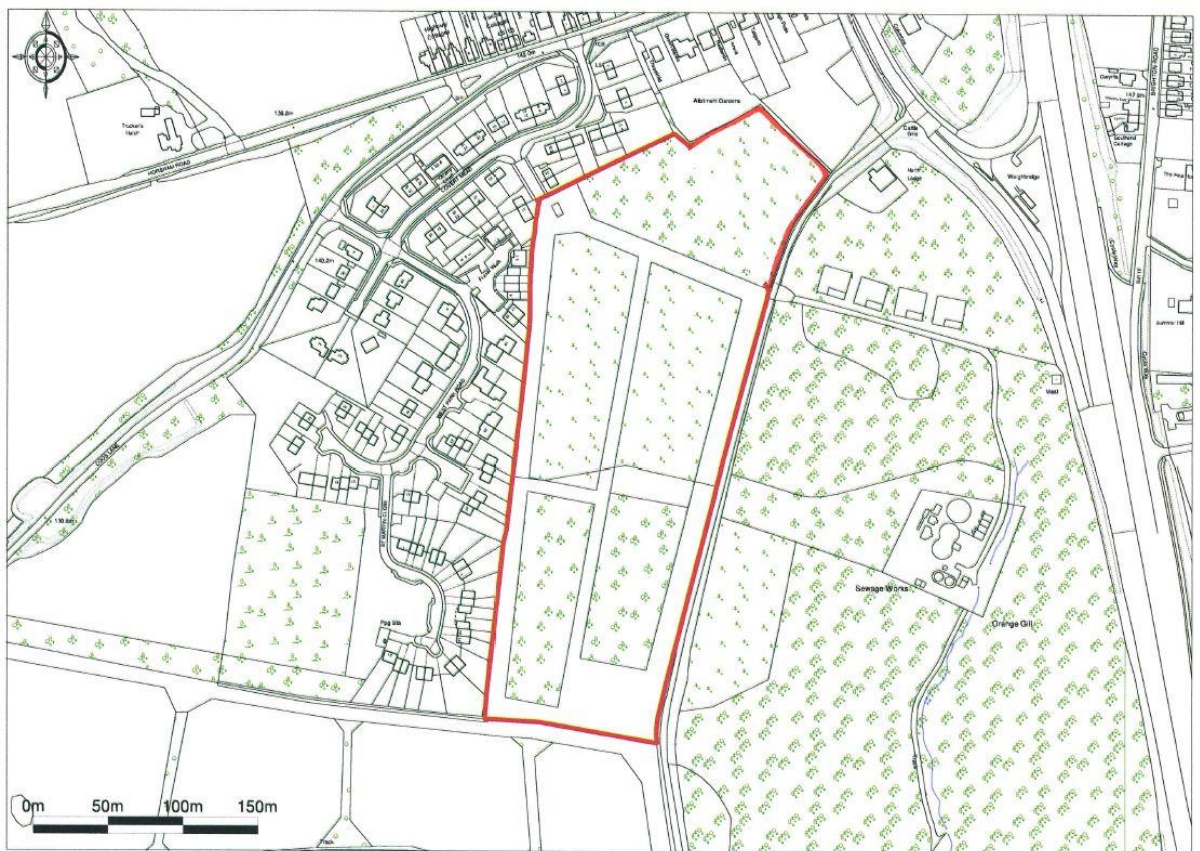
APPENDICES

Appendix 1	Illustrative Concept Layout (Drawing No. 19013(AF)00.01 P07)
Appendix 2	Slaugham Neighbourhood Plan Examiners Report
Appendix 3	Preliminary Tree Survey Schedule and Preliminary Tree Constraints Plan
Appendix 4	Proposed Site Access (Drawing No. ITB14511-GA-003A)

1.0 INTRODUCTION AND SCOPE OF REPRESENTATIONS

Introduction

- 1.1 These representations have been prepared on behalf of Wates Developments Limited and the Blind Veterans UK Charity who have an interest in approximately 5.45 hectares (13.4 acres) of land located to the west of Park Road, Handcross.
- 1.2 The land is edged red on the plan below:



- 1.3 As part of these representations Wates Developments Ltd has appointed the SLR Group and Simon Jones Associates to assess Landscape and Arboricultural matters, respectively. Their assessments have been taken into account in these representations and respond directly to the Council's previous assessment of the Site.
- 1.4 Wates has prepared an updated Illustrative Concept Layout Plan (Drawing No. 19013(AF)00.01 P07) which forms Appendix 1 of these representations. This shows how the promotion site could be developed.

Scope of Representations

- 1.5 These representations confirm that there is a deficit of 133 dwellings in the context of the “Updated Minimum Residual Housing Figure” for the Category 3 Settlements (Medium Sized Villages) of which Handcross is one of 12 Category 3 settlements. To compensate for this deficit the Site Allocations Development Plan Document (SA DPD) seeks to increase the amount of development taking place at the three Category 1 Settlements (Burgess Hill, East Grinstead and Haywards Heath) instead. This approach will not help meet the development needs of the Category 3 Settlements and does not reflect the principles of sustainable development or the Council’s own spatial distribution.
- 1.6 Wates and the Blind Veterans UK Charity are of the opinion that there are opportunities to provide for additional development at some Category 3 Settlements to help address the overall need for the category. One such settlement is Handcross and in particular land to the west of Park Road.
- 1.7 It is notable that the Major Development in the High Weald AONB Topic Paper sets out that 6 of the 22 housing sites fall within the AONB, all of which are in category 3 settlements. Accordingly, the principle of doing so is accepted by the Council and well-established and therefore should not preclude the allocation of sites such as these.
- 1.8 My clients are concerned about the latest Windfall site supply estimate which has increased from 450 dwellings in the adopted Mid Sussex District Plan to 504 dwellings in draft SA DPD. This increase is based on only two years of monitoring on sites granted planning permission for between 6 and 9 dwellings which is insufficient to provide a reliable Windfall forecast from this type of site. As a result, the windfall allowance should revert to 450 dwellings and a revised estimate from this source should be left to next District Plan Review when increased monitoring has taken place.
- 1.9 Concern is also expressed about the inclusion of draft Policy SA27 - Land at St Martin Close (West) for up to 30 dwellings when this site is also allocated a reserve housing site under Policy 10 of the ‘made’ Slaugham Neighbourhood Plan Allocation. As result, this amounts to double counting and should be excluded from the SA DPD. Instead, my clients land should be allocated for a mix of housing, community hall and public open space.
- 1.10 In summary, the SA DPD under provides against the housing requirement for the Category 3 Settlements as set out in the adopted Mid Sussex District Plan which does not reflect the principles of sustainable development. There is doubt about the accuracy of the revised windfall figure and the proposed Policy SA27 – Land at St Martin Close (West) allocation which amounts to double counting. As result the draft SA DPD is ***not consistent with national policy or justified*** which is contrary to the tests of soundness as set out in the National Planning Policy Framework.

- 1.11 To remedy this situation the SA DPD should allocate additional land at Handcross for housing and in particular my client's land to the west of Park Lane, Handcross for mix of housing, a community hall and public open space. This would contribute towards reducing the current shortfall of housing across the Category 3 Settlements and help them to meet their own development needs.

2.0 PLANNING HISTORY CONTEXT

- 2.1 The land to the west of Park Road, Handcross (excluding the part of the site owned by the Blind Veterans UK) was promoted by Wates for a mix of residential and public open space at the Regulation 18 stage of the SA DPD and at the Regulation 16 Stage of the Slaugham Neighbourhood Plan.
- 2.2 Appendix 2 of these representations contains the Slaugham Neighbourhood Plan Examiner's Report which was published in May 2019. The Examiner acknowledged in his report that planning permission had recently been granted for 600 homes at Pease Pottage which is one of four settlements in Slaugham Parish and on that basis the other settlements within the Parish (Handcross, Slaugham and Warninglid) would not be required to identify further growth in the Neighbourhood Plan (NP). He did, however, acknowledge that the NP could make additional allocations in order to boost the supply of housing. On that basis the Examiner accepted the Parish Council's provision for some modest new housing provision at Handcross in order to boost the supply of housing as it would reflect the pro-growth national growth agenda.
- 2.3 In his report the Examiner agreed with the two draft housing allocations at Handcross. These included:
- Land at St Martin Close (East) for up to 30 houses
 - Land at St Martin Close (West) as a reserve site for up to 35 houses
- 2.4 In terms of these two site allocations, the Examiner felt that they would be modest in scale and well related to the existing built up area of the village (para 7.69 of the Examiners Report). In addition, they would be seen within the wider landscape as a logical and natural rounding off of the existing village (para 7.84). AS set previously it is important to note that my client's land has similar characteristics to the two allocated sites and is located immediately to the east of the existing St Martin Close development. It therefore has recognised characteristics as a location suitable for development. In terms of proximity to the rest of the settlement my client's land is also closer to the village centre and its associated facilities when compared to the two Neighbourhood Plan allocations.
- 2.5 Whilst the Examiner did not propose any additional housing allocations (other than those proposed) in the Neighbourhood Plan he acknowledged that Handcross is the most sustainable settlement within the neighbourhood plan area and ***"it has a critical mass of community services and an attractive and vibrant village centre"*** (para 7.70). He was also satisfied that the Plan sought to concentrate additional housing development in Handcross which is an appropriate location for residential development in principle (para 7.71); and, that ***"there was no practical option other than to allocate sites for any new residential development within the High Weald AONB"*** (para 7.84).

- 2.6 The Neighbourhood Plan was the subject of a Referendum and was ‘made’ on 25th September 2019. The two sites at St. Martin Close were allocated for housing. These included St. Martin Close (east) which is allocated for up to 30 dwellings (under Policy 9); and St. Martin Close (west) which is allocated as a ‘reserve’ site for up to 35 dwellings under Policy 10. The reserve site requires the development of St Martin Close (east) first and its release for development could be triggered by one or more of the following:
- The review of the Neighbourhood Plan itself
 - The adoption of the emerging Mid Sussex Allocations DPD
 - The adoption of any review of the Mid Sussex District Local Plan
 - A material delay in the delivery of the Pease Pottage strategic allocation in the adopted Mid Sussex District Local Plan
- 2.7 In addition to the Neighbourhood Plan promotion, the land to the west of Park Road, Handcross (excluding the part of the site owned by the Blind Veterans UK Charity) was promoted in January 2019 for a mix of housing and public open space in the rolling ‘Call for Site’s process of the Strategic Housing and Employment Land Availability Assessment (SHELAA); and the Regulation 18 SA DPD Consultation in November 2019. These sought the allocation of the land to the West of Park Road for the provision of between 65 to 80 dwellings plus public open space. In response to the representations the Strategic Policy section of MSDC sought clarification on various matters including the size of the site, the developable area and the nature of the mixed use proposed i.e. was it just housing and open space, and was there a more detailed plan showing the disposition of the proposed uses. This information was requested to assist MSDC’s consideration of the site.
- 2.8 In December Genesis Town Planning (GTP) responded to MSDC confirming that it might be possible to provide a community building on the site or on adjacent land and that this was being discussed with adjoining landowners and that a more detailed layout plan would also be prepared following the preparation of a Landscape Visual Appraisal.
- 2.9 In February 2020 MSDC sought further information about the deliverability of the promotion site and sought comments on its initial site appraisal for the site. GTP responded to this request on 13th February and also suggested increasing the size of the promotion site so that it included additional land in the ownership of the Blind Veterans UK Charity. This additional land could be used to provide a community hall plus additional residential accommodation. It also confirmed that the Tree Consultant acting on behalf of Wates was seeking to meet the MSDC Tree Officer on-site to assess the trees, particularly their status under the National Forest Inventory which was referred to in the initial site appraisal by MSDC. This meeting took place on 4th March during which it was agreed that there was no arboricultural reason that might prevent the allocation of the main body of the site for housing, or its development at a later date. The Tree Officer identified the groups of trees that she felt should be retained which included the row of conifers on the southern part of the western boundary and the trees located in the triangle of land at the northern end of the site as shown in the Preliminary Tree Retention Plan (Drawing No. SJA TRP 20124 – 051) forming part of Appendix 3.

- 2.10 It is important to note that the background documents for the Regulation 19 version of the Plan including ***“SSP3 Site Selection Paper: Housing Sites and Appendix B: Housing Site Proformas (February 2020)”*** and topic paper TP1 ***“Major Development in the High Weald AONB Topic Paper (July 2020)”*** assessed under ID Ref 987 - Land West of Park Road do not assess the larger site which now includes the Blind Veteran UK Charity land.

3.0 COMMENTS ON THE SOUNDNESS OF THE DRAFT PLAN

3.1 The Introduction section of the draft SA DPD sets out how the DPD has been prepared. Paragraphs 1.12 to 1.26 refer to the National Planning Policy Framework (NPPF) which requires DPDs to be prepared in accordance with the legal and procedural requirements. To be found ‘sound’ plans must be:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the areas objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, taking into account the reasonable alternatives based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with policies of the framework.

Windfall Allowance

3.2 Table 2.3: District Plan Housing Requirement of the Regulation 19 SA DPD sets a windfall requirement of 504 dwellings. This amounts to an increase of 54 dwellings compared to the windfall estimate of 450 homes in Policy DP4 of the adopted Mid Sussex District Plan (March 2018).

3.3 The updated contribution from windful sites is assessed in the Housing Topic Paper H1 “**Windfall Study Update (July 2020)**” which forms part of the evidence base for the emerging SA DPD. The main reason for this increase appears to be that the windfall allowance now includes sites of 6 to 9 units. This type of site was previously excluded from the District Plan windfall calculation because at that time there was no data available to make an evidenced calculation on the potential supply from this source. Since then there have been two further monitoring years (i.e. 2018/19 and 2019/20). Based on this additional monitoring information the District Council has increased the windfall allowance to 504 dwellings. It is important to note that the additional monitoring is only over a two year period. This is a relatively short time period in terms of monitoring, and it would be prudent to use a longer monitoring period in assessing the windfall allowance for the SA DPD. As set out in paragraph 2.3 of the Windfall Study “**It will be for the District Plan Review to explore if there is further justification for amending the windfall allowance, including the approach taken to a potential windfall supply for large sites**”. As a result, the lower windfall allowance of 450 dwellings of the District Plan should continue to be used for the preparation of the SA DPD.

District Plan Housing Requirement (updated) and Spatial Distribution of Housing

- 3.4 Paragraph 1.20 of the draft Plan confirms that SA DPD should complement the adopted District Plan 2014-2031 and additional housing should be consistent with the Strategic Policies set out in the District Plan, including the Settlement Hierarchy.
- 3.5 Draft Policy SA10: Housing of the SA DPD updates the District Plan Housing Requirement as set out in Policy DP4 of the adopted District Plan of March 2018. Table 2.3 updates the position on District Plan Housing Requirement which includes the number of completions between 2018/19 and 2019/20; the total number of Housing Commitments (including sites with planning permission and allocations in made Neighbourhood Plans); and, an updated Windfall estimate. Table 2.4: sets out the Spatial Distribution of Housing Requirement for each settlement category in the Settlement Hierarchy. This is reproduced below:

SA10: Housing (continued)

Table 2.4: Spatial Distribution of Housing Requirement

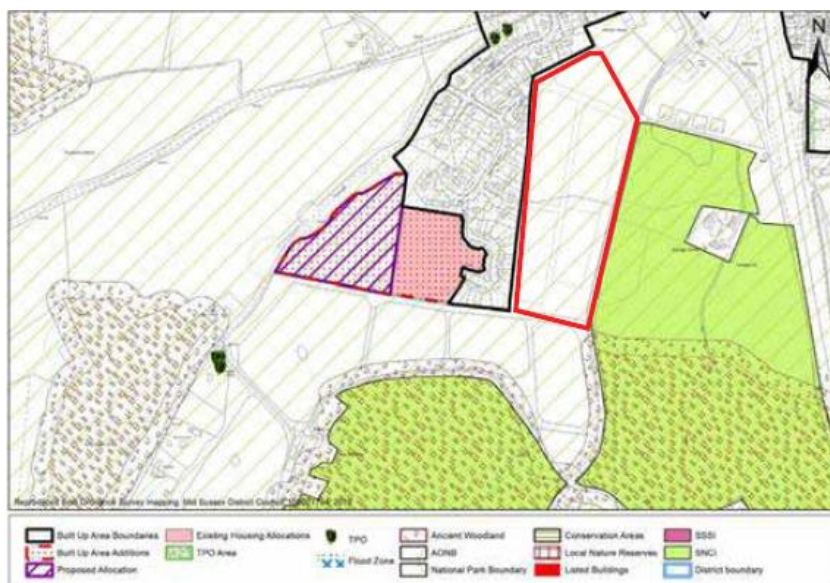
Settlement category	Settlements	Minimum Required over Plan Period	Updated Minimum Residual Housing Figure	Site Allocations – Housing Supply
1 – Town	Burgess Hill East Grinstead Hayward's Heath	10,653	706	1,409
2 – Larger Village (Local Service Centre)	Copthorne Crawley Down Cuckfield Hassocks and Keymer Hurstpierpoint Lindfield	3,005	198	105
3 – Medium Sized Village	Albourne Ardingly Balcombe Bolney Handcross Horsted Keynes Pease Pottage Sayers Common Scaynes Hill Sharpthorne Turners Hill West Hoathly	2,200	371	238
4 – Smaller Village	Ansty Staplefield Slaugham Twineham Warminglid	82	5	12
5 – Hamlets	Hamlets such as: Birch Grove Brook Street Hickstead Highbrook Walsted	N/A *	N/A *	N/A *
Total		16,390**	1,280	1,764

- 3.6 Analysis of the above table indicates that the **Site Allocations – Housing Supply** for the Category 1 Settlements (Burgess Hill, East Grinstead and Haywards Heath) is 1,409 dwellings. This exceeds the **Updated Minimum Residual Housing Figure** of 706 dwellings by an additional 703 dwellings. With regard to the Category 3 Settlements – Medium Sized Villages (which includes Handcross) there is a shortfall of 133 dwellings in this category (a Minimum Residual Housing Figure of 371 dwellings minus the Site Allocations Housing Supply of 238 dwellings).
- 3.7 This situation is also confirmed in **Table 16 – Supply from 20 ‘constant sites’ Sites** forming part of paragraph 6.42 of the Sustainability Appraisal (Incorporating Strategic Environmental Assessment) Regulation 19 - July 2020 (SA). Paragraph 6.43 of the SA confirms that **“Whilst there is a shortfall at Category 3, this can be met by an over-supply at Category 1. As Category 1 is the most sustainable category, and under-supply should be met in categories higher up in the settlement hierarchy, this is acceptable”**.
- 3.8 Whilst it is acknowledged that the above approach would result in more development taking place at the most sustainable settlements in the District i.e. at the three Category 1 Settlements (Burgess Hill, East Grinstead and Haywards Heath) it will not help meet the development needs of the Category 3 Settlements and does not, therefore, reflect the principles of sustainable development. The approach now set out in the SA DPD and the SA is also inconsistent with the final sentence of the second paragraph on page 38 of the adopted District Plan (which forms part of the explanatory text to Policy DP6). This states **“Similarly, further sites may be allocated in the future to ensure that the minimum residual for each settlement category (set out in DP4: Housing) is met, based on monitoring”**. This implies that any shortfall should be met within the same settlement category.
- 3.9 Based on the above, it is evident that there will be an undersupply of 133 dwellings across the Category 3 Settlements. This does not accord with the development strategy of the adopted District Plan. In addition, the current allocation strategy of the draft SA DPD will create an imbalance in the existing settlement hierarchy. Overall, it will not result in well planned sustainable development which is required by the NPPF. On this basis the draft SA DPD is not **consistent with national policy**.
- 3.10 In addition to the above, whilst not objecting the allocations in principle, there is no evidence to justify the delivery of the large scale allocations including the proposed allocations at East Grinstead i.e. SA19 – Land South of Crawley Down Road (200 dwellings) and Land South and West of Imberhorne Upper School (550 dwellings) which will require significant upgrades to the highway network, particularly the A264/A22 Felbridge junction which has known capacity issues and recently lost funding which was being pursued in relation to the South Godstone allocation. This is considered in paragraphs 6.1.1 to 6.1.7 of the **Strategic Transport Assessment: Reg 19 (Background Paper T7)**. This confirms in paragraph 6.1.1 that this junction is currently regarded as a

'hotspot' where delays are experienced, and it would be reasonable to expect 'severe' conditions in future year scenarios. Paragraph 6.1.7 confirms that significant mitigation of the A264/A22 would be required and to be fully effective this could involve land outside of the WSCC highway boundary, subject to the outcome of more detailed study work. The approved scheme and timing of these junction improvements has yet to be confirmed which could influence the timing and deliverability of these two proposed allocations. As such the approach of increasing the amount of development at Category 1 Settlements, and particularly at East Grinstead, is not the most appropriate strategy taking account of the reasonable alternatives which includes allocating additional housing sites at Category 2 and 3 Settlements both of which are currently underproviding in the context of the Minimum Residual Housing Figures for each Category. This approach is not **justified** and therefore does not accord with the soundness test for the preparation of DPDs.

Policy SA27 – Land at St Martin Close (West)

- 3.11 As previously stated in paragraph 2.6 of these representations the 'made' Slaugham Neighbourhood Plan allocates two housing sites at St. Martin Close. These include St. Martin Close (east) which is allocated for up to 30 dwellings (under Policy 9); and St. Martin Close (west) which is allocated as a 'reserve' site for up to 35 dwellings under Policy 10. As a result, both of these sites are already development plan allocations and as such my client questions why the Land at St Martin Close (West) - Policy SA27 - is also allocated in the Regulation 19 draft SA DPD. This amounts to double counting and should not be allocated again in the SA DPD. As the principle of additional housing at Handcross in this location is clearly supported by the SA DPD and the made Slaugham Neighbourhood Plan additional land should be allocated at the settlement in addition to the two Neighbourhood Plan allocations. The below plan highlights the context of my client's land in relation to the current allocations and the Sites (outlined in red) closer proximity to the village.



Site in context with proposed allocation SA27

- 3.12 To remedy the above 'soundness' inadequacies the SA DPD should make additional housing allocations at the most sustainable and suitable Category 3 settlements including Handcross. This would overcome the existing 133 dwelling shortfall across the Category 3 settlements helping them to meet their own development needs and reduce the risk of some of the proposed housing allocations at East Grinstead not being developed or slow delivery because of highway congestion concerns.
- 3.13 As set out in the next section of these representations my client's land to the west of Park Road, Handcross should be allocated for a mix of housing, a new community hall and public open space. The merits of allocating this site are set out in the next section.

4.0 PROPOSED ALLOCATION ON LAND TO THE WEST OF PARK ROAD, HANDCROSS

The Site and Surrounding Area

- 4.1 The site is approximately 5.45 hectares (13.4 acres) in size and is located to the south-west of Handcross, west of Park Road and the A23 London to Brighton Trunk Road. At present the northern and central parts of the site comprise juvenile woodland which forms part of a commercial plantation. This was planted by the Slaugham Estate after the Great Storm of October 1987. The central and south eastern part of the site is currently partially cleared of trees and is open as can be seen from the photographs below.



Picture of southern part of the Site



Picture of northern part of the Site

- 4.2 The north-western and western boundaries abut the existing built up area boundary of Handcross. The immediate surrounding area mainly comprises established residential development to the north (Covert Mead) and to the west (West Park Road and St Martin Close). A mix of woodland/scrub and a sewage works are located to the east and agricultural fields to the south beyond which there is more woodland. The eastern boundary abuts Park Road which is also an historic Public Right of Way (PRoW) - Bridleway S7. This road has a junction onto the B2110 which is a slip road from/to the A23. Park Road is a private road and bridleway which provides an alternative vehicular route to Slaugham village located to the south.
- 4.3 There is also another PRoW (public footpath S3) which abuts the northern edge of the site and adjacent allotments which are accessed from Horsham Road to the north.

Comments on Site Assessment in Background Paper SSP3 - Site Selection Paper 3: Housing – Appendix B: Housing Site Proformas

- 4.4 The promotion site (excluding the Blind Veterans UK Charity land) is assessed under ID 987 – Land to the west of Park Road, Handcross in **Appendix B of the Site Selection Paper 3** (last updated 03/08/20). The assessment has various parts (Parts 1 to 4). Overall, the site assessment shows that there are significantly more positive/neutral impacts than negative impacts.
- 4.5 There are eight ‘Very Positive’ impacts including:
- Flood Risk
 - Ancient Woodland
 - SSSI/SNCI/LNR
 - Listed Buildings
 - Conservation Area
 - Deliverability
 - Infrastructure
 - Access to Services
- 4.6 There are five ‘Neutral’ Impacts including:
- Archaeology
 - Local Road/Access
 - Access to Education
 - Access to Health
 - Access to Public Transport
- 4.7 There is only one ‘Negative’ impact which relates to Trees/ TPOs; and only one ‘Very High Negative’ impact which relates to the High Weald AONB. As these negative impacts are in part related to each other, the response of Wates and the Blind Veterans UK Charity to these two assessment entries are set out below:

Impact on High Weald Area of Outstanding Natural Beauty (AONB)

- 4.8 The Site Selection Paper 3 assessment of “*High impact on AONB*” that would result from the of the proposed development on the promotion site is largely based on the anticipated “*loss of woodland*”. The assessment also notes that the site has “*modern residential development to west and north*” and that there is “*more substantial woodland to the east up to A23 and fields to the south*”.

- 4.9 As part of the investigative work carried out to date, Wates instructed SLR Consulting to carry out an initial landscape appraisal. A review of published AONB assessments confirms that one of the key components which helps to create the character of the AONB is its *“abundant, interconnected ancient woods and hedges”* and dense, broadleaved woodland. Wates also appointed Simon Jones Associates (Arboricultural Consultants) to assess the trees on-site. Their assessment confirmed that whilst large parts of the site currently contain trees these are, either, young or semi-mature self seeded with a maximum trunk diameter of 450mm and form part of a commercial crop which is periodically felled to create fuel for the Slaugham Estate.
- 4.10 Simon Jones Associates met with the Tree Officer earlier this year and it was agreed that trees within a large part of the site are suitable for removal. The assessment in Appendix B of the Site Selection Paper notes that *“most of the site comprises woodland”* and defines various types of woodland. It is important to note that it is likely that this will not continue to be the baseline in the longer term, subject to agreed felling, independent of any proposed development. The anticipated loss of woodland as a result of the development and the corresponding *“High impact on AONB”* assessed in Appendix B may not, therefore, be the reality.
- 4.11 Any development of the site would be designed to create a woodland character in line with the AONB Management Plan to avoid significant effects on the designation and on the character of the local landscape. It has been agreed that it would be important not just to create a ‘wall’ of trees along the edges of the site to screen views, but, also to integrate trees throughout the site along verges and within areas of public open space to provide high-quality, mixed native woodland to enhance and reinforce the key elements of the local landscape character.
- 4.12 The assessment notes that there is a *“historic PROW (Park Road) on the eastern boundary”* and that there *“will be views of site from PROW”*. The initial assessment carried out by SLR noted that there is also a Public Footpath (S3) to the north of the site connecting to allotments and the settlement.
- 4.13 It is noted that part of Public Bridleway 7S (*“historic PROW”*) is on land at a lower elevation than the site (see photograph below) and, as such, the views of walkers are partially contained. Potential views from the Public Bridleway 7S (*“historic PROW”*) could be further reduced with sensitive design including the reinforcement of the trees and shrubs along the eastern boundary with proposed built form set back from this boundary.



View to north from Historic PROW S7

- 4.14 In addition views from Public Footpath S3 to the north are currently limited by existing vegetation to either side of the path. This is shown in the photograph below.



View to south east towards Park Road from Public Footpath S3

- 4.15 In addition to the above comments, it is important to note that approximately 50% of Mid Sussex District falls within the High Weald AONB and eight of the Category 3 Settlements are located within the AONB. As set out above six of the 22 proposed housing allocations in the SA DPD fall within the AONB in category 3 settlements therefore the principle of doing so through the DPD is well established and should be increased in order to meet the housing needs of these settlements.

- 4.16 Although the whole of Handcross and surrounding land including the neighbouring settlement of Pease Pottage fall within the High Weald AONB the principle of allowing new housing development within the AONB in these locations has also been accepted in the recent past. This is demonstrated by the grant of planning permission for up to 600 homes on land east of Pease Pottage (DM/15/4711) and the planning permission for 90 dwellings on land to the south of Handcross Primary School (12/04033/OUT).
- 4.17 It is considered that the promotion site is more sustainable than the current allocations in the SNP. It is served by better footpath connections and is a shorter walking distance from the village. As a result, the Site serves as an obvious alternative for the Council to allocate which could come forward in a sensitive manner to mitigate any impact on the wider AONB whilst helping to meet the needs of smaller settlements in the district.

Impact on Trees/Tree Preservation Orders

- 4.18 As mentioned above, most of the trees and woodland within the site comprises a commercial plantation of young trees which are periodically felled. Notwithstanding this, Wates Developments appointed Simon Jones Associates (Arboricultural Consultants) to assess on-site trees. An initial appraisal of the site confirmed that there are very few trees of high quality within the site. There are no veteran trees within or overhanging the site. None of the trees are covered by a Tree Preservation Order (TPO) and the site is not within a conservation area. Consequently, there are no constraints on trees in this regard.
- 4.19 On 4th March 2020 Simon Jones met the District Council Tree Officer to discuss on-site trees and potential development on the site. During the meeting it was agreed that there were no arboricultural reasons that would prevent the allocation of the main body of the site for housing, or its development at a later date. The Tree Officer identified the groups of trees that she felt should be retained which included the row of conifers on the southern part of the western boundary and some of the trees located in the triangle of land at the northern end of the site. As a result of this site meeting, Simon Jones Associates has produced a Preliminary Tree Survey Schedule and a Preliminary Tree Constraints Plan. These are contained in Appendix 3 of these representations. The tree assessment has informed the Concept Layout Plan (Appendix 1) for the promotion site which shows the broad disposition of development, the extent of retained woodland/trees and new tree planting and greenspace areas across the site. This demonstrates that significant parts of the site could be developed for housing whilst retaining various areas of woodland and tree belts worthy of retention. It also incorporates significant amounts of new tree planting which will help soften the appearance of the new development reducing the harm to the AONB to acceptable levels. As a result, the site would retain a high degree of biodiversity.

Local Road/Access

- 4.20 According to the SSP3 Appendix B Assessment for the site the Local Road/ Access category is given a neutral score. It comments that significant improvements will be required to the Local Roads and Access. At an early stage in the consideration of the site, Wates appointed i-Transport (Specialist Transport Planning Consultancy) to consider how a development of about 65 to 80 new homes could be accessed and its potential traffic impact.
- 4.21 In terms of site **Vehicular Access**, the principle vehicular access would be via Park Road. This is shown on Drawing No. ITB14511-GA-003A – Proposed Access Arrangement which is contained in Appendix 4. This involves upgrading the Park Road junction with the A23 slip road and the construction of a new 5.5m wide carriageway generally on the same alignment as the current Park Road alignment on land which Wates has an interest. The new carriageway would then enter the site at its north-eastern point.
- 4.22 Initial discussions have been held with Highways England regarding re-using and improving the existing access to the B2110. Highways England have no objection in principle but would need to see the access proved in technical terms, particularly in terms of visibility. Speed surveys have been undertaken, and these demonstrate a design speed of 40mph for traffic approaching from the south. Drawing ITB14511-GA-003A shows a commensurate visibility splay of 9m x 120m. Even if the design speed is 60mph (which it is not), a visibility splay of 9m x 215m is achievable. Visibility all the way to the mini-roundabout is achievable to the left. Wates has secured the necessary land to provide the access and visibility splays without the need for any 3rd party land contrary to the Council's assessment. Therefore, access from the B2100 is fully deliverable and achievable. The site access arrangements shown on Drawing ITB14511-GA-003A will provide an achievable, safe and suitable access to the development which is acceptable to Highways England.
- 4.23 **Cycle and Pedestrian Facilities** - A new segregated 2.0m wide footway along the western side of the B2110 would be provided in the vicinity of the upgraded Park Road junction. This would link into the existing pedestrian facilities on the southern side of the B2110 to the north of the mini roundabout junction. There are existing pedestrian crossing facilities across each arm of the mini-roundabout junction. In addition, there are continuous pedestrian facilities through Handcross which provide access to services in the village centre and onwards to the GP surgery and Handcross Primary School. The north western part of the promotion site abuts the footways on the existing Covert Mead cul-de-sac, (located to the north-west) which are part of the public highway. Whilst no vehicular access is proposed or needed via Covert Mead, pedestrian/cyclist access can be provided to create a pedestrian link to this part of the settlement. There is also the opportunity to bring forward cycling improvements within Handcross (e.g. on carriageway cycle lanes) and Wates would be keen to discuss this with the District Council and West Sussex County Council at the appropriate time.

- 4.24 With regard to **Traffic Impact** the development will result in no more than about 20 movements through the centre of Handcross during peak hours, i.e. around one vehicle movement every three minutes. The design of the site access in drawing no. ITB14511-GA-003A includes widening of the access and the provision of a right-turn lane. This will be more than adequate to accommodate the very modest traffic generation of an 80 dwelling scheme. On this basis traffic impact is not an issue.
- 4.25 With regard to **Sustainability/Access to Services** the site has a mix of 'very positive' and 'neutral' impacts. Handcross provides a good range of facilities and services and the site is well located for journeys to be made by walking and cycling. Public footpath (3S) abuts the northern boundary and bridleway (7S) is adjacent to the eastern boundary (Park Road). Bus stops are within easy walking distance and these are served by frequent buses which provide a realistic opportunity for non-car travel further afield. These aspects are shown on Table 1: Local Services and Facilities and Figure 1: Local Facilities Plan below:

Table 1: Local Services and Facilities

Purpose	Destination	Distance (m)	Walking Journey Time	Cycle Journey Time
Employment	Brighton Road Industrial Estate	600	7	2
	Angleton Ltd	1600	19	6
Education	Handcross Primary School	1400	17	5
	Handcross Park School	1600	19	6
Retail	Handcross Butchers	550	7	2
	SPAR (with Post Office)	650	8	2
	Handcross Newsagents	700	8	3
Leisure	The Royal Oak Inn	400	5	2
	The Red Lion Public House	550	7	2
	Handcross Village Hall	900	11	3
	Handcross Recreation Ground and Pavilion	1000	12	4
	Nymans – National Trust	1000	12	4
Healthcare	Ouse Valley Medical Practice	1200	14	5
	Dumbledore Dental Centre	1200	14	5

Source: Consultants Estimates

Notes:

	'Easy' walking distance, i.e. less than 800m (ref: <i>Manual for Streets</i>)
	'Comfortable' walking distance, i.e. within 1600m which the National Travel Survey identifies as being the distance up to which circa 75% of people will walk

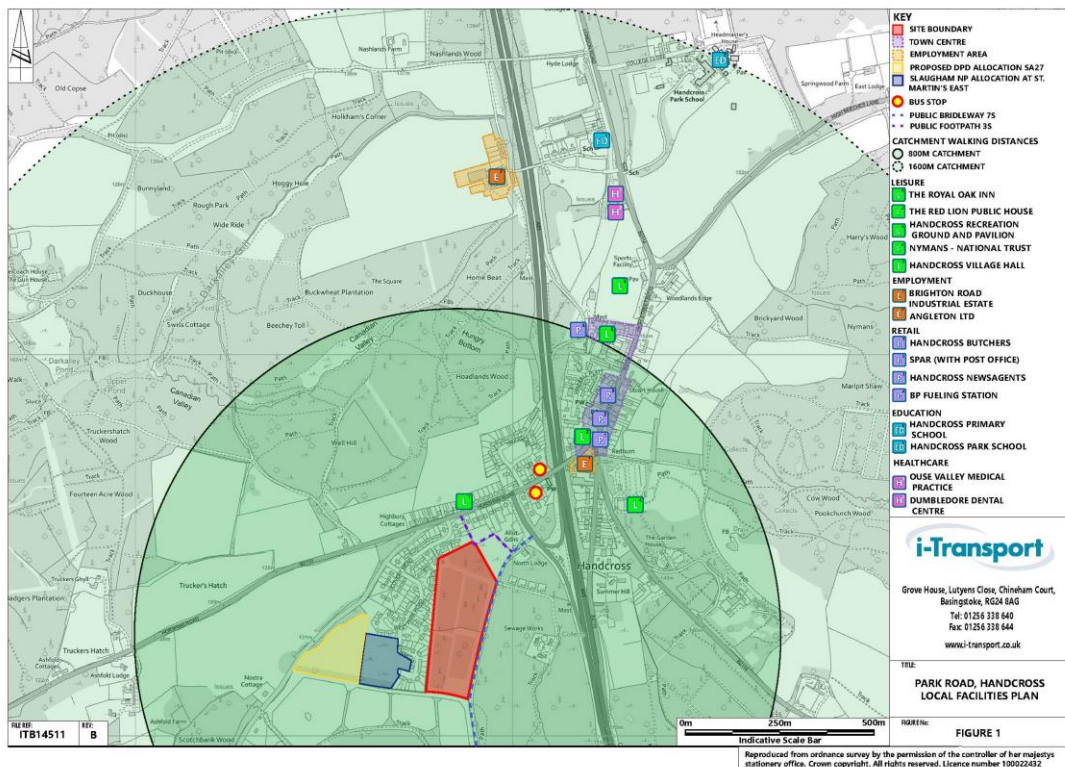


Figure 1: Local Facilities Plan

- 4.26 The above table and figure confirms that the promotion site is within easy and comfortable walking and cycling distances of the key services at Handcross and is therefore in a sustainable location.

Community Facilities

- 4.27 As set out above Handcross has a good range of local services and community facilities. Paragraph 5.7 of the made Slaugham Neighbourhood Plan states ***“Public feedback has highlighted residents support for improvement and/or replacement to/of Handcross Village Hall. In light of local support, SPC will support proposals which seek to enhance and/or in the longer-term replace the existing facility”***. Owing to the relative size of the promotion site and its close proximity to the main part of the settlement there is scope to provide a new purpose built community hall, that meets modern day needs, as part of the development package.

5.0 SUMMARY AND RECOMMENDATION

- 5.1 These representations confirm that there is a deficit of 133 dwellings in the context of the “Updated Minimum Residual Housing Figure” for the Category 3 Settlements (Medium Sized Villages) of which Handcross is one of 12 Category 3 settlements. To compensate for this deficit the SA DPD seeks to increase the amount of development taking place at the three Category 1 Settlements (Burgess Hill, East Grinstead and Haywards Heath) instead. This approach will not help meet the development needs of the Category 3 Settlements and does not reflect the principles of sustainable development.
- 5.2 My clients are concerned about the latest Windfall site supply estimate which has increased from 450 dwellings in the adopted Mid Sussex District Plan to 504 dwellings in draft SA DPD. This increase is based on only two years of monitoring on sites of between 6 and 9 dwellings granted planning permission between 2018 and 2020. This new data is insufficient to provide a reliable Windfall forecast from this type of site. As a result, the windfall allowance should revert to 450 dwellings and a revised estimate from this source should be left to next District Plan Review when increased monitoring has taken place.
- 5.3 Concern is also expressed about the inclusion of draft Policy SA27 - Land at St Martin Close (West) for up to 35 dwellings when this site is also allocated a reserve housing site under Policy 10 of the ‘made’ Slaugham Neighbourhood Plan Allocation. As result, this amounts to double counting.
- 5.4 As the Reg 19 SA DPD under provides against the housing requirement for the Category 3 Settlements as set out in the adopted Mid Sussex District Plan it does not reflect the principles of sustainable development. There is also doubt about the accuracy of the revised windfall figure and the proposed Policy SA27 – Land at St Martin Close (West) allocation which amounts to double counting. As result the draft SA DPD is ***not consistent with national policy or justified*** which is contrary to the tests of soundness as set out in the National Planning Policy Framework.
- 5.5 There are opportunities to provide for additional development at a number of Category 3 Settlements in order to meet the shortfall across the district which could result in an imbalance between large and small settlements. One such settlement is Handcross where the principle of development is accepted locally by the Slaugham Neighbourhood Plan and draft Policy SA 27 of the Regulation 19 SA DPD which allocates the land at St Martin Close (West) for up to 35 dwellings. As such Handcross is a sustainable location well suited for the provision of additional residential development. To remedy this situation the SA DPD should allocate my client’s land to the west of Park Lane, Handcross for a mix of housing, a new community hall and public open space.

- 5.6 Land to west of Park Road is well related to existing settlement of Handcross. It abuts the existing built up area boundary to the north and west and established residential development. It is well contained in the wider landscape by virtue of the existing woodland to the east and the existing housing to the north and west. In terms of proximity to the main services and facilities at Handcross this site is highly sustainable and is closer to these facilities than both recent St Martin Close housing allocations in the 'made' Slaughtam Neighbourhood Plan.
- 5.7 Based on investigations carried out to date the site can be developed without causing unacceptable harm to the High Weald AONB. It is available for development and provides the opportunity to deliver a new mixed-use development for between 65-80 dwellings (including much needed affordable homes), a new community hall plus formal and informal public open space. A mixed-use development of this type would provide additional public open space on the western side of Handcross which would be more easily accessed by residents living in this part of the settlement.
- 5.8 It is therefore recommended that my client's land to the west of Park Road, Handcross is allocated for between 65 and 80 dwellings, community hall and public open space in the adopted Site Allocations DPD.



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	Mr
First Name	Jeremy
Last Name	Farrelly
Job Title (where relevant)	Director of Planning
Organisation (where relevant)	Genesis Town Planning Ltd (GTP)
Respondent Ref. No. (if known)	18091
On behalf of (where relevant)	Wates Developments Limited
Address Line 1	26 Chapel Street
Line 2	Chichester
Line 3	West Sussex
Line 4	
Post Code	P019 1DL
Telephone Number	01243 - 354050
E-mail Address	jeremy@genesistp.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:

GTP on behalf of Wates Developments 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

27

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 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.

Please see paragraphs 3.11 and 3.12 of Representations Statement

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.

Please see paragraphs 3.11 and 3.12 of Representations Statement

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 paragraph 3.13 of Representations Statement. To avoid double counting Policy SA27 should be deleted and replaced by a new housing allocation for up to 80 dwellings, Community Hall and Public Open Space on Land West of Park Road, Handcross

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 discuss more fully the nature of these representations and any changes of circumstance

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:

28th September 2020

Thank you for taking time to respond to this consultation

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA27

ID: 765

Response Ref: Reg19/765/5

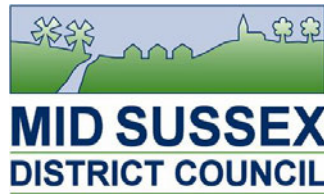
Respondent: Dr I Gibson

Organisation:

On Behalf Of:

Category: District Councillor

Appear at Examination? ✓



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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="DR"/>
First Name	<input type="text" value="IAN"/>
Last Name	<input type="text" value="GIBSON"/>
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="SELF"/>
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: IAN GIBSON

3a. Does your comment relate to:

Site Allocations DPD	<input checked="" type="checkbox"/>	Sustainability Appraisal	<input checked="" 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	<input type="text" value="21, 22, 26, 27, 33 & 32"/>	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 checked="" type="checkbox"/>	<input type="checkbox"/>
(2) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(3) Effective	<input checked="" 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.

1. The Site Allocations DPD is inconsistent with the spatial strategy set out in Policies DP4 and DP6 of the Mid Sussex District Plan because it allocates sites in settlements that have already met and exceeded their minimum requirement housing 'target' without demonstrating that settlements that have not met their 'target' do not have sufficient sustainable sites to meet the Residual Housing Requirement. See appendix for detailed explanation.
2. The Site Allocations DPD is inconsistent with Policy DP16 of the Mid Sussex District Plan because it allocates a site in the North 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.

1. Sites SA21, SA22, SA26, SA27 and SA33 should be deleted from the list of Additional Housing Allocations (SA11) and should not be allocated as they are all in settlements that have met and exceeded their DP6 target. Deleting these five sites will reduce the number of new dwelling sites provided by the Site Selection DPD by 129. The number of new dwelling sites that would then be provided (1,635) is still 355 (28%) more than the Residual Housing Requirement (1,280). Therefore, deleting the five sites does not increase the risk that the District Plan minimum Requirement (16,390) will not be achieved.
2. Site SA32 should be deleted from the list of Additional Housing Allocations (SA11) and should not be allocated as it lies within the AONB and is contrary to DP16. Deleting this site will further reduce the number of new dwelling sites provided by the Site Selection DPD by 16. The number of new dwelling sites that would still be provided (1,619) is still 339 (26%) more than the Residual Housing Requirement (1,280). Therefore, deleting the site does not increase the risk that the District Plan minimum Requirement (16,390) will not be achieved.

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 provide clarification as required.

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:

Ian Gibson

Date:

27th September 2020

Thank you for taking time to respond to this consultation

Comments on Draft Site Allocations DPD (Regulation 19) Consultation

The Mid Sussex District Plan sets out a clear spatial strategy for where new homes should be built based on the 27 towns, villages and hamlets ("settlements") in the District. The settlements are divided into four categories by size and District Plan Policy DP4 sets a target (a 'Minimum Requirement') for the number of new homes in each category. Policy DP6 then sets a target for the number of new homes that represents sustainable development for each of the 27 settlements. It is an inescapable fact that if every settlement met its DP6 target, then the District would meet its overall target of 16,390 new homes.

The number of new homes that each settlement will deliver over the plan period has been calculated by adding the number of new homes already built since 2014, the number for which planning permission has been granted and the number on sites allocated in Neighbourhood Plans. In April 2020 this arithmetic showed that 14 of the 27 settlements had met their DP6 'target'; as indicated by a "0" against the settlement in Table 3. of the Sustainability Appraisal Non-Technical Summary. In fact collectively these 14 settlements had exceeded their 'target' by over 670 new homes. The methodology used by Mid Sussex in to the DPD does not credit these excess homes against the DP4 targets for each settlement category. For example, if excess new homes were credited, the category 2 settlements have together delivered the full category 2 target despite the shortfall in Cuckfield.

It would be reasonable to assume that the settlements which have already met and exceeded their DP6 target would be spared any further site allocations if the DPD Residual Housing Requirement can be achieved without this. However, the methodology adopted by Mid Sussex did not test whether the DPD Residual Housing Requirement could be met from sites in settlements that had not met their DP6 target by April 2020. Instead five of the 'over-performing' settlements have been allocated sites totaling 129 new homes:

- Ansty - 12 new homes (Policy SA33)
- Ashurstwood - 12 new homes (Policy SA26)
- Crawley Down- 50 new homes (Policy SA22)
- Handcross- 30 new homes (SA27)
- Haywards Heath- 25 new homes (Policy SA21)

The Site Allocation DPD is therefore unsound because it is inconsistent with policies DP4 and DP6 of the District Plan.

It is relevant that DPD identifies sufficient sites for 1,764 new homes which is 484 (38%) more than the calculated Residual Housing Requirement (1,280). Clearly a small number of additional allocations would be prudent, but the current margin is excessive. It does, however give some flexibility to remove the 5 sites (SA21, SA22, SA26, SA27 and SA33) without prejudicing the ability to deliver the Residual Housing Requirement through the remaining sites which are all in settlements that have not met their DP6 target. This would permit the DPD to be considered 'sound'.

Dr Ian Gibson

Member for Crawley Down and Turners Hill Ward.
Councillor Worth Parish Council,
Councillor Turners Hill Parish Council,

1424

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA27

ID: 1424

Response Ref: Reg19/1424/1

Respondent: Ms A Hunt

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Amanda Hunt
Address	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	Sa27
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>There are ongoing and regular utilities issues in the village, regular power outages, water outages and low pressure issues.</p> <p>With the current housing there are already significant parking issues with many paths blocked by cars parking both sides on the pavement. Regular traffic problems due to large vehicles unable to pass through due to parking and the road width.</p> <p>Pedestrians cannot cross the road due to volume traffic and parking.</p> <p>Traffic calming measures are needed to address speeding cars.</p> <p>With the new 90 houses at hoad lands and planned 35 on this site the village will already be significantly impacted by further strain on utilities. If the utility companies cannot upgrade service and provisions identified to address parking no further planing permissions should be granted.</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>Utilities have to be upgraded sufficiently to manage increased housing and then assessed for planned housing.</p> <p>Water pump supplying the village should be replaced or fixed properly.</p> <p>Traffic assessment must be conducted.</p> <p>Pedestrian crossings are needed and traffic calming measures.</p> <p>Parking assessment has to be conducted and addressed.</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

1425

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA27

ID: 1425

Response Ref: Reg19/1425/1

Respondent: Mr L Vandendyck

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Luke Vandendyck
Address	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA27
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>Under the housing requirements guidelines for each village, Handcross does not need to provide any more housing. The village is already being pushed to its limits with the large crest Nichols development to the north of the village. The village facilities are inadequate as it is without building another 30+ properties.</p> <p>The access to the site through West park road is highly impractical as the road is already busy with vehicles parking on the road, an increase in vehicle traffic will only make the road more dangerous. Access will have to be via coos lane, it's not impossible and an access road could easily be cut into the verge/bank as can be seen to other properties along coos lane.</p> <p>The village is in need of a proper shop such as tesco express or co op. The water services for the area are extremely inadequate with complete water loss happening several times recently something that shouldn't happen in a 21st century 1st world country.</p> <p>The village does not need any more housing, the proposal will not benefit Handcross in any way only cause more strain on on Fss as failing systems</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 village requires adequate services to cope with the potential increase in residents.</p> <p>A sufficient shopping facility such as tesco express or co op is needed.</p> <p>Better or more frequent busses</p> <p>Upgraded water services.</p> <p>The site will need to be accessed via coos lane and not west park road</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

16/08/2020

1426

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA27

ID: 1426

Response Ref: Reg19/1426/1

Respondent: Mr K Lewry

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Keith Lewry
Organisation	none
Respondent ref. number	SA 27
Address	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA27
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	With the problems of water supplies to homes in the Handcross area with increasing low pressure problems , and being cut off without notice , we can not understand any more homes being built here, Only 4 shops in the area with a very small first school with no hope of expansion , More lorries taking short cut through the village each week to prevent them from being weight tested at the top of Handcross hill on the A23,
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	16/08/2020

2054

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA27

ID: 2054

Response Ref: Reg19/2054/1

Respondent: Ms C Baldock

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Clare Baldock
Address	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	Sa27
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	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	Recent and past events have shown that the local community are now already badly served by the lack of investment in the local infrastructure, including schools, doctors surgeries, water and power supplies. Examples being the recent water and power cuts which have affected large parts of the area. In the case of the water cuts this was for many days in soaring temperatures and due to demand by customers. Since Handcross and Pease pottage have already had to absorb around 1000 new homes and probably about 4000 or more new residents, the amenities are already stretched and unable to cope. The situation will only get worse with any more development. We are not unwelcoming people and appreciate our new neighbors and the strength they bring to our community, but investment is needed to ensure the infrastructure can cope which it currently can't.
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.	Sufficient infrastructure and utilities for development to be approved.
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

2140

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA27

ID: 2140

Response Ref: Reg19/2140/9

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



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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.

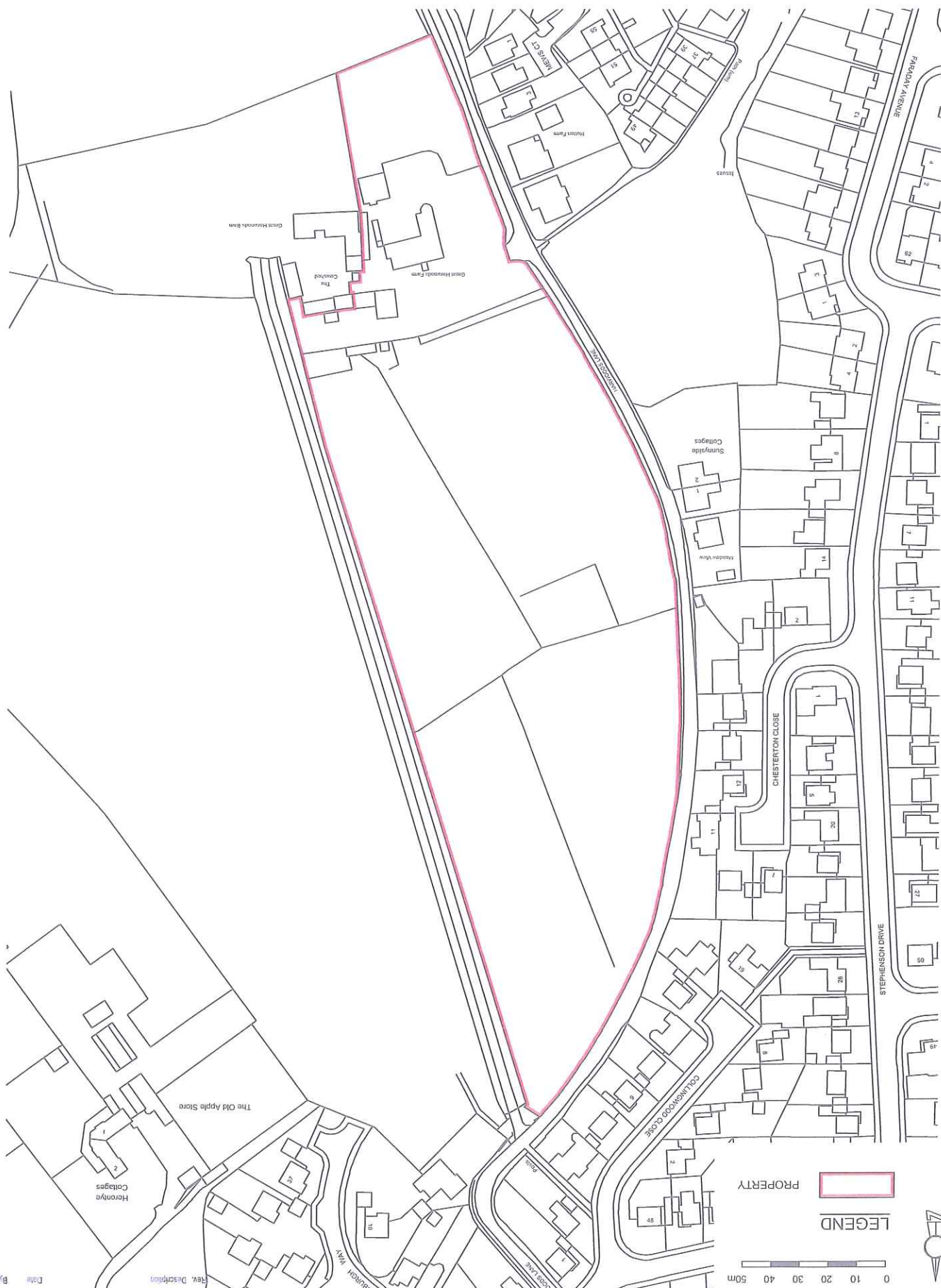
**REGULATION 19 SUBMISSION DRAFT
SEPTEMBER 2020**

**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

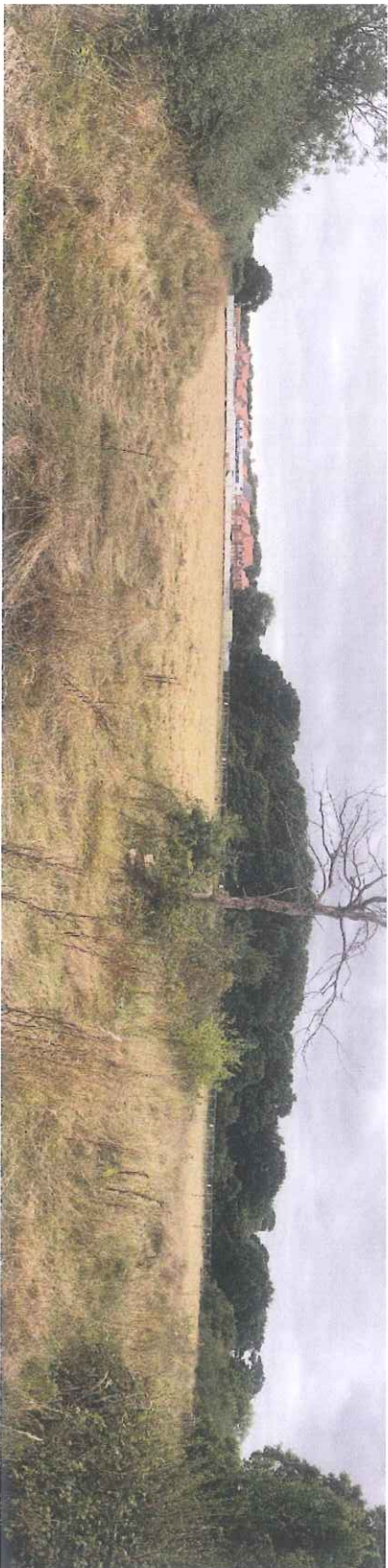


APPENDIX B

Total	
NIS	
Date	03.05.19
	standing at 1263.01



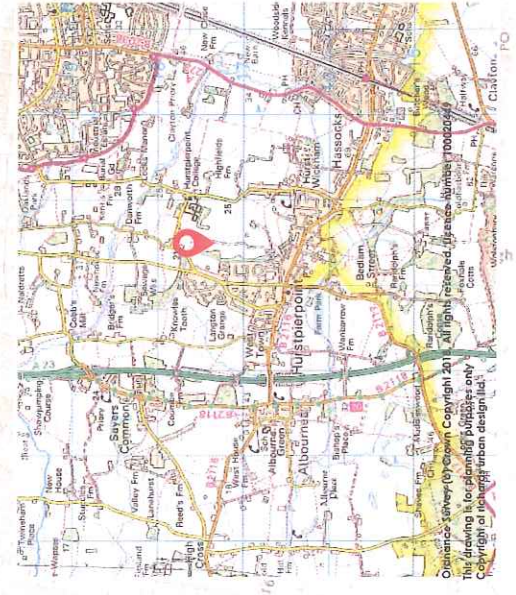
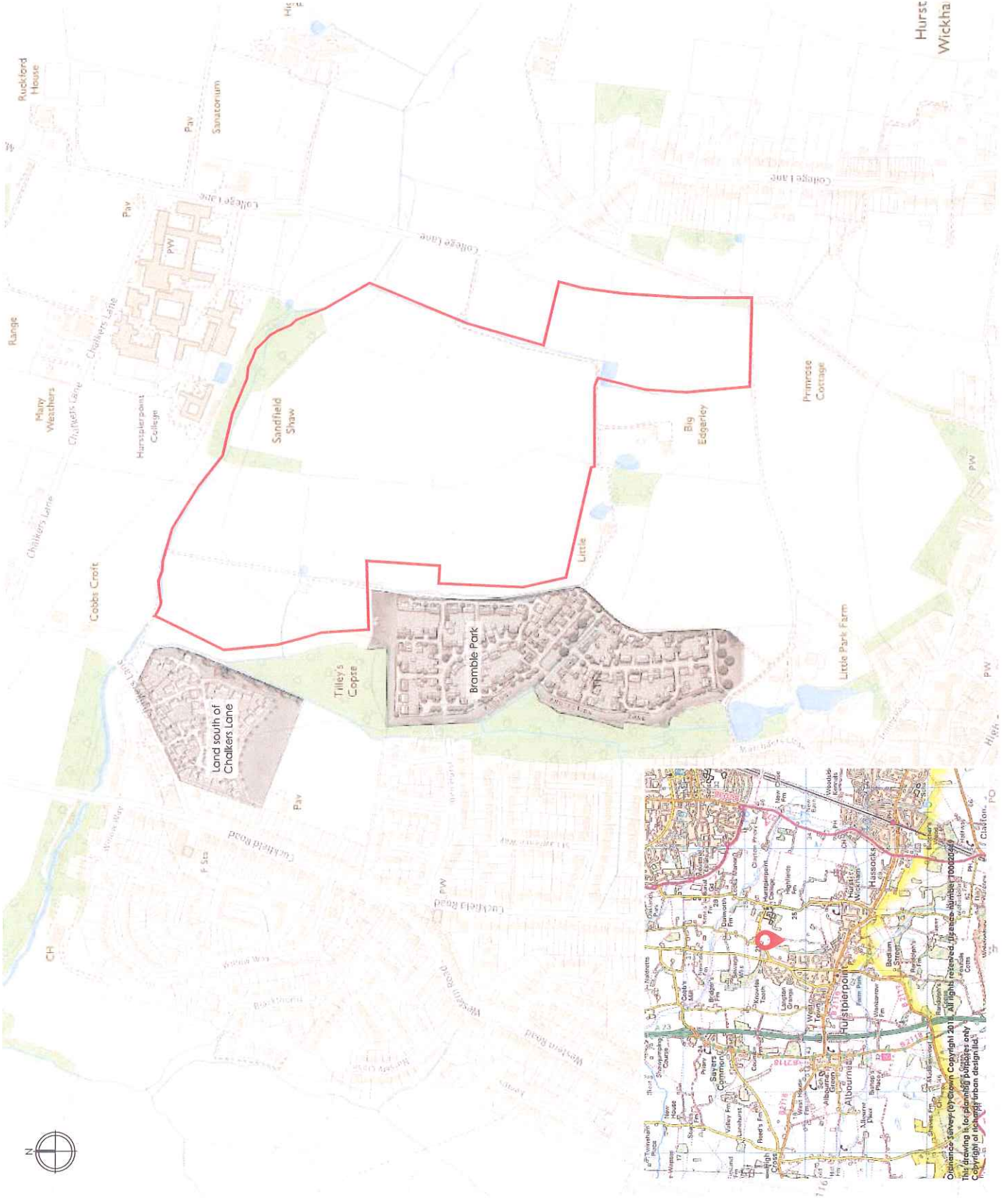
1. View looking north from the centre of the site with new housing south of Chalkers Lane on the left and Hurstpierpoint College on the right



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 lidd.

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 childrens 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

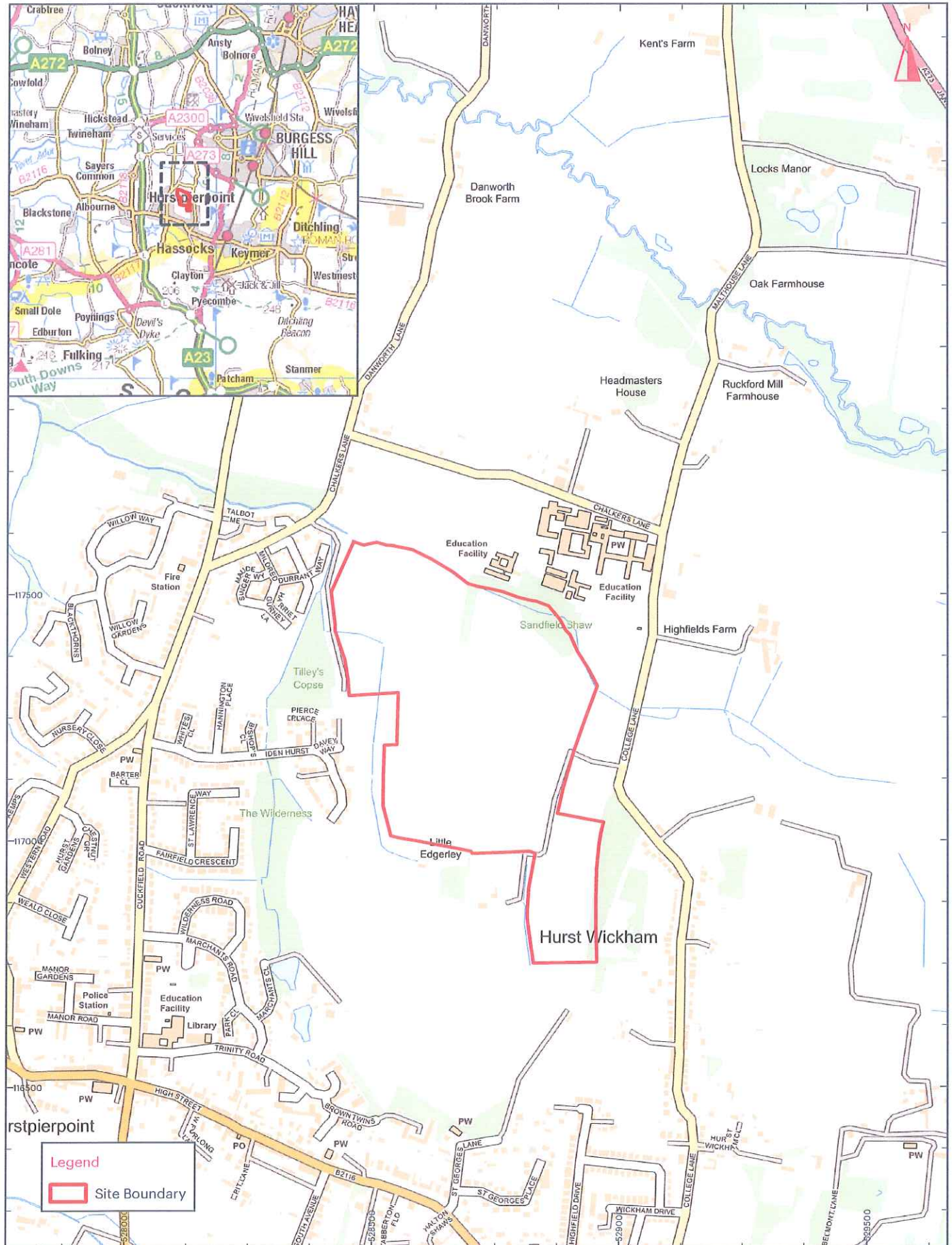
- 3.5 The two listed buildings occupy the main central and eastern area of the college complex. They dominate the grass sports pitches and facilities immediately to the north the buildings and the artificial grass sports pitches immediately to the south of the buildings. There are a series of pre-WWII, 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 of the college as they will not be experienced from the 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 the 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

A horizontal number line starting at 0 and ending at 300m. The line is divided into six equal segments by vertical tick marks. The segments alternate in color: blue, white, blue, white, blue, and white. The first segment (0 to 50m) is blue, the second (50 to 100m) is white, and so on.

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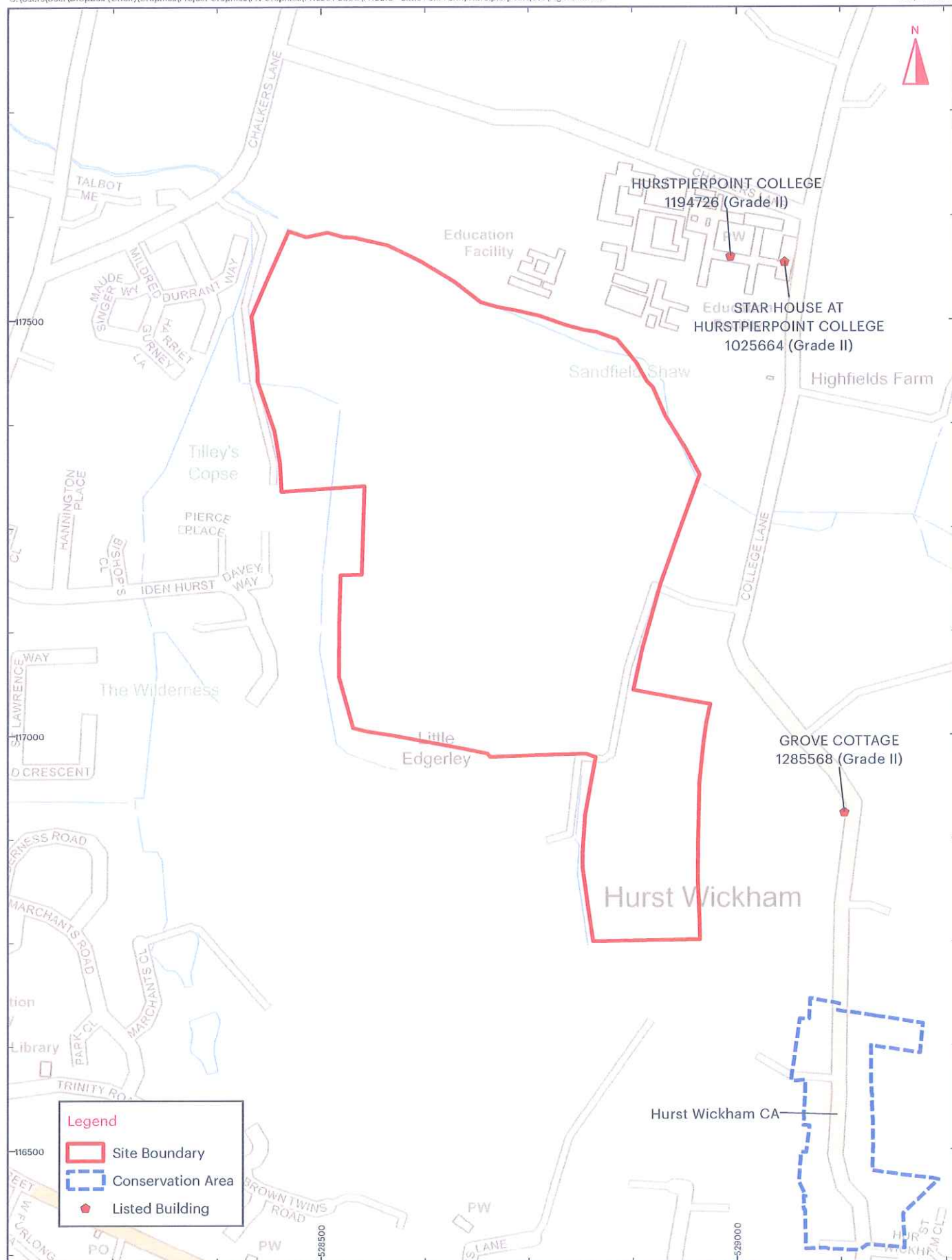
**Title:**

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.

2307

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA27

ID: 2307

Response Ref: Reg19/2307/1

Respondent: Ms T Fenter

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Tessa Fenter
Address	[REDACTED]
Phone	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA27
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	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 provision of more dwellings in St Martin Close area was to be expected by anyone with any common sense from the moment the original houses wer built. However, the quantity that is being proposed is completely unrealistic and would overwhelm the already stretched utilities.</p> <p>The village as a whole, including St Martin Close, suffers from water loss and lack of pressure on a regular basis - at least once a month, and more recently it has been more frequently. On top of that the water comes back a dirty and cloudy colour and then takes ages to clear. Further we suffer from regular power cuts and 'blips' in power. I do not think that it is possible to propose, and expect people to back, more houses when the services they already receive are poor.</p> <p>The road link to St Martin Close is through other residential roads and to have building lorries etc through those roads whilst works were carried out and also as an access road afterwards is unthinkable. The entrance to the close is narrow and cars are always parked on the side of the road along West Park on the approach. The increased traffic following any construction work would be dangerous both to public and other road users. The highway infrastructure was not designed with more housing in mind.</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	27/09/2020

2449

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA27

ID: 2449

Response Ref: Reg19/2449/1

Respondent: Mr I Barden

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Ian Barden
Address	[REDACTED]
Phone	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA27
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>My opinion is that this SA27 plan is unsound based on numerous factors not being properly taken into consideration or reviewed. Expanding housing on the perimeters of an under functioning village will only exacerbate existing issues such as:</p> <ol style="list-style-type: none"> 1. The continuing water shortages due to improper supply from Ardingly Reservoir via the Balcombe Road Water Tower. 2. Continuing Power Cuts 3. Complete lack of Public Parking in the Village to access the limited four shops (Butchers/Hardware/Newsagent/Spar) 4. Excessive traffic through all access roads to and from the Village High Street including excess parking to the NT Nymans on village verges etc 5. Further pressure on the Single primary school at the far opposite end of the village. 6. Further pressure on the Dumbledoor Doctor and Dental Surgery. 7. Severely increasing traffic (an extra 105-140 vehicles + 70 Houses) through West Park Road with already reduced road space. 8. Very limited leisure space for evolving children to utilise (on Skateboards/bicycles etc).

<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>What the Slaugham Parish Council (SPC) should have considered is that:</p> <ol style="list-style-type: none"> 1. They have already donated land for 450 houses at Pease Pottage for the Crawley Overspill thus completing their Neighbourhood Plan requirements. 2. The recent 150 houses privately built at Hoadlands Grange behind the Surgery already adding to the points above. <p>What the SPC should have considered is getting better aligned with the National Trust (NT)(Nymans) and exploiting the land currently owned by the NT directly behind the Village High Street to both theirs and the Villages benefit through:</p> <ol style="list-style-type: none"> 1. Building the necessary additional housing 2. Expanding the centre of the Village with: <ul style="list-style-type: none"> A. A 'retained' joint Ambulance/Police/Fire Centre (not dissimilar to Turners Hill) B. A Village Garage and Repair Shop C. Specific Public Parking Space D. Additional Shopping outlets E. A Road connecting the Village High Street to the Balcombe Road via the expanded Village Centre. F. All of which would also require upgraded Power/Water/ Supply to benefit the whole village
<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>No, I do not wish to participate at the oral examination</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>28/09/2020</p>