

SA32: Withypitts Farm, Selsfield Road - Index by ID Number

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
597	Mrs A Bolt	Turners Hill Parish Council		Town & Parish Council	<input type="checkbox"/>
642	Ms C Tester	High Weald AONB Unit		Statutory Consultee	<input checked="" type="checkbox"/>
684	Mr C Noel	Strutt and Parker	Paddockhurst Estate Turners Hill	Promoter	<input type="checkbox"/>
710	Mr N Burns	Natural England		Statutory Consultee	<input type="checkbox"/>
765	Dr I Gibson			District Councillor	<input checked="" type="checkbox"/>
1702	Mr P Mchale			Resident	<input type="checkbox"/>
1707	Mr & Mrs Mugridge			Resident	<input type="checkbox"/>
2079	Mr A Black	Andrew Black consulting	Vanderbilt Homes - Hurstwood HH	Promoter	<input type="checkbox"/>
2080	Mr A Black	Andrew Black consulting	Vanderbilt homes - CDR	Promoter	<input type="checkbox"/>

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA32

ID: 597

Response Ref: Reg19/597/1

Respondent: Mrs A Bolt

Organisation: Turners Hill Parish Council

On Behalf Of:

Category: Town & Parish Council

Appear at Examination? x

From: Turners Hill Parish Council <office@turnershillparishcouncil.gov.uk>
Sent: 23 September 2020 12:54
To: ldfconsultation
Subject: MSDC SITE ALLOCATIONS DPD (Regulation 19 Submission Draft)

Categories: SiteDPD

Dear Sirs,

Turners Hill Parish Council continues to strongly object to the inclusion of SA 32 Withypitts Farm, Selsfield Road.

We do not wish to see any development of the High Weald Area of Outstanding Natural Beauty (AONB) and the inclusion of this site would set an unwarranted and unwanted precedent.

We do not agree that the impact on the AONB would be moderate especially as the impact on the actual farm would be immense. The overall impact has not, in our view, been considered.

Such development in the AONB was questioned by the High Weald AONB Unit, Natural England and CPRE Sussex who did not feel it was appropriate or necessary and greater consideration should be given to sites in Turners Hill which are outside of the AONB.

Site 852 was put forward by the same landowner and by Turners Hill Parish Council as part of the call for sites. While we are yet to discuss this in detail with the landowner, we continue to support this site and will be considering all, or part, of it for inclusion in our revised Neighbourhood Plan. This site can provide for the sixty homes which MSDC require in its spatial strategy set out in the District Plan.

From comments submitted under Regulation 18 it appears that the landowners have continued to develop their plans for this site and have discussed access arrangements with WSCC as a formal pre-application consultation (June 2019).

If it agreed that this site deserves further consideration, we would ask that all relevant parties meet with the Parish Council for discussions on the way forward.

As previously stated, Withypitts Farm is the last working farm in the Parish, and it would not be able to continue farming livestock without the farm buildings. It is currently a sustainable economically viable farm and should therefore be protected.

The proposer states that the land could not come forward for six to ten years and that they would need time to relocate the farming activities to Worth Lodge Farm so removing the last working farm from the Parish. This concerns us not simply because of the loss of the farm but what will become of the farmland all of which is in the ANOB with far reaching views along the ridge line.

They have also submitted comments which cause us to question the inclusion of this site and of it ever providing appropriate village housing. The comments made by the proposer are:

- The development costs at this site are anticipated to be much higher than average because:-
- Forming new residential units in converted farm buildings is generally far more expensive than delivering new-build dwellings.
- The proposal will necessitate additional costs to the Estate in relocating the existing agricultural operations to Worth Lodge Farm. These are development costs that are directly attributable to the scheme.
- It is possible that formation of an acceptable access will involve the demolition of existing buildings, and the redevelopment will certainly require such works within the site.

- As the scheme develops, we will review the viability of the proposals but it seems possible that a scheme of 16 units as envisaged in policy SA 32 may not be able to deliver a District Plan compliant level of affordable provision because of the anticipated level of development costs.

In other words, the development would not provide small homes which are needed, but large expensive homes built to cover all foreseeable costs which brings no benefit to the village.

It appears that the site cannot be developed by 2030/31.

The access to this site is extremely dangerous as we have said previously and will require considerable works to transform. We are surprised to note that WSCC made no comment on this during regulation 18 consultations and find their submission inappropriate and fairly amazing.

There does not need to be on-site passenger information including RTI display(s) for bus and rail services; nor money spent on improvements to bus stopping facilities on Selsfield Road including provision of a bus shelter and RTI displays. This money would be better spent on safeguarding the minimum bus service we now have. Additionally, they ask for a contribution towards cycling improvements to the Turners Hill Road cycle path – where is this?

A continuous safe pedestrian footway with safe crossing points is a far greater priority. This would allow children attending our Primary School to walk to school safely as well as those at senior school who need to walk to the village centre for the school bus.

The Sustainability Appraisal still states that there is a GP surgery within a ten-minute walk despite our informing you that there is no GP surgery in Turners Hill. Education and retail facilities are not accessible safely from the site. Any development in Turners Hill has a negative impact on the highway and needs to be carefully considered. We agree that the site performs very negatively against the countryside criteria due to its location within the High Weald AONB.

Our comments on the District Plan Policies remain the same and are repeated here for consideration.

DP15 states:

The re-use and adaptation of rural buildings for residential use in the countryside will be permitted where it is not a recently constructed agricultural building which has not been or has been little used for its original purpose and: the re-use would secure the future of a heritage asset; or the re-use would lead to an enhancement of the immediate setting and the quality of the rural and landscape character of the area is maintained.

We do not accept that development of this site complies with this.

DP16:

In our opinion this proposal does not comply with the national policy. It does not bring any benefits to the village and, with the proposal being for 16 dwellings on 1.7 hectares, is likely to only provide large dwellings that are certainly not what the village needs.

We question that this proposal fulfils any of the requirements of DP16, for instance it does not support the economy and social well-being of the AONB or of the whole Parish.

DP26 talks of well-located and designed development that reflects the distinctive aspect of villages and retain their separate identity and character; that support sustainable communities which are safe and inclusive. These criteria are not met by this proposal. It most certainly would not be able to provide a pedestrian friendly environment that is safe, well-connected and accessible without a great deal of highway work being carried out to link the site safely to the village and its services.

Kind regards
Chris

Mrs Chris Marsh
Clerk to Turners Hill Parish Council

The Ark, Mount Lane, Turners Hill, West Sussex RH10 4RA
www.turnershillparishcouncil.gov.uk

Tel: 01342 712226

Office Hours: 9am to 12:30pm Tuesday to Thursday

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA32

ID: 642

Response Ref: Reg19/642/10

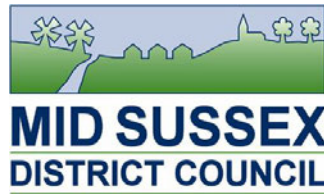
Respondent: Ms C Tester

Organisation: High Weald AONB Unit

On Behalf Of:

Category: Statutory Consultee

Appear at Examination? ✓



Site Allocations Development Plan Document Regulation 19 Submission Draft Consultation Form

The District Council is seeking representations on the Submission Draft Site Allocations Development Plan Document, which supports the strategic framework for development in Mid Sussex until 2031.

The Site Allocations DPD, has four main aims, which are:

- i) to allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan;
- ii) to allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development;
- iii) to allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development, and
- iv) to set out additional Strategic Policies necessary to deliver sustainable development.

All comments submitted will be considered by a Planning Inspector, appointed by the Secretary of State, at a public examination to determine whether the plan is sound.

The Site Allocations DPD is available to view at:

www.midsussex.gov.uk/planning-building/development-plan-documents/

A number of documents have been prepared to provide evidence for the Site Allocations DPD and these can be viewed on the Council's website at the above address.

Paper copies will also be at the Council offices (see address below) and your local library and available to view if the buildings are able to open during the consultation period.

Please return to Mid Sussex District Council by midnight on 28th September 2020

How can I respond to this consultation?

Online: A secure e-form is available online at:

www.midsussex.gov.uk/planning-building/development-plan-documents/

The online form has been prepared following the guidelines and standard model form provided by the Planning Inspectorate. To enable the consultation responses to be processed efficiently, it would be helpful to submit a response using the online form, however, it is not necessary to do so. Consultation responses can also be submitted by:

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

E-mail: LDFconsultation@midsussex.gov.uk

A guidance note accompanies this form and can be used to help fill this form in.

Part A – Your Details (You only need to complete this once)

1. Personal Details

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



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

The information gathered from this form will only be used for the purposes described and any personal details given will not be used for any other purpose.

Part B – Your Comments

You can find an explanation of the terms used in the guidance note. Please fill this part of the form out for each representation you make.

Name or Organisation: High Weald AONB Partnership

3a. Does your comment relate to:

Site Allocations DPD	<input checked="" type="checkbox"/>	Sustainability Appraisal	<input type="checkbox"/>	Habitats Regulations Assessment	<input type="checkbox"/>
Community Involvement Plan	<input type="checkbox"/>	Equalities Impact Assessment	<input type="checkbox"/>	Draft Policies Maps	<input type="checkbox"/>

3b. To which part does this representation relate?

Paragraph	<input type="text"/>	Policy SA	SA 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 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.

Historic England advises that redevelopment of farmsteads should be based on an analysis of their historic form (National Farmstead Assessment Framework <https://historicengland.org.uk/images-books/publications/national-farmstead-assessment-framework/>)

'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. Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant. Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant.

Please can you make the following amendments in red – **additions in bold** and deletions ~~crossed through~~.

Under 'Objectives'

"To deliver a farmstead character redevelopment which retains existing buildings of historic value and capable of conversion, **and** which conserves and enhances the **landscape** character of the High Weald AONB".

Under 'Urban Design Principles'

- "Enhance local landscape **and historic** character and views with a high quality development with a farmstead character **based on an analysis of the historic farmstead**, utilising any existing **historic** buildings which are capable of being retained, ~~set within a landscape setting and reinstating those that have been previously lost.~~
- Ensure the design and layout of the development works with the natural grain of the landscape following the slope contours of the site, minimising cut and fill.

Under 'AONB'

- "Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to conserve and enhance the landscape of the High Weald AONB, ~~and minimise impacts on its special qualities~~, as set out in the High Weald AONB Management Plan.
- Avoid development on the higher and more visible areas of the site in order to conserve and enhance landscape views.
- Retain and enhance with native tree species the ~~the~~ existing Scots Pine tree belt on the western boundary and provide additional tree planting along the southern and eastern boundaries.
- Provide a robust native hedge with trees along the north boundary of the site to reinforce the field patterns and soften the visible built form.
- Avoid use of close boarded fencing adjacent to any site boundaries where it will be visible in wider views.
- Development proposals will need to protect the character and amenity of existing PRow to the north of the site".

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: SA32

ID: 684

Response Ref: Reg19/684/2

Respondent: Mr C Noel

Organisation: Strutt and Parker

On Behalf Of: Paddockhurst Estate Turners Hill

Category: Promoter

Appear at Examination? x

**Mid Sussex District Council
Site Allocations DPD**

Regulation 19 Consultation

**Representations on behalf of Paddockhurst
Estate**

Our ref: CN 151478

10th September 2020

Appendix 1 – Turners Hill Neighbourhood Plan (Policy THP2) and Proposals Map.

Appendix 2 – Proposed Site Layout Sketch

Introduction

- 1.1. Strutt and Parker are instructed by Paddockhurst Estate to respond to the Regulation 19 consultation Site Allocations Development Plan Document (SADPD) published by Mid Sussex District Council in July 2020. Paddockhurst Estate are freehold owners of land north of Old Vicarage Field, Turners Hill which it is promoting for sustainable new housing and open space. The Estate also own land at Withypitts, Turners Hill, which is promoted for redevelopment for residential purposes.
- 1.2. Land north of Old Vicarage Field (Site 852) extending to 9 hectares was assessed as suitable at Stage 1 of the site assessment process in September 2018 with an anticipated yield of 150 dwellings. It also remained in consideration following the Stage 2 high level assessment (and was therefore considered compliant with the District Plan spatial strategy). It features in the Stage 3 assessment but did not progress to Stage 4.
- 1.3. Land at Withypitts Farm, Selsfield Road, Turners Hill (Site 854) is proposed for allocation under Policy SA32. This allocation is supported.
- 1.4. This representation focusses on the spatial strategy for the District, its relationship to sustainability, and the associated housing numbers addressed through the Regulation 19 proposals. It also provides further details in support of Policy SA 32.

Spatial Strategy for the District

- 2.1. It is notable that the Regulation 19 SADPD under-delivers housing numbers in Category 3 settlements when assessed against District Plan targets. We consider that this shortcoming should be addressed prior to advancing the SADPD by identification of additional sites in Category 3 Medium Sized Villages. This will have sustainability advantages in addition to meeting the District Plan targets, including ensuring that the spatial distribution of affordable housing provision more accurately mirrors that anticipated in the District Plan.
- 2.2. The District Plan table which identified the spatial distribution of the housing requirement (page 32 of the District Plan) also provides minimum figures for each of the settlement Categories.
- 2.3. The minimum housing requirement for Category 1 settlements (Towns) has been revised to 706 dwellings, from the figure of 840 units in the Regulation 18 document. In Category 2 settlements (Local Service Centres), this has decreased from 222 dwellings to 198 dwellings (as a result of planning permission being granted at Land North of Shepherds Walk, Hassocks). In Category 3 (Medium Sized Villages), the requirement has reduced from 439 to 371. In Category 4 the requirement has decreased from 6 units to 5. These housing supply figures have been revised following an update to completion, commitments and windfall figures.
- 2.4. Despite the minimum residual requirement for Category 3 decreasing, this category remains the most underrepresented in the proposed site allocations. Only 238 of the minimum 371 homes required are proposed in the Regulation 19 SADPD, providing a shortfall of 133 dwellings. This position is shown in the table below (red text):

MSDC SADPD Reg 19: Representations on behalf of Paddockhurst Estate

Category	Settlements	District Plan Allocations	Minimum Requirement (2014-2031)	Minimum Residual (2017 +)	Minimum Residual Reg 18 SADPD	Minimum Residual Reg 19 SADPD	Reg19 SADPD Sites	Category Difference
1 Towns	Burgess Hill, E Grinstead, Haywards Heath	3,287	10,653	1,272	840	706	1069	363
2 Larger Village	Crawley Down, Cuckfield, Hassocks	500	3,005	838	222	198	105 (Figure does not include recent consent at Shepherds Walk, Hassocks)	37
3 Medium Village	Albourne, Ardingly, Ashurst Wood, Balcome, Bolney, Handcross, Horsted Keynes, Pease Pottage, Sayers Common, Scaynes Hill, Sharpthorne, Turners Hill, West Hoathly	600	2,200	311	439	371	238	-133
4 Smaller Village	Ansty, Staplefield, Slaugham,, Twineham, Warninglid	0	82	19	6	5	12	7
5	Hamlets	N/A	N/A	N/A	N/A	N/A	N/A	
Windfall			450					
Total			16,390	2,439	1,507	1,280	1,764	

Table 1: Spatial Distribution of Housing Requirement (Source of data: SADPD Regulation 18 and 19 draft documents.)

- 2.5. The number of dwellings at Site Allocation 27 (Land at St Martins Close (West) Handcross) has reduced from 65 to 30 dwellings because the Slaugham Neighbourhood Plan is now made and Land at St Martins Close (East) is now a commitment as at 1st April 2020. Therefore, only 30

units are identified to avoid double counting. However, there would still be a shortfall of 103 units in Category 3 if the additional 30 dwellings had been included in the housing figures.

- 2.6. The Settlement Sustainability Review (May 2015) forms part of the evidence base for the Mid Sussex District Plan (2014-2031). Paragraph 1.4 notes the Settlement Sustainability Review (May 2015) identifies strategic allocations for housing at Burgess Hill. However, additional “housing development is proposed to be met at the district’s other towns and villages to help meet the needs of existing communities.” This suggests housing supply should be proposed across the numerous settlements and not concentrated to only a select number.
- 2.7. As Table 1 shows, there is over-provision in the Category 1 settlements against under provision in Category 2 and 3 settlements. The approved settlement hierarchy constitutes a policy for delivering the spatial strategy, ensuring a sustainable pattern of development across the District. It would be wrong therefore to regard additional provision in Category 1 settlements as essentially more sustainable than provision in accordance with the spatial strategy. The latter has been formulated to produce an appropriate balance of development across settlements in the interests of sustainability.
- 2.8. The settlement hierarchy table included as part of District Plan Policy DP6 outlines the characteristics and functions of a Category 3 settlement: “Medium sized villages providing essential services for the needs of their own residents and immediate surrounding communities.” As a result, settlements within Category 3 should be considered as sustainable settlements.
- 2.9. Thus, there is sufficient justification for amending the Site Allocations DPD to increase the number of sites and units allocated within Category 3 settlements, to ensure consistency with the District Plan and the approved spatial strategy, and in turn support a sustainable pattern of development.

Housing Supply

- 3.1. Policy SA10 (Housing) within the SADPD Regulation 19 sets out how the Council propose to distribute housing across the District. Policy SA11 (Additional Housing Allocations) proposes how the 1,764 dwellings required through the SADPD will be distributed. The figure of 1,764 dwellings presents an excess of 484 dwellings above the residual amount required of 1,280.
- 3.2. Nevertheless, there is a clear under provision of homes in Category 3 settlements and therefore the settlements cannot meet their guideline (Policy DP6) residual housing requirement.
- 3.3. 158 sites out of 253 sites were taken forward following a High level Assessment (Site Selection Paper 1). Following the Detailed Evidence Testing stage (Site Selection Paper 3), 51 sites remained as having potential for allocation and were subject to further evidence base testing and assessment. The SADPD Regulation 19 document includes 22 housing allocations. This is a narrow proportion of the sites that were positively assessed and were regarded as having potential for allocation following the Detailed Evidence Testing stage.
- 3.4. Whilst there is an over-supply from the 22 sites proposed for allocation, this may not be a sufficient buffer should sites fall out of the allocations process between now and adoption. In

addition, the non-deliverability of any proposed site allocation could result in the Council jeopardising housing supply for the District.

- 3.5. MSDC should consider allocating more sites in the SADPD to ensure a continuous supply of sites during the plan period. Therefore, it would be sensible to look at settlements that are not currently meeting the residual housing requirement, most notably Category 3 settlements, to provide the necessary flexibility.

Assessed Housing Options and Sustainability Appraisal

- 4.1. This section is an update to assessed housing options and sustainability appraisal discussion presented in the representation in response to the SADPD Regulation 18 document.
- 4.2. MSDC are required to assess potential reasonable alternative strategies against the selected approach developed for the purposes of the Regulation 19 version of the SADPD. Similarly, to the preparation of the Regulation 18 draft document, the Council purports to have carried out that exercise by considering three potential Options for the SADPD consultation, as set out in the SADPD Sustainability Appraisal – Non-technical Summary Regulation 19 (July 2020).
- 4.3. As with the SADPD Sustainability Appraisal Regulation 18 document (September 2019), the Options presented were not sufficiently different in terms of addressing the approved spatial strategy. 20 of the 22 sites ultimately identified in the selected Option were common to all 3 Options.
- 4.4. Option B included three additional sites at Burgess Hill (Category 1 settlement) while Option 3 included those sites plus a 3rd site at Haywards Heath (again a Category 1 settlement). This means that the choice around options was solely a choice around the overall number of units to be delivered in excess of the minimum residual requirement. There was no reasonable alternative presented in relation to the spatial strategy and the distribution of development between the settlement categories. Options B and C simply added additional dwellings to Category 1 settlements and did not seek to redress imbalances between the other settlement categories. The choice provided was against delivering either 144, 484 or 774 dwellings above the minimum residual requirement. In each scenario, the minimum target provision was exceeded in Category 1, 2 and 4 settlements. None of the Options met the Category 3 target residual minimum.
- 4.5. This is surprising given that there are nearly the same number of settlements in Category 3 (13) than in all of the other settlement categories where sites are proposed for allocation combined (14). It is not credible that there are no potentially suitable additional Category 3 sites that might be considered as reasonable alternatives for the purpose of the sustainability appraisal.
- 4.6. Paragraph 1.36 of the Sustainability Appraisal (July 2020) says that additional sites should ideally be drawn from sites from the highest settlement category in the hierarchy. As noted at paragraph 4.5, all additional sites were only considered from Category 1 settlements.
- 4.7. Housing supply should not only be directed at Category 1 settlements, not only because that would be contrary to the Spatial Strategy in the District Plan, but indeed because Category 3

settlements should be considered as sustainable locations to provide housing in Mid Sussex. There is strong justification that settlements in Category 3 of the Settlement Hierarchy should be considered as sustainable locations for site allocations as locations outside of the main town centres become increasingly desirable places to live, and there is less need to commute to offices in the main towns. An increase in home-working has eased pressures on public transport links in the District, and will continue to do so as employers prepare for the longevity of home-working.

- 4.8. The assessment criteria in the Sustainability Appraisal should be reviewed as a result of rapidly changing employment environments in response to the COVID-19 crisis; the pandemic has shifted transport movements and commuting patterns, in particular.

Windfalls

- 5.1. The Regulation 19 SADPD proposes to increase the windfall allowance to 84 dwellings per annum, amounting to a total of 504 dwellings over the final 7 years of the Plan period (2024-2031). Proportionately then, there are more windfall units to be provided for than are now proposed to be identified in categories 2 and 3 combined.
- 5.2. Part of this increase is attributed to the inclusion of sites of up to 9 units in the assessment. MSDC are still very reliant on the delivery of homes from windfall sites. This could potentially negatively impact the delivery of affordable housing. In addition, site-specific infrastructure requirements are more readily made out in policies supporting the delivery of allocated sites, meaning that generally speaking greater public benefit can be anticipated in plans where a higher proportion of the number of dwellings targeted are to be provided on sites specifically allocated in Local Plans. It is also important to note that windfall sites cannot be assumed to come forward in proportion to the balance of development contemplated through the spatial strategy. This means that the spatial strategy may be further compromised (in addition to the under-provision in categories 2 and 3 identified above), given that windfall developments most commonly derive from within the larger settlements. These issues can be overcome by identifying more housing sites through the SADPD, and specifically with Category 3 settlements.
- 5.3. Without allocating further sites to meet the adjusted housing need, there will be a greater reliance on windfall sites. The Council is therefore encouraged to rely less on non-identified sources of housing growth (which by their nature are unpredictable in relation to the realisation of the spatial strategy) and to plan more effectively by identifying additional sites for allocation in the SADPD.

Suitability of Turners Hill

- 6.1. Turners Hill is acknowledged to be one of 13 settlements within Category 3 in the settlement hierarchy, identified as a Medium-Sized Village that provides essential services and which is capable of accommodating additional residential development. The District Plan identifies a minimum residual requirement for Category 3 settlements of 311 dwellings. This has been

increased to 371 in the context of the current Regulation 19 consultation. The current draft SADPD delivers 238 units in such settlements, an under-provision of 133 units.

- 6.2. Under-provision is also apparent within Turners Hill. Table 12 produced at paragraph 6.12 of the sustainability appraisal demonstrates that (in addition to the 133-unit shortfall across Category 3 Settlements), the Regulation 19 SADPD under-delivers against the expectation for sustainable growth for Turners Hill – namely a further 67 dwellings. The SADPD does allocate one site in Turners Hill for 16 dwellings, leaving at least 51 units to be found if the residual for the village is to be met. While the Turners Hill Neighbourhood Plan (Made in 2016) does identify a development site, this provision is included in the Council's assessment in order to arrive at the residual requirement as an existing Neighbourhood Plan commitment.

Land north of Old Vicarage Field

- 7.1. Land north of Old Vicarage Field (Site 852) was found to be unsuitable for allocation, primarily for access reasons. The Site Selection Paper notes that *“access is proposed via an adjacent allocated site. However, the adjacent allocation has no extant permission and it cannot be assumed that it will come forward over the plan period”*.
- 7.2. The adjacent land in question is allocated in the made Turners Hill Neighbourhood Plan (Policy THP2). Crucially, it is under the control of the same landowner. Whilst no planning permission has been granted, it is not unreasonable to assume that the THP2 land will come forward for development within the next 5 years, unlocking the land to the north for development. Extracts from the Made Neighbourhood Plan and associated Proposals Map are at Appendix 1.
- 7.3. All other matters raised (in relation to potential Conservation Area and Landscape impact) are capable of mitigation through site master planning.
- 7.4. This site is very well related to the settlement and to planned new development. The land lies to the north of the AONB. It is capable of meeting the identified housing shortfall in Turners Hill. It is deliverable within years 6-10 and should not be ruled out as a potential allocation by virtue of access arrangements.

Land at Withpitts Farm

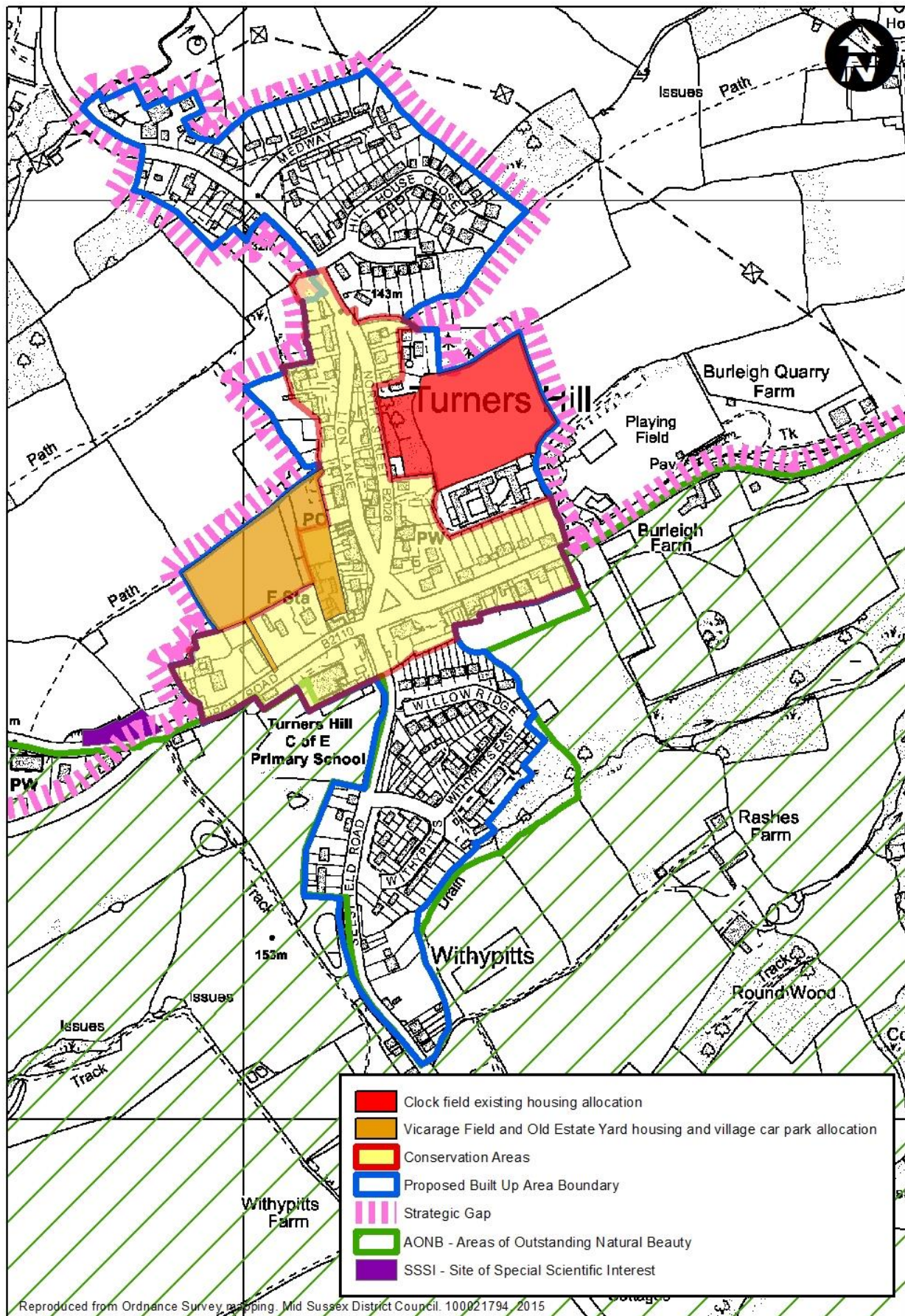
- 8.1. Paddockhurst Estate has been proactive in undertaking assessment work in support of the proposed allocation of land at Withypitts Farm. A sketch layout has been prepared (Appendix 2), supported by an Opportunities and Constraints Assessment and a Design Development document. A LVIA has been produced, and a Transport Assessment is being prepared, supported by Safety Audit work. The Transport Assessment will soon be finalised with the provision of vehicle tracking work.

Summary

- 9.1. It is evident from the figures published in the Regulation 19 SADPD that there remains a significant shortfall of homes in Category 3 settlements across the District. Turners Hill is a

Category 3 settlement where housing provision is under-represented against the target minimum figure indicated in the Sustainability Appraisal.

- 9.2. The proposed allocation at Withypitts Farm will help to deliver the Spatial Strategy, but in addition, our representation at Regulation 18 highlighted a suitable site (Land North of Old Vicarage Farm) available to meet this acknowledged shortfall. Access to this site is available across land within the same ownership, across land that in turn is allocated for development in the Turners Hill Neighbourhood Plan. There is no reason to consider that the site will not come forward for development within years 6-10.
- 9.3. As noted in our previous representation, the Regulation 19 SADPD over-relies on windfall development, and more so in the latest iteration of the DPD. If the SADPD relies too heavily on windfall despite the availability of suitable residential sites, it cannot be considered justified, effective or consistent with national policy and therefore would be unsound. Difficulties with delivery on some of the District Plan's strategic sites and the unproven response to Policy DP6 mean that further site allocations are the safest way to ensure that a five-year supply is maintained through the Plan period.
- 9.4. We do not consider the SADPD to be 'sound' in its current form. In addition to the heavy reliance on windfall sites, the approach to reasonable alternatives presented in the Sustainability Appraisal (July 2020) is not consistent with the spatial strategy of the District Plan. The SADPD not only under-provides for housing in Category 3 settlements, but MSDC also risk not meeting housing numbers across the District if any of the proposed site allocations are non-deliverable.

Proposals Map

12 POLICIES

HOUSING POLICIES

THP1 Housing Site Allocations

Development of Old Vicarage Field and the Old Estate Yard will be permitted providing they meet the site specific conditions listed in THP2 below.

THP2 Development of Old Vicarage Field and the Old Estate Yard

Development of the two adjoining sites of Old Vicarage Field & the Old Estate Yard must deliver the following:

A mix of dwellings, which will address the priorities of the parish including 30% affordable homes. The mix will consist mainly of 1, 2 and 3 bedroom homes which would include 2 bungalows for the elderly and/or disabled as identified in the village survey.

The development will provide 44 new homes

A Village Car Park must be incorporated within The Old Estate Yard with pedestrian access via The Bank and the Fire Station.

The entrance road to this new Estate and Village car park is to be sited to the western side of The Old Vicarage. This position will ensure additional congestion is not created within the Primary School area which, together with the proposed 20mph zone, will not have a detrimental effect on traffic and pedestrian safety. The entrance road is to be a minimum 5.5m to incorporate pedestrian footpath and accommodate free flowing traffic to and from the Village car park.

The existing entrance to The Old Vicarage and School View properties must be closed and replaced with a continuous footpath from the new entrance road to the Fire Station. These existing properties will have rear access provision from the new entrance road. The entrance road will serve the new properties and the Village Car Park.

New pedestrian footpaths adjacent to roads must provide protection for pedestrians, for instance by way of kerbing

Internal Estate roads must meet the needs of Emergency & utility vehicles as a minimum

New homes must as a minimum comply with nationally described space standards for internal floor space and storage.

Where provided, garages should have an internal measurement of 7m x 3m as a minimum in order to accommodate a modern family sized car and some storage space.

The development will need to provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.

S106 / CIL funds from this development will provide a financial contribution to the Village Enhancement Scheme.

Development should be designed to preserve or enhance the character or appearance of the Turners Hill Conservation Area and its setting. Proposals should take into account the guidance of the adopted Village Design Statement and any conservation area appraisal which may be adopted by the Council.

THP3 New Homes Parking New residential development must provide the following minimum levels of off-street parking (including garages) as detailed in the table below.

1-2 bedroom dwellings	2 on-plot car parking spaces
3 + bedroom dwellings	1 on-plot car parking space per bedroom

THP4 New Homes The Design of new homes must take into account the character and style of buildings in the Parish. Applications for new development must demonstrate how they have incorporated the guidance of the adopted Village Design Statement.

Developers must use Building for Life 12 to help deliver high quality design. Good design is fundamental to making neighbourhoods sustainable and this is our desire for Turners Hill. We want all future homes to be as energy-efficient and sustainable as possible and the highest standards must always be strived for.



DRAWINGS CAN BE SCALED FOR PLANNING PURPOSES ONLY. DO NOT SCALE FOR ANY OTHER PURPOSE. ALL DIMENSIONS TO BE CHECKED ON SITE AND ANY DISCREPANCIES TO BE NOTIFIED TO THE ARCHITECT IMMEDIATELY.

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P03	22.07.20	Revised planting and hatching	BM	NM
P02	17.07.20	General changes	BM	DRC
P01	02.06.20	Initial Issue	MH	DRC
REV.	DATE	REVISION	DRW.	CHK.

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Client: The Trustees of Paddockhurst Estate

Job: Withypitts Farm

Address: Selsfield Road, Turners Hill

Drawing: PROPOSED SITE LAYOUT

Scale: 1:500		SKETCH For plan development only, not for construction
Drawn: BM		
Checked: DRC		
Date: 02/06/2020		
Size: A3	Dwg No. 2277-CAL-XX-XX-SK05-S3	Rev. P03

Transport Statement

WITHYPITTS FARM, TURNERS HILL

OCTOBER 2020



Reeves Transport Planning

PRODUCED for PADDOCKHURST ESTATE TRUSTEES

PRODUCED by REEVES TRANSPORT PLANNING LTD

SGR/WPF/140920 V3

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1. Introduction

- 1.1 Reeves Transport Planning is appointed to provide a Transport Statement in support of a proposal for residential development at Withypitts Farm, Selsfield Road, Turners Hill, RH10 4PP. A site location plan is attached, as Appendix 1.
- 1.2 The proposal consists of a replacement of agricultural buildings at the farm with a mixed residential development of 16 dwellings served via the existing farm access.
- 1.3 This Transport Statement is drafted with reference to the Ministry of Housing, Communities & Local Government Guidance on Travel Plans, Transport Assessments and Statements, published March 2014 and pre-application discussions with West Sussex County Council.

2. Policy Context

- 2.1 This section of the Transport Statement sets out the relevant policies, at a national and local level, that this proposal will be judged against.
- 2.2 The *National Planning Policy Framework* (NPPF), adopted in March 2012 and updated in February 2019, details the Government's planning policy and is a material consideration in planning decisions. Its emphasis is on minimising the need to travel, reducing car use and encouraging the use of sustainable transport. Paragraph 108 states that in assessing development sites it should be '*ensured that:*
 - *appropriate opportunities to promote sustainable transport modes can be - or have been - taken up, given the type of development and its location.*
 - *safe and suitable access to the site can be achieved for all users; and*
 - *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.'*

- 2.3 At the heart of the *NPPF* is a presumption in favour of sustainable development, and decision makers, at all levels, are encouraged to seek approval where possible. Paragraph 109 emphasises this and states that *‘development should only be prevented or refused on highway grounds if there would be an **unacceptable** impact on highway safety, or the residual cumulative impacts on the road network would be **severe**’*.
- 2.4 The *Mid Sussex District Plan 2014-2031* was adopted in March 2018. It sets out a vision for how Mid Sussex wants to evolve and presents a delivery strategy for how this will be achieved. It supports the *National Planning Policy Framework’s (NPPF)* *‘presumption in favour of sustainable development’*. It also reflects the requirements of the NPPF by setting out a clear economic vision and strategy, as well as identifying strategic sites and criteria for supporting inward investment and existing businesses. *Policy DP1: Sustainable Economic Development* encourages new businesses to the area to meet aspirations for economic growth and the wider benefits that this will bring.
- 2.5 *Policy DP21* confirms that development will be required to support the objectives of the *West Sussex Transport Plan 2011-2026*, which are:
- *A high-quality transport network that promotes a competitive and prosperous economy;*
 - *A resilient transport network that complements the built and natural environment whilst reducing carbon emissions over time;*
 - *Access to services, employment and housing; and*
 - *A transport network that feels, and is, safer and healthier to use.*
- 2.6 The policy also states that to meet the council’s strategic objectives development proposals will take account of whether:
- *The scheme is sustainably located to minimise the need for travel noting there might be circumstances where development needs to be located*

in the countryside, such as rural economic uses (see policy DP14: Sustainable Rural Development and the Rural Economy);

- *Appropriate opportunities to facilitate and promote the increased use of alternative means of transport to the private car, such as the provision of, and access to, safe and convenient routes for walking, cycling and public transport, including suitable facilities for secure and safe cycle parking, have been fully explored and taken up;*
- *The scheme is designed to adoptable standards, or other standards as agreed by the Local Planning Authority, including road widths and size of garages;*
- *The scheme provides adequate car parking for the proposed development taking into account the accessibility of the development, the type, mix and use of the development and the availability and opportunities for public transport; and with the relevant Neighbourhood Plan where applicable;*
- *Development which generates significant amounts of movement is supported by a Transport Assessment/Statement and a Travel Plan that is effective and demonstrably deliverable including setting out how schemes will be funded;*
- *The scheme provides appropriate mitigation to support new development on the local and strategic road network, including the transport network outside of the district, secured where necessary through appropriate legal agreements;*
- *The scheme avoids severe additional traffic congestion, individually or cumulatively, taking account of any proposed mitigation;*
- *The scheme protects the safety of road users and pedestrians; and*
- *The scheme does not harm the special qualities of the South Downs National Park or the High Weald Area of Outstanding Natural Beauty through its transport impacts.'*

- 2.7 This Transport Statement will demonstrate that the transport implications of this proposal adhere to both national and local policies, and that it does not have any adverse impact on highway safety or capacity.

3. Existing Conditions

- 3.1 The farm is located 600metres to the south of Turners Hill, on the western side of Selsfield Road.
- 3.2 Selsfield Road is classified as the B2028 and follows a north/south alignment. It provides a route to Haywards Heath to the south and Lingfield to the north.
- 3.3 The existing farm access is located 20 metres to the south of the Snow Hill junction, which is on the opposite of Selsfield Road. The current access is in a poor state of repair with limited visibility in both directions.
- 3.4 There are no direct footway connections to Withypitts Farm. There is a narrow section of footway that terminates at 66 Selsfield Road, which is circa 53metres to the north of the farm access. There are limited sections of footway on the opposite side of Selsfield Road.
- 3.5 The footway on the western side of Selsfield Road terminates at the mini-roundabout junction with Withypitts, which is circa 350metres to the north. There are crossing facilities that include dropped kerbs at the mini roundabout. Beyond the junction with Withypitts, there is a continuous footway on the eastern side of Selsfield Road toward the village centre.
- 3.6 Photographs of the current footways and access to the application site are included below.

	
<p>Figure 1: End of Footway at 66 Selsfield Road</p>	<p>Figure 2 Eastern Footway towards the south</p>
	
<p>Figure 3: Farm Access</p>	<p>Figure 4: Missing Section of Footway</p>

- 3.7 There is a 30mph sign speed limit at the farm access and to the south, the limit is 40mph.
- 3.8 A *speed and volume traffic survey* was undertaken to establish the 85th percentile speed of traffic passing the site's access between 5th and 12th December 2019. The collected data is attached, as Appendix 2.
- 3.9 The collected data establishes that the 85th percentile traffic speeds were 72.42km/h (38mph) northbound and 78.86km/h (37mph) southbound, with an average traffic flow of circa 11500 vehicle movements per day.
- 3.10 Table 3.1 presents the stopping sight distance (visibility splay) calculations for the recorded vehicle speeds.

Table 3.1
Visibility Splay (SSD) Calculations - Withypitts Farm

Guidance	Lane	km/h	v (m/s)	t (s)	d (m/s ²)	a (%)	$\frac{vt + v^2}{2d}$	+2.4m
MfS	NB	61.16	16.99	1.5	4.41	5.26	54.7	57.1
	SB	59.55	16.54	1.5	4.41	-7.68	62.4	64.8
DMRB	NB	61.16	16.99	2	2.45	5.26	82.5	84.9
	SB	59.55	16.54	2	2.45	-7.68	114.4	116.8

- 3.11 Section 7.5 of Manual for Streets (MfS) notes that *'this section provides guidance on stopping sight distances (SSD) for streets where 85th percentile speeds are up to 60km/h. At speeds above this, the recommended SSDs in the Design Manual for Roads and Bridges [DMRB] may be more appropriate'*. The data confirms that these speeds are more than 60km/h so DMRB's design standards are the most appropriate.

Accessibility by Foot and Cycle

- 3.12 It is generally accepted that walking and cycling provide realistic and important alternatives to the private car. Both are also actively encouraged to form part of longer journeys that involve public transport. The distances people are prepared to walk, or cycle, depend on their fitness and physical ability, journey purpose, settlement size, and walking/cycling conditions.
- 3.13 As noted, there are currently no direct footways connecting the site to local amenities. There is a Public Right of Way (PROW 67W) connecting Selsfield Road with Church Road at the junction of Turners Hill Road. Access to the PROW is circa 150metres to the north of the farm access, which is illustrated in Appendix 3.
- 3.14 The plan attached at Appendix 3 also highlights (in red) the route of a permissive path linking the farm buildings to PROW 67W
- 3.15 There is a range of amenities including a restaurant, local shopping, and a primary school within a 650metres walk of the site.

Accessibility by Bus

- 3.16 There are existing bus stops located within the optimum walking distance to a bus stop of 400metres (Planning for Public Transport in Development, 1999). The stops are known as Tarana and Withypitts Pond and they do not benefit from a shelter, seating, or raised kerbs.
- 3.17 Services 84 and 272 use these stops, and a summary of the routes and frequencies are presented in Table 3.2. The relevant timetables are attached at Appendix 4.

Table 3.2: Local Bus Services

Service*	Route	Service Frequency	
		Mon to Sat	Sunday
84	Crawley - Three Bridges - Turners Hill - West Hoathly - Sharpthorne - East Grinstead	Bi-hourly	No Service
272	Crawley - Three Bridges - Turners Hill - Haywards Heath - Burgess Hill - Hassocks - Brighton	Bi-hourly**	No Service

*Services reduced by Covid19 lockdown conditions
**Hourly in peak hours

Accessibility by Train

- 3.18 Three Bridges Rail Station is 6.7kilometres from Withypitts Farm site, and East Grinstead Train Station is 6.9kilometres. These stations provide regular services to London, Gatwick, local stations, and the south coast. The Southern Railway network map demonstrating routes to and from these stations is included at Appendix 5.

4. Proposed Development

- 4.1 The proposal seeks to demolish existing agricultural buildings at Withypitts Farm and replace them with up to 16 dwellings.
- 4.2 There is no definitive mix of housing proposed at this stage, but the parking allocations will be based on a ratio of two spaces per dwelling, and there is additional capacity for visitor or unallocated resident parking demand. On this

basis, it is considered highly unlikely that the proposal will result in any vehicular parking spilling out from the development site.

- 4.3 West Sussex County Council adopted parking standards require a minimum of 28% of the parking allocation to have '*active EV charging facilities.*' Each property will be provided with EV changing facilities for at least one vehicle to promote the adoption of electric vehicles by future residents
- 4.4 Each dwelling will have covered and secure cycle parking facilities that adhere to West Sussex County Council's parking standards.
- 4.5 The properties will include a separate study space or workspace that can be utilised as a home office and will be able to connect to high speed broadband, which will facilitate regular home working and less commuting trips.
- 4.6 The local bus stops will also be upgraded with shelters, seating, and improved access for wheelchairs and buggies, which will encourage an increase in use of the bus service.

Access

- 4.7 The proposal incorporates an extension to the footway on the western side of Selsfield Road, which will connect the site to the existing footway and improve pedestrian access and amenity.
- 4.8 The existing footway will be widened to the edge of the carriageway, which will provide a footway of circa 1.5metres to 1.8metres wide. A copy of the adopted highway plan is attached, as Appendix 6.
- 4.9 The permissive path noted in paragraph 3.14 will be retained and given an appropriate surface treatment, which will facilitate greater accessibility to the site.
- 4.10 Vehicle access to the site has been subject to extensive discussions with the Local Highway Authority. The original proposal was to provide a mini-roundabout junction and some form of 'gateway' feature, which would have reduced traffic speeds as they exceed the current signed limit of 30mph.

- 4.11 The Local Highway Authority advised that they would not consider the roundabout's merits or gateway proposal until a draft Traffic Regulation Order had been published. This was considered to be an unreasonable delay, as securing approval to publish a Traffic Regulation Order can take up to two years, with no guarantee of success.
- 4.12 A Stage 1 Road Safety Audit of the proposed mini roundabout was undertaken and is attached, as Appendix 7. The Auditors highlighted problems with securing the required visibility and recommended that the access be upgraded to form a Priority Junction.
- 4.13 A plan of the proposed Priority Junction, which illustrates the visibility splays that will comply with the required design standards is included in Appendix 2 of the attached Stage 1 Road Safety Audit.
- 4.14 Swept path analyses illustrating fire appliance and refuse collection vehicle use of the proposed T junction are attached at Appendix 8.

5. Traffic and Transport Impacts

- 5.1 Data for the traffic impact of the extant agricultural use of the site is based on extensive discussions with the landowners, contractors, and a specialist farm consultant.
- 5.2 Details of the extant use trip rates and information provided by a specialist farming consultant are attached, as Appendix 9. The data informs that the extant use can generate between 36 and 50 vehicle movements per day, which does not include ancillary visits by vets, HSE inspections, DEFRA inspections, chemical deliveries, equipment servicing, and building/site maintenance. Depending on the time of the year these can equate to 10 vehicle movements per day.
- 5.3 This suggests that the extant uses at Withypitts Farm could generate circa 60 vehicle trips per day.

- 5.4 Version 7.7.2 of the TRICS database has been interrogated to identify the potential traffic impact of the proposed development. The TRICS data is attached, as Appendix 10.
- 5.5 The TRICS data indicates that housing in relatively sparsely populated areas will now generate an average of 4.7 vehicle movements per day. The datasheets suggest that the proposed development could generate up to 75 vehicle movements per day.

6. Collision Records

- 6.1 Collision information derived from Sussex Safer Roads Partnership and Crashmap® is attached, as Appendix 11.
- 6.2 The data informs that there have been no reported collisions on Selsfield Road, near the site, in the most recent five-year period, up to May 2020, which is the typical period for assessment of the impacts of development.
- 6.3 Expanding the data range to cover data 21 years up to December 2019 also shows that there have been no collisions at the site access during this period. There is a sporadic distribution of collisions with an average of one collision every TWO years, which is a typical distribution and frequency of collisions over the extended period of 21 years.
- 6.4 This indicates that there are no intrinsic safety hazards along Selsfield Road, or at the various accesses, which will be worsened by this proposal to a degree that could be considered unacceptable.
- 6.5 To enhance public safety and the free flow of traffic on Selsfield Road the existing car parking area serving 64 Selsfield Road, which as highlighted in the photograph below does not benefit from onsite vehicle turning, will be closed and dedicated parking provided via the new junction.



Figure 5: Parking Hardstanding 64 Selsfield Road

7. Summary and Conclusions

- 7.1 Reeves Transport Planning has been appointed to provide a Transport Statement in support of an application for the demolition of existing farm buildings and the erection of circa 16 dwellings.
- 7.2 Each dwelling will be provided with adequate car parking provision and at least one EV charging facility. Secure and covered cycle parking is included for each dwelling too. The homes will be provided with high speed broadband, and a study or workspace to facilitate homeworking and reduce commuting trips. A Residential Travel Plan will be also be introduced, at an appropriate time, to further reduce trips in a private car.
- 7.3 The proposal includes a new footway that will connect the site to the existing footway at 66 Selsfield Road, and improvements to an existing permissive path. These improved pedestrian facilities will connect the site to the village and its

amenities and the local bus stops. Both the southbound and northbound bus stops will be upgraded to include seating, raised kerbs, and shelter, which will encourage the use of sustainable modes of travel.

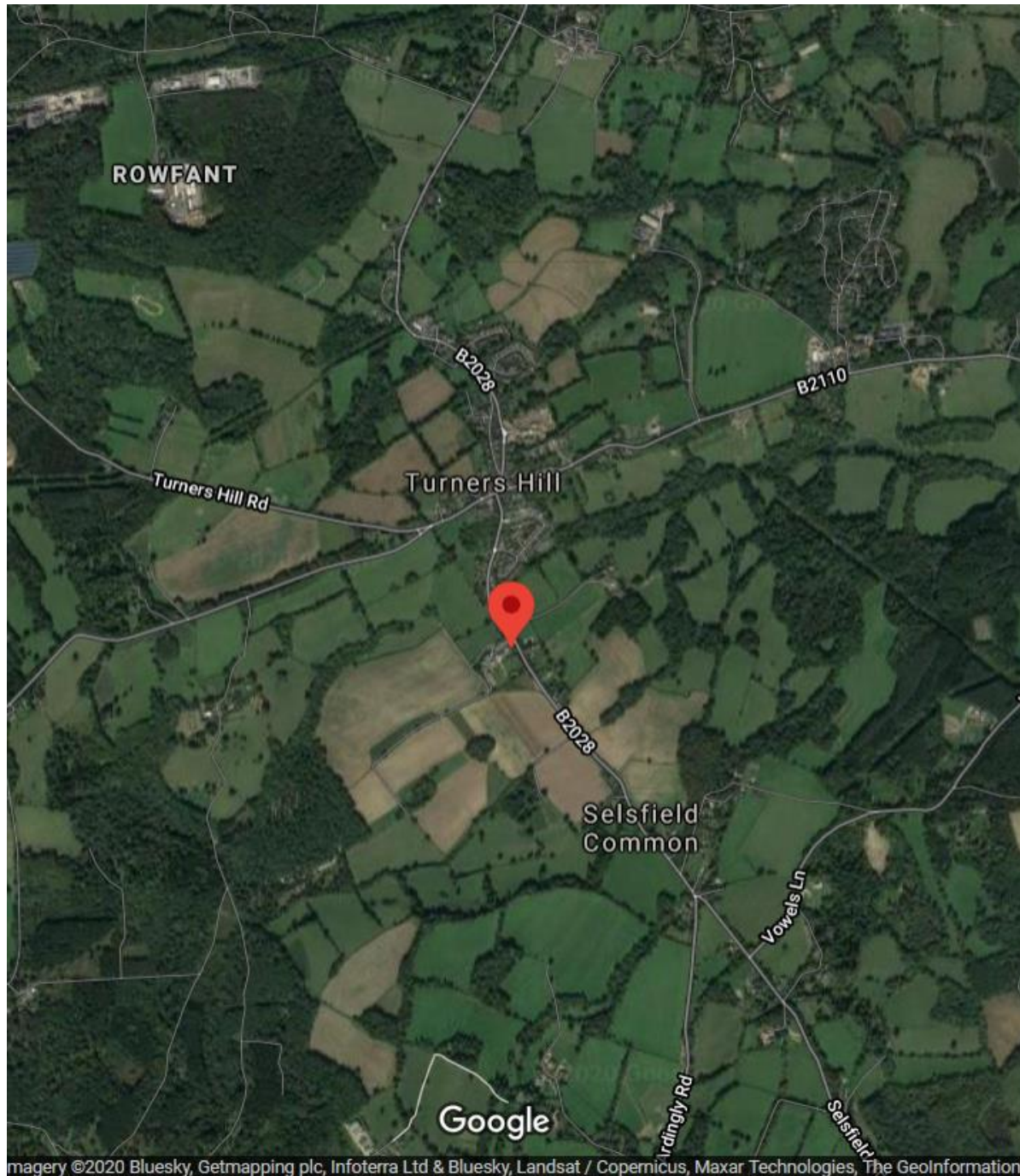
- 7.4 The proposal will be served by a new Priority Junction that will upgrade the existing access. The design of the junction was subject to extensive discussions with the Local Highway Authority and a Stage 1 Road Safety Audit. The Audit recommended a Priority Junction rather than a mini roundabout, as this layout will accord with the required design standards. The gradient across the junction exceeds the minimum recommended but this is an upgrade of an existing poorly constructed access, which is a material consideration.
- 7.5 Our client has confirmed that they own all of the land that falls beyond the limit of the adopted highway.
- 7.6 The enhanced visibility splays, which are designed to meet the prevailing conditions, and closure of the access serving 64 Selsfield Road will improve highway safety and the free flow of traffic.
- 7.7 The existing use can generate up to 60 vehicle movements per day and the information provided informs that these trips are predominately by large and slow-moving vehicles. In comparison, the TRICS data suggests that each of the dwellings will generate circa five vehicle movements per day, which indicates a maximum of 75 vehicle movements per day.
- 7.8 It is reasonable to assume that a trip rate of five movements per dwelling, from the TRICS site surveys 2015-2019, was historically robust but potentially overestimates future daily trip rates. There is a shift towards home working, which is prompted by the Covid19 'lockdown' conditions and a change in work practices. It is reasonable to assume that average trip rates will be less than the historic norms, as survey results published by the Chartered Institute of Personnel and Development state that employers expect that *'the proportion of people working from home on a regular basis once the crisis is over will increase to 37% compared to 18% before the pandemic'*.*

* <https://www.cipd.co.uk/about/media/press/home-working-increases>

- 7.9 Such an increase in homework would inevitably reduce the overall traffic impact of the proposal.
- 7.10 On this basis, taking all the relevant information it is considered that the proposed development will not have a **severe** impact on highway capacity or an **unacceptable** highway safety impact. Accordingly, the proposed development should not be refused on transport related grounds.
- 7.9 Our client welcomes conditions, or obligations, to upgrade the access to a Priority T Junction, provide new bus stop facilities, improve footway connections, ensure parking requirements, and introduce a Residential Travel Plan.

APPENDIX 1.

SITE LAYOUT PLAN



APPENDIX 2.

SPEED & VOLUME TRAFFIC SURVEY

Site Number: 00005756

B2028 Selsfield Road, Turners Hill, just south of Snow Hill

Details

Site Reference: 00005756

Grid Reference: 534208,135053

Site Configuration:

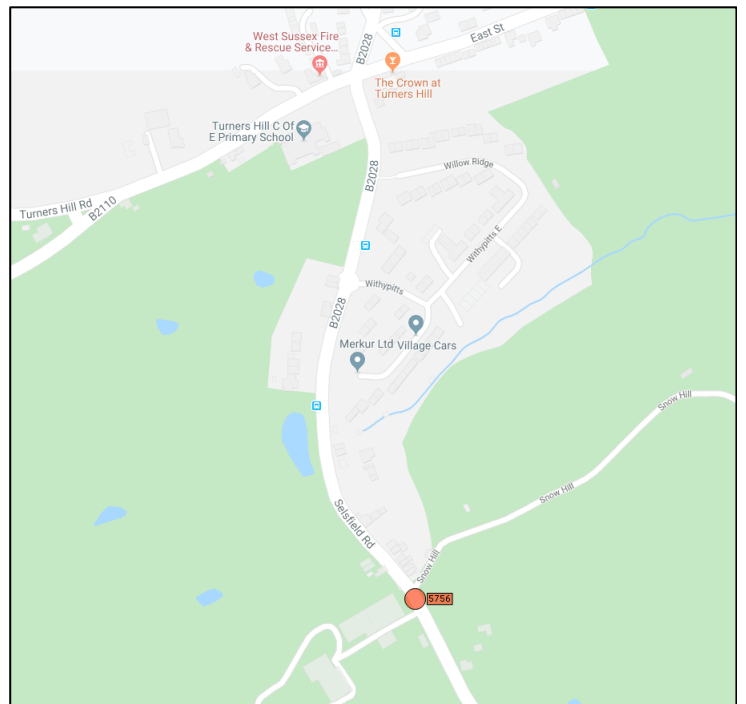
Interval: 60

Telemetry: No

Channels

Channel 1: Southbound (South)

Channel 2: Northbound (North)



Location



A5756 NB.jpg



A5756 SB.jpg

B2028 Selsfield Road, Turners Hill, S of Snow Hill

Site Number: 00005756

From 05/12/2019 To 12/12/2019

Site Reference: 00005756

Speed Summary (All Days) Report

No Filters Applied

Southbound

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5Mph	Bin 2 5-<10	Bin 3 10-<15	Bin 4 15-<20	Bin 5 20-<25	Bin 6 25-<30	Bin 7 30-<35	Bin 8 35-<40	Bin 9 40-<45	Bin 10 45-<50	Bin 11 50-<55	Bin 12 55-<60	Bin 13 =>60
00:00	41	39	34	5	0	0	0	0	1	5	19	12	4	0	0	0	0
01:00	16	41	35	6	0	0	0	0	0	3	4	5	2	1	0	0	0
02:00	13	42	36	6	0	0	0	0	0	2	3	3	3	1	0	0	0
03:00	11	43	36	7	0	0	0	0	0	2	3	3	2	1	0	0	0
04:00	16	43	37	7	0	0	0	0	0	1	5	5	2	1	1	0	0
05:00	34	39	34	5	0	0	0	0	0	6	15	9	3	1	0	0	0
06:00	144	38	33	5	0	0	0	1	4	32	64	32	8	1	0	0	0
07:00	318	35	31	5	0	1	1	4	21	110	133	41	6	1	0	0	0
08:00	360	36	31	5	0	2	1	4	22	101	158	63	9	0	0	0	0
09:00	315	36	31	5	0	2	2	4	17	99	130	54	7	0	0	0	0
10:00	293	36	32	5	0	2	2	3	13	76	138	53	7	0	0	0	0
11:00	340	37	32	5	0	2	2	4	11	85	156	68	11	1	0	0	0
12:00	349	37	32	5	0	2	1	6	16	91	154	67	11	0	0	0	0
13:00	352	38	32	5	0	2	2	2	11	76	163	82	13	1	0	0	0
14:00	366	37	32	5	0	1	2	3	9	98	163	79	10	1	0	0	0
15:00	465	36	31	5	0	2	2	7	19	138	206	78	11	1	0	0	0
16:00	556	35	31	4	0	1	1	4	29	193	266	54	7	1	0	0	0
17:00	534	35	31	4	0	1	0	2	33	185	232	73	7	1	0	0	0
18:00	485	35	31	4	0	0	0	2	31	186	200	59	7	1	0	0	0
19:00	284	37	32	5	0	0	0	1	17	87	118	49	10	1	0	0	0
20:00	132	38	33	5	0	0	0	0	5	30	56	33	7	1	0	0	0
21:00	100	38	33	5	0	0	0	0	3	19	42	28	6	1	0	0	0
22:00	98	39	34	5	0	0	0	0	2	17	44	27	6	1	0	0	0
23:00	75	39	34	5	0	0	0	0	1	13	31	20	6	2	0	0	0
Total																	
12H(7-19)	4734	36	31	5	0	17	15	45	233	1438	2100	769	106	9	1	0	0
16H(6-22)	5393	36	31	5	0	18	16	47	262	1607	2381	911	137	12	1	0	0
18H(6-24)	5565	37	31	5	0	18	16	48	265	1637	2456	959	149	15	2	0	0
24H(0-24)	5696	37	32	5	0	18	16	48	267	1656	2506	996	164	21	3	0	0
AM Peak	08:00 360	04:00 43	04:00 37	04:00 7	11:00 0	09:00 2	09:00 2	08:00 4	08:00 22	07:00 110	08:00 158	11:00 68	11:00 11	05:00 1	04:00 1	11:00 0	11:00 0
PM Peak	16:00 556	23:00 39	23:00 34	23:00 5	23:00 0	15:00 2	15:00 2	15:00 7	17:00 33	16:00 193	16:00 266	13:00 82	13:00 13	23:00 2	23:00 0	23:00 0	13:00 0

Local Events Included & Include All Globals

Printed at: 11:03 on 12 December 2019

B2028 Selsfield Road, Turners Hill, S of Snow Hill

Site Number: 00005756

From 05/12/2019 To 12/12/2019

Site Reference: 00005756

Speed Summary (All Days) Report

No Filters Applied

Northbound

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5Mph	Bin 2 5-<10	Bin 3 10-<15	Bin 4 15-<20	Bin 5 20-<25	Bin 6 25-<30	Bin 7 30-<35	Bin 8 35-<40	Bin 9 40-<45	Bin 10 45-<50	Bin 11 50-<55	Bin 12 55-<60	Bin 13 =>60
00:00	31	39	34	5	0	0	0	0	0	7	11	9	3	1	0	0	0
01:00	22	41	35	6	0	0	0	0	0	5	6	6	4	0	0	0	0
02:00	12	42	38	5	0	0	0	0	0	1	2	5	3	1	0	0	0
03:00	20	43	37	6	0	0	0	0	1	2	5	7	4	1	0	0	0
04:00	39	44	38	6	0	0	0	0	0	2	9	14	10	3	1	0	0
05:00	138	44	38	5	0	0	0	0	1	7	26	59	34	9	2	0	0
06:00	292	40	35	4	0	0	0	0	0	27	119	113	29	4	0	0	0
07:00	527	39	34	4	0	0	0	1	7	70	243	171	32	2	0	0	0
08:00	540	39	34	4	0	1	0	1	8	65	249	180	31	4	0	0	0
09:00	402	38	34	5	0	1	1	3	3	62	192	116	23	2	0	0	0
10:00	353	38	33	5	0	0	1	1	7	63	163	97	19	1	1	0	0
11:00	322	38	33	5	0	1	0	1	4	60	149	87	17	2	0	0	0
12:00	330	38	33	5	0	1	1	1	8	66	141	96	15	1	0	0	0
13:00	321	38	33	5	0	1	0	1	6	60	139	94	18	1	0	0	0
14:00	336	38	33	5	0	0	0	1	9	67	154	83	19	1	0	0	0
15:00	399	38	33	4	0	0	0	1	6	76	190	110	15	1	0	0	0
16:00	426	37	32	4	0	0	0	0	11	99	215	91	8	0	0	0	0
17:00	386	37	33	4	0	0	0	0	6	80	201	85	11	1	0	0	0
18:00	277	37	32	4	0	0	1	1	4	72	137	54	7	0	0	0	0
19:00	197	37	32	4	0	0	0	1	6	58	91	34	6	1	0	0	0
20:00	154	38	33	5	0	0	0	0	4	42	66	32	8	1	0	0	0
21:00	130	38	33	5	0	0	0	0	4	28	59	30	6	3	0	0	0
22:00	84	39	33	5	0	0	0	0	3	18	32	23	7	1	0	0	0
23:00	56	40	34	6	0	0	0	0	1	11	22	13	7	1	0	0	0
Total																	
12H(7-19)	4617	38	33	4	0	6	5	14	79	840	2175	1267	215	16	1	0	0
16H(6-22)	5390	38	33	5	0	6	5	15	94	994	2509	1476	263	25	2	1	0
18H(6-24)	5531	38	33	5	0	6	5	16	98	1023	2563	1513	277	27	2	1	1
24H(0-24)	5793	38	33	5	0	6	5	16	100	1046	2623	1612	335	42	7	1	1
AM Peak																	
	08:00	04:00	04:00	03:00	11:00	09:00	09:00	09:00	08:00	07:00	08:00	08:00	05:00	05:00	05:00	11:00	11:00
	540	44	38	6	0	1	1	3	8	70	249	180	34	9	2	0	0
PM Peak																	
	16:00	23:00	23:00	23:00	23:00	13:00	12:00	13:00	16:00	16:00	16:00	15:00	14:00	21:00	23:00	21:00	20:00
	426	40	34	6	0	1	1	1	11	99	215	110	19	3	0	0	0

Local Events Included & Include All Globals

Printed at: 11:03 on 12 December 2019

B2028 Selsfield Road, Turners Hill, S of Snow Hill

Site Number: 00005756

From 05/12/2019 To 12/12/2019

Site Reference: 00005756

Speed Summary (All Days) Report

No Filters Applied

All Channels

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5Mph	Bin 2 5-<10	Bin 3 10-<15	Bin 4 15-<20	Bin 5 20-<25	Bin 6 25-<30	Bin 7 30-<35	Bin 8 35-<40	Bin 9 40-<45	Bin 10 45-<50	Bin 11 50-<55	Bin 12 55-<60	Bin 13 =>60
00:00	72	39	34	5	0	0	0	0	2	12	29	20	7	2	0	0	0
01:00	37	41	35	6	0	0	0	0	0	8	10	11	6	1	0	0	0
02:00	25	43	37	6	0	0	0	0	0	3	6	8	6	1	0	0	0
03:00	32	43	37	6	0	0	0	0	1	4	9	10	6	2	1	0	0
04:00	55	44	38	6	0	0	0	0	0	3	14	19	12	4	2	0	0
05:00	171	43	37	5	0	0	0	0	1	12	41	68	37	10	2	0	0
06:00	436	39	34	5	0	0	0	1	5	59	183	145	37	5	0	0	0
07:00	845	38	33	5	0	1	1	5	28	180	376	213	38	3	0	0	0
08:00	899	38	33	5	0	2	1	6	30	166	407	243	40	4	0	0	0
09:00	717	38	32	5	0	3	3	7	19	160	322	170	30	2	0	0	0
10:00	646	38	32	5	0	2	2	4	20	139	302	150	26	1	1	0	0
11:00	662	38	33	5	0	3	2	5	15	146	305	155	28	3	0	0	0
12:00	678	38	32	5	0	3	2	7	25	157	295	163	25	1	0	0	0
13:00	673	38	33	5	0	3	2	3	17	135	303	176	31	2	0	0	0
14:00	702	38	32	5	0	1	2	4	18	165	317	162	29	2	0	0	0
15:00	864	37	32	5	0	2	2	8	25	214	396	188	26	2	0	0	0
16:00	981	35	31	4	0	1	1	5	41	292	481	145	15	1	0	0	0
17:00	920	36	32	4	0	1	0	2	39	266	433	158	19	2	0	0	0
18:00	762	36	31	4	0	0	1	3	36	257	337	113	14	1	0	0	0
19:00	481	37	32	5	0	1	0	1	23	145	209	83	16	2	0	0	0
20:00	286	38	33	5	0	0	0	0	9	72	122	65	14	2	0	0	0
21:00	230	38	33	5	0	0	0	0	7	48	101	58	11	3	0	0	0
22:00	183	39	34	5	0	0	0	1	5	35	76	51	13	2	0	0	0
23:00	131	39	34	5	0	0	0	1	3	24	53	34	13	3	1	0	0
Total																	
12H(7-19)	9351	37	32	5	0	23	20	59	312	2277	4275	2036	321	25	2	0	0
16H(6-22)	10783	38	32	5	0	24	20	62	355	2601	4890	2388	400	37	3	1	1
18H(6-24)	11096	38	32	5	0	25	20	63	363	2660	5020	2472	425	42	4	1	1
24H(0-24)	11488	38	33	5	0	25	20	64	367	2702	5129	2608	500	62	9	1	1
AM Peak																	
	08:00	04:00	04:00	03:00	11:00	09:00	09:00	09:00	08:00	07:00	08:00	08:00	08:00	05:00	04:00	11:00	11:00
	899	44	38	6	0	3	3	7	30	180	407	243	40	10	2	0	0
PM Peak																	
	16:00	23:00	23:00	23:00	23:00	13:00	12:00	15:00	16:00	16:00	16:00	15:00	13:00	21:00	23:00	21:00	20:00
	981	39	34	5	0	3	2	8	41	292	481	188	31	3	1	0	0

Local Events Included & Include All Globals

Printed at: 11:03 on 12 December 2019

APPENDIX 3.

PUBLIC RIGHT OF WAY 67W ROUTE PLAN

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SEARCH PURPOSES ONLY. NO FURTHER
COPIES MAY BE MADE

F.P. 67W

— Approx Route of Public Bridleway
— Approx Route of Public Footpath

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Selsfield Road Turners Hill

Local Development

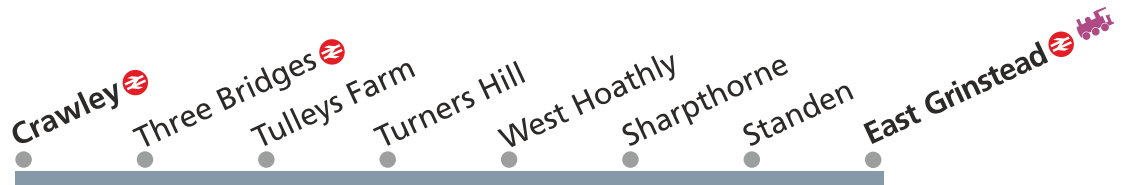
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APPENDIX 4.

BUS TIMETABLES

84

Crawley - Tulleys Farm - Turners Hill - East Grinstead

Talking
busMondays to Saturdays
from 1st June 2020

Mondays to Saturdays

Code	SDO	MFSH				
Crawley Bus Station, Stop D	0716	0718	0935	1135	1335	1610
Three Bridges Station, Stop B	0722	0724	0941	1141	1341	1616
Pound Hill Worth Road Parade	0723	0725	0943	1143	1343	1618
Tulleys Farm	0729	0731	0949	1149	1349	1624
Turners Hill Crown	0736	0736	0954	1154	1354	1629
Turners Hill Park	↓	↓	0956	1156	1356	1631
Turners Hill Crown	0736	0736	0958	1158	1358	1634
West Hoathly Broadfield	0742	0742	1004	1204	1404	1640
Sharpthorne Station Road	0745	0745	1007	1207	1407	1643
Standen	0753	0753	1015	1215	1415	1651
Dunnings Coronation Road	0755	0755	1017	1217	1417	1653
East Grinstead Brooklands Way (for Stn)	0758	0758	1021	1221	1421	1657
Herontye Drive	0802	0802	1025	1225	1425	1701
East Grinstead War Memorial	0806	0806	1029	1229	1429	1705
Imberhorne Upper School	0814

CODE:

SDO Schooldays only.

MFSH Mondays to Fridays School Holidays only.

Historic Building.

Rail Station nearby.

Preserved Railway Station nearby.

Mondays to Saturdays

Code	MF	SAT	MF	SDO	SSH
Sackville School A22	1505
East Grinstead War Memorial	0722	0805	0835	1035	1235
East Grinstead Brooklands Way (for Stn)	0724	0807	0839	1039	1239
Imberhorne Upper School	↓	↓	↓	↓	↓
Dunnings Coronation Road	0727	0810	0843	1043	1243
Standen	0729	0812	0845	1045	1245
Sharpthorne Station Road	0738	0819	0853	1053	1253
West Hoathly Broadfield	0740	0821	0855	1055	1255
Turners Hill Crown	0751	0828	0902	1102	1302
Turners Hill Park	0753	0830	0904	1104	1304
Turners Hill Crown	0756	0832	0906	1106	1306
Tulleys Farm	0759	0835	0909	1109	1309
Pound Hill Worth Road Parade	0808	0841	0916	1116	1316
Three Bridges Station, Stop A	0812	0843	0918	1118	1318
Crawley Bus Station	0819h	0848	0924	1124	1324
				1552	1552
				1554	1554
				1600	1600

CODE:

MF Mondays to Fridays only.

SAT Saturdays only.

SDO Schooldays only.

SSH Saturdays and School Holidays.
h Continues to St. Wilfrid's School
as Route 23 on Schooldays.t Time at East Grinstead Station
- does not serve Brooklands Way.
Historic Building.

Rail Station nearby.

Preserved Railway Station nearby.

No service on Sundays or Public Holidays

Service 84 is supported by



Talking
busMondays to Saturdays
from 1st September 2020

Crawley Copthorne Crawley Down Turners Hill Ardingly Lindfield Haywards Heath Princess Royal Hospital Wivelsfield World's End Burgess Hill Hassocks Patcham Brighton R.S.C.H.

Mondays to Fridays

Crawley Bus Station, Stop D	0655	0736	0849	1040	1240	1456	1715	1935
Three Bridges Station, Stop B	0700	0742	0855	1046	1246	1503	1723	1941
Copthorne Hotel	0705	0749	0901	1051	1251	1509	1729	1946
Copthorne Dukes Head	0553	0708	0752	0904	1054	1254	1512	1732	1949
Crawley Down War Memorial	0556	0711	0755	0907	1057	1257	1515	1735	1952
Turners Hill Crown	0602	0717	0804	0914	1104	1304	1522	1742	1957
Wakehurst	↓	0724	0811	0921	1111	1311	1529	1749	↓
Ardingly Hapstead Hall	0611	0729	0817	0926	1116	1316	1534	1753	2006
Lindfield High Street	0618	0736	0824	0933	1123	1323	1541	1800	2013
Haywards Heath Perrymount Road (arr)	0623	0742	0832	0938	1128	1328	1546	1805	2017

Guaranteed connection available; passengers do not need to change vehicles

Haywards Heath Perrymount Road (dep)	0624	0742	0832	0940	1130	1330	1548	1700	1807	2018	2123
Haywards Heath South Road	0627	0746	0836	0945	1135	1335	1553	1705	1812	2021	2126
Princess Royal Hospital	0631	0735	0749	0840	0950	1140	1340	1558	1710	1817	2025	2130
Wivelsfield Ote Hall Chapel	0636	0740	0955	1145	1345	1603	1715	1822	2030	2135
World's End Janes Lane	0641	0745	1000	1150	1350	1608	1720	1827	2035	2140
Burgess Hill Rail Station	0645	0750	1005	1154	1354	1613	1725	1831	2038	2143
Burgess Hill Church Road	0647	0753	1008	1157	1357	1616	1728	1834	2040	2145
Hassocks Stone Pound	0656	0804	1017	1206	1406	1626	1740	1843	2047	2152
Pyecombe Garage	0701	0809	1022	1210	1410	1630	1745	1847	2051	2156
Patcham Black Lion	0705	0813	1026	1214	1414	1634	1749	1851	2055	2200
Preston Road Harrington Road	0709	0819	1030	1218	1418	1638	1753	1855	2058	2203
Brighton Old Steine	0721	0835	1043	1231	1431	1652	1808	1908	2109	2213
Royal Sussex County Hospital	0728	0843	1050	1238	1438	1700	1816	1915	2115	2219

Saturdays

Crawley Bus Station, Stop D	0750	0844	1040	1240	1440	1710
Three Bridges Station, Stop B	0755	0849	1046	1246	1446	1716
Copthorne Hotel	0800	0854	1051	1251	1451	1721
Copthorne Dukes Head	0802	0857	1054	1254	1454	1724
Crawley Down War Memorial	0805	0900	1057	1257	1457	1727
Turners Hill Crown	0812	0907	1104	1304	1504	1734
Wakehurst Car Park	0818	0913	1111	1311	1511	1741
Ardingly Hapstead Hall	0822	0918	1116	1316	1516	1745
Lindfield High Street	0829	0925	1123	1323	1523	1752
Haywards Heath Perrymount Road (arr)	0834	0930	1128	1328	1528	1757

Guaranteed connection; passengers do not need to change vehicles

Haywards Heath Perrymount Road (dep)	0834	0932	1130	1330	1530	1757
Haywards Heath South Road	0837	0936	1135	1335	1535	1800
Princess Royal Hospital	0840	0940	1140	1340	1540	1802
Wivelsfield Ote Hall Chapel	0945	1145	1345	1545
World's End Janes Lane	0950	1150	1350	1550
Burgess Hill Rail Station	0954	1154	1354	1554
Burgess Hill Church Road	0957	1157	1357	1557
Hassocks Stone Pound	1006	1206	1406	1606
Pyecombe Garage	1010	1210	1410	1610
Patcham Black Lion	1014	1214	1414	1614
Preston Road Harrington Road	1018	1218	1418	1618
Brighton Old Steine	1031	1231	1431	1631
Royal Sussex County Hospital	1038	1238	1438	1638

No service on Sundays or Public Holidays

CODE: Rail Station nearby. Historic Building and Gardens.

Service 272 is
partly supported by west
sussex
county
council



Mondays to Saturdays
from 1st September 2020



Mondays to Fridays

Code						SDX					
Royal Sussex County Hospital	0637	0856	1100	1250	1505	1713	1827	2025	2125
Brighton Old Steine.....	0644	0905	1108	1258	1513	1722	1835	2031	2131
Preston Road Harrington Road.....	0653	0915	1117	1307	1523	1733	1844	2039	2138
Patcham Black Lion.....	0658	0923	1124	1314	1531	1742	1852	2044	2143
Pyecombe Garage.....	0702	0927	1128	1318	1535	1746	1856	2047	2146
Hassocks Stone Pound.....	0706	0932	1133	1323	1540	1751	1901	2051	2150
Burgess Hill Church Road.....	0714	0942	1143	1333	1552	1802	1911	2058	2157
Burgess Hill Rail Station🚉.....	0715	0943	1144	1334	1553	1803	1912	2059	2158
World's End Janes Lane.....	0719	0948	1149	1339	1558	1808	1917	2103	2202
Wivelsfield Ote Hall Chapel.....	0723	0952	1153	1343	1602	1812	1921	2107	2206
Princess Royal Hospital	0730	1000	1050	1200	1350	1609	1821	1928	2113	2212
Haywards Heath South Road.....	1003	1053	1203	1353	1612	1823	1930	2115	2214
Haywards Heath Perrymount Road🚉(arr).....	1007	1057	1207	1357	1616	1827	1933	2118	2217





Guaranteed connection to Crawley available; passengers do not need to change vehicles

Haywards Heath Perrymount Road 🚏 (dep)....	1009	1057	1209	1359	1619	1829	2218
Oathall Community College	↓	↓	↓	↓	1523	↓	↓	↓
Lindfield High Street.....	1014	1102	1214	1404	1527	1624	1834	2222
Ardingly Hapstead Hall.....	1021	1109	1221	1411	1534	1631	1841	2229
Wakehurst 🏡 🌻.....	1024	1112	1224	1414	1537	1634	1844	2232
Turners Hill Crown	1031	1119	1231	1421	1544	1641	1850	2238
Crawley Down War Memorial	1036	1124	1236	1426	1549	1647	1855	2242
Copthorne Dukes Head.....	1039	1127	1239	1429	1552	1651	1858	2245
Copthorne Hotel	1042	1130	1242	1432	1555	1654	1901	2247
Three Bridges Station 🚏.....	1047	1135	1247	1437	1601	1700	1906	2252
Crawley Bus Station 🚏.....	1053	1141	1253	1443	1607	1706	1911	2256

Saturdays

Royal Sussex County Hospital	1050	1250	1450	1650
Brighton Old Steine.....	1058	1258	1458	1658
Preston Road Harrington Road.....	1107	1307	1507	1707
Patcham Black Lion.....	1114	1314	1514	1714
Pyecombe Garage.....	1118	1318	1518	1718
Hassocks Stone Pound.....	1123	1323	1523	1723
Burgess Hill Church Road.....	1133	1333	1533	1733
Burgess Hill Rail Station 	1134	1334	1534	1734
World's End Janes Lane.....	1139	1339	1539	1739
Wivelsfield Ote Hall Chapel.....	1143	1343	1543	1743
Princess Royal Hospital	0850	1150	1350	1550	1750
Haywards Heath South Road.....	0853	1153	1353	1553	1753
Haywards Heath Perymount Road  (arr).....	0857	1157	1357	1557	1757

Guaranteed connection available; passengers do not need to change vehicles

Haywards Heath Perrymount Road  (dep).....	0857	1159	1359	1559	1759
Lindfield High Street	0902	1204	1404	1604	1804
Ardingly Hapstead Hall	0909	1211	1411	1611	1811
Wakehurst 	0912	1214	1414	1614	1814
Turners Hill Crown	0919	1221	1421	1621	1820
Crawley Down War Memorial	0924	1226	1426	1626	1825
Copthorne Dukes Head.....	0927	1229	1429	1629	1828
Copthorne Hotel	0930	1232	1432	1632	1831
Three Bridges Station 	0935	1237	1437	1637	1836
Crawley Bus Station 	0941	1243	1443	1643	1841

No service on Sundays or Public Holidays

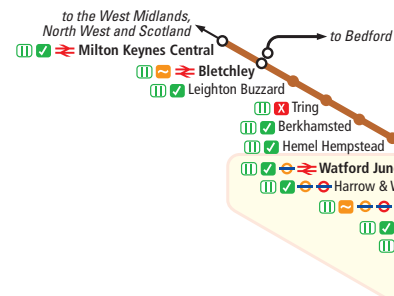
CODE: Rail Station nearby. Historic Building and Gardens.

SDX Schooldays only. THIS JOURNEY IS TEMPORARILY AVAILABLE TO SCHOOL CHILDREN ONLY.

Service **272** is partly supported by  west sussex county council

APPENDIX 5.

SOUTHERN RAILWAY NETWORK MAP



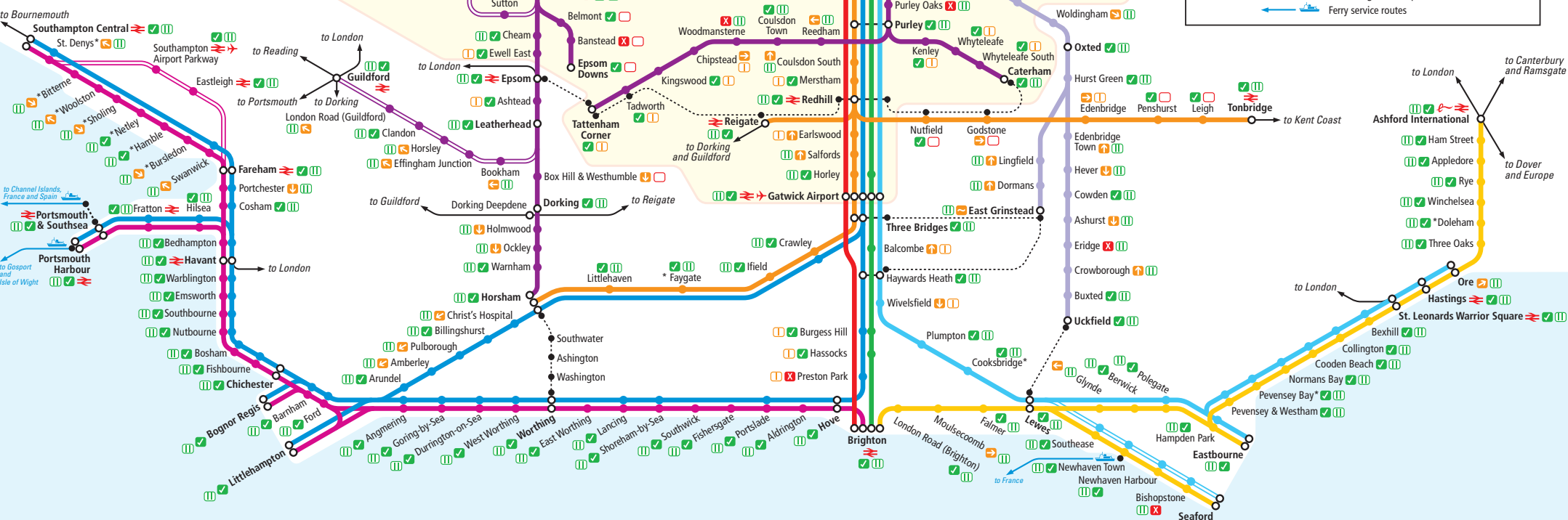
ACCESSIBILITY

- Step-Free access between the street and all platforms
 - Some step-free access between the street and platforms
 - Step-free access is available in the direction of the arrow
 - No step-free access between the street and platforms
- Notes:**
Platform access points may vary and there may not be step-free access to or between all station areas or facilities. Access routes may be unsuitable for unassisted wheelchair users owing to the gradient of ramps or other reasons.
- Step-free access between train and platform requires a staff-operated ramp. If you require a ramp or need help getting on or off trains, please book this in advance and we will make sure staff are available to help, otherwise there might be a significant delay to your journey.

Gatwick Express and Southern Assisted Travel: 0800 138 1016

STAFF AVAILABILITY

- On-train or station staff available at all times
- On-train or station staff available at certain times only
- No on-train or station staff available



SERVICES AND FACILITIES

This is a general guide to the basic daily services. Not all trains stop at all stations on each coloured line, so please check the timetable. Routes are shown in different colours to help identify the general pattern.

Gatwick Express

- REGULAR SERVICE
- ROUTE IDENTITY
- GX1 Gatwick Express

Southern

- LIMITED SERVICE
- REGULAR SERVICE
- ROUTE IDENTITY
- SN1 Brighton MainLine
- SN2 West London
- SN3 Metro
- SN4 Oxted
- SN5 Redhill
- SN6 Mainline West
- SN7 Mainline East
- SN8 Coastway West
- SN9 Coastway East

Other train operators may provide additional services along some of our routes.

- Other train operators' routes
- Bus links
- Faygate*
- Limited service stations on our network
- Principal stations
- Interchange with London Underground
- Interchange with London Overground
- Interchange with London Tramlink
- Interchange with Eurostar
- Interchange with other operators' train services
- Interchange with Airports
- Ferry service routes

APPENDIX 6.

ADOPTED HIGHWAY PLAN



APPENDIX 7.

STAGE 1 ROAD SAFETY AUDIT

REEVES TRANSPORT PLANNING
PROPOSED ACCESS ARRANGEMENTS
WITHYPITTS FARM RESIDENTIAL DEVELOPMENT

ROAD SAFETY AUDIT STAGE 1
FEBRUARY 2020

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2. Stage 1 Road Safety Audit	4
3. Audit Team Statement	6

Appendix

- A. Schedule of Documents Examined
- B. Annotated Drawings

1.0 INTRODUCTION

1.1 This report presents the findings of a Stage 1 Road Safety Audit (preliminary design) into proposals for new access arrangements at Withypitts Farm, Selsfield Road, Turners Hill.

1.2 This Audit was carried out at the request of Mr Steve Reeves of Reeves Transport Planning and the Audit Team has acted independently of the Design Team and has had no prior involvement in the project.

1.3 This Audit comprised a site visit and an examination of the documents listed in Appendix A. The site visit was carried out on Monday 16th February 2020 in daylight. The visit occurred between the hours of 10:30–11:00 and during the visit the weather was dry but with good visibility. Record photographs were taken.

1.4 The Audit Team membership was as follows:

Laurence Shaw MCIHT MSoRSA Cert Comp	Team Leader
Roger Harper BSc (Eng) FIHE IEng	Team Member

1.5 The report has been prepared in accordance with General Principles and Scheme Governance General Information, GG 119, Road Safety Audit. The audit team has only reported on the road safety implications of the existing and proposed facilities and has not examined or verified the compliance of the design or any other criteria.

1.6 The works to be included are a new access to the west of Selsfield Road and a new mini-roundabout at the access road.

1.7 Selsfield Road has a 40mph speed limit at the existing access to Withypitts Farm but the speed limit changes immediately changes to 30mph north of the access. The road does not have a system of street lighting in the vicinity of the site. No night visit was carried out in connection with this audit at this time.

- 1.8** All comments and recommendations are referenced to the design drawings and the locations have been indicated on the plans supplied with the Audit Brief, annotated copies of which are attached to this report.
- 1.9** No departures from standard have been advised to the Auditor by the design team.
- 1.10** This is a Stage 1 Road Safety Audit and it has been noted that details of drainage, landscaping, street lighting, bollards and signing, etc. are not included in the information provided to the Audit Team and that any such information will be provided to the Audit Team at Stage 2 RSA unless a problem is noted as a result of the site inspection.
- 1.11** This Road Safety Audit has been prepared in accordance with the instructions from, and for the specific use of Reeves Transport Planning and its clients. The authors shall not be liable for the information contained in this report if used for any purpose other than that for which it was provided in connection with their appointment as road safety auditors.

2.0 ISSUES ARISING FROM STAGE 1 ROAD SAFETY AUDIT

2.1 Problem

Location: Proposed Mini-Roundabout.

Summary: Sub-standard inter-visibility for minor arm of junction may lead to accidents.

The Audit Team noted that the inter-visibility between vehicles on the side road and traffic travelling on the main road is sub-standard and does not conform to Section 5 visibility standard D, E & F of design standard CD116 of Design Manual of Roads & Bridges (DMRB). This will increase collision risk between vehicles emerging from the side road and those travelling on the main road.

Recommendation

It is recommended that the mini-roundabout is replaced and the proposed access is redesigned as a Priority Junction in accordance with design standard CD123 (DMRB).

2.2 Problem

Location: North of the proposed mini-roundabout.

Summary: Existing signage and other street furniture may lead to accidents.

The Audit Team noted that the existing signage and other street furniture (telegraph pole) would block the proposed footway and may cause pedestrians to enter the carriageway leading to possible pedestrian/vehicle collisions.

Recommendation

It is recommended that either the proposed footway is of a width adequate to allow the signage and the telegraph pole to be retained or the signage and the telegraph pole are resited.

3.0 AUDIT TEAM STATEMENT

ROAD SAFETY AUDIT STAGE 1

I certify that this road safety audit has been carried out in accordance with General Principles and Scheme Governance General Information, GG 119, Road Safety Audit (Formerly HD 19/15).

Audit Team Leader

L. E. Shaw MCIHT MSoRSA
Senior Associate
Laurence Shaw Associates
Downsview
Poynings Road
Poynings
West Sussex
BN45 7AH

Signed 

Date 20th February 2020

Audit Team Member

Roger Harper BSc (Eng) FIHE IEng

Signed 

Date 20th February 2020

APPENDIX A

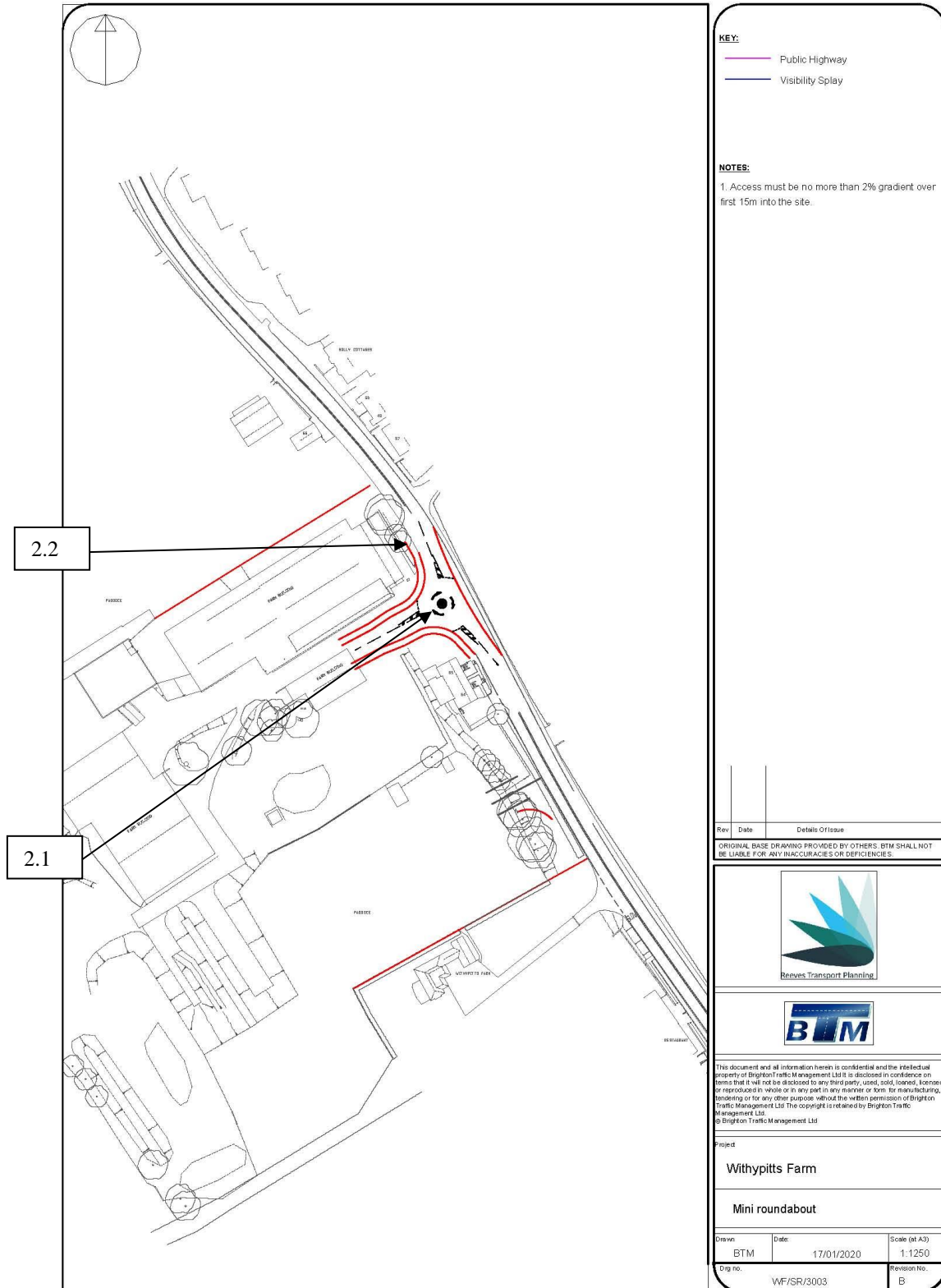
Schedule of documents examined

Drawing No.	Rev	Title	Description	Scale
WF/SR/3003	B	Withypitts Farm	Mini-roundabout	1:1250 @ A3
16981219	-	Withypitts Farm Selsfield Road	Site Plan	1:250

B2028 Selsfield Road 7 day Speed Survey

APPENDIX B

SCHEME DRAWING



Stage 1 Road Safety Audit Designer's Response
WITHYPITTS FARM SELSFIELD ROAD TURNERS HILL CRAWLEY RH104PP
SEPTEMBER 2020



Reeves Transport Planning

PRODUCED by REEVES TRANSPORT PLANNING LTD
DR/SGR/WPF/140620/V2

AUTHORISATION SHEET


Project: Proposed access to serve potential residential development of land
at Withypitts Farm Selsfield Road Turners Hill Crawley RH104PP.

Report Title: Stage 1 Road Safety Audit Designer's Response Report

PREPARED BY:

Name: Steve Reeves

Position: Design Leader

Signed: 

Organisation: Reeves Transport Planning

Date: 15th September 2020

APPROVED BY:

Name: Steve Reeves

Position: Project Sponsor

Signed: 

Organisation: Reeves Transport Planning

Date: 15th September 2020

Route Name: Selsfield Road

Scheme: New mini roundabout serving as site access

Road Safety Audit: Stage 1

Introduction

- 1.1 Reeves Transport Planning is commissioned to provide services in support of a proposed development on land at Withypitts Farm Selsfield Road Turners Hill Crawley RH104PP.
- 1.2 The proposal is to develop the redundant farm to serve a residential development of circa 16 dwellings. No formal design of the layout, parking supply, or circulation routes have been established. Given the constraints of the access options it has been deemed appropriate to establish whether the principle of an access can be established as acceptable before detailed consideration of the internal layout.

Current Conditions

- 1.2.1 The gradient along the relevant section of Selsfield Road is steep, currently 7.68% to the north, and 5.26% to the south of Withypitts Farm access. This is the average over the required Stopping Sight Distance (discussed below). It should be noted that sections of Selsfield Road exceed these averages, with gradient a maximum gradient of just over 8%. Design Manual for Roads and Bridges (DMRB) notes that direct access should not be provided where gradients on the approaches to junction exceed 4%.
- 1.2.2 The traffic speeds are just over the 60km/h triggering the use of DMRB design standards. We have assumed the worst case that WSCC will require the DMRB standard. The Stopping Sight Distance (SSD) taking into consideration the gradient, can be secured on land under my clients control or adopted highway.

Design Consideration

- 1.3.1 LTN 1/07 – Traffic Calming notes *'for maximum benefit, gateways need to be used in conjunction with other measures with the village, so that drivers are made*

aware that lower speeds are required throughout'. Depending on the type of treatment, 85th percentile traffic speeds can be reduced by between 3mph and 10mph.

- 1.3.2 The introduction of a gateway feature associated with moving the limit of the 30mph TRO, mini-roundabout, and new section of footway could, in combination with existing features to the north, help reduce traffic speeds to between 28mph and 35mph. This would bring the 85th percentile traffic speed to within the range where a mini roundabout would be a suitable access configuration.
- 1.3.3 West Sussex County Council appear to accept the principle of accesses, served by major roads with gradients that exceed 4%, similar to our proposal. For example, the site known as Clock Field, on the B2028 North Street, the north side of the village, is served via a mini roundabout but the overall gradient of North Street averages 8.7%.

Proposal

- 1.4.1 Reflecting the approved access serving the Clock Field development we have considered a mini roundabout serving the development site is the most appropriate option. This will also maximise the benefits of the moved 30mph limit.
- 1.4.2 The proposal will include a new section of footway that will connect Withypitts Farmhouse, and development derived pedestrians with the existing footway that terminates at 66 Selsfield Road. The properties known as 64 & 65 Selsfield Road, will be demolished to achieve the required visibility at the new junction. All works can be undertaken on land that is either adopted as public highway or under the control of our client.

2. Issues Raised at the Stage 1 Audit and the Designer's Response

2.1 Problem

Location: Proposed Mini-Roundabout.

Summary: Sub-standard inter-visibility for minor arm of junction may lead to accidents.

The Audit Team noted that the inter-visibility between vehicles on the side road and traffic travelling on the main road is sub-standard and does not conform to Section 5 visibility standard D, E & F of design standard CD116 of Design Manual of Roads & Bridges (DMRB). This will increase collision risk between vehicles emerging from the side road and those travelling on the main road.

Recommendation

It is recommended that the mini roundabout is replaced, and the proposed access is redesigned as a Priority Junction in accordance with design standard CD123 (DMRB).

DESIGNER'S RESPONSE

The proposed junction has been modified to provide a Priority Junction in accordance with design standard CD123 (DMRB). A copy of the new layout is attached at Appendix 2.

AUDIT TEAM COMMENT

Agreed – No further comment needed.

2.2 Problem

Location: North of the proposed mini roundabout.

Summary: Existing signage and other street furniture may lead to accidents.

The Audit Team noted that the existing signage and other street furniture (telegraph pole) would block the proposed footway and may cause pedestrians to enter the carriageway leading to possible pedestrian/vehicle collisions.

Recommendation

It is recommended that either the proposed footway is of a width adequate to allow the signage and the telegraph pole to be retained or the signage and the telegraph pole are re-sited.

DESIGNER'S RESPONSE

Infrastructure noted above will be re-positioned to allow adequate footway width as part of the detailed design.

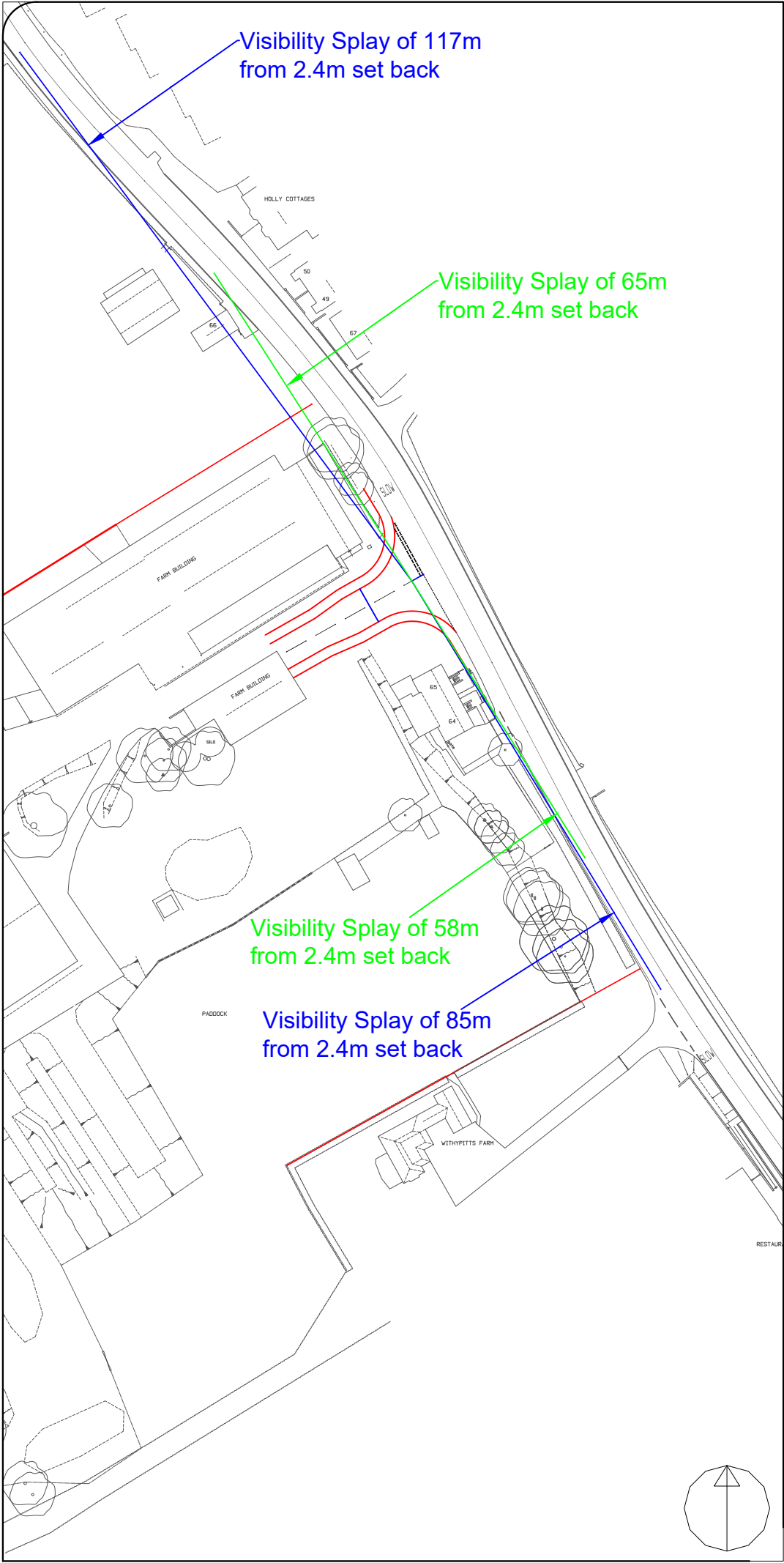
AUDIT TEAM COMMENT

Agreed – No further comment needed.

APPENDIX 1: TRAFFIC SPEED SURVEY RESULTS

(Attached at Appendix 2 of the Transport Statement)

APPENDIX 2: ACCESS LAYOUT DRAWING (WF/SR/3004 REV B.)



KEY:

Rev	Date	Details Of Issue
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Project

Withypitts Farm

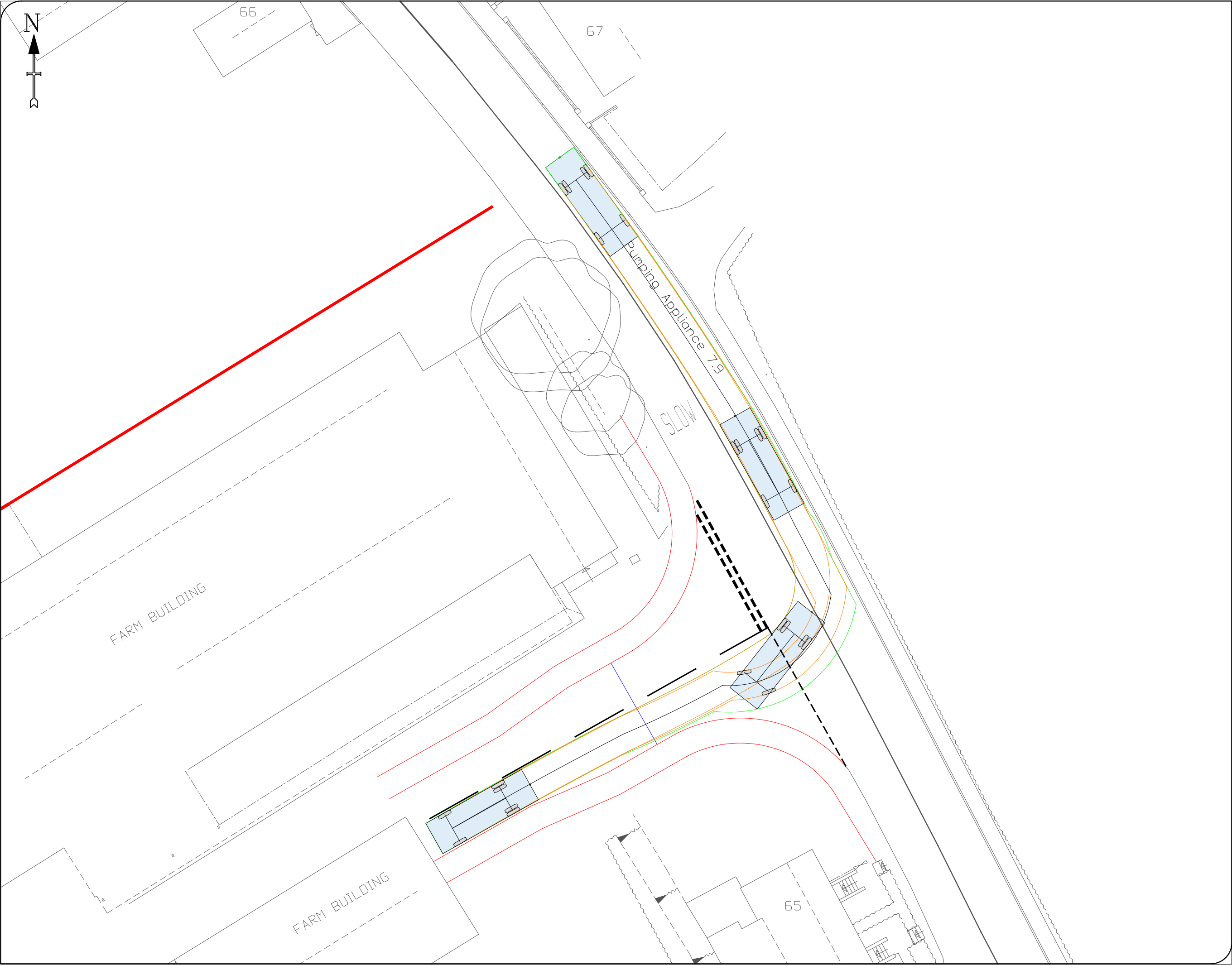
T Junction with Visibility Splays

Drawn BTM	Date: 07/07/2020	Scale (at A3) 1:1000
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Dwg no. WF/SR/3004	Revision No. B
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APPENDIX 8.

SWEPT PATH ANALYSES



VEHICLE DETAILS:

Green line shows body

Orange line shows axle/wheels

PUMPING APPLIANCE

Overall Length	7.900m
Overall Width	2.500m
Overall Body Height	3.300m
Min Body Ground Clearance	0.140m
Track Width	2.500m
Lock to Lock Time	4.00s
Kerb to Kerb Turning Radius	7.750m

Design speed 5kph for all Forward movements
Design speed 2.5kph for all Reverse movements

Rev	Date	Details Of Issue

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Reeves Transport Planning

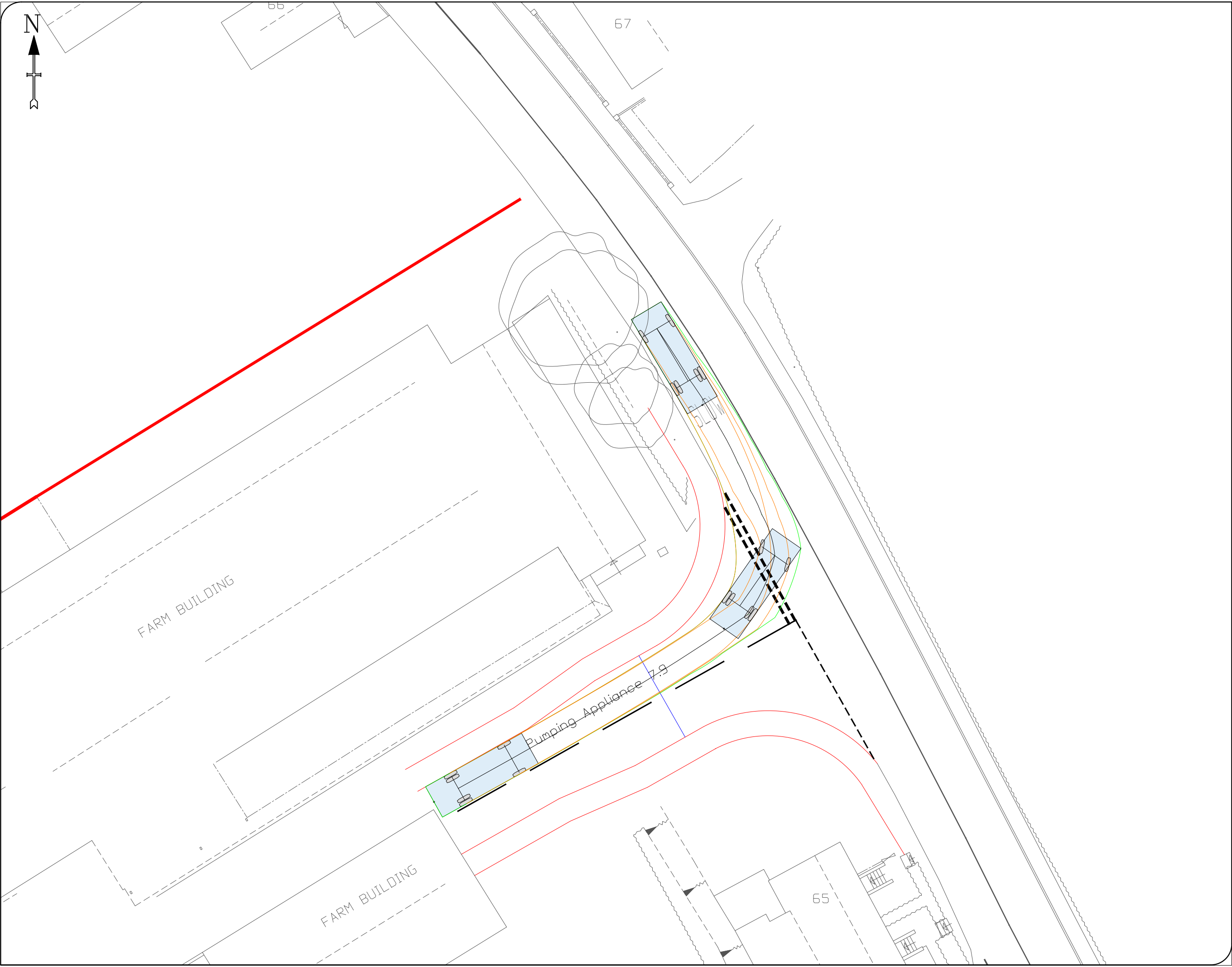
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Project

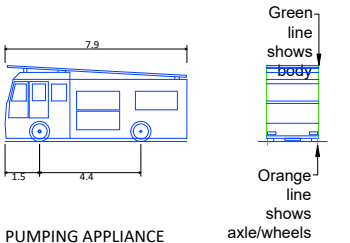
Withypitts Farm

Swept Path Analysis for
7.9m Fire Appliance IN

Drawn	Date:	Scale (at A3)
BTM	19/09/2020	1:250
Drg no.	Revision No.	
WF/SR/4005	A	



VEHICLE DETAILS:



PUMPING APPLIANCE

Overall Length	7.900m
Overall Width	2.500m
Overall Body Height	3.300m
Min Body Ground Clearance	0.140m
Track Width	2.500m
Lock to Lock Time	4.00s
Kerb to Kerb Turning Radius	7.750m

Design speed 5kph for all Forward movements
Design speed 2.5kph for all Reverse movements

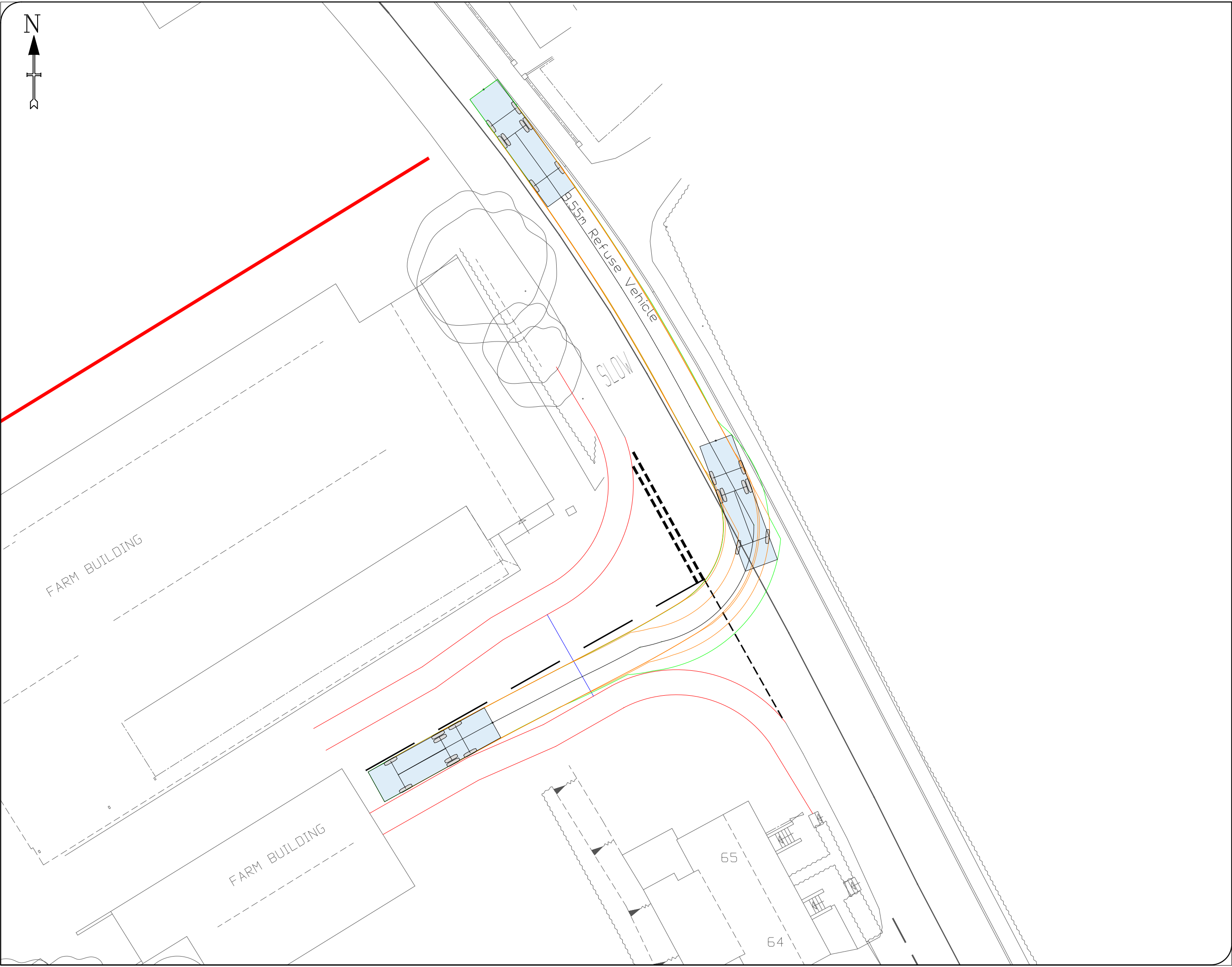
Rev	Date	Details Of Issue

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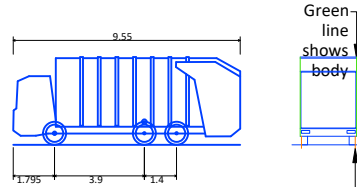


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Project		
Withypitts Farm		
Swept Path Analysis for 7.9m Fire Appliance OUT		
Drawn	Date:	Scale (at A3)
BTM	19/09/2020	1:250
Drg no.	Revision No.	
WF/SR/4006	A	



VEHICLE DETAILS:



LARGE REFUSE VEHICLE (3 AXLE) axle/wheels

Overall Length	9.550m
Overall Width	2.450m
Overall Body Height	3.814m
Min Body Ground Clearance	0.366m
Track Width	2.450m
Lock to Lock Time	4.00s
Kerb to Kerb Turning Radius	9.500m

Design speed 5kph for all Forward movements
Design speed 2.5kph for all Reverse movements

Rev	Date	Details Of Issue
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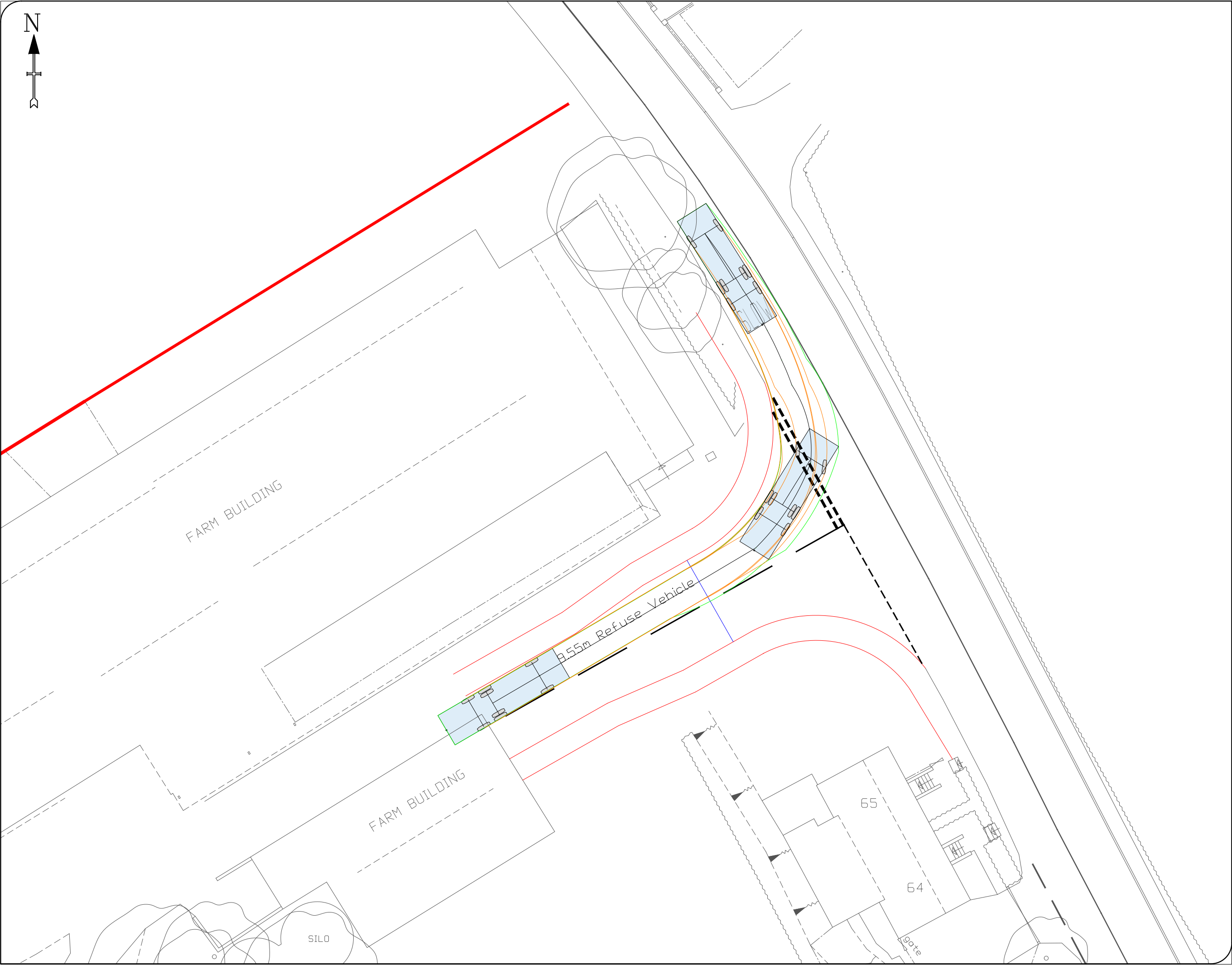


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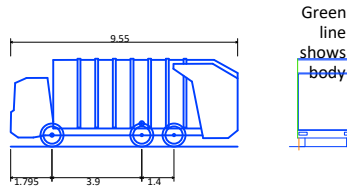
Project
Withypitts Farm

Swept Path Analysis for
9.550m Refuse Vehicle IN

Drawn BTM	Date: 19/09/2020	Scale (at A3) 1:250
Dwg no. WF/SR/4007	Revision No. A	



VEHICLE DETAILS:



LARGE REFUSE VEHICLE (3 AXLE) axle/wheels

Overall Length	9.550m
Overall Width	2.450m
Overall Body Height	3.814m
Min Body Ground Clearance	0.366m
Track Width	2.450m
Lock to Lock Time	4.00s
Kerb to Kerb Turning Radius	9.500m

Design speed 5kph for all Forward movements
Design speed 2.5kph for all Reverse movements

Rev	Date	Details Of Issue

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Project Withypitts Farm		
Swept Path Analysis for 9.550m Refuse Vehicle OUT		
Drawn BTM	Date: 19/09/2020	Scale (at A3) 1:250
Drg no. WF/SR/4008	Revision No. A	

APPENDIX 9.

EXTANT USE TRIP RATE INFORMATION



E-mail : BenL@rhrwclutton.co.uk
Our Ref : GHB/BL/19/337

Ms Olivia Dickie BSc (Hons)
Strutt & Parker
201 High Street
Lewes
BN7 2NR

28th September 2020

Dear Olivia,

Paddockhurst Estate – Withypitts Farm - Agricultural Traffic Movements

As discussed, I set out below our estimate of agricultural vehicle movements at Withypitts Farm, Selsfield Road, Turners Hill, West Sussex, RH10 4PP.

1. Existing Activities

Withypitts Farm is predominantly a livestock farm which supports a beef suckler herd and a flock of commercial mule ewes. The yard and buildings provide livestock housing, storage for hay, straw and machinery, as well as being the base from which agricultural contracting activities take place and a haylage enterprise operates. The land is not all contiguous to the buildings and therefore regular access is required onto Selsfield Road is required for all livestock operations.

2. Traffic Movements

The extent of vehicular movements is understandably seasonal, in line with agricultural activities, with peak movements in the summer and reduced movements in the winter when operations largely relate to livestock husbandry.

The movements generated by the livestock enterprise would incorporate visits to check on stock, movement of feed to outlying land, transport of livestock to outlying land, together with visits throughout the year by a vet, sheep shearers and purchasers of finished or store animals. Our estimate of vehicle movements at 'off-peak' times, being October to April, would be:

- | | |
|----------------------------------|--------------------|
| • Pick-up truck and trailer | 3-4 movements/day |
| • Pick-up truck | 8-10 movements/day |
| • Casual visitors/other vehicles | 3-4 movements/day |

During the Spring and Summer far more regular vehicular movements can be expected, initially as a result of lambing requiring more frequent inspections of livestock but subsequently for muck-spreading and

Directors

G.H. Back BSc Hons MRICS V.A. Back BA Hons

Rural Agency

J.P.B Tillard MRICS

Commercial Agency

R.C. Grassly BSc MRICS

Manager

O.H.F. Harwood MA (Cantab) FRICS

Estate Agency

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T.M.M. Raikes FRICS

T.J.B Hutchings FRICS FAAV

R. Windle FRICS FAAV

grassland operations in the Spring before the carting of silage and hay takes place in the Summer and straw following harvest. At this time casual labour would be required and therefore the arrival and departure of these employees would create further movements. Our estimate of vehicle movements at 'peak' times, being May to September, are:

- Tractor and trailer/farm equipment 15-20 movements/day
- Pick-up truck and trailer 8-10 movements/day
- Pick-up truck 8-10 movements/day
- Casual visitors/other vehicles 5-6 movements/day

The arable contracting operations will create some movements throughout the year however these would be greatest through the Summer from silaging in May through to the autumn cultivations in September/October. The haylage enterprise would largely generate vehicular movements throughout the winter when customers require feed for their stabled horses. An estimate of the movements resulting is therefore:

- Silaging/Haymaking – May-June – approximately 20-30 movements/day
- Harvest/Baling – July-September – approximately 20-30 movements/day
- Autumn cultivations – September-October – approximately 6-8 movements/day
- Haylage Enterprise – September-April – approximately 4-6 movements/day

3. Summary

A summary of the estimated vehicle movements is enclosed in table form, identifying the maximum and minimum estimates throughout the year. Taking this into account, it can be estimated that the total daily average vehicle movements at Withypitts Farm is up to **50 movements per day**. It should be noted that the above account of activities is not necessarily exhaustive and other activities could operate from the yard which would increase vehicular movements. Finally, the above figure also excludes the vehicular movements from the residential properties at 65 & 66 Selsfield Road which share the entrance to the farm.

Should you have any queries regarding the above then please do not hesitate to contact me.

Yours sincerely,



Ben Lee MRICS FAAV
For and on behalf of RH & RW Clutton Property Ltd

Withpitts Farm - Current Trip Rates

Farming Activities

No. Days	7	6	5
May to Sept	153	131	110
<i>Tractor etc</i>			
15	2295	1965	1650
20	3060	2620	2200
<i>Truck/Trailer</i>			
8	1224	1048	880
10	1530	1310	1100
<i>Truck</i>			
8	1224	1048	880
10	1530	1310	1100
<i>Casual</i>			
5	765	655	550
6	918	786	660
Sub Total			
Min	5508	4716	3960
Max	7038	6026	5060
Oct to Apr	212	182	151
<i>Truck/Trailer</i>			
3	636	546	453
4	848	728	604
<i>Truck</i>			
8	1696	1456	1208
10	2120	1820	1510
<i>Casual</i>			
3	636	546	453
4	848	728	604
Sub Total			
Min	2968	2548	2114
Max	3816	3276	2718
Total			
Min	8476	7264	6074
Max	10854	9302	7778
Daily Average			
Min	23.2	23.2	23.3
Max	29.7	29.7	29.8

Contracting Activities

May to June	61	52	43
<i>Silaging/Haymaking</i>			
20	1220	1040	860
30	1830	1560	1290
July to Sept	92	79	66
<i>Harvet/Baling</i>			
20	1840	1580	1320
30	2760	2370	1980
Sept to Oct	61	52	43
<i>Autumn cultivations</i>			
6	366	312	258
8	488	416	344
Sept to Apr	242	207	172
<i>haylage business</i>			
4	968	828	688
6	1452	1242	1032
Total			
Min	4394	3760	3126
Max	6530	5588	4646
Daily Average			
Min	12.0	12.0	13.0
Max	17.9	17.9	19.3

Total Daily Average			
Min	35.3	35.2	36.2
Max	47.6	47.6	49.1

APPENIDX 10.

TRICS DATA

Calculation Reference: AUDIT-753101-200914-0903

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : A - HOUSES PRIVATELY OWNED
 VEHICLES

Selected regions and areas:

02	SOUTH EAST	
	IW ISLE OF WIGHT	1 days
	KC KENT	1 days
	WS WEST SUSSEX	1 days
03	SOUTH WEST	
	DV DEVON	1 days
	SM SOMERSET	3 days
04	EAST ANGLIA	
	NF NORFOLK	1 days
	SF SUFFOLK	1 days
05	EAST MIDLANDS	
	LE LEICESTERSHIRE	1 days
06	WEST MIDLANDS	
	ST STAFFORDSHIRE	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings
 Actual Range: 17 to 85 (units:)
 Range Selected by User: 6 to 100 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/15 to 19/11/19

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	1 days
Tuesday	3 days
Wednesday	2 days
Thursday	4 days
Friday	1 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	10 days
Directional ATC Count	1 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Suburban Area (PPS6 Out of Centre)	2
Edge of Town	3
Neighbourhood Centre (PPS6 Local Centre)	5
Free Standing (PPS6 Out of Town)	1

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	5
Village	5
Out of Town	1

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

C3

11 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 1 mile:

1,000 or Less	1 days
1,001 to 5,000	4 days
5,001 to 10,000	1 days
10,001 to 15,000	2 days
15,001 to 20,000	1 days
20,001 to 25,000	2 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	1 days
25,001 to 50,000	3 days
50,001 to 75,000	3 days
75,001 to 100,000	4 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

1.1 to 1.5	10 days
1.6 to 2.0	1 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

No

11 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present

11 days

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1	DV-03-A-03 TERRACED & SEMI DETACHED LOWER BRAND LANE HONITON	DEVON
	Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: 70 <i>Survey date: MONDAY 28/09/15</i>	<i>Survey Type: MANUAL</i>
2	IW-03-A-01 DETACHED HOUSES MEDHAM FARM LANE NEAR COWES MEDHAM	ISLE OF WIGHT
	Free Standing (PPS6 Out of Town) Out of Town Total No of Dwellings: 72 <i>Survey date: TUESDAY 25/06/19</i>	<i>Survey Type: MANUAL</i>
3	KC-03-A-03 MIXED HOUSES & FLATS HYTHE ROAD ASHFORD WILLESBOROUGH	KENT
	Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: 51 <i>Survey date: THURSDAY 14/07/16</i>	<i>Survey Type: MANUAL</i>
4	LE-03-A-02 DETACHED & OTHERS MELBOURNE ROAD IBSTOCK	LEICESTERSHIRE
	Neighbourhood Centre (PPS6 Local Centre) Village Total No of Dwellings: 85 <i>Survey date: THURSDAY 28/06/18</i>	<i>Survey Type: MANUAL</i>
5	NF-03-A-10 MIXED HOUSES & FLATS HUNSTANTON ROAD HUNSTANTON	NORFOLK
	Edge of Town Residential Zone Total No of Dwellings: 17 <i>Survey date: WEDNESDAY 12/09/15</i>	<i>Survey Type: DIRECTIONAL ATC COUNT</i>
6	SF-03-A-06 DETACHED & SEMI-DETACHED BURY ROAD KENTFORD	SUFFOLK
	Neighbourhood Centre (PPS6 Local Centre) Village Total No of Dwellings: 38 <i>Survey date: FRIDAY 22/09/17</i>	<i>Survey Type: MANUAL</i>
7	SM-03-A-01 DETACHED & SEMI WEMBDON ROAD BRIDGWATER NORTHFIELD	SOMERSET
	Edge of Town Residential Zone Total No of Dwellings: 33 <i>Survey date: THURSDAY 24/09/15</i>	<i>Survey Type: MANUAL</i>
8	SM-03-A-02 MIXED HOUSES HYDE LANE NEAR TAUNTON CREECH SAINT MICHAEL	SOMERSET
	Neighbourhood Centre (PPS6 Local Centre) Village Total No of Dwellings: 42 <i>Survey date: TUESDAY 25/09/18</i>	<i>Survey Type: MANUAL</i>

LIST OF SITES relevant to selection parameters (Cont.)

9	SM-03-A-03	MIXED HOUSES	SOMERSET
	HYDE LANE NEAR TAUNTON CREECH ST MICHAEL Neighbourhood Centre (PPS6 Local Centre) Village Total No of Dwellings: 41 <i>Survey date: TUESDAY 25/09/18</i>		
10	ST-03-A-08	DETACHED HOUSES	STAFFORDSHIRE
	SILKMORE CRESCENT STAFFORD MEADOWCROFT PARK Edge of Town Residential Zone Total No of Dwellings: 26 <i>Survey date: WEDNESDAY 22/11/17</i>		
11	WS-03-A-07	BUNGALOWS	WEST SUSSEX
	EMMS LANE NEAR HORSHAM BROOKS GREEN Neighbourhood Centre (PPS6 Local Centre) Village Total No of Dwellings: 57 <i>Survey date: THURSDAY 19/10/17</i>		

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
VEHICLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	11	48	0.073	11	48	0.303	11	48	0.376
08:00 - 09:00	11	48	0.148	11	48	0.374	11	48	0.522
09:00 - 10:00	11	48	0.162	11	48	0.194	11	48	0.356
10:00 - 11:00	11	48	0.128	11	48	0.160	11	48	0.288
11:00 - 12:00	11	48	0.143	11	48	0.177	11	48	0.320
12:00 - 13:00	11	48	0.184	11	48	0.167	11	48	0.351
13:00 - 14:00	11	48	0.165	11	48	0.190	11	48	0.355
14:00 - 15:00	11	48	0.179	11	48	0.173	11	48	0.352
15:00 - 16:00	11	48	0.220	11	48	0.165	11	48	0.385
16:00 - 17:00	11	48	0.276	11	48	0.164	11	48	0.440
17:00 - 18:00	11	48	0.359	11	48	0.165	11	48	0.524
18:00 - 19:00	11	48	0.246	11	48	0.147	11	48	0.393
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.283			2.379			4.662

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

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Parameter summary

Trip rate parameter range selected: 17 - 85 (units:)
 Survey date range: 01/01/15 - 19/11/19
 Number of weekdays (Monday-Friday): 11
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 0
 Surveys manually removed from selection: 0

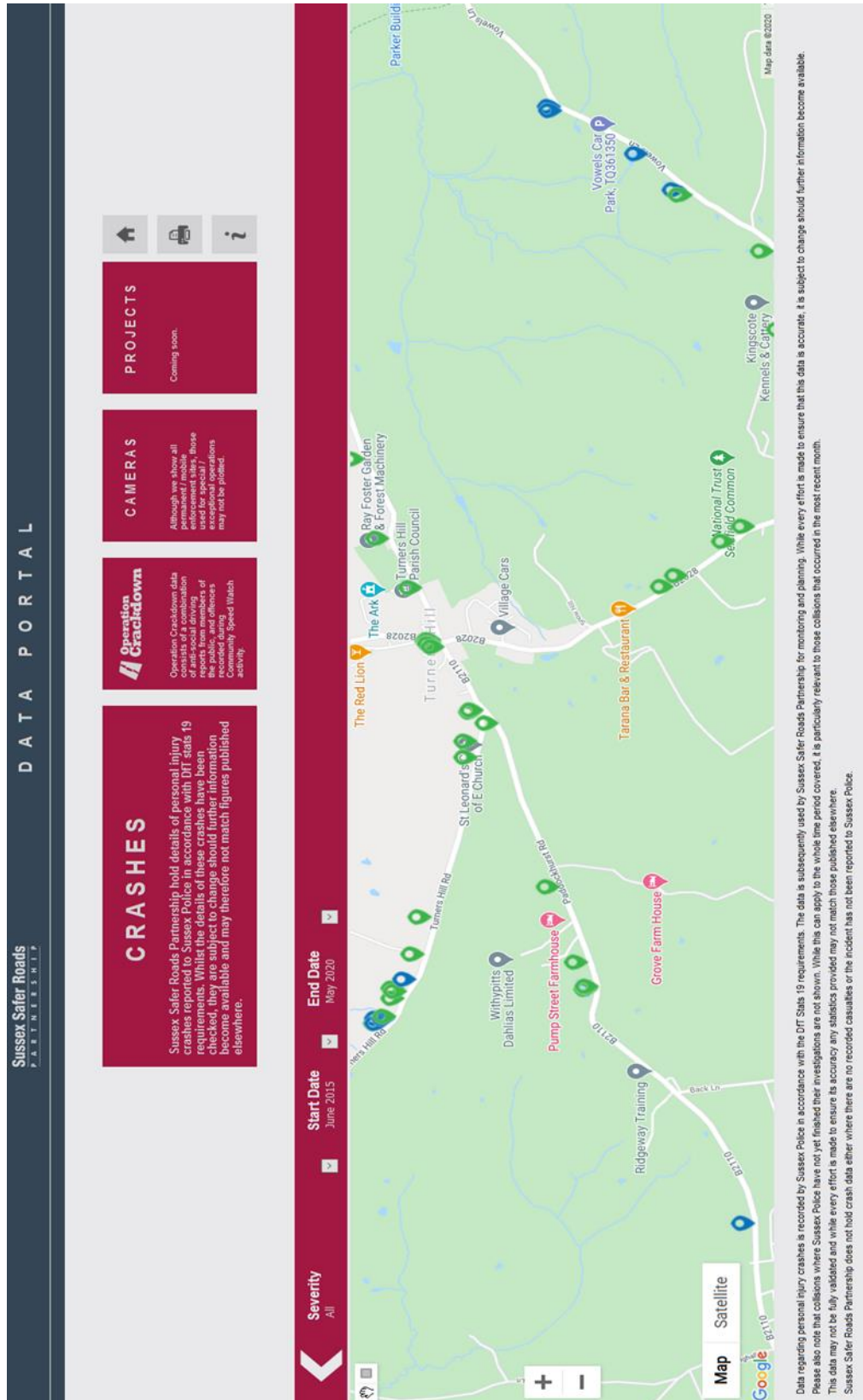
This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

APPENDIX 11.

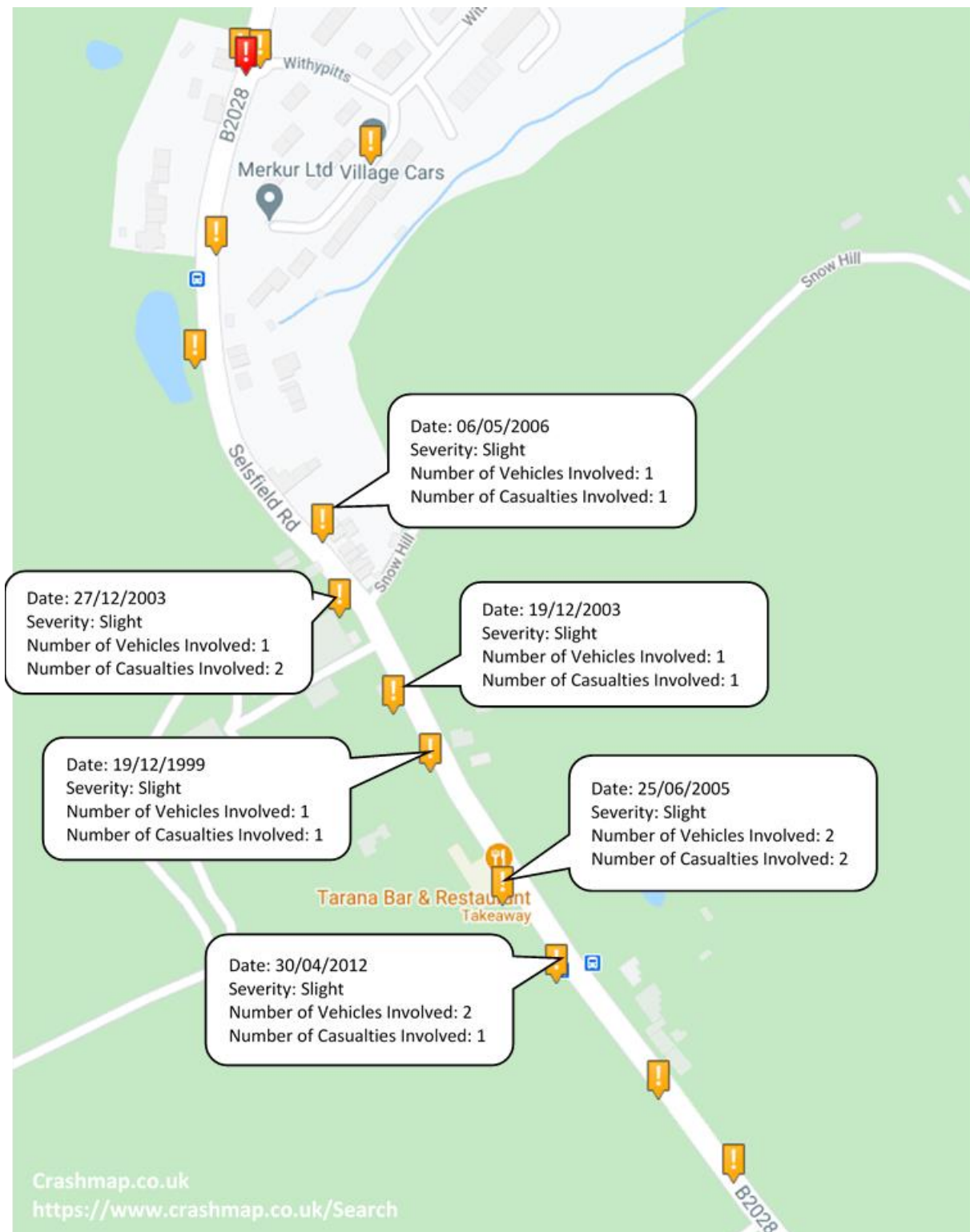
SUSSEX SAFER ROADS PARTNERSHIP AND CRASHMAP®

COLLISION MAPPING

Sussex Safer Roads Partnership – to May 2020



Crashmaps.co.uk – 21 years to December 2019





**Mid Sussex District Council
Site Allocations DPD**

Regulation 19 Consultation

**Representations on behalf of Paddockhurst
Estate**

Our ref: CN 151478

28th September 2020

Appendix 1 – Turners Hill Neighbourhood Plan (Policy THP2) and Proposals Map.

Appendix 2 – Proposed Site Layout Sketch

Appendix 3 – Transport Statement (Reeves Transport Planning)

Introduction

- 1.1. Strutt and Parker are instructed by Paddockhurst Estate to respond to the Regulation 19 consultation Site Allocations Development Plan Document (SADPD) published by Mid Sussex District Council in July 2020. Paddockhurst Estate are freehold owners of land north of Old Vicarage Field, Turners Hill which it is promoting for sustainable new housing and open space. The Estate also own land at Withypitts, Turners Hill, which is promoted for redevelopment for residential purposes.
- 1.2. Land north of Old Vicarage Field (Site 852) extending to 9 hectares was assessed as suitable at Stage 1 of the site assessment process in September 2018 with an anticipated yield of 150 dwellings. It also remained in consideration following the Stage 2 high level assessment (and was therefore considered compliant with the District Plan spatial strategy). It features in the Stage 3 assessment but did not progress to Stage 4.
- 1.3. Land at Withypitts Farm, Selsfield Road, Turners Hill (Site 854) is proposed for allocation under Policy SA32. This allocation is supported.
- 1.4. This representation focusses on the spatial strategy for the District, its relationship to sustainability, and the associated housing numbers addressed through the Regulation 19 proposals. It also provides further details in support of Policy SA 32.

Spatial Strategy for the District

- 2.1. It is notable that the Regulation 19 SADPD under-delivers housing numbers in Category 3 settlements when assessed against District Plan targets. We consider that this shortcoming should be addressed prior to advancing the SADPD by identification of additional sites in Category 3 Medium Sized Villages. This will have sustainability advantages in addition to meeting the District Plan targets, including ensuring that the spatial distribution of affordable housing provision more accurately mirrors that anticipated in the District Plan.
- 2.2. The District Plan table which identified the spatial distribution of the housing requirement (page 32 of the District Plan) also provides minimum figures for each of the settlement Categories.
- 2.3. The minimum housing requirement for Category 1 settlements (Towns) has been revised to 706 dwellings, from the figure of 840 units in the Regulation 18 document. In Category 2 settlements (Local Service Centres), this has decreased from 222 dwellings to 198 dwellings (as a result of planning permission being granted at Land North of Shepherds Walk, Hassocks). In Category 3 (Medium Sized Villages), the requirement has reduced from 439 to 371. In Category 4 the requirement has decreased from 6 units to 5. These housing supply figures have been revised following an update to completion, commitments and windfall figures.
- 2.4. Despite the minimum residual requirement for Category 3 decreasing, this category remains the most underrepresented in the proposed site allocations. Only 238 of the minimum 371 homes required are proposed in the Regulation 19 SADPD, providing a shortfall of 133 dwellings. This position is shown in the table below (red text):

MSDC SADPD Reg 19: Representations on behalf of Paddockhurst Estate

Category	Settlements	District Plan Allocations	Minimum Requirement (2014-2031)	Minimum Residual (2017 +)	Minimum Residual Reg 18 SADPD	Minimum Residual Reg 19 SADPD	Reg19 SADPD Sites	Category Difference
1 Towns	Burgess Hill, E Grinstead, Haywards Heath	3,287	10,653	1,272	840	706	1069	363
2 Larger Village	Crawley Down, Cuckfield, Hassocks	500	3,005	838	222	198	105 (Figure does not include recent consent at Shepherds Walk, Hassocks)	37
3 Medium Village	Albourne, Ardingly, Ashurst Wood, Balcome, Bolney, Handcross, Horsted Keynes, Pease Pottage, Sayers Common, Scaynes Hill, Sharpthorne, Turners Hill, West Hoathly	600	2,200	311	439	371	238	-133
4 Smaller Village	Ansty, Staplefield, Slaugham,, Twineham, Warninglid	0	82	19	6	5	12	7
5	Hamlets	N/A	N/A	N/A	N/A	N/A	N/A	
Windfall			450					
Total			16,390	2,439	1,507	1,280	1,764	

Table 1: Spatial Distribution of Housing Requirement (Source of data: SADPD Regulation 18 and 19 draft documents.)

- 2.5. The number of dwellings at Site Allocation 27 (Land at St Martins Close (West) Handcross) has reduced from 65 to 30 dwellings because the Slaugham Neighbourhood Plan is now made and Land at St Martins Close (East) is now a commitment as at 1st April 2020. Therefore, only 30

units are identified to avoid double counting. However, there would still be a shortfall of 103 units in Category 3 if the additional 30 dwellings had been included in the housing figures.

- 2.6. The Settlement Sustainability Review (May 2015) forms part of the evidence base for the Mid Sussex District Plan (2014-2031). Paragraph 1.4 notes the Settlement Sustainability Review (May 2015) identifies strategic allocations for housing at Burgess Hill. However, additional “housing development is proposed to be met at the district’s other towns and villages to help meet the needs of existing communities.” This suggests housing supply should be proposed across the numerous settlements and not concentrated to only a select number.
- 2.7. As Table 1 shows, there is over-provision in the Category 1 settlements against under provision in Category 2 and 3 settlements. The approved settlement hierarchy constitutes a policy for delivering the spatial strategy, ensuring a sustainable pattern of development across the District. It would be wrong therefore to regard additional provision in Category 1 settlements as essentially more sustainable than provision in accordance with the spatial strategy. The latter has been formulated to produce an appropriate balance of development across settlements in the interests of sustainability.
- 2.8. The settlement hierarchy table included as part of District Plan Policy DP6 outlines the characteristics and functions of a Category 3 settlement: “Medium sized villages providing essential services for the needs of their own residents and immediate surrounding communities.” As a result, settlements within Category 3 should be considered as sustainable settlements.
- 2.9. Thus, there is sufficient justification for amending the Site Allocations DPD to increase the number of sites and units allocated within Category 3 settlements, to ensure consistency with the District Plan and the approved spatial strategy, and in turn support a sustainable pattern of development.

Housing Supply

- 3.1. Policy SA10 (Housing) within the SADPD Regulation 19 sets out how the Council propose to distribute housing across the District. Policy SA11 (Additional Housing Allocations) proposes how the 1,764 dwellings required through the SADPD will be distributed. The figure of 1,764 dwellings presents an excess of 484 dwellings above the residual amount required of 1,280.
- 3.2. Nevertheless, there is a clear under provision of homes in Category 3 settlements and therefore the settlements cannot meet their guideline (Policy DP6) residual housing requirement.
- 3.3. 158 sites out of 253 sites were taken forward following a High level Assessment (Site Selection Paper 1). Following the Detailed Evidence Testing stage (Site Selection Paper 3), 51 sites remained as having potential for allocation and were subject to further evidence base testing and assessment. The SADPD Regulation 19 document includes 22 housing allocations. This is a narrow proportion of the sites that were positively assessed and were regarded as having potential for allocation following the Detailed Evidence Testing stage.
- 3.4. Whilst there is an over-supply from the 22 sites proposed for allocation, this may not be a sufficient buffer should sites fall out of the allocations process between now and adoption. In

addition, the non-deliverability of any proposed site allocation could result in the Council jeopardising housing supply for the District.

- 3.5. MSDC should consider allocating more sites in the SADPD to ensure a continuous supply of sites during the plan period. Therefore, it would be sensible to look at settlements that are not currently meeting the residual housing requirement, most notably Category 3 settlements, to provide the necessary flexibility.

Assessed Housing Options and Sustainability Appraisal

- 4.1. This section is an update to assessed housing options and sustainability appraisal discussion presented in the representation in response to the SADPD Regulation 18 document.
- 4.2. MSDC are required to assess potential reasonable alternative strategies against the selected approach developed for the purposes of the Regulation 19 version of the SADPD. Similarly, to the preparation of the Regulation 18 draft document, the Council purports to have carried out that exercise by considering three potential Options for the SADPD consultation, as set out in the SADPD Sustainability Appraisal – Non-technical Summary Regulation 19 (July 2020).
- 4.3. As with the SADPD Sustainability Appraisal Regulation 18 document (September 2019), the Options presented were not sufficiently different in terms of addressing the approved spatial strategy. 20 of the 22 sites ultimately identified in the selected Option were common to all 3 Options.
- 4.4. Option B included three additional sites at Burgess Hill (Category 1 settlement) while Option 3 included those sites plus a 3rd site at Haywards Heath (again a Category 1 settlement). This means that the choice around options was solely a choice around the overall number of units to be delivered in excess of the minimum residual requirement. There was no reasonable alternative presented in relation to the spatial strategy and the distribution of development between the settlement categories. Options B and C simply added additional dwellings to Category 1 settlements and did not seek to redress imbalances between the other settlement categories. The choice provided was against delivering either 144, 484 or 774 dwellings above the minimum residual requirement. In each scenario, the minimum target provision was exceeded in Category 1, 2 and 4 settlements. None of the Options met the Category 3 target residual minimum.
- 4.5. This is surprising given that there are nearly the same number of settlements in Category 3 (13) than in all of the other settlement categories where sites are proposed for allocation combined (14). It is not credible that there are no potentially suitable additional Category 3 sites that might be considered as reasonable alternatives for the purpose of the sustainability appraisal.
- 4.6. Paragraph 1.36 of the Sustainability Appraisal (July 2020) says that additional sites should ideally be drawn from sites from the highest settlement category in the hierarchy. As noted at paragraph 4.5, all additional sites were only considered from Category 1 settlements.
- 4.7. Housing supply should not only be directed at Category 1 settlements, not only because that would be contrary to the Spatial Strategy in the District Plan, but indeed because Category 3

settlements should be considered as sustainable locations to provide housing in Mid Sussex. There is strong justification that settlements in Category 3 of the Settlement Hierarchy should be considered as sustainable locations for site allocations as locations outside of the main town centres become increasingly desirable places to live, and there is less need to commute to offices in the main towns. An increase in home-working has eased pressures on public transport links in the District, and will continue to do so as employers prepare for the longevity of home-working.

- 4.8. The assessment criteria in the Sustainability Appraisal should be reviewed as a result of rapidly changing employment environments in response to the COVID-19 crisis; the pandemic has shifted transport movements and commuting patterns, in particular.

Windfalls

- 5.1. The Regulation 19 SADPD proposes to increase the windfall allowance to 84 dwellings per annum, amounting to a total of 504 dwellings over the final 7 years of the Plan period (2024-2031). Proportionately then, there are more windfall units to be provided for than are now proposed to be identified in categories 2 and 3 combined.
- 5.2. Part of this increase is attributed to the inclusion of sites of up to 9 units in the assessment. MSDC are still very reliant on the delivery of homes from windfall sites. This could potentially negatively impact the delivery of affordable housing. In addition, site-specific infrastructure requirements are more readily made out in policies supporting the delivery of allocated sites, meaning that generally speaking greater public benefit can be anticipated in plans where a higher proportion of the number of dwellings targeted are to be provided on sites specifically allocated in Local Plans. It is also important to note that windfall sites cannot be assumed to come forward in proportion to the balance of development contemplated through the spatial strategy. This means that the spatial strategy may be further compromised (in addition to the under-provision in categories 2 and 3 identified above), given that windfall developments most commonly derive from within the larger settlements. These issues can be overcome by identifying more housing sites through the SADPD, and specifically with Category 3 settlements.
- 5.3. Without allocating further sites to meet the adjusted housing need, there will be a greater reliance on windfall sites. The Council is therefore encouraged to rely less on non-identified sources of housing growth (which by their nature are unpredictable in relation to the realisation of the spatial strategy) and to plan more effectively by identifying additional sites for allocation in the SADPD.

Suitability of Turners Hill

- 6.1. Turners Hill is acknowledged to be one of 13 settlements within Category 3 in the settlement hierarchy, identified as a Medium-Sized Village that provides essential services and which is capable of accommodating additional residential development. The District Plan identifies a minimum residual requirement for Category 3 settlements of 311 dwellings. This has been

increased to 371 in the context of the current Regulation 19 consultation. The current draft SADPD delivers 238 units in such settlements, an under-provision of 133 units.

- 6.2. Under-provision is also apparent within Turners Hill. Table 12 produced at paragraph 6.12 of the sustainability appraisal demonstrates that (in addition to the 133-unit shortfall across Category 3 Settlements), the Regulation 19 SADPD under-delivers against the expectation for sustainable growth for Turners Hill – namely a further 67 dwellings. The SADPD does allocate one site in Turners Hill for 16 dwellings, leaving at least 51 units to be found if the residual for the village is to be met. While the Turners Hill Neighbourhood Plan (Made in 2016) does identify a development site, this provision is included in the Council's assessment in order to arrive at the residual requirement as an existing Neighbourhood Plan commitment.

Land north of Old Vicarage Field

- 7.1. Land north of Old Vicarage Field (Site 852) was found to be unsuitable for allocation, primarily for access reasons. The Site Selection Paper notes that *“access is proposed via an adjacent allocated site. However, the adjacent allocation has no extant permission and it cannot be assumed that it will come forward over the plan period”*.
- 7.2. The adjacent land in question is allocated in the made Turners Hill Neighbourhood Plan (Policy THP2). Crucially, it is under the control of the same landowner. Whilst no planning permission has been granted, it is not unreasonable to assume that the THP2 land will come forward for development within the next 5 years, unlocking the land to the north for development. Extracts from the Made Neighbourhood Plan and associated Proposals Map are at Appendix 1.
- 7.3. All other matters raised (in relation to potential Conservation Area and Landscape impact) are capable of mitigation through site master planning.
- 7.4. This site is very well related to the settlement and to planned new development. The land lies to the north of the AONB. It is capable of meeting the identified housing shortfall in Turners Hill. It is deliverable within years 6-10 and should not be ruled out as a potential allocation by virtue of access arrangements.

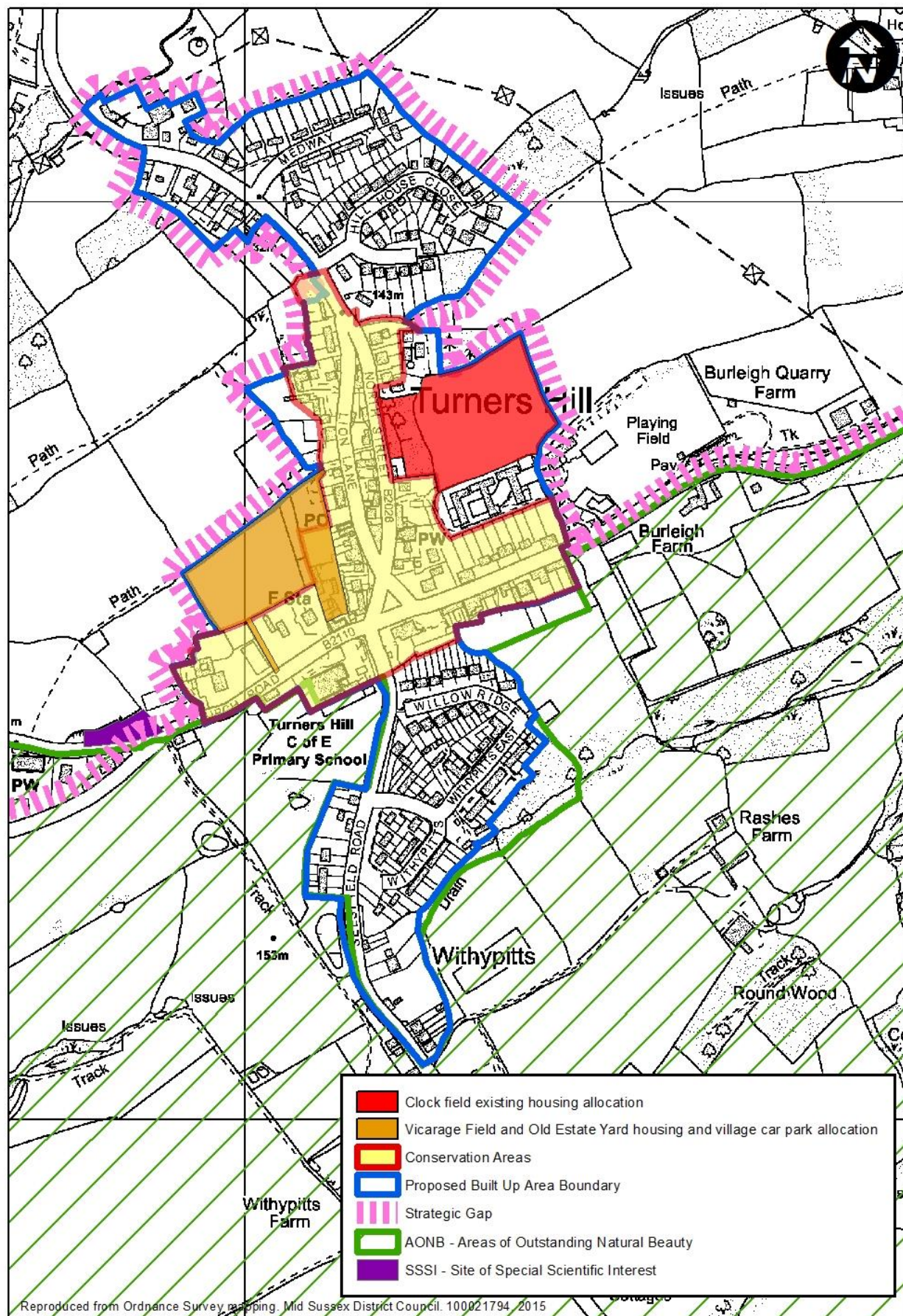
Land at Withpitts Farm

- 8.1. Paddockhurst Estate has been proactive in undertaking assessment work in support of the proposed allocation of land at Withypitts Farm. A sketch layout has been prepared (Appendix 2), supported by an Opportunities and Constraints Assessment and a Design Development document. A LVIA has been produced, and a Transport Assessment has been prepared, supported by Safety Audit work. The Transport Assessment has only recently been finalised with the provision of vehicle tracking work. The TA is appended to this submission (Appendix 3).

Summary

- 9.1. It is evident from the figures published in the Regulation 19 SADPD that there remains a significant shortfall of homes in Category 3 settlements across the District. Turners Hill is a Category 3 settlement where housing provision is under-represented against the target minimum figure indicated in the Sustainability Appraisal.
- 9.2. The proposed allocation at Withypitts Farm will help to deliver the Spatial Strategy, but in addition, our representation at Regulation 18 highlighted a suitable site (Land North of Old Vicarage Farm) available to meet this acknowledged shortfall. Access to this site is available across land within the same ownership, across land that in turn is allocated for development in the Turners Hill Neighbourhood Plan. There is no reason to consider that the site will not come forward for development within years 6-10.
- 9.3. As noted in our previous representation, the Regulation 19 SADPD over-relies on windfall development, and more so in the latest iteration of the DPD. If the SADPD relies too heavily on windfall despite the availability of suitable residential sites, it cannot be considered justified, effective or consistent with national policy and therefore would be unsound. Difficulties with delivery on some of the District Plan's strategic sites and the unproven response to Policy DP6 mean that further site allocations are the safest way to ensure that a five-year supply is maintained through the Plan period.
- 9.4. We do not consider the SADPD to be 'sound' in its current form. In addition to the heavy reliance on windfall sites, the approach to reasonable alternatives presented in the Sustainability Appraisal (July 2020) is not consistent with the spatial strategy of the District Plan. The SADPD not only under-provides for housing in Category 3 settlements, but MSDC also risk not meeting housing numbers across the District if any of the proposed site allocations are non-deliverable.

Proposals Map



12 POLICIES

HOUSING POLICIES

THP1 Housing Site Allocations

Development of Old Vicarage Field and the Old Estate Yard will be permitted providing they meet the site specific conditions listed in THP2 below.

THP2 Development of Old Vicarage Field and the Old Estate Yard

Development of the two adjoining sites of Old Vicarage Field & the Old Estate Yard must deliver the following:

A mix of dwellings, which will address the priorities of the parish including 30% affordable homes. The mix will consist mainly of 1, 2 and 3 bedroom homes which would include 2 bungalows for the elderly and/or disabled as identified in the village survey.

The development will provide 44 new homes

A Village Car Park must be incorporated within The Old Estate Yard with pedestrian access via The Bank and the Fire Station.

The entrance road to this new Estate and Village car park is to be sited to the western side of The Old Vicarage. This position will ensure additional congestion is not created within the Primary School area which, together with the proposed 20mph zone, will not have a detrimental effect on traffic and pedestrian safety. The entrance road is to be a minimum 5.5m to incorporate pedestrian footpath and accommodate free flowing traffic to and from the Village car park.

The existing entrance to The Old Vicarage and School View properties must be closed and replaced with a continuous footpath from the new entrance road to the Fire Station. These existing properties will have rear access provision from the new entrance road. The entrance road will serve the new properties and the Village Car Park.

New pedestrian footpaths adjacent to roads must provide protection for pedestrians, for instance by way of kerbing

Internal Estate roads must meet the needs of Emergency & utility vehicles as a minimum

New homes must as a minimum comply with nationally described space standards for internal floor space and storage.

Where provided, garages should have an internal measurement of 7m x 3m as a minimum in order to accommodate a modern family sized car and some storage space.

The development will need to provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.

S106 / CIL funds from this development will provide a financial contribution to the Village Enhancement Scheme.

Development should be designed to preserve or enhance the character or appearance of the Turners Hill Conservation Area and its setting. Proposals should take into account the guidance of the adopted Village Design Statement and any conservation area appraisal which may be adopted by the Council.

THP3 New Homes Parking New residential development must provide the following minimum levels of off-street parking (including garages) as detailed in the table below.

1-2 bedroom dwellings	2 on-plot car parking spaces
3 + bedroom dwellings	1 on-plot car parking space per bedroom

THP4 New Homes The Design of new homes must take into account the character and style of buildings in the Parish. Applications for new development must demonstrate how they have incorporated the guidance of the adopted Village Design Statement.

Developers must use Building for Life 12 to help deliver high quality design. Good design is fundamental to making neighbourhoods sustainable and this is our desire for Turners Hill. We want all future homes to be as energy-efficient and sustainable as possible and the highest standards must always be strived for.



DRAWINGS CAN BE SCALED FOR PLANNING PURPOSES ONLY. DO NOT SCALE FOR ANY OTHER PURPOSE. ALL DIMENSIONS TO BE CHECKED ON SITE AND ANY DISCREPANCIES TO BE NOTIFIED TO THE ARCHITECT IMMEDIATELY.

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P03	22.07.20	Revised planting and hatching	BM	NM
P02	17.07.20	General changes	BM	DRC
P01	02.06.20	Initial Issue	MH	DRC
REV.	DATE	REVISION	DRW.	CHK.

COWAN

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Client: The Trustees of Paddockhurst Estate

Job: Withypitts Farm

Address: Selsfield Road, Turners Hill

Drawing: PROPOSED SITE LAYOUT

Scale: 1:500

Drawn: BM

Checked: DRC

Date: 02/06/2020

Size: A3

2277-CAL-XX-XX-SK05-S3

Rev. P03

SKETCH

For plan development only, not for construction

Transport Statement

WITHYPITTS FARM, TURNERS HILL

OCTOBER 2020



Reeves Transport Planning

PRODUCED for PADDOCKHURST ESTATE TRUSTEES

PRODUCED by REEVES TRANSPORT PLANNING LTD

SGR/WPF/140920 V3

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1. Introduction

- 1.1 Reeves Transport Planning is appointed to provide a Transport Statement in support of a proposal for residential development at Withypitts Farm, Selsfield Road, Turners Hill, RH10 4PP. A site location plan is attached, as Appendix 1.
- 1.2 The proposal consists of a replacement of agricultural buildings at the farm with a mixed residential development of 16 dwellings served via the existing farm access.
- 1.3 This Transport Statement is drafted with reference to the Ministry of Housing, Communities & Local Government Guidance on Travel Plans, Transport Assessments and Statements, published March 2014 and pre-application discussions with West Sussex County Council.

2. Policy Context

- 2.1 This section of the Transport Statement sets out the relevant policies, at a national and local level, that this proposal will be judged against.
- 2.2 The *National Planning Policy Framework* (NPPF), adopted in March 2012 and updated in February 2019, details the Government's planning policy and is a material consideration in planning decisions. Its emphasis is on minimising the need to travel, reducing car use and encouraging the use of sustainable transport. Paragraph 108 states that in assessing development sites it should be '*ensured that:*
- *appropriate opportunities to promote sustainable transport modes can be - or have been - taken up, given the type of development and its location.*
 - *safe and suitable access to the site can be achieved for all users; and*
 - *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.'*

- 2.3 At the heart of the *NPPF* is a presumption in favour of sustainable development, and decision makers, at all levels, are encouraged to seek approval where possible. Paragraph 109 emphasises this and states that *‘development should only be prevented or refused on highway grounds if there would be an **unacceptable** impact on highway safety, or the residual cumulative impacts on the road network would be **severe**’*.
- 2.4 The *Mid Sussex District Plan 2014-2031* was adopted in March 2018. It sets out a vision for how Mid Sussex wants to evolve and presents a delivery strategy for how this will be achieved. It supports the *National Planning Policy Framework’s (NPPF)* *‘presumption in favour of sustainable development’*. It also reflects the requirements of the NPPF by setting out a clear economic vision and strategy, as well as identifying strategic sites and criteria for supporting inward investment and existing businesses. *Policy DP1: Sustainable Economic Development* encourages new businesses to the area to meet aspirations for economic growth and the wider benefits that this will bring.
- 2.5 *Policy DP21* confirms that development will be required to support the objectives of the *West Sussex Transport Plan 2011-2026*, which are:
- *A high-quality transport network that promotes a competitive and prosperous economy;*
 - *A resilient transport network that complements the built and natural environment whilst reducing carbon emissions over time;*
 - *Access to services, employment and housing; and*
 - *A transport network that feels, and is, safer and healthier to use.*
- 2.6 The policy also states that to meet the council’s strategic objectives development proposals will take account of whether:
- *The scheme is sustainably located to minimise the need for travel noting there might be circumstances where development needs to be located*

in the countryside, such as rural economic uses (see policy DP14: Sustainable Rural Development and the Rural Economy);

- *Appropriate opportunities to facilitate and promote the increased use of alternative means of transport to the private car, such as the provision of, and access to, safe and convenient routes for walking, cycling and public transport, including suitable facilities for secure and safe cycle parking, have been fully explored and taken up;*
- *The scheme is designed to adoptable standards, or other standards as agreed by the Local Planning Authority, including road widths and size of garages;*
- *The scheme provides adequate car parking for the proposed development taking into account the accessibility of the development, the type, mix and use of the development and the availability and opportunities for public transport; and with the relevant Neighbourhood Plan where applicable;*
- *Development which generates significant amounts of movement is supported by a Transport Assessment/Statement and a Travel Plan that is effective and demonstrably deliverable including setting out how schemes will be funded;*
- *The scheme provides appropriate mitigation to support new development on the local and strategic road network, including the transport network outside of the district, secured where necessary through appropriate legal agreements;*
- *The scheme avoids severe additional traffic congestion, individually or cumulatively, taking account of any proposed mitigation;*
- *The scheme protects the safety of road users and pedestrians; and*
- *The scheme does not harm the special qualities of the South Downs National Park or the High Weald Area of Outstanding Natural Beauty through its transport impacts.'*

- 2.7 This Transport Statement will demonstrate that the transport implications of this proposal adhere to both national and local policies, and that it does not have any adverse impact on highway safety or capacity.

3. Existing Conditions

- 3.1 The farm is located 600metres to the south of Turners Hill, on the western side of Selsfield Road.
- 3.2 Selsfield Road is classified as the B2028 and follows a north/south alignment. It provides a route to Haywards Heath to the south and Lingfield to the north.
- 3.3 The existing farm access is located 20 metres to the south of the Snow Hill junction, which is on the opposite of Selsfield Road. The current access is in a poor state of repair with limited visibility in both directions.
- 3.4 There are no direct footway connections to Withypitts Farm. There is a narrow section of footway that terminates at 66 Selsfield Road, which is circa 53metres to the north of the farm access. There are limited sections of footway on the opposite side of Selsfield Road.
- 3.5 The footway on the western side of Selsfield Road terminates at the mini-roundabout junction with Withypitts, which is circa 350metres to the north. There are crossing facilities that include dropped kerbs at the mini roundabout. Beyond the junction with Withypitts, there is a continuous footway on the eastern side of Selsfield Road toward the village centre.
- 3.6 Photographs of the current footways and access to the application site are included below.

	
<p>Figure 1: End of Footway at 66 Selsfield Road</p>	<p>Figure 2 Eastern Footway towards the south</p>
	
<p>Figure 3: Farm Access</p>	<p>Figure 4: Missing Section of Footway</p>

- 3.7 There is a 30mph sign speed limit at the farm access and to the south, the limit is 40mph.
- 3.8 A *speed and volume traffic survey* was undertaken to establish the 85th percentile speed of traffic passing the site's access between 5th and 12th December 2019. The collected data is attached, as Appendix 2.
- 3.9 The collected data establishes that the 85th percentile traffic speeds were 72.42km/h (38mph) northbound and 78.86km/h (37mph) southbound, with an average traffic flow of circa 11500 vehicle movements per day.
- 3.10 Table 3.1 presents the stopping sight distance (visibility splay) calculations for the recorded vehicle speeds.

Table 3.1
Visibility Splay (SSD) Calculations - Withypitts Farm

Guidance	Lane	km/h	v (m/s)	t (s)	d (m/s ²)	a (%)	$\frac{vt + v^2/2d}{+2.4m}$	+2.4m
MfS	NB	61.16	16.99	1.5	4.41	5.26	54.7	57.1
	SB	59.55	16.54	1.5	4.41	-7.68	62.4	64.8
DMRB	NB	61.16	16.99	2	2.45	5.26	82.5	84.9
	SB	59.55	16.54	2	2.45	-7.68	114.4	116.8

- 3.11 Section 7.5 of Manual for Streets (MfS) notes that *'this section provides guidance on stopping sight distances (SSD) for streets where 85th percentile speeds are up to 60km/h. At speeds above this, the recommended SSDs in the Design Manual for Roads and Bridges [DMRB] may be more appropriate'*. The data confirms that these speeds are more than 60km/h so DMRB's design standards are the most appropriate.

Accessibility by Foot and Cycle

- 3.12 It is generally accepted that walking and cycling provide realistic and important alternatives to the private car. Both are also actively encouraged to form part of longer journeys that involve public transport. The distances people are prepared to walk, or cycle, depend on their fitness and physical ability, journey purpose, settlement size, and walking/cycling conditions.
- 3.13 As noted, there are currently no direct footways connecting the site to local amenities. There is a Public Right of Way (PROW 67W) connecting Selsfield Road with Church Road at the junction of Turners Hill Road. Access to the PROW is circa 150metres to the north of the farm access, which is illustrated in Appendix 3.
- 3.14 The plan attached at Appendix 3 also highlights (in red) the route of a permissive path linking the farm buildings to PROW 67W
- 3.15 There is a range of amenities including a restaurant, local shopping, and a primary school within a 650metres walk of the site.

Accessibility by Bus

- 3.16 There are existing bus stops located within the optimum walking distance to a bus stop of 400metres (Planning for Public Transport in Development, 1999). The stops are known as Tarana and Withypitts Pond and they do not benefit from a shelter, seating, or raised kerbs.
- 3.17 Services 84 and 272 use these stops, and a summary of the routes and frequencies are presented in Table 3.2. The relevant timetables are attached at Appendix 4.

Table 3.2: Local Bus Services

Service*	Route	Service Frequency	
		Mon to Sat	Sunday
84	Crawley - Three Bridges - Turners Hill - West Hoathly - Sharpthorne - East Grinstead	Bi-hourly	No Service
272	Crawley - Three Bridges - Turners Hill - Haywards Heath - Burgess Hill - Hassocks - Brighton	Bi-hourly**	No Service

*Services reduced by Covid19 lockdown conditions
**Hourly in peak hours

Accessibility by Train

- 3.18 Three Bridges Rail Station is 6.7kilometres from Withypitts Farm site, and East Grinstead Train Station is 6.9kilometres. These stations provide regular services to London, Gatwick, local stations, and the south coast. The Southern Railway network map demonstrating routes to and from these stations is included at Appendix 5.

4. Proposed Development

- 4.1 The proposal seeks to demolish existing agricultural buildings at Withypitts Farm and replace them with up to 16 dwellings.
- 4.2 There is no definitive mix of housing proposed at this stage, but the parking allocations will be based on a ratio of two spaces per dwelling, and there is additional capacity for visitor or unallocated resident parking demand. On this

basis, it is considered highly unlikely that the proposal will result in any vehicular parking spilling out from the development site.

- 4.3 West Sussex County Council adopted parking standards require a minimum of 28% of the parking allocation to have '*active EV charging facilities.*' Each property will be provided with EV charging facilities for at least one vehicle to promote the adoption of electric vehicles by future residents
- 4.4 Each dwelling will have covered and secure cycle parking facilities that adhere to West Sussex County Council's parking standards.
- 4.5 The properties will include a separate study space or workspace that can be utilised as a home office and will be able to connect to high speed broadband, which will facilitate regular home working and less commuting trips.
- 4.6 The local bus stops will also be upgraded with shelters, seating, and improved access for wheelchairs and buggies, which will encourage an increase in use of the bus service.

Access

- 4.7 The proposal incorporates an extension to the footway on the western side of Selsfield Road, which will connect the site to the existing footway and improve pedestrian access and amenity.
- 4.8 The existing footway will be widened to the edge of the carriageway, which will provide a footway of circa 1.5metres to 1.8metres wide. A copy of the adopted highway plan is attached, as Appendix 6.
- 4.9 The permissive path noted in paragraph 3.14 will be retained and given an appropriate surface treatment, which will facilitate greater accessibility to the site.
- 4.10 Vehicle access to the site has been subject to extensive discussions with the Local Highway Authority. The original proposal was to provide a mini-roundabout junction and some form of 'gateway' feature, which would have reduced traffic speeds as they exceed the current signed limit of 30mph.

- 4.11 The Local Highway Authority advised that they would not consider the roundabout's merits or gateway proposal until a draft Traffic Regulation Order had been published. This was considered to be an unreasonable delay, as securing approval to publish a Traffic Regulation Order can take up to two years, with no guarantee of success.
- 4.12 A Stage 1 Road Safety Audit of the proposed mini roundabout was undertaken and is attached, as Appendix 7. The Auditors highlighted problems with securing the required visibility and recommended that the access be upgraded to form a Priority Junction.
- 4.13 A plan of the proposed Priority Junction, which illustrates the visibility splays that will comply with the required design standards is included in Appendix 2 of the attached Stage 1 Road Safety Audit.
- 4.14 Swept path analyses illustrating fire appliance and refuse collection vehicle use of the proposed T junction are attached at Appendix 8.

5. Traffic and Transport Impacts

- 5.1 Data for the traffic impact of the extant agricultural use of the site is based on extensive discussions with the landowners, contractors, and a specialist farm consultant.
- 5.2 Details of the extant use trip rates and information provided by a specialist farming consultant are attached, as Appendix 9. The data informs that the extant use can generate between 36 and 50 vehicle movements per day, which does not include ancillary visits by vets, HSE inspections, DEFRA inspections, chemical deliveries, equipment servicing, and building/site maintenance. Depending on the time of the year these can equate to 10 vehicle movements per day.
- 5.3 This suggests that the extant uses at Withypitts Farm could generate circa 60 vehicle trips per day.

- 5.4 Version 7.7.2 of the TRICS database has been interrogated to identify the potential traffic impact of the proposed development. The TRICS data is attached, as Appendix 10.
- 5.5 The TRICS data indicates that housing in relatively sparsely populated areas will now generate an average of 4.7 vehicle movements per day. The datasheets suggest that the proposed development could generate up to 75 vehicle movements per day.

6. Collision Records

- 6.1 Collision information derived from Sussex Safer Roads Partnership and Crashmap® is attached, as Appendix 11.
- 6.2 The data informs that there have been no reported collisions on Selsfield Road, near the site, in the most recent five-year period, up to May 2020, which is the typical period for assessment of the impacts of development.
- 6.3 Expanding the data range to cover data 21 years up to December 2019 also shows that there have been no collisions at the site access during this period. There is a sporadic distribution of collisions with an average of one collision every TWO years, which is a typical distribution and frequency of collisions over the extended period of 21 years.
- 6.4 This indicates that there are no intrinsic safety hazards along Selsfield Road, or at the various accesses, which will be worsened by this proposal to a degree that could be considered unacceptable.
- 6.5 To enhance public safety and the free flow of traffic on Selsfield Road the existing car parking area serving 64 Selsfield Road, which as highlighted in the photograph below does not benefit from onsite vehicle turning, will be closed and dedicated parking provided via the new junction.



Figure 5: Parking Hardstanding 64 Selsfield Road

7. Summary and Conclusions

- 7.1 Reeves Transport Planning has been appointed to provide a Transport Statement in support of an application for the demolition of existing farm buildings and the erection of circa 16 dwellings.
- 7.2 Each dwelling will be provided with adequate car parking provision and at least one EV charging facility. Secure and covered cycle parking is included for each dwelling too. The homes will be provided with high speed broadband, and a study or workspace to facilitate homeworking and reduce commuting trips. A Residential Travel Plan will be also be introduced, at an appropriate time, to further reduce trips in a private car.
- 7.3 The proposal includes a new footway that will connect the site to the existing footway at 66 Selsfield Road, and improvements to an existing permissive path. These improved pedestrian facilities will connect the site to the village and its

amenities and the local bus stops. Both the southbound and northbound bus stops will be upgraded to include seating, raised kerbs, and shelter, which will encourage the use of sustainable modes of travel.

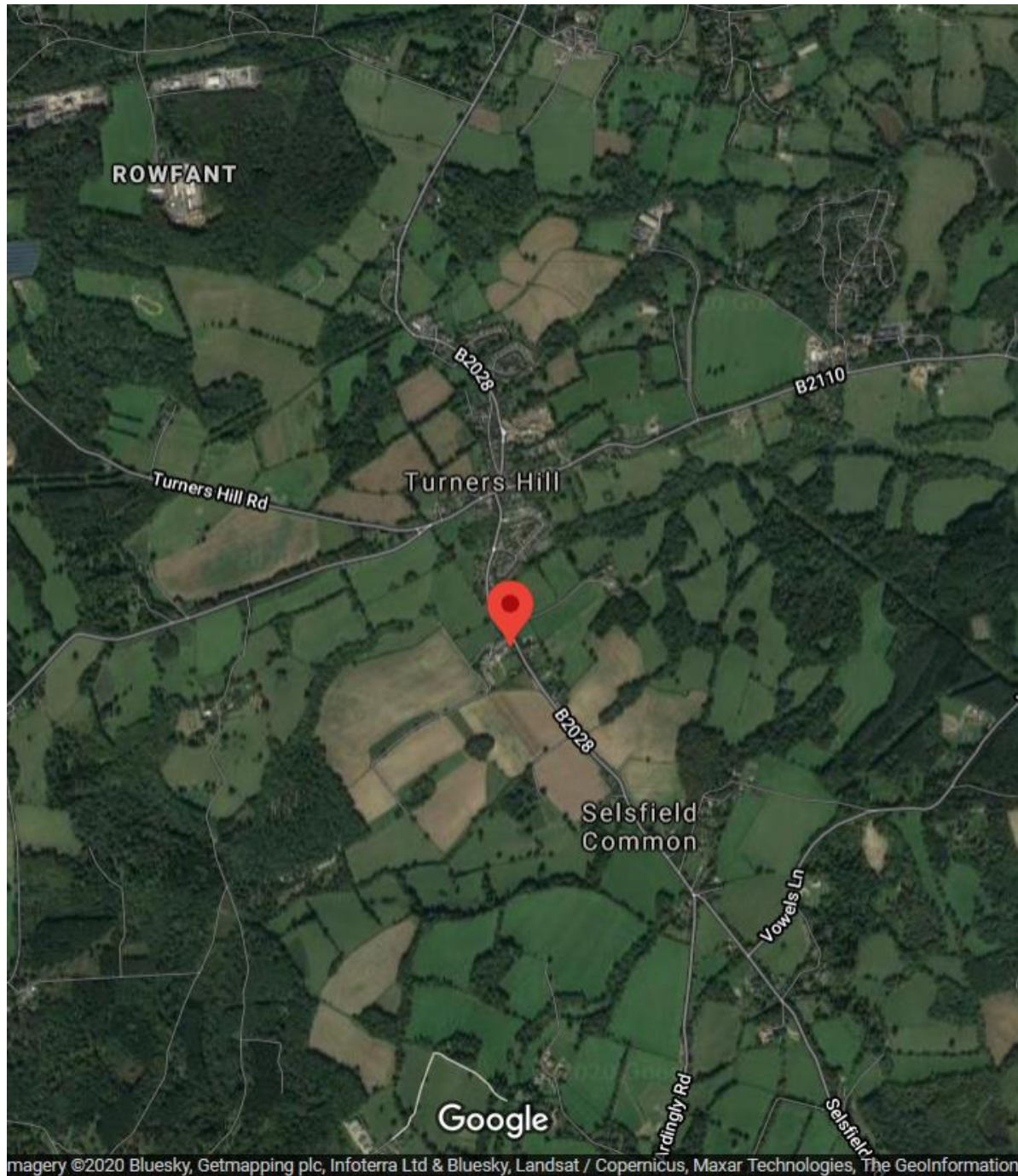
- 7.4 The proposal will be served by a new Priority Junction that will upgrade the existing access. The design of the junction was subject to extensive discussions with the Local Highway Authority and a Stage 1 Road Safety Audit. The Audit recommended a Priority Junction rather than a mini roundabout, as this layout will accord with the required design standards. The gradient across the junction exceeds the minimum recommended but this is an upgrade of an existing poorly constructed access, which is a material consideration.
- 7.5 Our client has confirmed that they own all of the land that falls beyond the limit of the adopted highway.
- 7.6 The enhanced visibility splays, which are designed to meet the prevailing conditions, and closure of the access serving 64 Selsfield Road will improve highway safety and the free flow of traffic.
- 7.7 The existing use can generate up to 60 vehicle movements per day and the information provided informs that these trips are predominately by large and slow-moving vehicles. In comparison, the TRICS data suggests that each of the dwellings will generate circa five vehicle movements per day, which indicates a maximum of 75 vehicle movements per day.
- 7.8 It is reasonable to assume that a trip rate of five movements per dwelling, from the TRICS site surveys 2015-2019, was historically robust but potentially overestimates future daily trip rates. There is a shift towards home working, which is prompted by the Covid19 'lockdown' conditions and a change in work practices. It is reasonable to assume that average trip rates will be less than the historic norms, as survey results published by the Chartered Institute of Personnel and Development state that employers expect that *'the proportion of people working from home on a regular basis once the crisis is over will increase to 37% compared to 18% before the pandemic'*.*

* <https://www.cipd.co.uk/about/media/press/home-working-increases>

- 7.9 Such an increase in homework would inevitably reduce the overall traffic impact of the proposal.
- 7.10 On this basis, taking all the relevant information it is considered that the proposed development will not have a **severe** impact on highway capacity or an **unacceptable** highway safety impact. Accordingly, the proposed development should not be refused on transport related grounds.
- 7.9 Our client welcomes conditions, or obligations, to upgrade the access to a Priority T Junction, provide new bus stop facilities, improve footway connections, ensure parking requirements, and introduce a Residential Travel Plan.

APPENDIX 1.

SITE LAYOUT PLAN



APPENDIX 2.

SPEED & VOLUME TRAFFIC SURVEY

Site Number: 00005756

B2028 Selsfield Road, Turners Hill, just south of Snow Hill

Details

Site Reference: 00005756

Grid Reference: 534208,135053

Site Configuration:

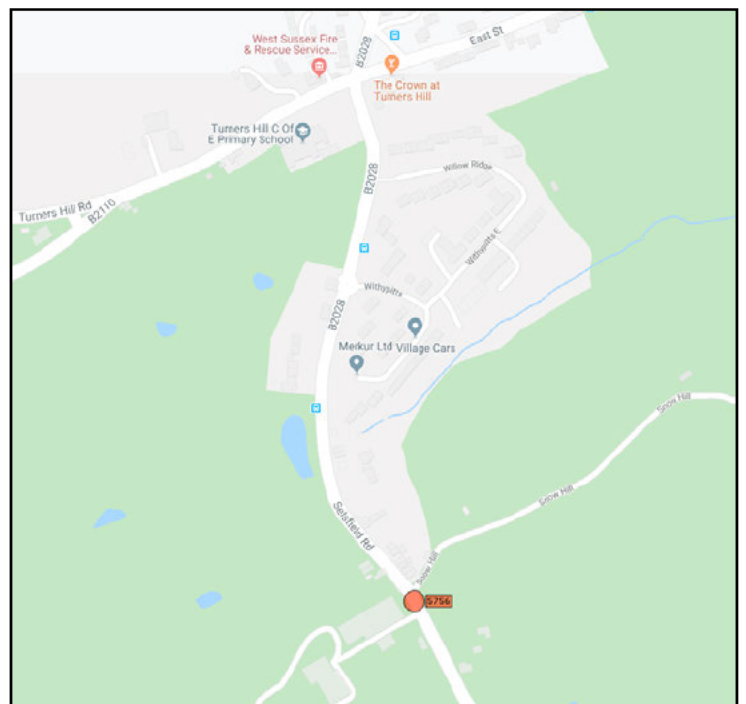
Interval: 60

Telemetry: No

Channels

Channel 1: Southbound (South)

Channel 2: Northbound (North)



Location



A5756 NB.jpg



A5756 SB.jpg

B2028 Selsfield Road, Turners Hill, S of Snow Hill

Site Number: 00005756

From 05/12/2019 To 12/12/2019

Site Reference: 00005756

Speed Summary (All Days) Report

No Filters Applied

Southbound

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5Mph	Bin 2 5-<10	Bin 3 10-<15	Bin 4 15-<20	Bin 5 20-<25	Bin 6 25-<30	Bin 7 30-<35	Bin 8 35-<40	Bin 9 40-<45	Bin 10 45-<50	Bin 11 50-<55	Bin 12 55-<60	Bin 13 =>60
00:00	41	39	34	5	0	0	0	0	1	5	19	12	4	0	0	0	0
01:00	16	41	35	6	0	0	0	0	0	3	4	5	2	1	0	0	0
02:00	13	42	36	6	0	0	0	0	0	2	3	3	3	1	0	0	0
03:00	11	43	36	7	0	0	0	0	0	2	3	3	2	1	0	0	0
04:00	16	43	37	7	0	0	0	0	0	1	5	5	2	1	1	0	0
05:00	34	39	34	5	0	0	0	0	0	6	15	9	3	1	0	0	0
06:00	144	38	33	5	0	0	0	1	4	32	64	32	8	1	0	0	0
07:00	318	35	31	5	0	1	1	4	21	110	133	41	6	1	0	0	0
08:00	360	36	31	5	0	2	1	4	22	101	158	63	9	0	0	0	0
09:00	315	36	31	5	0	2	2	4	17	99	130	54	7	0	0	0	0
10:00	293	36	32	5	0	2	2	3	13	76	138	53	7	0	0	0	0
11:00	340	37	32	5	0	2	2	4	11	85	156	68	11	1	0	0	0
12:00	349	37	32	5	0	2	1	6	16	91	154	67	11	0	0	0	0
13:00	352	38	32	5	0	2	2	2	11	76	163	82	13	1	0	0	0
14:00	366	37	32	5	0	1	2	3	9	98	163	79	10	1	0	0	0
15:00	465	36	31	5	0	2	2	7	19	138	206	78	11	1	0	0	0
16:00	556	35	31	4	0	1	1	4	29	193	266	54	7	1	0	0	0
17:00	534	35	31	4	0	1	0	2	33	185	232	73	7	1	0	0	0
18:00	485	35	31	4	0	0	0	2	31	186	200	59	7	1	0	0	0
19:00	284	37	32	5	0	0	0	1	17	87	118	49	10	1	0	0	0
20:00	132	38	33	5	0	0	0	0	5	30	56	33	7	1	0	0	0
21:00	100	38	33	5	0	0	0	0	3	19	42	28	6	1	0	0	0
22:00	98	39	34	5	0	0	0	0	2	17	44	27	6	1	0	0	0
23:00	75	39	34	5	0	0	0	0	1	13	31	20	6	2	0	0	0
Total																	
12H(7-19)	4734	36	31	5	0	17	15	45	233	1438	2100	769	106	9	1	0	0
16H(6-22)	5393	36	31	5	0	18	16	47	262	1607	2381	911	137	12	1	0	0
18H(6-24)	5565	37	31	5	0	18	16	48	265	1637	2456	959	149	15	2	0	0
24H(0-24)	5696	37	32	5	0	18	16	48	267	1656	2506	996	164	21	3	0	0
AM Peak																	
	08:00	04:00	04:00	04:00	11:00	09:00	09:00	08:00	08:00	07:00	08:00	11:00	11:00	05:00	04:00	11:00	11:00
	360	43	37	7	0	2	2	4	22	110	158	68	11	1	1	0	0
PM Peak																	
	16:00	23:00	23:00	23:00	23:00	15:00	15:00	15:00	17:00	16:00	16:00	13:00	13:00	23:00	23:00	23:00	13:00
	556	39	34	5	0	2	2	7	33	193	266	82	13	2	0	0	0

Local Events Included & Include All Globals

Printed at: 11:03 on 12 December 2019

B2028 Selsfield Road, Turners Hill, S of Snow Hill

Site Number: 00005756

From 05/12/2019 To 12/12/2019

Site Reference: 00005756

Speed Summary (All Days) Report

No Filters Applied

Northbound

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5Mph	Bin 2 5-<10	Bin 3 10-<15	Bin 4 15-<20	Bin 5 20-<25	Bin 6 25-<30	Bin 7 30-<35	Bin 8 35-<40	Bin 9 40-<45	Bin 10 45-<50	Bin 11 50-<55	Bin 12 55-<60	Bin 13 =>60
00:00	31	39	34	5	0	0	0	0	0	7	11	9	3	1	0	0	0
01:00	22	41	35	6	0	0	0	0	0	5	6	6	4	0	0	0	0
02:00	12	42	38	5	0	0	0	0	0	1	2	5	3	1	0	0	0
03:00	20	43	37	6	0	0	0	0	1	2	5	7	4	1	0	0	0
04:00	39	44	38	6	0	0	0	0	0	2	9	14	10	3	1	0	0
05:00	138	44	38	5	0	0	0	0	1	7	26	59	34	9	2	0	0
06:00	292	40	35	4	0	0	0	0	0	27	119	113	29	4	0	0	0
07:00	527	39	34	4	0	0	0	1	7	70	243	171	32	2	0	0	0
08:00	540	39	34	4	0	1	0	1	8	65	249	180	31	4	0	0	0
09:00	402	38	34	5	0	1	1	3	3	62	192	116	23	2	0	0	0
10:00	353	38	33	5	0	0	1	1	7	63	163	97	19	1	1	0	0
11:00	322	38	33	5	0	1	0	1	4	60	149	87	17	2	0	0	0
12:00	330	38	33	5	0	1	1	1	8	66	141	96	15	1	0	0	0
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14:00	336	38	33	5	0	0	0	1	9	67	154	83	19	1	0	0	0
15:00	399	38	33	4	0	0	0	1	6	76	190	110	15	1	0	0	0
16:00	426	37	32	4	0	0	0	0	11	99	215	91	8	0	0	0	0
17:00	386	37	33	4	0	0	0	0	6	80	201	85	11	1	0	0	0
18:00	277	37	32	4	0	0	1	1	4	72	137	54	7	0	0	0	0
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22:00	84	39	33	5	0	0	0	0	3	18	32	23	7	1	0	0	0
23:00	56	40	34	6	0	0	0	0	1	11	22	13	7	1	0	0	0
Total																	
12H(7-19)	4617	38	33	4	0	6	5	14	79	840	2175	1267	215	16	1	0	0
16H(6-22)	5390	38	33	5	0	6	5	15	94	994	2509	1476	263	25	2	1	0
18H(6-24)	5531	38	33	5	0	6	5	16	98	1023	2563	1513	277	27	2	1	1
24H(0-24)	5793	38	33	5	0	6	5	16	100	1046	2623	1612	335	42	7	1	1
AM Peak																	
	08:00	04:00	04:00	03:00	11:00	09:00	09:00	09:00	08:00	07:00	08:00	08:00	05:00	05:00	05:00	11:00	11:00
	540	44	38	6	0	1	1	3	8	70	249	180	34	9	2	0	0
PM Peak																	
	16:00	23:00	23:00	23:00	23:00	13:00	12:00	13:00	16:00	16:00	16:00	15:00	14:00	21:00	23:00	21:00	20:00
	426	40	34	6	0	1	1	1	11	99	215	110	19	3	0	0	0

Local Events Included & Include All Globals

Printed at: 11:03 on 12 December 2019

B2028 Selsfield Road, Turners Hill, S of Snow Hill

Site Number: 00005756

From 05/12/2019 To 12/12/2019

Site Reference: 00005756

Speed Summary (All Days) Report

No Filters Applied

All Channels

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5Mph	Bin 2 5-<10	Bin 3 10-<15	Bin 4 15-<20	Bin 5 20-<25	Bin 6 25-<30	Bin 7 30-<35	Bin 8 35-<40	Bin 9 40-<45	Bin 10 45-<50	Bin 11 50-<55	Bin 12 55-<60	Bin 13 =>60
00:00	72	39	34	5	0	0	0	0	2	12	29	20	7	2	0	0	0
01:00	37	41	35	6	0	0	0	0	0	8	10	11	6	1	0	0	0
02:00	25	43	37	6	0	0	0	0	0	3	6	8	6	1	0	0	0
03:00	32	43	37	6	0	0	0	0	1	4	9	10	6	2	1	0	0
04:00	55	44	38	6	0	0	0	0	0	3	14	19	12	4	2	0	0
05:00	171	43	37	5	0	0	0	0	1	12	41	68	37	10	2	0	0
06:00	436	39	34	5	0	0	0	1	5	59	183	145	37	5	0	0	0
07:00	845	38	33	5	0	1	1	5	28	180	376	213	38	3	0	0	0
08:00	899	38	33	5	0	2	1	6	30	166	407	243	40	4	0	0	0
09:00	717	38	32	5	0	3	3	7	19	160	322	170	30	2	0	0	0
10:00	646	38	32	5	0	2	2	4	20	139	302	150	26	1	1	0	0
11:00	662	38	33	5	0	3	2	5	15	146	305	155	28	3	0	0	0
12:00	678	38	32	5	0	3	2	7	25	157	295	163	25	1	0	0	0
13:00	673	38	33	5	0	3	2	3	17	135	303	176	31	2	0	0	0
14:00	702	38	32	5	0	1	2	4	18	165	317	162	29	2	0	0	0
15:00	864	37	32	5	0	2	2	8	25	214	396	188	26	2	0	0	0
16:00	981	35	31	4	0	1	1	5	41	292	481	145	15	1	0	0	0
17:00	920	36	32	4	0	1	0	2	39	266	433	158	19	2	0	0	0
18:00	762	36	31	4	0	0	1	3	36	257	337	113	14	1	0	0	0
19:00	481	37	32	5	0	1	0	1	23	145	209	83	16	2	0	0	0
20:00	286	38	33	5	0	0	0	0	9	72	122	65	14	2	0	0	0
21:00	230	38	33	5	0	0	0	0	7	48	101	58	11	3	0	0	0
22:00	183	39	34	5	0	0	0	1	5	35	76	51	13	2	0	0	0
23:00	131	39	34	5	0	0	0	1	3	24	53	34	13	3	1	0	0
Total																	
12H(7-19)	9351	37	32	5	0	23	20	59	312	2277	4275	2036	321	25	2	0	0
16H(6-22)	10783	38	32	5	0	24	20	62	355	2601	4890	2388	400	37	3	1	1
18H(6-24)	11096	38	32	5	0	25	20	63	363	2660	5020	2472	425	42	4	1	1
24H(0-24)	11488	38	33	5	0	25	20	64	367	2702	5129	2608	500	62	9	1	1
AM Peak																	
	08:00	04:00	04:00	03:00	11:00	09:00	09:00	09:00	08:00	07:00	08:00	08:00	08:00	05:00	04:00	11:00	11:00
	899	44	38	6	0	3	3	7	30	180	407	243	40	10	2	0	0
PM Peak																	
	16:00	23:00	23:00	23:00	23:00	13:00	12:00	15:00	16:00	16:00	16:00	15:00	13:00	21:00	23:00	21:00	20:00
	981	39	34	5	0	3	2	8	41	292	481	188	31	3	1	0	0

Local Events Included & Include All Globals

Printed at: 11:03 on 12 December 2019

APPENDIX 3.

PUBLIC RIGHT OF WAY 67W ROUTE PLAN

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F.P. 67W

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— Approx Route of Public Footpath

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Selsfield Road Turners Hill

Local Development

N
1:2,500

APPENDIX 4.

BUS TIMETABLES

Talking
busMondays to Saturdays
from 1st June 2020

Mondays to Saturdays

Code	SDO	MF	SH	SSH	SSH
Crawley Bus Station, Stop D	0716	0718	0935	1135	1335 1610
Three Bridges Station, Stop B	0722	0724	0941	1141	1341 1616
Pound Hill Worth Road Parade	0723	0725	0943	1143	1343 1618
Tulleys Farm	0729	0731	0949	1149	1349 1624
Turners Hill Crown	0736	0736	0954	1154	1354 1629
Turners Hill Park	↓	↓	0956	1156	1356 1631
Turners Hill Crown	0736	0736	0958	1158	1358 1634
West Hoathly Broadfield	0742	0742	1004	1204	1404 1640
Sharpthorne Station Road	0745	0745	1007	1207	1407 1643
Standen	0753	0753	1015	1215	1415 1651
Dunnings Coronation Road	0755	0755	1017	1217	1417 1653
East Grinstead Brooklands Way (for Stn)	0758	0758	1021	1221	1421 1657
Herontye Drive	0802	0802	1025	1225	1425 1701
East Grinstead War Memorial	0806	0806	1029	1229	1429 1705
Imberhorne Upper School	0814

CODE:

SDO	Schooldays only.
MF	Mondays to Fridays School Holidays only.
h	Historic Building.
st	Rail Station nearby.
st	Preserved Railway Station nearby.

Mondays to Saturdays

Code	MF	SAT	MF	SDO	SSH
Sackville School A22	1505
East Grinstead War Memorial	0722	0805	0835	1035	1235 1508 1516 1710
East Grinstead Brooklands Way (for Stn)	0724	0807	0839	1039	1239 1512t 1520 1714
Imberhorne Upper School	↓	↓	↓	↓	1520 ↓
Dunnings Coronation Road	0727	0810	0843	1043	1243 ↓ 1523 1717
Standen	0729	0812	0845	1045	1245 ↓ 1525 1719
Sharpthorne Station Road	0738	0819	0853	1053	1253 1533 1533 1727
West Hoathly Broadfield	0740	0821	0855	1055	1255 1535 1535 1729
Turners Hill Crown	0751	0828	0902	1102	1302 1543 1543 1737
Turners Hill Park	0753	0830	0904	1104	1304 ↓ 1739
Turners Hill Crown	0756	0832	0906	1106	1306 1543 1543 1742
Tulleys Farm	0759	0835	0909	1109	1309 1546 1546 1745
Pound Hill Worth Road Parade	0808	0841	0916	1116	1316 1552 1552 1751
Three Bridges Station, Stop A	0812	0843	0918	1118	1318 1554 1554 1753
Crawley Bus Station	0819h	0848	0924	1124	1324 1600 1600 1758

CODE:

MF	Mondays to Fridays only.
SAT	Saturdays only.
SDO	Schooldays only.
SSH	Saturdays and School Holidays.
h	Continues to St. Wilfrid's School as Route 23 on Schooldays.
t	Time at East Grinstead Station - does not serve Brooklands Way.
h	Historic Building.
st	Rail Station nearby.
st	Preserved Railway Station nearby.

No service on Sundays or Public Holidays

Service 84 is supported by



Talking
busMondays to Saturdays
from 1st September 2020

Crawley Copthorne Crawley Down Turners Hill Ardingly Lindfield Haywards Heath Princess Royal Hospital Wivelsfield World's End Burgess Hill Hassocks Patcham Brighton R.S.C.H.

Mondays to Fridays

Crawley Bus Station, Stop D	0655	0736	0849	1040	1240	1456	...	1715	1935	...
Three Bridges Station, Stop B	0700	0742	0855	1046	1246	1503	...	1723	1941	...
Copthorne Hotel	0705	0749	0901	1051	1251	1509	...	1729	1946	...
Copthorne Dukes Head	0553	...	0708	0752	0904	1054	1254	1512	...	1732	1949	...
Crawley Down War Memorial	0556	...	0711	0755	0907	1057	1257	1515	...	1735	1952	...
Turners Hill Crown	0602	...	0717	0804	0914	1104	1304	1522	...	1742	1957	...
Wakehurst	↓	...	0724	0811	0921	1111	1311	1529	...	1749	↓	...
Ardingly Hapstead Hall	0611	...	0729	0817	0926	1116	1316	1534	...	1753	2006	...
Lindfield High Street	0618	...	0736	0824	0933	1123	1323	1541	...	1800	2013	...
Haywards Heath Perrymount Road (arr)	0623	...	0742	0832	0938	1128	1328	1546	...	1805	2017	...

Guaranteed connection available; passengers do not need to change vehicles

Haywards Heath Perrymount Road (dep)	0624	...	0742	0832	0940	1130	1330	1548	1700	1807	2018	2123
Haywards Heath South Road	0627	...	0746	0836	0945	1135	1335	1553	1705	1812	2021	2126
Princess Royal Hospital	0631	0735	0749	0840	0950	1140	1340	1558	1710	1817	2025	2130
Wivelsfield Ote Hall Chapel	0636	0740	0955	1145	1345	1603	1715	1822	2030	2135
World's End Janes Lane	0641	0745	1000	1150	1350	1608	1720	1827	2035	2140
Burgess Hill Rail Station	0645	0750	1005	1154	1354	1613	1725	1831	2038	2143
Burgess Hill Church Road	0647	0753	1008	1157	1357	1616	1728	1834	2040	2145
Hassocks Stone Pound	0656	0804	1017	1206	1406	1626	1740	1843	2047	2152
Pyecombe Garage	0701	0809	1022	1210	1410	1630	1745	1847	2051	2156
Patcham Black Lion	0705	0813	1026	1214	1414	1634	1749	1851	2055	2200
Preston Road Harrington Road	0709	0819	1030	1218	1418	1638	1753	1855	2058	2203
Brighton Old Steine	0721	0835	1043	1231	1431	1652	1808	1908	2109	2213
Royal Sussex County Hospital	0728	0843	1050	1238	1438	1700	1816	1915	2115	2219

Saturdays

Crawley Bus Station, Stop D	0750	0844	1040	1240	1440	1710
Three Bridges Station, Stop B	0755	0849	1046	1246	1446	1716
Copthorne Hotel	0800	0854	1051	1251	1451	1721
Copthorne Dukes Head	0802	0857	1054	1254	1454	1724
Crawley Down War Memorial	0805	0900	1057	1257	1457	1727
Turners Hill Crown	0812	0907	1104	1304	1504	1734
Wakehurst Car Park	0818	0913	1111	1311	1511	1741
Ardingly Hapstead Hall	0822	0918	1116	1316	1516	1745
Lindfield High Street	0829	0925	1123	1323	1523	1752
Haywards Heath Perrymount Road (arr)	0834	0930	1128	1328	1528	1757

Guaranteed connection; passengers do not need to change vehicles

Haywards Heath Perrymount Road (dep)	0834	0932	1130	1330	1530	1757
Haywards Heath South Road	0837	0936	1135	1335	1535	1800
Princess Royal Hospital	0840	0940	1140	1340	1540	1802
Wivelsfield Ote Hall Chapel	...	0945	1145	1345	1545	...
World's End Janes Lane	...	0950	1150	1350	1550	...
Burgess Hill Rail Station	...	0954	1154	1354	1554	...
Burgess Hill Church Road	...	0957	1157	1357	1557	...
Hassocks Stone Pound	...	1006	1206	1406	1606	...
Pyecombe Garage	...	1010	1210	1410	1610	...
Patcham Black Lion	...	1014	1214	1414	1614	...
Preston Road Harrington Road	...	1018	1218	1418	1618	...
Brighton Old Steine	...	1031	1231	1431	1631	...
Royal Sussex County Hospital	...	1038	1238	1438	1638	...

No service on Sundays or Public Holidays

CODE: Rail Station nearby. Historic Building and Gardens.

Service 272 is
partly supported by



Talking bus

Mondays to Saturdays
from 1st September 2020

R.S.C.H. Brighton
Patcham
Hassocks
Burgess Hill
World's End
Wivelsfield
Princess Royal Hospital
Haywards Heath
Lindfield
Ardingly
Turners Hill
Crawley Down
Copthorne
Crawley



Mondays to Fridays

Code						SDX					
Royal Sussex County Hospital	0637	0856	1100	1250	1505	1713	1827	2025	2125
Brighton Old Steine	0644	0905	1108	1258	1513	1722	1835	2031	2131
Preston Road Harrington Road	0653	0915	1117	1307	1523	1733	1844	2039	2138
Patcham Black Lion	0658	0923	1124	1314	1531	1742	1852	2044	2143
Pyecombe Garage	0702	0927	1128	1318	1535	1746	1856	2047	2146
Hassocks Stone Pound	0706	0932	1133	1323	1540	1751	1901	2051	2150
Burgess Hill Church Road	0714	0942	1143	1333	1552	1802	1911	2058	2157
Burgess Hill Rail Station 🚉	0715	0943	1144	1334	1553	1803	1912	2059	2158
World's End Janes Lane	0719	0948	1149	1339	1558	1808	1917	2103	2202
Wivelsfield Ote Hall Chapel	0723	0952	1153	1343	1602	1812	1921	2107	2206
Princess Royal Hospital	0730	1000	1050	1200	1350	1609	1821	1928	2113	2212
Haywards Heath South Road	1003	1053	1203	1353	1612	1823	1930	2115	2214
Haywards Heath Perrymount Road 🚉 (arr).....	1007	1057	1207	1357	1616	1827	1933	2118	2217

Guaranteed connection to Crawley available; passengers do not need to change vehicles

Haywards Heath Perrymount Road (dep)...	1009	1057	1209	1359	1523	1619	1829	2218
Oathall Community College	1014	1102	1214	1404	1527	1624	1834	2222
Lindfield High Street	1021	1109	1221	1411	1534	1631	1841	2229
Ardingly Hapstead Hall	1024	1112	1224	1414	1537	1634	1844	2232
Wakehurst	1031	1119	1231	1421	1544	1641	1850	2238
Turners Hill Crown	1036	1124	1236	1426	1549	1647	1855	2242
Crawley Down War Memorial	1039	1127	1239	1429	1552	1651	1858	2245
Copthorne Dukes Head	1042	1130	1242	1432	1555	1654	1901	2247
Copthorne Hotel	1047	1135	1247	1437	1601	1700	1906	2252
Three Bridges Station	1053	1141	1253	1443	1607	1706	1911	2256
Crawley Bus Station								

Saturdays

Royal Sussex County Hospital	1050	1250	1450	1650
Brighton Old Steine.....	1058	1258	1458	1658
Preston Road Harrington Road.....	1107	1307	1507	1707
Patcham Black Lion.....	1114	1314	1514	1714
Pyecombe Garage.....	1118	1318	1518	1718
Hassocks Stone Pound.....	1123	1323	1523	1723
Burgess Hill Church Road.....	1133	1333	1533	1733
Burgess Hill Rail Station 	1134	1334	1534	1734
World's End Janes Lane.....	1139	1339	1539	1739
Wivelsfield Ote Hall Chapel.....	1143	1343	1543	1743
Princess Royal Hospital	0850	1150	1350	1550
Haywards Heath South Road.....	0853	1153	1353	1553
Haywards Heath Perymount Road  (arr).....	0857	1157	1357	1557

Guaranteed connection available; passengers do not need to change vehicles

Haywards Heath Perrymount Road (dep).....	0857	1159	1359	1559	1759
Lindfield High Street.....	0902	1204	1404	1604	1804
Ardingly Hapstead Hall.....	0909	1211	1411	1611	1811
Wakehurst ￼ ￼.....	0912	1214	1414	1614	1814
Turners Hill Crown.....	0919	1221	1421	1621	1820
Crawley Down War Memorial.....	0924	1226	1426	1626	1825
Copthorne Dukes Head.....	0927	1229	1429	1629	1828
Copthorne Hotel.....	0930	1232	1432	1632	1831
Three Bridges Station ￼.....	0935	1237	1437	1637	1836
Crawley Bus Station ￼.....	0941	1243	1443	1643	1841

No service on Sundays or Public Holidays

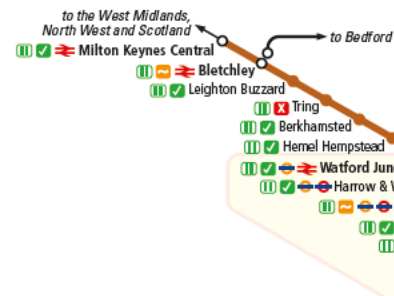
CODE: Rail Station nearby. Historic Building and Gardens.

SDX School days only. THIS JOURNEY IS TEMPORARILY AVAILABLE TO SCHOOL CHILDREN ONLY.

Service **272** is partly supported by  west sussex county council

APPENDIX 5.

SOUTHERN RAILWAY NETWORK MAP



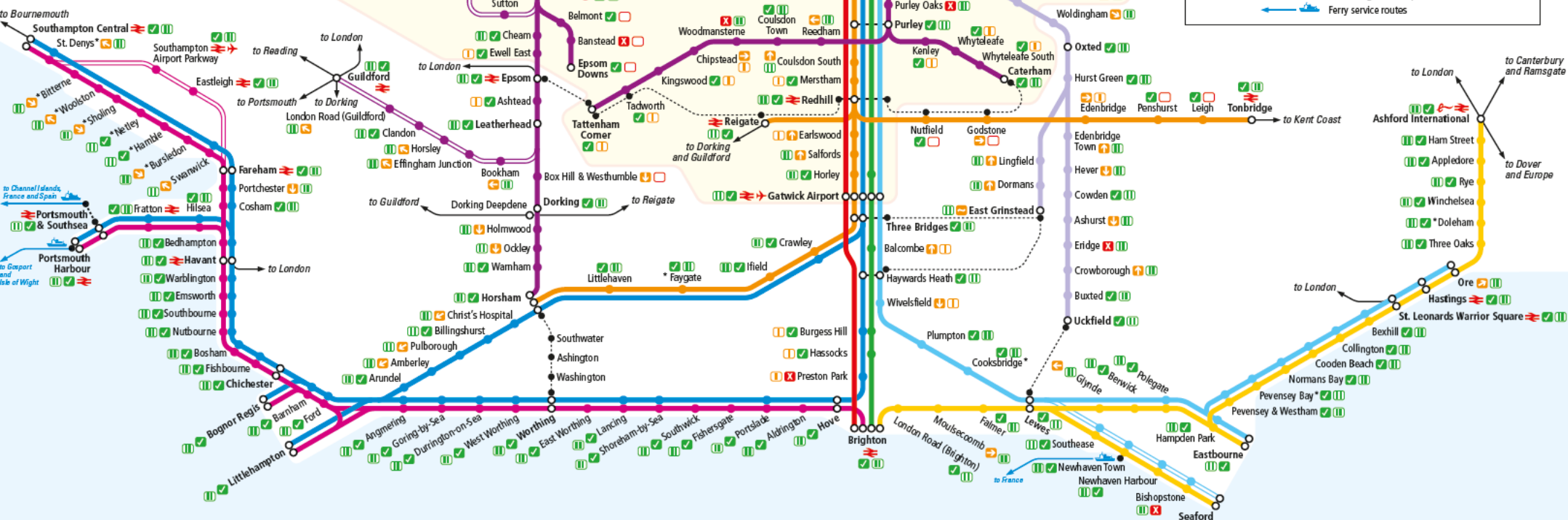
ACCESSIBILITY

- Step-Free access between the street and all platforms
 - Some step-free access between the street and platforms
 - Step-free access is available in the direction of the arrow
 - No step-free access between the street and platforms
- Notes:
- Platform access points may vary and there may not be step-free access to or between all station areas or facilities. Access routes may be unsuitable for unassisted wheelchair users owing to the gradient of ramps or other reasons.
- Step-free access between train and platform requires a staff-operated ramp. If you require a ramp or need help getting on or off trains, please book this in advance and we will make sure staff are available to help, otherwise there might be a significant delay to your journey.

Gatwick Express and Southern Assisted Travel: 0800 138 1016

STAFF AVAILABILITY

- On-train or station staff available at all times
- On-train or station staff available at certain times only
- No on-train or station staff available



SERVICES AND FACILITIES

This is a general guide to the basic daily services. Not all trains stop at all stations on each coloured line, so please check the timetable. Routes are shown in different colours to help identify the general pattern.

Gatwick Express

REGULAR SERVICE	ROUTE IDENTITY
	GX1 Gatwick Express

Southern

LIMITED SERVICE	REGULAR SERVICE	ROUTE IDENTITY
		SN1 Brighton MainLine
		SN2 West London
		SN3 Metro
		SN4 Oxted
		SN5 Redhill
		SN6 Mainline West
		SN7 Mainline East
		SN8 Coastway West
		SN9 Coastway East

Other train operators may provide additional services along some of our routes.

- Other train operators' routes
- Bus links
- Faygate*
- Limited service stations on our network
- Principal stations
- Interchange with London Underground
- Interchange with London Overground
- Interchange with London Tramlink
- Interchange with Eurostar
- Interchange with other operators' train services
- Interchange with Airports
- Ferry service routes

APPENDIX 6.

ADOPTED HIGHWAY PLAN



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Date: 17/12/2019

Scale: 1:1,250

Information about the status of a highway, and in some circumstances the extent of the highway, may be taken from a number of sources held by the County Council. Unless taken from a legal agreement the information should be regarded as guidance only.

Local Development

for Customers and Communities



APPENDIX 7.

STAGE 1 ROAD SAFETY AUDIT

REEVES TRANSPORT PLANNING
PROPOSED ACCESS ARRANGEMENTS
WITHYPITTS FARM RESIDENTIAL DEVELOPMENT

ROAD SAFETY AUDIT STAGE 1
FEBRUARY 2020

CONTENTS

	Page No.
1. Introduction	2
2. Stage 1 Road Safety Audit	4
3. Audit Team Statement	6

Appendix

- A. Schedule of Documents Examined
- B. Annotated Drawings

1.0 INTRODUCTION

1.1 This report presents the findings of a Stage 1 Road Safety Audit (preliminary design) into proposals for new access arrangements at Withypitts Farm, Selsfield Road, Turners Hill.

1.2 This Audit was carried out at the request of Mr Steve Reeves of Reeves Transport Planning and the Audit Team has acted independently of the Design Team and has had no prior involvement in the project.

1.3 This Audit comprised a site visit and an examination of the documents listed in Appendix A. The site visit was carried out on Monday 16th February 2020 in daylight. The visit occurred between the hours of 10:30–11:00 and during the visit the weather was dry but with good visibility. Record photographs were taken.

1.4 The Audit Team membership was as follows:

Laurence Shaw MCIHT MSoRSA Cert Comp	Team Leader
Roger Harper BSc (Eng) FIHE IEng	Team Member

1.5 The report has been prepared in accordance with General Principles and Scheme Governance General Information, GG 119, Road Safety Audit. The audit team has only reported on the road safety implications of the existing and proposed facilities and has not examined or verified the compliance of the design or any other criteria.

1.6 The works to be included are a new access to the west of Selsfield Road and a new mini-roundabout at the access road.

1.7 Selsfield Road has a 40mph speed limit at the existing access to Withypitts Farm but the speed limit changes immediately changes to 30mph north of the access. The road does not have a system of street lighting in the vicinity of the site. No night visit was carried out in connection with this audit at this time.

- 1.8** All comments and recommendations are referenced to the design drawings and the locations have been indicated on the plans supplied with the Audit Brief, annotated copies of which are attached to this report.
- 1.9** No departures from standard have been advised to the Auditor by the design team.
- 1.10** This is a Stage 1 Road Safety Audit and it has been noted that details of drainage, landscaping, street lighting, bollards and signing, etc. are not included in the information provided to the Audit Team and that any such information will be provided to the Audit Team at Stage 2 RSA unless a problem is noted as a result of the site inspection.
- 1.11** This Road Safety Audit has been prepared in accordance with the instructions from, and for the specific use of Reeves Transport Planning and its clients. The authors shall not be liable for the information contained in this report if used for any purpose other than that for which it was provided in connection with their appointment as road safety auditors.

2.0 ISSUES ARISING FROM STAGE 1 ROAD SAFETY AUDIT

2.1 Problem

Location: Proposed Mini-Roundabout.

Summary: Sub-standard inter-visibility for minor arm of junction may lead to accidents.

The Audit Team noted that the inter-visibility between vehicles on the side road and traffic travelling on the main road is sub-standard and does not conform to Section 5 visibility standard D, E & F of design standard CD116 of Design Manual of Roads & Bridges (DMRB). This will increase collision risk between vehicles emerging from the side road and those travelling on the main road.

Recommendation

It is recommended that the mini-roundabout is replaced and the proposed access is redesigned as a Priority Junction in accordance with design standard CD123 (DMRB).

2.2 Problem

Location: North of the proposed mini-roundabout.

Summary: Existing signage and other street furniture may lead to accidents.

The Audit Team noted that the existing signage and other street furniture (telegraph pole) would block the proposed footway and may cause pedestrians to enter the carriageway leading to possible pedestrian/vehicle collisions.

Recommendation

It is recommended that either the proposed footway is of a width adequate to allow the signage and the telegraph pole to be retained or the signage and the telegraph pole are resited.

3.0 AUDIT TEAM STATEMENT

ROAD SAFETY AUDIT STAGE 1

I certify that this road safety audit has been carried out in accordance with General Principles and Scheme Governance General Information, GG 119, Road Safety Audit (Formerly HD 19/15).

Audit Team Leader

L. E. Shaw MCIHT MSoRSA
Senior Associate
Laurence Shaw Associates
Downsview
Poynings Road
Poynings
West Sussex
BN45 7AH

Signed



Date 20th February 2020

Audit Team Member

Roger Harper BSc (Eng) FIHE IEng

Signed



Date 20th February 2020

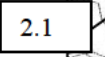
APPENDIX A

Schedule of documents examined

Drawing No.	Rev	Title	Description	Scale
WF/SR/3003	B	Withypitts Farm	Mini-roundabout	1:1250 @ A3
16981219	-	Withypitts Farm Selsfield Road	Site Plan	1:250

B2028 Selsfield Road 7 day Speed Survey

SCHEME DRAWING



Stage 1 Road Safety Audit Designer's Response
WITHYPITTS FARM SELSFIELD ROAD TURNERS HILL CRAWLEY RH104PP
SEPTEMBER 2020



Reeves Transport Planning

PRODUCED by REEVES TRANSPORT PLANNING LTD
DR/SGR/WPF/140620/V2

AUTHORISATION SHEET

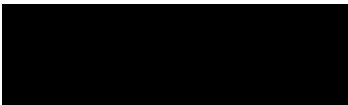
Project: Proposed access to serve potential residential development of land
at Withypitts Farm Selsfield Road Turners Hill Crawley RH104PP.

Report Title: Stage 1 Road Safety Audit Designer's Response Report

PREPARED BY:

Name: Steve Reeves

Position: Design Leader

Signed: 

Organisation: Reeves Transport Planning

Date: 15th September 2020

APPROVED BY:

Name: Steve Reeves

Position: Project Sponsor

Signed: 

Organisation: Reeves Transport Planning

Date: 15th September 2020

Route Name: Selsfield Road

Scheme: New mini roundabout serving as site access

Road Safety Audit: Stage 1

Introduction

- 1.1 Reeves Transport Planning is commissioned to provide services in support of a proposed development on land at Withypitts Farm Selsfield Road Turners Hill Crawley RH104PP.
- 1.2 The proposal is to develop the redundant farm to serve a residential development of circa 16 dwellings. No formal design of the layout, parking supply, or circulation routes have been established. Given the constraints of the access options it has been deemed appropriate to establish whether the principle of an access can be established as acceptable before detailed consideration of the internal layout.

Current Conditions

- 1.2.1 The gradient along the relevant section of Selsfield Road is steep, currently 7.68% to the north, and 5.26% to the south of Withypitts Farm access. This is the average over the required Stopping Sight Distance (discussed below). It should be noted that sections of Selsfield Road exceed these averages, with gradient a maximum gradient of just over 8%. Design Manual for Roads and Bridges (DMRB) notes that direct access should not be provided where gradients on the approaches to junction exceed 4%.
- 1.2.2 The traffic speeds are just over the 60km/h triggering the use of DMRB design standards. We have assumed the worst case that WSCC will require the DMRB standard. The Stopping Sight Distance (SSD) taking into consideration the gradient, can be secured on land under my clients control or adopted highway.

Design Consideration

- 1.3.1 LTN 1/07 – Traffic Calming notes *'for maximum benefit, gateways need to be used in conjunction with other measures with the village, so that drivers are made*

aware that lower speeds are required throughout'. Depending on the type of treatment, 85th percentile traffic speeds can be reduced by between 3mph and 10mph.

- 1.3.2 The introduction of a gateway feature associated with moving the limit of the 30mph TRO, mini-roundabout, and new section of footway could, in combination with existing features to the north, help reduce traffic speeds to between 28mph and 35mph. This would bring the 85th percentile traffic speed to within the range where a mini roundabout would be a suitable access configuration.
- 1.3.3 West Sussex County Council appear to accept the principle of accesses, served by major roads with gradients that exceed 4%, similar to our proposal. For example, the site known as Clock Field, on the B2028 North Street, the north side of the village, is served via a mini roundabout but the overall gradient of North Street averages 8.7%.

Proposal

- 1.4.1 Reflecting the approved access serving the Clock Field development we have considered a mini roundabout serving the development site is the most appropriate option. This will also maximise the benefits of the moved 30mph limit.
- 1.4.2 The proposal will include a new section of footway that will connect Withypitts Farmhouse, and development derived pedestrians with the existing footway that terminates at 66 Selsfield Road. The properties known as 64 & 65 Selsfield Road, will be demolished to achieve the required visibility at the new junction. All works can be undertaken on land that is either adopted as public highway or under the control of our client.

2. Issues Raised at the Stage 1 Audit and the Designer's Response

2.1 Problem

Location: Proposed Mini-Roundabout.

Summary: Sub-standard inter-visibility for minor arm of junction may lead to accidents.

The Audit Team noted that the inter-visibility between vehicles on the side road and traffic travelling on the main road is sub-standard and does not conform to Section 5 visibility standard D, E & F of design standard CD116 of Design Manual of Roads & Bridges (DMRB). This will increase collision risk between vehicles emerging from the side road and those travelling on the main road.

Recommendation

It is recommended that the mini roundabout is replaced, and the proposed access is redesigned as a Priority Junction in accordance with design standard CD123 (DMRB).

DESIGNER'S RESPONSE

The proposed junction has been modified to provide a Priority Junction in accordance with design standard CD123 (DMRB). A copy of the new layout is attached at Appendix 2.

AUDIT TEAM COMMENT

Agreed – No further comment needed.

2.2 Problem

Location: North of the proposed mini roundabout.

Summary: Existing signage and other street furniture may lead to accidents.

The Audit Team noted that the existing signage and other street furniture (telegraph pole) would block the proposed footway and may cause pedestrians to enter the carriageway leading to possible pedestrian/vehicle collisions.

Recommendation

It is recommended that either the proposed footway is of a width adequate to allow the signage and the telegraph pole to be retained or the signage and the telegraph pole are re-sited.

DESIGNER'S RESPONSE

Infrastructure noted above will be re-positioned to allow adequate footway width as part of the detailed design.

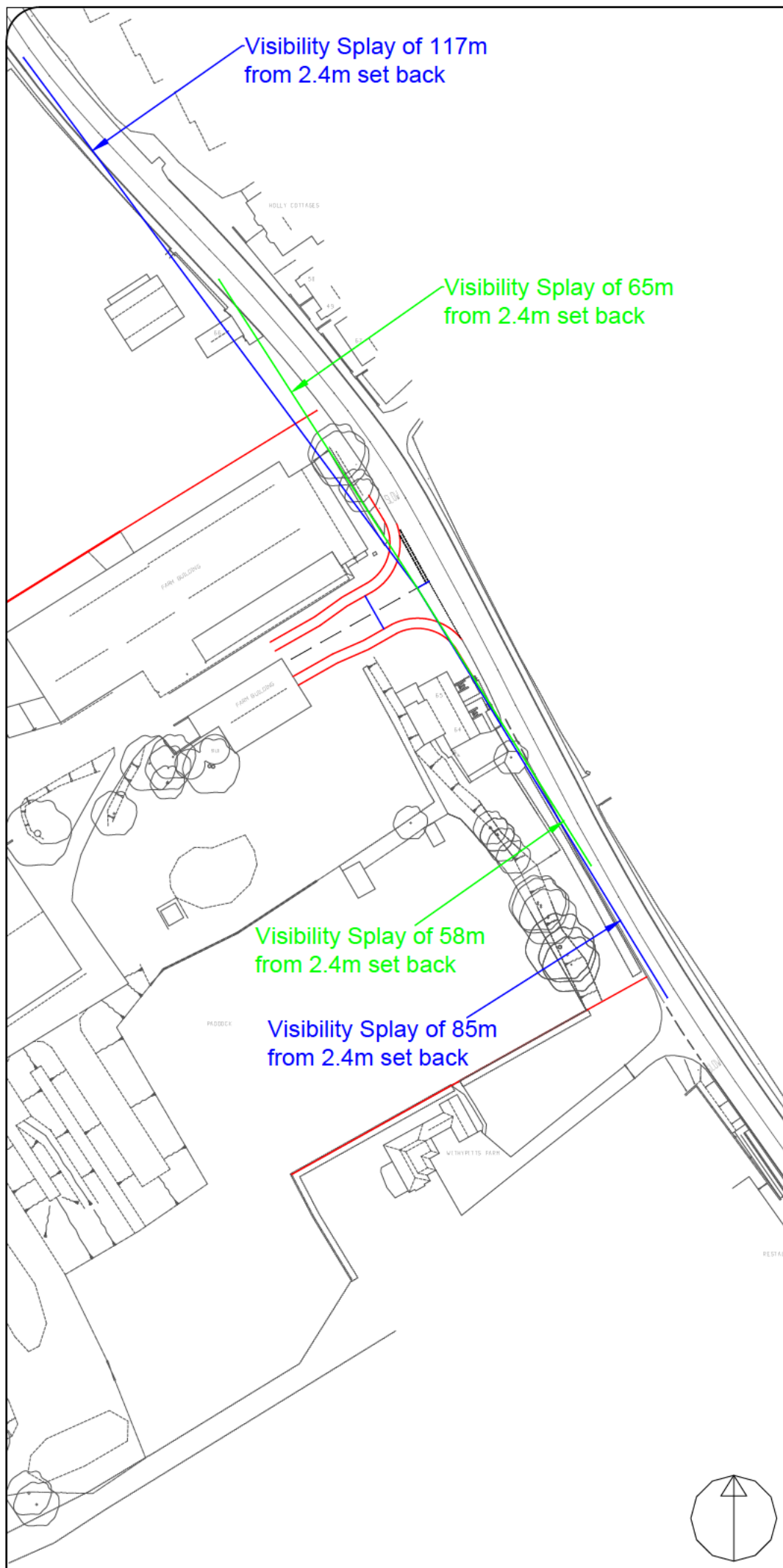
AUDIT TEAM COMMENT

Agreed – No further comment needed.

APPENDIX 1: TRAFFIC SPEED SURVEY RESULTS

(Attached at Appendix 2 of the Transport Statement)

APPENDIX 2: ACCESS LAYOUT DRAWING (WF/SR/3004 REV B.)



KEY:

Rev	Date	Details Of Issue

ORIGINAL BASE DRAWING PROVIDED BY OTHERS. BTM SHALL NOT BE LIABLE FOR ANY INACCURACIES OR DEFICIENCIES.



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Project

Withypitts Farm

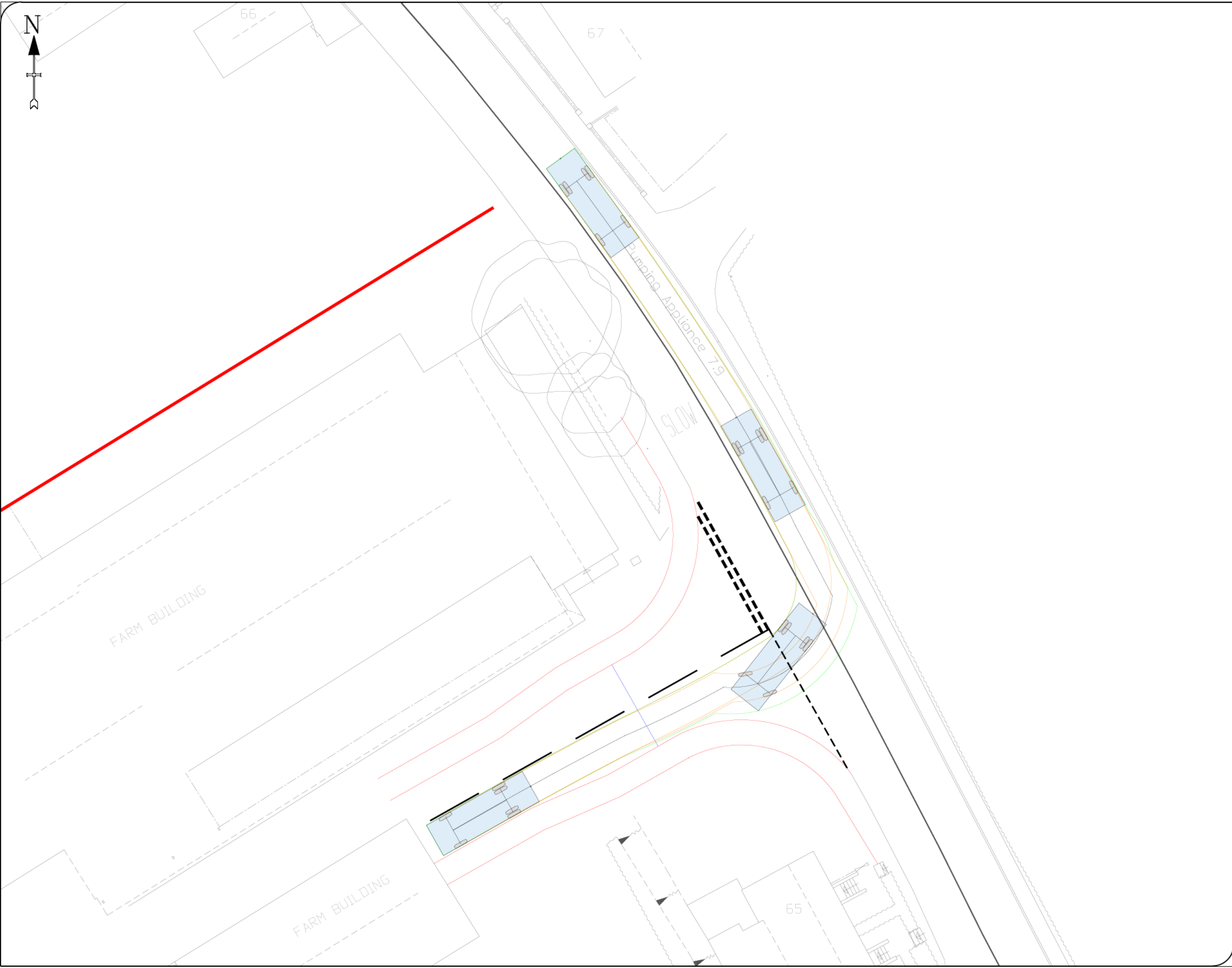
T Junction with Visibility Splays

Drawn BTM	Date 07/07/2020	Scale (at A3) 1:1000
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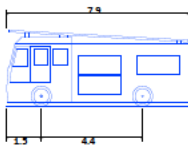
Dwg no. WF/SR/3004	Revision No. B
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APPENDIX 8.

SWEPT PATH ANALYSES



VEHICLE DETAILS:



Green-line shows body
Orange-line shows axle/wheels

PUMPING APPLIANCE

Overall Length	7.900m
Overall Width	2.500m
Overall Body Height	3.300m
Min Body Ground Clearance	0.140m
Track Width	2.500m
Lock to Lock Time	4.00s
Kerb to Kerb Turning Radius	7.750m

Design speed 5kph for all Forward movements
Design speed 2.5kph for all Reverse movements

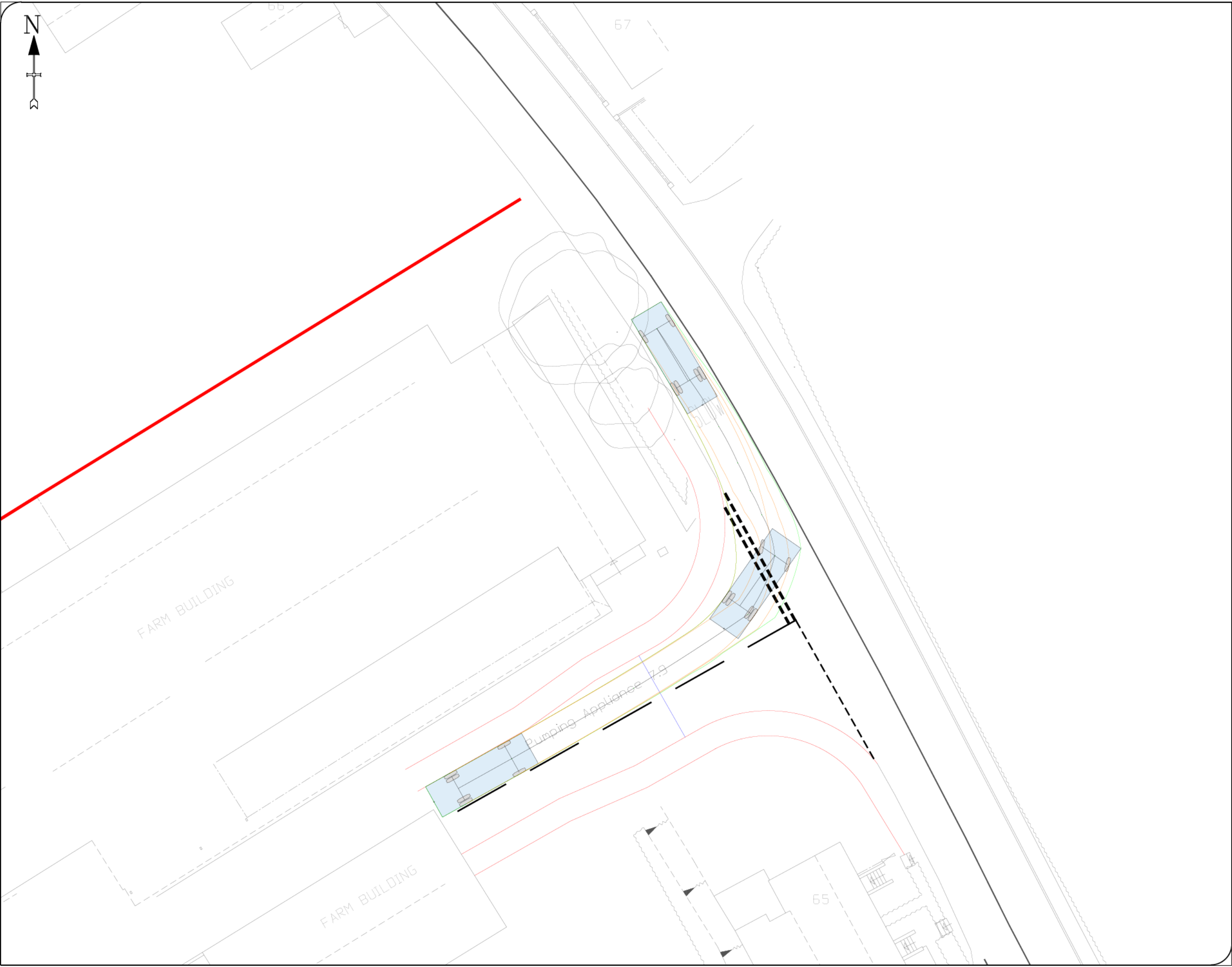
Rev	Date	Details Of Issue

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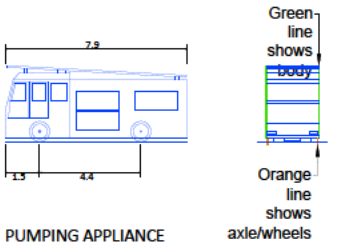


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Project		
Withypitts Farm		
Swept Path Analysis for 7.9m Fire Appliance IN		
Drawn	Date	Scale (at A3)
BTM	19/09/2020	1 250
Orig no.	Revision No.	
WF/SR/4005	A	



VEHICLE DETAILS:



Overall Length	7.900m
Overall Width	2.500m
Overall Body Height	3.300m
Min Body Ground Clearance	0.140m
Track Width	2.500m
Lock to Lock Time	4.00s
Kerb to Kerb Turning Radius	7.750m

Design speed 5kph for all Forward movements
Design speed 2.5kph for all Reverse movements

Rev	Date	Details Of Issue

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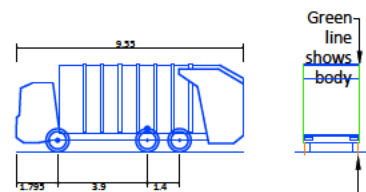
Project
Withypitts Farm

Swept Path Analysis for
7.9m Fire Appliance OUT

Drawn	Date	Scale (at A3)
BTM	19/09/2020	1 250
Orig no.	Revision No.	
WF/SR/4006	A	



VEHICLE DETAILS:



LARGE REFUSE VEHICLE (3 AXLE) axle/wheels

Overall Length	9.550m
Overall Width	2.450m
Overall Body Height	3.814m
Min Body Ground Clearance	0.366m
Track Width	2.450m
Lock to Lock Time	4.00s
Kerb to Kerb Turning Radius	9.500m

Design speed 5kph for all Forward movements
Design speed 2.5kph for all Reverse movements

Rev	Date	Details Of Issue

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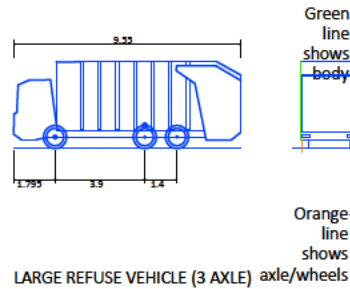


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Project		
Withypitts Farm		
Swept Path Analysis for 9.550m Refuse Vehicle IN		
Drawn	Date	Scale (at A3)
BTM	19/09/2020	1 250
Orig no.	Revision No.	
WF/SR/4007	A	



VEHICLE DETAILS:



Overall Length	9.550m
Overall Width	2.450m
Overall Body Height	3.814m
Min Body Ground Clearance	0.366m
Track Width	2.450m
Lock to Lock Time	4.00s
Kerb to Kerb Turning Radius	9.500m

Design speed 5kph for all Forward movements
Design speed 2.5kph for all Reverse movements

Rev	Date	Details Of Issue

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Project
Withypitts Farm

Swept Path Analysis for
9.550m Refuse Vehicle OUT

Drawn	Date	Scale (at A3)
BTM	19/09/2020	1:250
Orig no.	Revision No.	
WF/SR/4008	A	

APPENDIX 9.

EXTANT USE TRIP RATE INFORMATION



E-mail : BenL@rhrwclutton.co.uk
Our Ref : GHB/BL/19/337

Ms Olivia Dickie BSc (Hons)
Strutt & Parker
201 High Street
Lewes
BN7 2NR

28th September 2020

Dear Olivia,

Paddockhurst Estate – Withypitts Farm - Agricultural Traffic Movements

As discussed, I set out below our estimate of agricultural vehicle movements at Withypitts Farm, Selsfield Road, Turners Hill, West Sussex, RH10 4PP.

1. Existing Activities

Withypitts Farm is predominantly a livestock farm which supports a beef suckler herd and a flock of commercial mule ewes. The yard and buildings provide livestock housing, storage for hay, straw and machinery, as well as being the base from which agricultural contracting activities take place and a haylage enterprise operates. The land is not all contiguous to the buildings and therefore regular access is required onto Selsfield Road is required for all livestock operations.

2. Traffic Movements

The extent of vehicular movements is understandably seasonal, in line with agricultural activities, with peak movements in the summer and reduced movements in the winter when operations largely relate to livestock husbandry.

The movements generated by the livestock enterprise would incorporate visits to check on stock, movement of feed to outlying land, transport of livestock to outlying land, together with visits throughout the year by a vet, sheep shearers and purchasers of finished or store animals. Our estimate of vehicle movements at 'off-peak' times, being October to April, would be:

- | | |
|----------------------------------|--------------------|
| • Pick-up truck and trailer | 3-4 movements/day |
| • Pick-up truck | 8-10 movements/day |
| • Casual visitors/other vehicles | 3-4 movements/day |

During the Spring and Summer far more regular vehicular movements can be expected, initially as a result of lambing requiring more frequent inspections of livestock but subsequently for muck-spreading and

Directors

G.H. Back BSc Hons MRICS V.A. Back BA Hons

Rural Agency

J.P.B Tillard MRICS

Commercial Agency

R.C. Grassly BSc MRICS

Manager

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Estate Agency

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Consultants

T.M.M. Raikes FRICS

T.J.B Hutchings FRICS FAAV

R. Windle FRICS FAAV

grassland operations in the Spring before the carting of silage and hay takes place in the Summer and straw following harvest. At this time casual labour would be required and therefore the arrival and departure of these employees would create further movements. Our estimate of vehicle movements at 'peak' times, being May to September, are:

- Tractor and trailer/farm equipment 15-20 movements/day
- Pick-up truck and trailer 8-10 movements/day
- Pick-up truck 8-10 movements/day
- Casual visitors/other vehicles 5-6 movements/day

The arable contracting operations will create some movements throughout the year however these would be greatest through the Summer from silaging in May through to the autumn cultivations in September/October. The haylage enterprise would largely generate vehicular movements throughout the winter when customers require feed for their stabled horses. An estimate of the movements resulting is therefore:

- Silaging/Haymaking – May-June – approximately 20-30 movements/day
- Harvest/Baling – July-September – approximately 20-30 movements/day
- Autumn cultivations – September-October – approximately 6-8 movements/day
- Haylage Enterprise – September-April – approximately 4-6 movements/day

3. Summary

A summary of the estimated vehicle movements is enclosed in table form, identifying the maximum and minimum estimates throughout the year. Taking this into account, it can be estimated that the total daily average vehicle movements at Withypitts Farm is up to **50 movements per day**. It should be noted that the above account of activities is not necessarily exhaustive and other activities could operate from the yard which would increase vehicular movements. Finally, the above figure also excludes the vehicular movements from the residential properties at 65 & 66 Selsfield Road which share the entrance to the farm.

Should you have any queries regarding the above then please do not hesitate to contact me.

Yours sincerely,



Ben Lee MRICS FAAV
For and on behalf of RH & RW Clutton Property Ltd

Withpitts Farm - Current Trip Rates

Farming Activities

No. Days	7	6	5
May to Sept	153	131	110
<i>Tractor etc</i>			
15	2295	1965	1650
20	3060	2620	2200
<i>Truck/Trailer</i>			
8	1224	1048	880
10	1530	1310	1100
<i>Truck</i>			
8	1224	1048	880
10	1530	1310	1100
<i>Casual</i>			
5	765	655	550
6	918	786	660
Sub Total			
Min	5508	4716	3960
Max	7038	6026	5060
Oct to Apr	212	182	151
<i>Truck/Trailer</i>			
3	636	546	453
4	848	728	604
<i>Truck</i>			
8	1696	1456	1208
10	2120	1820	1510
<i>Casual</i>			
3	636	546	453
4	848	728	604
Sub Total			
Min	2968	2548	2114
Max	3816	3276	2718
Total			
Min	8476	7264	6074
Max	10854	9302	7778
Daily Average			
Min	23.2	23.2	23.3
Max	29.7	29.7	29.8

Contracting Activities

May to June	61	52	43
<i>Silaging/Haymaking</i>			
20	1220	1040	860
30	1830	1560	1290
July to Sept	92	79	66
<i>Harvet/Baling</i>			
20	1840	1580	1320
30	2760	2370	1980
Sept to Oct	61	52	43
<i>Autumn cultivations</i>			
6	366	312	258
8	488	416	344
Sept to Apr	242	207	172
<i>haylage business</i>			
4	968	828	688
6	1452	1242	1032
Total			
Min	4394	3760	3126
Max	6530	5588	4646
Daily Average			
Min	12.0	12.0	13.0
Max	17.9	17.9	19.3

Total Daily Average			
Min	35.3	35.2	36.2
Max	47.6	47.6	49.1

APPENIDX 10.

TRICS DATA

Calculation Reference: AUDIT-753101-200914-0903

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : A - HOUSES PRIVATELY OWNED
 VEHICLES

Selected regions and areas:

02	SOUTH EAST	
	IW ISLE OF WIGHT	1 days
	KC KENT	1 days
	WS WEST SUSSEX	1 days
03	SOUTH WEST	
	DV DEVON	1 days
	SM SOMERSET	3 days
04	EAST ANGLIA	
	NF NORFOLK	1 days
	SF SUFFOLK	1 days
05	EAST MIDLANDS	
	LE LEICESTERSHIRE	1 days
06	WEST MIDLANDS	
	ST STAFFORDSHIRE	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings
 Actual Range: 17 to 85 (units:)
 Range Selected by User: 6 to 100 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/15 to 19/11/19

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	1 days
Tuesday	3 days
Wednesday	2 days
Thursday	4 days
Friday	1 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	10 days
Directional ATC Count	1 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Suburban Area (PPS6 Out of Centre)	2
Edge of Town	3
Neighbourhood Centre (PPS6 Local Centre)	5
Free Standing (PPS6 Out of Town)	1

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	5
Village	5
Out of Town	1

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

C3

11 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 1 mile:

1,000 or Less	1 days
1,001 to 5,000	4 days
5,001 to 10,000	1 days
10,001 to 15,000	2 days
15,001 to 20,000	1 days
20,001 to 25,000	2 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	1 days
25,001 to 50,000	3 days
50,001 to 75,000	3 days
75,001 to 100,000	4 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

1.1 to 1.5	10 days
1.6 to 2.0	1 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

No

11 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present

11 days

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1	DV-03-A-03 LOWER BRAND LANE HONITON	TERRACED & SEMI DETACHED	DEVON
	Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings:	70	
	Survey date: MONDAY	28/09/15	Survey Type: MANUAL
2	IW-03-A-01 MEDHAM FARM LANE NEAR COWES MEDHAM	DETACHED HOUSES	ISLE OF WIGHT
	Free Standing (PPS6 Out of Town) Out of Town Total No of Dwellings:	72	
	Survey date: TUESDAY	25/06/19	Survey Type: MANUAL
3	KC-03-A-03 HYTHE ROAD ASHFORD WILLESBOROUGH	MIXED HOUSES & FLATS	KENT
	Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings:	51	
	Survey date: THURSDAY	14/07/16	Survey Type: MANUAL
4	LE-03-A-02 MELBOURNE ROAD IBSTOCK	DETACHED & OTHERS	LEICESTERSHIRE
	Neighbourhood Centre (PPS6 Local Centre) Village Total No of Dwellings:	85	
	Survey date: THURSDAY	28/06/18	Survey Type: MANUAL
5	NF-03-A-10 HUNSTANTON ROAD HUNSTANTON	MIXED HOUSES & FLATS	NORFOLK
	Edge of Town Residential Zone Total No of Dwellings:	17	
	Survey date: WEDNESDAY	12/09/18	Survey Type: DIRECTIONAL ATC COUNT
6	SF-03-A-06 BURY ROAD KENTFORD	DETACHED & SEMI-DETACHED	SUFFOLK
	Neighbourhood Centre (PPS6 Local Centre) Village Total No of Dwellings:	38	
	Survey date: FRIDAY	22/09/17	Survey Type: MANUAL
7	SM-03-A-01 WEMBDON ROAD BRIDGWATER NORTHFIELD	DETACHED & SEMI	SOMERSET
	Edge of Town Residential Zone Total No of Dwellings:	33	
	Survey date: THURSDAY	24/09/15	Survey Type: MANUAL
8	SM-03-A-02 HYDE LANE NEAR TAUNTON CREECH SAINT MICHAEL	MIXED HOUSES	SOMERSET
	Neighbourhood Centre (PPS6 Local Centre) Village Total No of Dwellings:	42	
	Survey date: TUESDAY	25/09/18	Survey Type: MANUAL

LIST OF SITES relevant to selection parameters (Cont.)

9	SM-03-A-03	MIXED HOUSES	SOMERSET
	HYDE LANE NEAR TAUNTON CREECH ST MICHAEL Neighbourhood Centre (PPS6 Local Centre) Village Total No of Dwellings: 41 <i>Survey date: TUESDAY 25/09/18</i>		
10	ST-03-A-08	DETACHED HOUSES	STAFFORDSHIRE
	SILKMORE CRESCENT STAFFORD MEADOWCROFT PARK Edge of Town Residential Zone Total No of Dwellings: 26 <i>Survey date: WEDNESDAY 22/11/17</i>		
11	WS-03-A-07	BUNGALOWS	WEST SUSSEX
	EMMS LANE NEAR HORSHAM BROOKS GREEN Neighbourhood Centre (PPS6 Local Centre) Village Total No of Dwellings: 57 <i>Survey date: THURSDAY 19/10/17</i>		
			<i>Survey Type: MANUAL</i>

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
VEHICLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	11	48	0.073	11	48	0.303	11	48	0.376
08:00 - 09:00	11	48	0.148	11	48	0.374	11	48	0.522
09:00 - 10:00	11	48	0.162	11	48	0.194	11	48	0.356
10:00 - 11:00	11	48	0.128	11	48	0.160	11	48	0.288
11:00 - 12:00	11	48	0.143	11	48	0.177	11	48	0.320
12:00 - 13:00	11	48	0.184	11	48	0.167	11	48	0.351
13:00 - 14:00	11	48	0.165	11	48	0.190	11	48	0.355
14:00 - 15:00	11	48	0.179	11	48	0.173	11	48	0.352
15:00 - 16:00	11	48	0.220	11	48	0.165	11	48	0.385
16:00 - 17:00	11	48	0.276	11	48	0.164	11	48	0.440
17:00 - 18:00	11	48	0.359	11	48	0.165	11	48	0.524
18:00 - 19:00	11	48	0.246	11	48	0.147	11	48	0.393
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.283			2.379			4.662

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

The survey data, graphs and all associated supporting information, contained within the TRICS Database are published by TRICS Consortium Limited ("the Company") and the Company claims copyright and database rights in this published work. The Company authorises those who possess a current TRICS licence to access the TRICS Database and copy the data contained within the TRICS Database for the licence holders' use only. Any resulting copy must retain all copyrights and other proprietary notices, and any disclaimer contained thereon.

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Parameter summary

Trip rate parameter range selected: 17 - 85 (units:)
 Survey date range: 01/01/15 - 19/11/19
 Number of weekdays (Monday-Friday): 11
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 0
 Surveys manually removed from selection: 0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

APPENDIX 11.

SUSSEX SAFER ROADS PARTNERSHIP AND CRASHMAP®

COLLISION MAPPING



Crashmaps.co.uk – 21 years to December 2019



Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA32

ID: 710

Response Ref: Reg19/710/12

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: SA32

ID: 765

Response Ref: Reg19/765/7

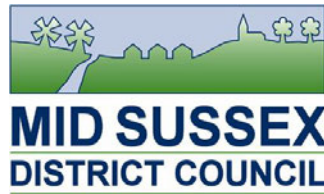
Respondent: Dr I Gibson

Organisation:

On Behalf Of:

Category: District Councillor

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="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="REDACTED"/>
Line 2	<input type="text" value="REDACTED"/>
Line 3	<input type="text" value="REDACTED"/>
Line 4	<input type="text" value="REDACTED"/>
Post Code	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text" value="REDACTED"/>
E-mail Address	<input type="text" value="REDACTED"/>



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"/>
-----------	----------------------	-----------	--	--------------------	----------------------

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,

1702

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA32

ID: 1702

Response Ref: Reg19/1702/1

Respondent: Mr P Mchale

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Patrick mchale
Address	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	Sa32
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	further development outside the neighbourhood development plan is unacceptable, the village cannot sustain any additional housing for the following reasons, already local children are unable to get places at Turners hill school, traffic in the village is dangerous at best and regularly has significant disruption and finally this area lies in an area of outstanding natural beauty of ashdown forest.
If you wish to provide further documentation to support your response, you can upload it here	
If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	No, I do not wish to participate at the oral examination
Date	23/09/2020

1707

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA32

ID: 1707

Response Ref: Reg19/1707/1

Respondent: Mr & Mrs Mugridge

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

[REDACTED]

From: Tracy Mugridge [REDACTED]
Sent: 23 September 2020 21:23
To: ldfconsultation
Subject: Site Allocation Objection site SA32

Follow Up Flag: Follow up
Flag Status: Completed

Categories: SiteDPD

I would like to object to the proposal to build 16 dwellings on the Withypitts Farm, Selsfield Road (site SA32) in Turners Hill.

Turners Hill is a small village, with a very poor infrastructure - the crossroads is at bursting point, the roads are congested at peak times, and in addition to this our school is full and we have been told that we do not qualify for upgraded bus services as we are in a rural area.

Withypitts Farm has a cattle shed at the front of the property - the roof on this barn is of rare construction - there is another shed with a similar roof at Newhouse Farmhouse, Back Lane, Turners Hill - we are not aware of any other roofs of this type in existence. To remove this shed, and the farm and surrounding areas would result in the erosion of the historic buildings within Turners Hill.

There is a further site allocation at the old vicarage field in the heart of the village. Once again, poor infrastructure. an area of outstanding natural beauty and noise pollution are the reasons why I object to this development - Turners Hill is a village which is being crushed by a large number of housing developments which do not serve our community as they are highly priced, and do not lend themselves to the village at all.

Before we consider building any other developments, a clear plan to vastly improve our road network, to build additional facilities for our school, and introduce services such as a Doctors Surgery and improve the bus service must be agreed.

With the large number of housing developments surrounding Turners Hill, I would ask you to reject both site allocation proposals until all other developments have been built, and each dwelling occupied., so that the area can grow organically.

Kind Regards

Tracy & Shaun Mugridge

RE The Mid Sussex Regulation 19 Submission Draft Site Allocations Development Plan July 2020

LDFconsultation@midsussex.gov.uk

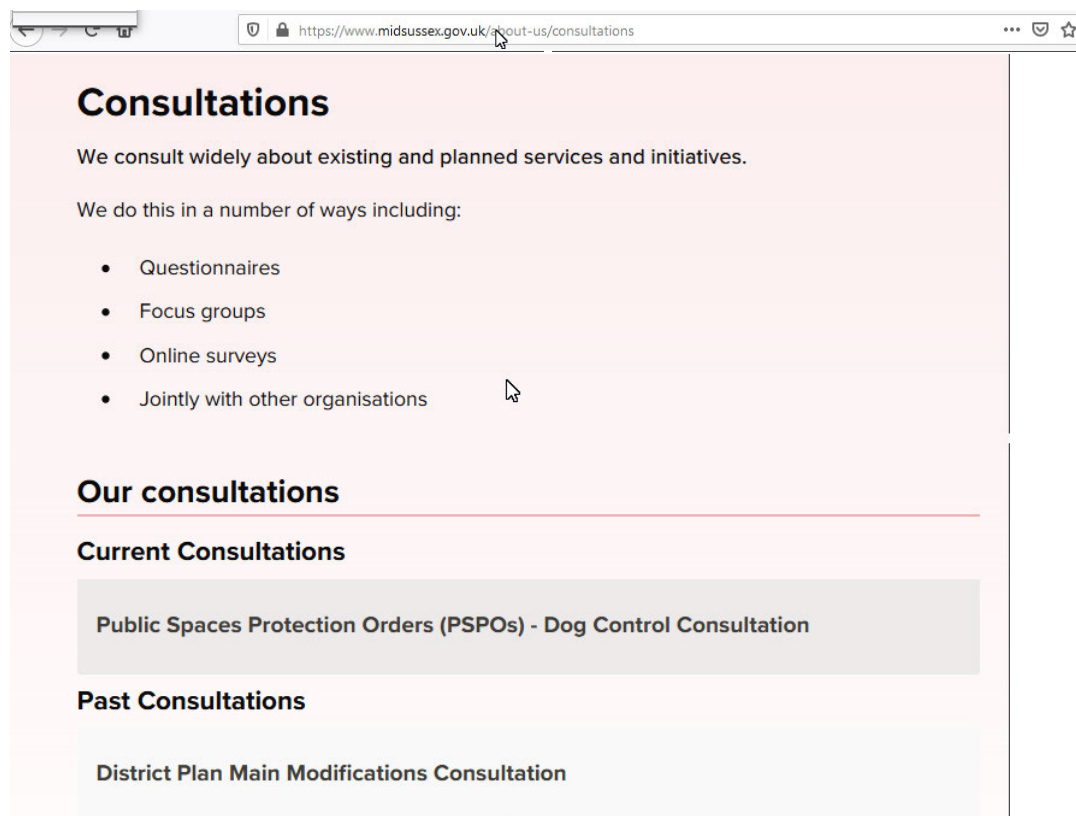
Copy: planningpolicy@midsussex.gov.uk requesting confirmation of receipt

General

The Mid Sussex Regulation 19 Submission Draft Site Allocations Development Plan July 2020 is not in accordance with legal and procedural requirements; including the duty to cooperate, requirement to consult and publication of referenced documents on which the plan claims to have been based.

In the referenced document MSDC claim that *"The Draft site Allocations Document was subject to public consultation in Autumn 2019"*. Public consultation requires adequate publicity in order for any conclusions/results to be credible. MSDC have failed in that fundamental aspect and so the consultation must be considered void as must the Regulation 19 consultation process.

Due to the lack of effective publicity by MSDC, I was totally unaware of the Regulation 18 consultation so was unable to comment on the Site Allocations DPD Draft Plan, despite wanting to do so and have only recently been made aware of that and the Regulation 19 consultation due to social media. I would have expected the "consultation" to have been advertised in the MSDC magazine (Mid-Sussex Matters) distributed to every household in the District as an absolute minimum. However nothing was mentioned about either Regulation 18 or 19 consultation. Even the MSDC consultations web page fails to notify the public that there is an ongoing Regulation 19 consultation. Screenshot taken today (10:30am, 27/9/20) – one day before "consultation" closes:



Felbridge Parish Council confirm that they have not been consulted, despite the large housing allocation and that the consultation was not listed on 20/9/20 when they checked the consultations page.

MSDC claim to have met their obligation to consult with residents by issuing a single press release, but cannot verify that it was used by any of the referenced media. I'm informed that the Mid Sussex Times ran a story, but that is not distributed in the north of the district (the area expected to provide half of the housing!).

Traffic is a major issue in the East Grinstead locality and A22 congestion seriously affects local villages. MSDC and Tandridge jointly commissioned WSP to carry out a study into Felbridge A264/22 junction capacity and to look in detail at options to alleviate congestion. However, MSDC have chosen not to publish the findings of the recent WSP traffic study and are therefore considered to be withholding material evidence from the consultation process, preventing residents being informed of the expected consequences of development.

The NPPF requires that development plans MUST be

a) positively prepared

MSDC have failed to positively engage with landowners/developers offering large strategic sites such as Crabbet Park and Mayfield.

b) justified

Failed to properly take account of reasonable alternatives, and failure to show sites SA22, SA19, SA20 to be sustainable or deliverable and SA32 to comply with policy ref High Weald AONB

c) effective,

Failed to demonstrate strategic highway matters to be deliverable to resolve severe traffic constraints in East Grinstead and the consequent severe impact on local villages The East Grinstead Neighbourhood Plan states that *"The constrained nature of East Grinstead's current infrastructure is by far the greatest challenge facing the town in the immediate future, with existing roads and junctions already over capacity."* That directly reflects into heavy traffic on the B2028 corridor.

d) consistent with national policy

Failed to demonstrate sustainability, failed to consult, failed to address infrastructure and other community needs. Failed Duty to Cooperate. Tandridge District Council (TDC) have confirmed to Felbridge Parish Council that they were not informed of the Regulation 19 consultation and have sought an extension to enable them to prepare a response. This is despite there being a Statement of Common Ground between MSDC and TDC

The document does not comply with NPPF or MSDC own requirements, it is not fit for purpose.

Additional housing along the B2028 corridor cannot be justified until the A22/A264 issues have been mitigated. Ongoing issues within the A22 and at the Felbridge junction mean that the B2028 will continue to be an overloaded rat run in dire need of maintenance.

The Tandridge District Council-MSDC SoCG confirms that both parties agree the necessity to implement highways improvements at four junctions on the A264 and A22 - the 'A22/A264 corridor

project'. The transport assessment does not include the benefits of the project and the source of the funding to complete the scheme has not been identified. West Sussex Highways response to the consultation was *'The DPD should acknowledge the possibility that improvements may not be deliverable at the Felbridge junction.'* Without commitment and funding line and a possible conclusion that no viable scheme exists to effectively mitigate the already severe road network. Any development in this area would further burden an already overloaded road network. Therefore the identified cross-boundary strategic matters have been deferred rather than dealt with, rendering the DPD **not Effective**.

'Rat running' through rural roads and residential streets is already occurring due to the severe congestion at the Star junction of the A22 and A264. It is not a sustainable transport strategy to rely upon unsuitable rural roads and residential streets to handle the additional traffic resulting from a proposed site just because the A-road network has exceeded its capacity.

The DPD Transport Assessment attributes the severe capacity issues in East Grinstead and local villages to houses already allocated by the 2018 District Plan and argues that the impact of the proposed DPD allocations taken separately is not sufficient to trigger the National Policy 'residual cumulative impact' test. NPPF paragraph 109 states that *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*

The impact of traffic from sites proposed in the Site Allocations DPD cannot be treated independently from the impact of other sites allocated in the Local Development Plan. Yet MSDC argue that traffic generated by the Local Development Plan is an 'existing situation' and can be ignored when applying the 'residual cumulative' test. That cannot be the intended interpretation of NPPF Paragraph 109. The Site Allocations DPD is effectively part of the Local Development Plan so should not be considered separately.

It is claimed that "the District Plan was based on a comprehensive understanding of the issues facing the district". The biggest issue currently facing the District is fallout from the Covid19 pandemic. That has not been considered at all and should require a formal review of proposals/strategy/policy to date. The North of the District is heavily dependent on Gatwick and associated aviation/aerospace industries. The most optimistic forecasts for the local area would seem to indicate much higher unemployment than the rest of Mid-Sussex, some 3-5 years for aviation to recover to 70% of pre-Covid levels and for recovery not to really start until Covid is under control (late 2021?). All of this will directly affect housing need (and type required) in the area. The move to remote working will also affect infrastructure requirements.

In the Sustainability Appraisal conclusion it states that "All site allocations have a positive impact on the sustainability objective to ensure high and stable levels of employment so everyone can benefit from the economic growth of the District". No proof has been offered to support this general statement. Neither of the Crawley Down or Turners Hill sites would offer anything other than temporary employment. Recent office conversion to residential in East Grinstead is estimated to have cost at least 1000 jobs in East Grinstead Town Centre with another 500 residents requiring jobs (Felbridge Parish Council statement). MSDC do not monitor the amount of office space lost to residential conversions. Therefore, they cannot know how much office space is currently available in East Grinstead in order to inform planning decisions.

MSDC claim that a series of reasonable alternatives were developed to address assessed housing need. If additional housing is still required post Covid then Crabbett Park and the proposed Mayfield

development should not be airily dismissed. Mayfield would “hedge the bets” on aviation recovery and provide capability for both Crawley and Burgess Hill, yet MSDC have failed to engage with the developers unlike Horsham. Crabtree Park is adjacent to the Crawley BUA boundary for all intents and purposes and could provide 2300 houses with easy access to Crawley facilities and opportunities, yet appears to have been rejected on spurious and inaccurate grounds.

I fully support the call for infrastructure before houses and it is past time that MSDC recognise this and deal with it rather than ignoring it as too difficult.

For too long MSDC have used New Homes Bonus to shore up MSDC general finances instead of being used for its stated purpose of supporting communities most affected by development. Crawley Down is at breaking point due to lack of investment and maintenance of infrastructure, developers providing the “wrong” mix of housing for the community – just one which produces the most profit at the expense of community.

SA22

I formally request that this site be deleted from the Site Allocations Development Plan.

The District Plan set a target of 874 new homes for Worth Parish (Cophorne and Crawley Down). By April 2020 the total of houses built and planning permissions granted to developers in the two villages was 908, there is an application for 39 off at Hurst Farm in Crawley Down in the pipeline, small scale proposals and windfall possibilities. The two villages have already EXCEEDED their agreed District Plan target which was supposed to last until 2031.

Contrary to the agreed allocation at Crawley Down, MSDC have now included Site SA22 - 50 extra houses behind Woodlands Close in Crawley Down.

The local school has only recently been expanded and is still having to turn village children away. There are at least 106 houses with planning permission yet to be built. NPPF (2018) paragraph 94 is quoted in supporting documents *“It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should... give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications”*. No consideration has been given to this requirement and implications thereof. It is not sustainable.

Access to SA22 via either Sycamore Lane or Woodlands Close is proposed. Development of the site would encroach into the gap between Crawley Down and Turners Hill, contrary to the Neighbourhood Plan objective of maintaining separate communities. The junction common to Woodlands Close and exit from Sycamore Close is already the subject of discussion at Worth PC and the issue has been raised with WSCC and MSDC. It is considered dangerous. Right of Way from Kiln Rd into the Burleigh Woods Estate (and Sycamore Close) crosses Woodlands Close/Woodlands Drive junction. Vehicles exiting Woodlands Drive have a blind bend to their right with no impediment to cars speeding into the Estate.

The document suggests a “proposed new BUAB”. This would appear to extend well beyond the current boundary to the East and the plan does not show the full extent of the proposed expansion. My understanding from previous discussions with MSDC in connection with the Neighbourhood Plan is that the formal BUAB cannot be altered without formal consultation. That has not happened and an incomplete proposal inside a draft document does not constitute formal consultation. Further,

both the Crawley Down Neighbourhood Plan (CDNP) and DP (DP12 and DP13) have policies specific to planning inside and outside the BUAB, which this diagram would appear to have the distinct possibility to undermine. On that basis the “proposed BUAB” should be entirely removed from the site allocations document and replaced with site boundary.

Upgrade to sewage infrastructure is stated as required. District Plan policy **DP42: Water Infrastructure and the Water Environment** should apply. However, history and experience has demonstrated that it doesn't!

South East Water has consistently stated that the existing foul water infrastructure would be inadequate to support additional development for every significant development in the village for the last 10 years or more. Nothing has been done to alleviate this situation and the new Burleigh Woods (Miller) Estate (of which Sycamore Lane forms a part) has suffered continual drainage problems since first occupation. Woodlands Close still has pitch fibre pipework which is approaching twice the design life. The pumping station in Hazel Way has been working at or over capacity for some years and there have been consequent environmental incidents.

The Burleigh Woods estate employs a buffer/pump system in a demonstrably unsuccessful attempt to limit foul water flow to manageable levels. MSDC have traditionally turned a blind eye to this problem in stipulating unenforceable Grampian conditions when granting planning permission – contrary to the Crawley Down Neighbourhood Plan (CDNP). Grampian conditions should be banned.

A number of natural springs and watercourses cross this area and flooding of adjacent areas is a distinct probability. The CDNP requires that surface water flow from the site into other areas be constrained to an equivalent level to that before development.

It is unfair and unreasonable to ask Crawley Down to take more houses when other towns and villages haven't met their target and directly contrary to information and assurances given to Crawley Down residents by MSDC representatives during and after preparation and adoption of the CDNP.

The NPPF requires that the Site Allocations Document deliver sustainable development. In the case of Crawley Down it does not.

The site selection criteria for housing sites in the ‘Site Selection Paper 2 - Methodology for Site Selection’ refers to NPPF (2018 Paragraph 103) in support of the Sustainability Objective; *“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health”*.

The Sustainability Appraisal conclusions state *“All site allocations have a positive impact on the sustainability objective to sustain economic growth and competitiveness across the District, protect existing employment space, and to provide opportunities for people to live and work within their communities therefore reducing the need for out-commuting.”*

Crawley Down only has limited employment local to the village. Main employment opportunities are supplied by Gatwick/Crawley, Burgess Hill, London/Croydon. East Grinstead offers limited employment which has decreased significantly with loss of office buildings recently. The extent of job loss in Crawley/Gatwick has yet to be assessed, but is forecast to be extremely significant. With the lack of public transport at times suitable for work and employment opportunities limited to further afield, personal transport is a necessity. More out-commuting and greater distance

commuting is inevitable. The decline in local employment and the rise of out-commuting is contrary to the stated Sustainability Objective so the site must qualify for a 'Significant Negative Impact'. Expansion of Crawley Down in current circumstances is not sustainable.

MSDC have adopted a fundamentally flawed policy in respect of categorisation under the "Settlement Hierarchy", whereby higher category settlements receive more housing as being more sustainable without assessing the viability of existing settlement facilities and services or viability/defined funding for expansion.

Crawley Down has been "assessed" as a sustainable community and therefore able to take more housing. The "sustainability assessment" performed appears to merely note the existence of facilities/infrastructure, not whether those facilities/infrastructure are currently viable and suitable for the local population, whether expansion of those facilities would be viable (and financed) within the proposed timescales etc. Schools, Health, Sewage, Communications and transport amongst others would fail those tests – making expansion unsustainable.

If the policy continues unmodified it would inevitably lead to failure of previously sustainable and viable communities and also allow marginally sustainable communities to fail. Policy should be to reinforce and support marginal communities with additional employment and housing opportunities, not discriminate against other communities.

SA19 & SA20

Encroachment into the gap between Crawley Down and East Grinstead, contrary to the Neighbourhood Plan objective of maintaining separate communities.

Development at East Grinstead should be limited until such time as the A22 issues are mitigated.

SA32

The list also includes 16 homes on Withypitts Farm in Turners Hill (site SA32). This will be in addition to the 44 homes on the Old Vicarage Yard site nominated in the Turners Hill Neighbourhood Plan.

The site allocation document states "Development in the High Weald AONB or within its setting will need to conserve and enhance the natural beauty and special qualities of the High Weald, as set out in the **High Weald Management Plan 2019-2024** and District Plan Policy **DP16: High Weald Area of Outstanding Natural Beauty**"

NPPF Duty to Co-operate also requires Mid Sussex to give consideration to potential impacts on the High Weald Area of Outstanding Natural Beauty (AONB). Adequate consideration and provision has not been given in this instance. Site SA32 is in the designated AONB and therefore should be excluded as not in accordance with national or local requirements for development approval.

ACTIONS REQUESTED

I request that the following action is taken with respect to the draft Site Allocations DPD and associated documents:

1. The DPD should be withdrawn as it is not legally compliant - the consultation was not carried out in line with national policy or the MSDC Statement of Community Involvement. Regulation 18 consultation should be repeated with adequate and appropriate publicity.
2. Housing needs and required spatial allocation to be reviewed, especially in view of collapse of the local aviation/aerospace industry and adverse effect on employment in the North Sussex area.
3. Policies in respect of Settlement Hierarchies and housing allocation on that basis be reviewed and viability of services assessed in determining suitability.
4. The WSP transport report should be published in full and its findings submitted for consultation. MSDC to use the most recent figures and assessments in determining traffic issues.
5. The proposed allocations at Crawley Down and Turners Hill should be withdrawn as they cannot be delivered sustainably.
6. MSDC should withdraw the DPD and carry out a full and proper evaluation of sustainable sites close to Crawley including Crabbet Park and Mayfield village.
7. In the event that the Inspector decides the DPD should progress to Examination then any allocations at Crawley Down or Turners Hill should be made contingent on providing funded and budgeted infrastructure improvements in respect of transport, education, health, sewage, water supply and community facilities as a minimum.
8. In the event that the Inspector decides the DPD should progress to Examination then any allocations at East Grinstead, Felbridge, Crawley Down, Copthorne or Turners Hill should be made contingent on delivering a viable and meaningful set of junction improvements along the A264-A22 corridor to mitigate the cumulative impact of local development since 2017.

A.M. Brooks

[REDACTED]

[REDACTED]

2079

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA32

ID: 2079

Response Ref: Reg19/2079/20

Respondent: Mr A Black

Organisation: Andrew Black consulting

On Behalf Of: Vanderbilt Homes - Hurstwood HH

Category: Promoter

Appear at Examination? x



Mid Sussex District Council

Draft Site Allocations DPD (Regulation 19)
Consultation

Representation on behalf of Vanderbilt Homes –
Land at Junction of Hurstwood Lane and Colwell
Lane, Haywards Heath

September 2020

Project MSDC Draft Site Allocations DPD

ABC Reference ABC/0072/07b

Local Authority Mid Sussex District Council

Client Vanderbilt Homes

Issue Final

Author Andrew Black

Date September 2020

Disclaimer: This report has been prepared for the above named client for the purpose agreed in Andrew Black Consulting's (ABC) terms of engagement. Whilst every effort has been made to ensure the accuracy and suitability of the information contained in this report, the results and recommendations presented should not be used as the basis of design, management or implementation of decisions unless the client has first discussed with ABC their suitability for these purposes and ABC has confirmed their suitability in writing to the client. ABC does not warrant, in any way whatsoever, the use of information contained in this report by parties other than the above named client.

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1. Introduction

- 1.1 These representations for the Draft Site Allocations DPD (Regulation 19) Consultation (Herein referred to as the ‘SADPD’) are submitted by Andrew Black Consulting on behalf of Vanderbilt Homes regarding a site within their control in Haywards Heath.
- 1.2 The site under the control of Vanderbilt Homes is Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath and was previously considered in the SHELAA (ref 508) as Available, Achievable and Deliverable.
- 1.3 It is understood that the SADPD has been produced in accordance with the Planning and Compulsory Purchase Act 2004, and other relevant regulations.
- 1.4 The NPPF states that Development Plan Documents should be prepared in accordance with the legal and procedural requirements. To be found to be ‘sound’, plans must be:
 - a) *positively prepared*
 - b) *justified*
 - c) *effective, and*
 - d) *consistent with national policy.*
- 1.5 It is with this in mind that the representations are made.
- 1.6 The draft SADPD has been prepared using an extensive and legally compliant evidence base including a Sustainability Appraisal, Habitat Regulations Assessment, Community Involvement Plan, Equalities Impact Assessment, and various technical reports and studies. Of particular note is the Built Up Area Boundary and Policies Map Topic Paper (TP1) produced in August 2020.
- 1.7 The Site Allocations DPD proposes to allocate 22 sites to meet this residual necessary to meet the overall agreed housing requirement for the plan period as reflected in the ‘stepped trajectory’ and in accordance with the District Plan.
- 1.8 These representations set out the detail of the Site and Surroundings and a response to the detailed parts of the SADPD.

2. Site and Surroundings

- 2.1 The site is located to the at the Junction of Hurstwood Lane and Colwell Lane in Haywards Heath.



Figure 1 – SHELAA Extract

- 2.2 The site was assessed in the most recent SHELAA (Ref 508) as Suitable, Available and Achievable in the Medium to Long Term (The full extract of the SHELAA is set out in Appendix 1). Several constraints were note within the HELAA form which are addressed below.
- 2.3 The SHELAA Appraisal of the site confirms that there are no constraints to the development of the site in terms of Flooding, SSSIs, Ancient Woodland, AONB, Local Nature Reserves, Heritage Assets or Access.

Planning History

- 2.4 The site does not have any planning history.
- 2.5 The site is in close proximity to a site which was allocated under the District Plan (H1) and has a current application for a substantial application. An application was submitted in 2017 (DM/17/2739) with the following description:
- Outline application for development of up to 375 new homes, a 2 form entry primary school with Early Years provision, a new burial ground, allotments, Country Park, car parking, 'Green Way', new vehicular accesses and associated parking and landscaping. All matters are to be reserved except for access.*
- 2.6 A resolution to grant planning permission was made by planning committee in August 2018. A formal planning decision is yet to be issued as further negotiations are taking place regarding the s106 agreement. However, the allocation of the site and the resolution to grant planning

permission is considered as a strong indicator that development of the site is highly likely to take place and will result in substantial change in the immediate context of the area.

- 2.7 The proximity of the site to the site under control of Vanderbilt Homes (shown in red) is set out below:

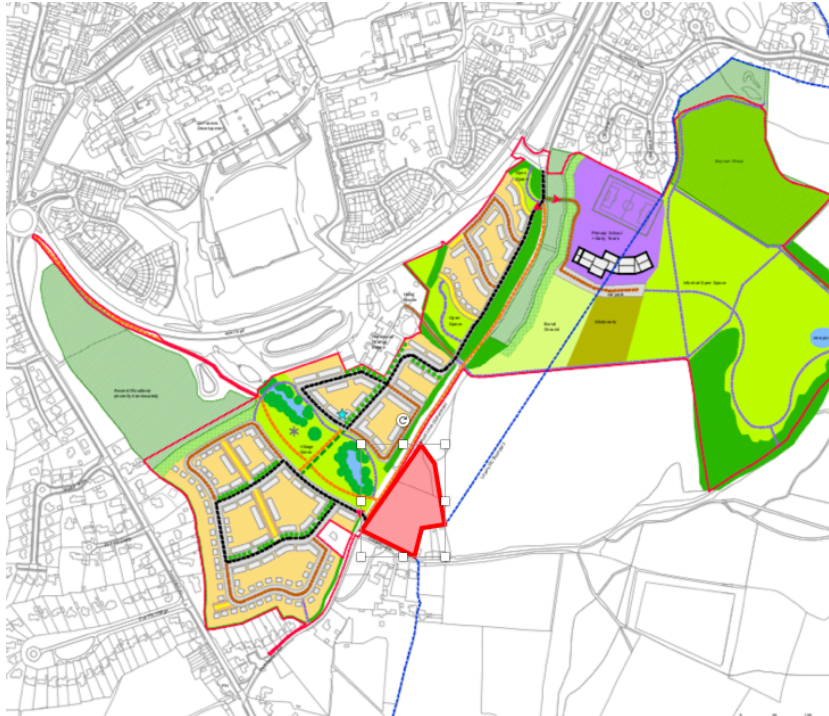


Figure 2 – Proximity of Site to significant application

- 2.8 The proposed policies map shows the extent of the built up area boundary, the proposed allocation of the site to the north (H1) and the proposed allocated site SA21 to the south-west.

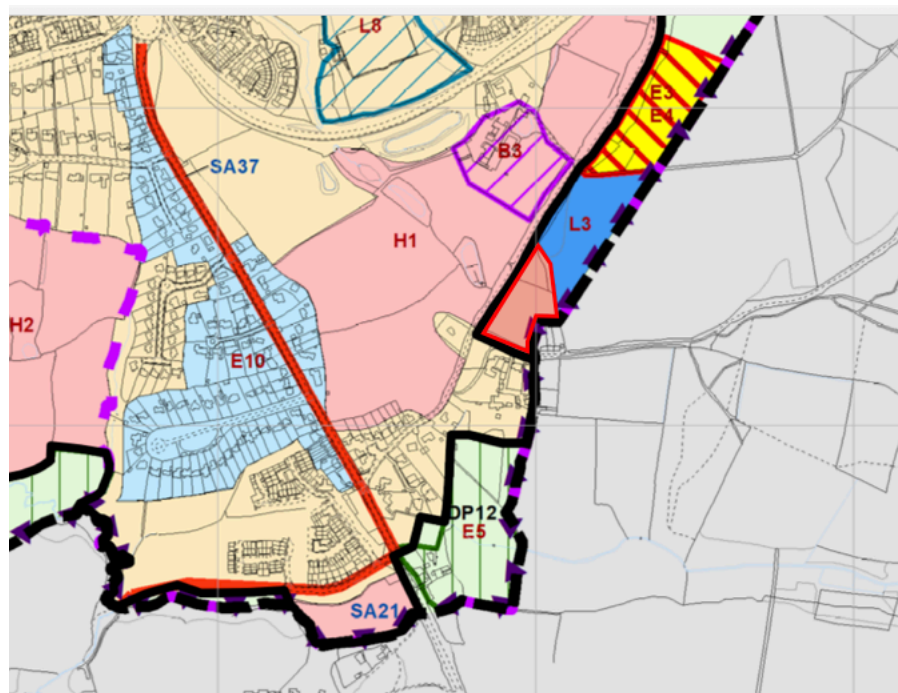


Figure 3 – Proposed Site Allocations Proposals Map

- 2.9 Specific representations are made against each of the allocated sites in subsequent sections of these representations. However, of specific focus is the allocation of Rogers Farm on Fox Hill in Haywards Heath. Significant concerns are raised as part of these representations as to why the Rogers Farm site has been allocated instead of the more obvious site under the control of Vanderbilt Homes at Hurstwood Lane.

SA 21 Rogers Farm, Fox Hill, Haywards Heath

- 2.10 This site is significantly constrained by the presence of heritage assets. This is referenced in the SA which states that:

Site option (b) is constrained in terms of impact upon a listed building; it would have a less than substantial harm (medium) on Cleavewater (Grade II listed) and The Old Cottage (Grade II listed).

- 2.11 Appendix B of the reg 18 SADPD also references these heritage assets together with an assessment of the likely impact as follows:

*Cleavewaters, Fox Hill there would be a fundamental impact not only on views from the building and associated farmstead but on the context and manner in which the farmhouse and farmstead are appreciated by those travelling along the road which runs between the farmstead and the site. **NPPF: LSH, MID***

*Olde Cottage, there would be some potential impact on views from the Cottage and its garden setting. The belt of woodland between the asset and the site is relatively narrow and development on the site is likely to be visible, particularly in winter. There would also be an impact on the setting in which the Cottage is appreciated by those approaching along the access drive from Ditchling Road. **NPPF: LSH, MID***

- 2.12 The impact on heritage assets and character of the area has been assessed in an appeal decision on the site (APP/D3830/W/17/3187318) issued in January 2019 following an application for up to 37 dwellings on the site (DM/16/3998).

15 The combination of the buffer and local topography would mean that any development would be clearly visible on the approach down Lunce's Hill and perceived as a separate and distinct residential development. I am not persuaded that it would be seen within the context of an urban fringe setting as the appellant suggests. On the contrary it would be a harmful encroachment into the countryside and the rural character of the approach into the settlement would be irrevocably changed and harmed through the loss of this open land.

16 Overall, the proposal would result in an unacceptable suburbanisation of the appeal site that would fundamentally change the character and appearance of the rural setting of the settlement. The effects would also be exacerbated somewhat by the loss of part of the existing mature hedgerow for the access. Proposed mitigation, in the form of additional landscaping would restrict the visibility of the proposal from a number of viewpoints. However, it would take a substantial amount of time to mature and be dependent on a number of factors to be successful. Moreover, I am not persuaded that it would fully mitigate the visual impacts.

17 For these reasons, the proposal would not be a suitable site for housing in terms of location and would cause significant harm to the character and appearance of the area. It would therefore conflict with Policy C1 of the LP and Policies E5 and E9 of the HHNP. In addition to the requirements set out above, these policies also require new development to be

permitted where it would protect, reinforce and not unduly erode the landscape character of the area. There would also be some conflict with Policies DP10 and DP24 which, seek to protect the countryside in recognition of its intrinsic character and beauty and promote well located and designed development.

2.13 In addition to consideration of heritage matters it would appear that the consideration of Sustainability / Access to Services is inconsistent between the Site Selection Paper (SSP3) and the Sustainability Appraisal.

2.14 In the Site Selection Paper (SSP3) the Sustainability / Access to Services of Rogers Farm is assessed as follows:

Part 3 - Sustainability / Access to Services	
14 - Education	More than 20 Minute Walk
15 - Health	15-20 Minute Walk
16 - Services	15-20 Minute Walk
17 - Public Transport	Fair

2.15 However, this differs from the assessment of these matters within the Sustainability Appraisal where the following conclusions are reached.

Objective	A - Oaklands	B - Rogers Farm	C - HH Golf Course	D - N. Old Wickham	Assessment
1 - Housing	+	+	++	+	All site options have demonstrated their deliverability; options (a), (b) and (d) make a contribution to the residual housing need, while (c) makes a significant contribution to the need.
2 - Health	++	0	++	-	Site options (a) and (c) are located a 10-15 minute walk from the nearest GP surgery, while option (b) is a 15-20 minute walk. Option (d) is more than a 20 minute walk.
3 - Education	+	-	++	+	Site option (c) is located less than a 10 minute walk from the nearest primary school, options (a) and (d) are a 10-15 minute walk, while option (b) is more than a 20 minute walk.
4 - Retail	++	+	++	+	Site options (a) and (c) is located less than a 10 minute walk from the nearest convenience store, while options (b) and (d) are a 10-15 minute walk.

2.16 The site is assessed positively for its access to retail and it is stated that they are a 10-15 minute walk when the SA correctly identifies that they are a 15-20 minute walk.

2.17 The Site Selection Paper (SSP3) for the Land at Hurstwood Lane makes it clear that whilst connectivity is currently poor, facilities will be provided at the Hurst Farm development and it is therefore considered that the SA would rate these as positive.

2.18 It is therefore clear that the Hurstwood Lane site has been overlooked in favour of the less suitable site at Rogers Farm.

2.19 It is apparent that the heritage constraints and poor sustainability for Rogers Farm weigh heavily against the allocation of the site and this should be readdressed within the final version of the SADPD.

3. Housing Site Allocation Process

- 3.1 The District Plan 2014-2031 sets out the housing requirement for the district for the plan period of 16,390 dwellings. This meets the Objectively Assessed Need (OAN) for the district of 14,892 dwellings in full and makes provision for the agreed quantum of unmet housing need for the Northern West Sussex Housing Market Area, to be addressed within Mid Sussex, of 1,498 dwellings.
- 3.2 The District Plan 2014-2031 established a ‘stepped’ trajectory for housing delivery with an average of 876 dwellings per annum (dpa) between 2014/15 and 2023/24 and thereafter an average of 1,090 dpa between 2024/25 and 2030/31. This represents a significant increase in housing supply compared with historical rates within the district.
- 3.3 The latest data on completions from MSDC was published in *MSDC Housing Land Supply Position Statement* was published in August 2020 (Document H1) and shows a significant shortfall in delivery against the housing requirement since the start of the plan:

Category		Number of Dwellings
Housing Requirement for the full plan period (April 2014 to March 2031)		16,390
Housing Completions (April 2014 to March 2020)		4,917
Completions 2014/15		630
Completions 2015/16		868
Completions 2016/17		912
Completions 2017/18		843
Completions 2018/19		661
Completions 2019/20		1003
Housing Supply (April 2014 to March 2031)	Commitments (including District Plan Allocations)	9,689
	Site Allocations DPD - Allocations	1,764
	Windfalls	504
Total Supply (at 1 April 2019)		16,874

Figure 4 – Extract from MSDC Housing Land Supply Position Statement

- 3.4 The Housing Delivery Test was introduced in the July 2018 update to the NPPF. The Housing Delivery Test is an annual measurement of housing delivery for each local authority and the first results were published in February 2019 by the Ministry of Housing, Communities and Local Government (MHCLG). Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority’s housing requirement over the previous 3 years then it is required to prepare an action plan. Where delivery has fallen below 85% of the housing requirement a 20% buffer should be added to the five year supply of deliverable sites.
- 3.5 The result for Mid Sussex produced in February 2020 was 95%. This result is based on monitoring years 2016-17, 2017-18 and 2018-19. Mid Sussex is therefore not required to add 20% buffer for significant under delivery, or prepare an Action Plan. However, it is clear that under current performance the council will struggle when the housing target steps up to 1,090 in 2024.
- 3.6 Para 4.10 of the previous MSDC Housing Land Supply Position Statement (2019) sets out the five year supply requirement for the district as follows:

Annual Requirement As set out in District Plan	876 x 5 years =	4,380
Shortfall spread over remaining plan period	466 divided by 12 remaining years x 5 years	194
Total		4,574
Buffer (see paras 2.4,4.9 above)	10%	457
Total five year supply requirement		5,032

*Figure 5 – Total Five Year Housing Requirement taken from MSDC Housing Land Supply
Position Statement*

- 3.7 MSDC is seeking to confirm the five year housing land supply under the terms of paragraph 74 of the NPPF through submission of the annual position statement to the secretary of state. Paragraph 74 of the framework states:

A five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan, or in a subsequent annual position statement which:

- a) has been produced through engagement with developers and others who have an impact on delivery, and been considered by the Secretary of State; and*
- b) incorporates the recommendation of the Secretary of State, where the position on specific sites could not be agreed during the engagement process.*

- 3.8 The report on the Annual Position Statement was issued by the Planning Inspectorate on 13 January 2020. It was confirmed that as the council did not have a recently adopted plan in conformity with the definition of the NPPF then the correct process had not been followed and the inspector was unable to confirm that the council had a five year housing land supply.

- 3.9 It is therefore clear that the council does not currently have a five year housing land supply and the demonstration of sufficiently deliverable sites within the SADPD is of critical importance for MSDC.

Deliverability of Sites

- 3.10 Any sites that have been included in the final Sites DPD will need to pass the tests of deliverability as set out in the NPPF. This is defined within the glossary of the framework as follows:

Deliverable: *To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

- 3.11 The Planning Practice Guidance provides a further explanation on how the deliverability of sites should be considered:

A site can be considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available.

The existence of planning permission can be a good indication of the availability of sites. Sites meeting the definition of deliverable should be considered available unless evidence indicates otherwise. Sites without permission can be considered available within the first five years, further guidance to this is contained in the 5 year housing land supply guidance. Consideration can also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions.

Paragraph: 019 Reference ID: 3-019-20190722

Revision date: 22 07 2019

- 3.12 It is with this in mind that the proposed sites within the Sites DPD are scrutinised within subsequent sections of this document. It is considered that many of the proposed sites do not fully accord with the definition of delivery and consideration of alternative sites is required.

Area of Outstanding Natural Beauty

- 3.13 A significant number of the proposed sites are located within, or close to, the High Weald AONB. Paragraph 172 sets out the significant protection which should be afforded to the AONB in planning terms and states that:

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

and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

- 3.14 It is part b of paragraph 172 that is of particular importance in this instance. It is not considered that MSDC has considered sites outside of the AONB which could be used to meet the identified residual housing requirement. It would appear that sites have been selected because of their conformity to the spatial strategy and hierarchy without the proper application of the ‘great weight’ required to protect the AONB.
- 3.15 The approach of allocating sites within the AONB as opposed to ‘outside the designated area’ should have been tested through a robust analysis of reasonable alternatives within the Sustainability Appraisal. The failure to do this adequately is a matter of soundness and it is considered that the Sites DPD fails the tests within the NPPF on this basis alone.

Historic Environment

- 3.16 Several of the allocations within the DPD are in close proximity to heritage assets. Paragraph 193 of the framework sets out the approach to heritage assets as follows:

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

- 3.17 In many instances the council themselves suggest that the development of housing on the sites is likely to have ‘less than significant harm’ on the heritage assets in question. Paragraph 196 of the framework sets out the approach which should be taken in this instance:

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the

- 3.18 It is not considered that the harm caused to heritage assets has been adequately assessed within the Sustainability Appraisal for many of the proposed sites and further consideration is required of the sites in this regard. This would include assessing sites which would not have an impact on heritage assets through a robust application of reasonable alternatives within the Sustainability Appraisal.

4. Sustainability Appraisal

- 4.1 The SADPD is accompanied by a Sustainability Appraisal (SA) report which is a legal requirement derived from the Planning and Compulsory Purchase Act 2004 (Section 19). Section 39 of the Act requires documents such as the SADPD to be prepared with a view to contributing to the achievement of sustainable development.
- 4.2 The requirement for Strategic Environmental Assessment, in addition to the SA, is set out in the European Directive 2001/42/EC adopted into UK law as the “Environmental Assessment of Plans or Programmes Regulations 2004”.
- 4.3 In line with best practice the SEA has been incorporated into the SA of the SADPD.
- 4.4 The planning practice guidance sets out detailed consideration as to how any sustainability should assess alternatives and identify likely significant effects:

The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. In doing so it is important to:

- *outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option). Criteria for determining the likely significance of effects on the environment are set out in [schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004](#);*
- *as part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them;*
- *provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives.*

Any assumptions used in assessing the significance of the effects of the plan will need to be documented. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.

The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings.

Paragraph: 018 Reference ID: 11-018-20140306

Revision date: 06 03 2014

- 4.5 In response to this guidance and requirement, paragraph 6.16 of the Sustainability Appraisal states that:

The Site Selection Paper 2 (paras 6.2 - 6.3) also recognises that, in order to meet the District Plan strategy, conclusions will be compared on a settlement-by-settlement basis with the most suitable sites at each settlement chosen in order to meet the residual needs of that settlement. This may result in some sites being chosen for allocation which have higher negative impact across all the objectives because this will be on the basis that the aim is to distribute allocations according to the District Plan strategy in the first instance; as opposed to simply selecting only

the most sustainable sites in the district (as this may not accord with the spatial strategy and would lead to an unequal distribution of sites across settlements). 20 sites that perform well individually and on a settlement basis, the residual housing need of 1,507 would be met with a small over-supply of 112 units.

- 4.6 Paragraph 6.45 recognises that this small over-supply *may not be a sufficient buffer should sites fall out of the allocations process between now and adoption (for example, due to delivery issues, reduction in yield, or any other reasons identified during consultation or the evidence base).*

- 4.7 The SA therefore considers reasonable alternatives of option A, B and C as follows:

Option A – 20 'Constant Sites' – 1,619 dwellings

Option B – 20 'Constant Sites' + Folders Lane, Burgess Hill (x3 sites) – 1,962 dwellings.

Option C – 20 'Constant Sites' + Haywards Heath Golf Court – 2,249 dwellings

- 4.8 Paragraph 6.52 of the SA concludes that:

Following the assessment of all reasonable alternative options for site selection, the preferred option is option B. Although option A would meet residual housing need, option B proposes a sufficient buffer to allow for non-delivery, therefore provides more certainty that the housing need could be met. Whilst option C also proposes a sufficient buffer, it is at the expense of negative impacts arising on environmental objectives. The level of development within option C is approximately 50% above the residual housing need, the positives of delivering an excess of this amount within the Site Allocations DPD is outweighed by the negative environmental impacts associated with it.

- 4.9 It is not considered that this assessment of Option A, B and C is a sufficient enough assessment of reasonable alternatives as required by guidance and legislation. All of the options contain the '20 Constant Sites' with no derivation of alternative options such as those which seek to divert housing growth away from the AONB or designated heritage assets.

- 4.10 It is apparent that other sites other than the 20 Constant Sites will need to be assessed if the council is to adequately demonstrate that reasonable alternatives have been considered as required.

5. Assessment of Proposed Sites.

- 5.1 This section analyses each of the proposed allocations against the tests of deliverability as set out in the NPPF and the potential shortcomings of several of the sites which require significant consideration. The findings of *Appendix B: Housing Site Proformas* of the *Site Selection Paper 3* (Appendix B) and the conclusions of the Sustainability Appraisal (SA) are considered in detail.

SA 12 Land South of 96 Folders Lane, Burgess Hill

- 5.2 Appendix B of the reg 18 SADPD set out that this site has *moderate landscape sensitivity and moderate landscape value. This site could be visible from the South Downs National Park*. The SA states that an LVIA is required to determine any impact on the national park. Given the weight that the NPPF requires to be placed on the protection of the national park, any impact must be measured prior to allocation. If it is deemed that mitigation would not minimise the harm caused, then the proposed allocation must fall away.
- 5.3 Appendix B of the reg 18 SADPD also set out that a TPO area lines the norther border and potential access route. It should be noted that an application was submitted in 2019 for the *erection of 43 dwellings and associated works* (DM/19/0276) but was withdrawn in September 2019 due to concerns over highways. The deliverability of this site is therefore not considered to be in accordance with the guidance set out in the framework.
- 5.4 Finally, whilst the priority for sites higher in the settlement hierarchy is acknowledged, this is site is very remote from the services offered by Burgess Hill. This is highlighted within the sustainability appraisal for the site which states that it is more than a 20 minute walk from the site to schools, GP and shops.

SA 13 Land East of Keymer Road and South of Folders Lane, Burgess Hill.

- 5.5 As with SA12, this site is in close proximity to the national park and the conclusions as set out above apply equally to this site.
- 5.6 The SA sets out that this is the only site within Burgess Hill to have any impact on listed buildings where it is stated that development of this site would cause *less than substantial harm (medium) on High Chimneys (Grade II listed)*. This is not mentioned within appendix B and this therefore calls into question the consistency of assessment of the sites in this regard.
- 5.7 Given that site SA12 and SA13 are in close proximity to one another it is notable that the cumulative impact of the development of both of these sites has not been assessed for a number of ‘in-combination’ impacts such as highways and landscape impact.

SA 14 Land to the south of Selby Close, Hammonds Ridge, Burgess Hill

- 5.8 There is a TPO at the front of this site which is potentially why access is proposed through the CALA Homes site (DM/17/0205). No evidence is submitted to suggest that this form of access is agreed or available. The section relating to Highways and Access within the SADPD simply states that this access *will need to be investigated further*.
- 5.9 The SA and appendix B both point towards the Southern Water Infrastructure which crosses the site. The wording in the DPD recommends that the layout of the development is considered to *ensure future access for maintenance and/or improvement work, unless diversion of the sewer is possible*. Given that the site is only 0.16ha it is therefore questionable whether there would be adequate space to develop the site for housing and provide accommodation for the sewage infrastructure crossing the site. The deliverability of this site has therefore not been adequately demonstrated.

- 5.10 As with SA12 and SA13 there are questions of the sustainability of the site given that the SA notes that it is more than a 20 minute walk to the school and GP.

SA 15 Land South of Southway, Burgess Hill

- 5.11 The SADPD describes the site as *overgrown and inaccessible land designated as a Local Green Space in the Burgess Hill Neighbourhood Plan*. It is unclear whether this site was ever previously in use as playing pitches and whether re-provision of this space would be required under Sport England policies.
- 5.12 Appendix B of the reg 18 SADPD points towards issues with relocation of existing parking on the site and states that:

Private parking areas would need to be removed to provide a suitable access point with sufficient visibility. The parking spaces are visitor spaces over which the owners/developers of the subject land have rights to access it to serve new development onto Linnet Lane. Accordingly, a new access into the site can be provided any new development would include two visitor spaces as close as reasonably possible to the existing visitor spaces.

- 5.13 It is clear that there are substantial issues with deliverability and availability of this site given these constraints and the site should be deleted as a proposed allocation until this can be adequately demonstrated.

SA 16 St. Wilfrids Catholic Primary School, School Close, Burgess Hill

- 5.14 The SADPD sets out that the satisfactory relocation of St Wilfrid's Primary School to St Paul's Catholic College site is required before development can commence on the school part of the site. There is also a requirement to re-provide the emergency services accommodation in a new emergency service centre either on this site or elsewhere in the town.
- 5.15 Given that the allocation is for 300 dwellings and requires this relocation first, it is considered that there is insufficient evidence to justify delivery of development of this site in the 6-10 year time period as set out.

SA 17 Woodfield House, Isaacs Lane, Burgess Hill

- 5.16 The SADPD sets out some significant landscape features on site which require retention and it is stated that:

There is a group Tree Preservation Order in the southern and western areas of the site. High quality substantial new planting of native trees is required, should these be lost to provide access from Isaac's Lane. All other TPO trees on the site are to be retained.

Retain and enhance important landscape features, mature trees, hedgerows and the pond at the south of the site and incorporate these into the landscape structure and Green Infrastructure proposals for the development. Open space is to be provided as an integral part of this landscape structure and should be prominent and accessible within the scheme.

- 5.17 Given that the site is only 1.4 hectares in size it is questionable whether there is adequate space on the site for 30 dwellings after retention of these landscape features.
- 5.18 It is clear from the Sites DPD that access to site is envisaged to be from the Northern Arc where it is stated that:

Integrated access with the Northern Arc Development is strongly preferred, the details of which will need to be investigated further.

- 5.19 This is also set out in appendix B of the reg 18 SADPD where it is stated that:

Entrance drive to house. Access on bend with limited visibility. 50 mph road. Would involve removal of trees that are subject to TPO. Objection for tree officer. However, future access is anticipated to be provided via the Northern Arc. Whilst the specific details of this remain uncertain on the basis that the enabling development is still at an early stage, it is considered that the identified constraints will no longer apply.

- 5.20 Given the uncertainty of the deliverability of the land immediately adjoining the site as part of the Northern Arc it is considered that the deliverability of this site is not clear enough to justify allocation within the sites DPD. The uncertainty of this deliverability also has an implication of the sustainability of the site and proximity to adequate services. This is highlighted within the SA where it is stated that:

The impact of option (h) on these objectives (Health/Retail/Education) is uncertain; currently the site is a long distance from local services, however, this will change once the Northern Arc is built out.

- 5.21 Overall it is not considered that this site is suitable for allocation and should be removed from the Sites DPD

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

- 5.22 We have no comments to make in relation to this allocation.

SA 19 Land south of Crawley Down Road, Felbridge

- 5.23 As set out, this allocation is directly to the west of the land under the control of Vanderbilt Homes which is also adjoined to the east by land with the benefit of planning permission for 63 dwellings.

- 5.24 Given that the entire area will be included within the revised Built Up Area Boundary, then it is considered logical that the adjoining sites are also identified for allocation within the SADPD.

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

- 5.25 There is a requirement in the SADPD for this site to provide a detailed phasing plan with agreement from key stakeholders to secure:

- Land for early years and primary school (2FE) provision – 2.2 ha
- A land exchange agreement between WSCC and the developer to secure 6 ha (gross) land to create new playing field facilities in association with Imberhorne Secondary School (c.4 ha net - excluding land for provision of a new vehicular access onto Imberhorne Lane).

- 5.26 It is unclear when these requirements are to be provided by within the development of any site and whether it is considered that the site would be suitable for allocation should these uses not come forward.

- 5.27 There are clear concerns over the suitability of this site in terms of ecology as set out in appendix B of the reg 18 SADPD which states:

Natural England have concerns over the high density of housing south of Felbridge. Hedgecourt SSSI is accessible from the proposed site allocations via a network of Public Rights of Way. In

line with paragraph 175 of the NPPF, Mid Sussex District Council should determine if allocations are likely to have an adverse effect (either individually or in combination) on SSSI's. The NPPF states that "if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused." We would be happy to provide further advice if requested, although this may need to be on a cost recovery basis. The LWS adjacent to the site is an important recreational route and therefore consideration needs to be given to additional recreational disturbance to its habitats. We are unable to advise you on specific impacts as we have no details of the scale or type of proposed development consider further impacts of disturbance of the LWS and Ancient woodland arising from people and domestic pets, connectivity, light and noise pollution, appropriate buffer and cumulative impact. This site is adjacent to the Worth Way. The SHELAA should be redrawn to remove the section of LWS. The site is an important recreational route and therefore consideration needs to be given to additional recreational disturbance to its habitats. Further consideration be given to impacts of disturbance on LWS and Ancient Woodland from people and pets, impacts on connectivity, impacts of light and noise pollution, need for Ancient Woodland buffer. Cumulative impact with SHELAA 686 and 561.

- 5.28 It is clear that the impacts upon ecology and the SSSI have not been adequately addressed.
- 5.29 As with other sites there is potential for impact upon local heritage assets of Gullege Farm, Imberhorne Farm and Imberhorne Cottages as set out below. The harm in terms of less than strategic harm is inappropriately weighted in the assessment as a means for justification of allocation.

APPENDIX B : Gullege Farm, Imberhorne Lane

This isolated farmstead has historically had a rural setting and continues to do so today. The introduction of a substantial housing development to the north, east and south of the listed manor house would have a fundamental impact on the character of that setting and would detract from the way in which the special interest of this Grade II listed rural manor house and the of the historic farmstead is appreciated.

NPPF: LSH, high

Imberhorne Farm and Imberhorne Cottages

In its original incarnation Imberhorne Cottages was probably constructed as a dwelling providing accommodation between London and Lewes, on Lewes Priory lands. It may have acted as the manor house to the substantial manor of Imberhorne, which was owned by the Priory. It seems likely that the building became farm cottages when the new farmhouse (Imberhorne) was constructed in the early 19th century. The currently rural setting of both buildings within the Imberhorne farmstead informs an understanding of their past function and therefore contributes positively to their special interest.

The proposed development site would engulf the farmstead to the west, north and east and would have a fundamental impact on the character of the greater part of its existing of rural setting and on views from both listed buildings. It would adversely affect the manner in which the special interest of the two listed buildings within their rural setting is appreciated, including by those passing along the PROW to the north of the farmstead.

NPPF: LSH, high

- 5.30 The potential harm to heritage is also referred to in the SA which states that:

option (e) which is not constrained by a conservation area, but would have a less than substantial harm (high) on Gullege Farm (Grade II listed) and Imberhorne Farm and Imberhorne Cottages (Grade II listed). As this is a large site, there is potential to still achieve the yield whilst providing necessary mitigation to lower the impact on these heritage assets.*

- 5.31 Notwithstanding the significant constraints to delivery from this site it is notable that the delivery of 550 in 6-10 years as set out in the SADPD is particularly optimistic and would need to be revised in order to be realistic on the constraints to delivery including the requirement for provision of education on the site.

SA 22 Land north of Burleigh Lane, Crawley Down

- 5.32 No comments.

SA 23 Land at Hanlye Lane to the east of Ardingly Road, Cuckfield

- 5.33 The site is within close proximity to the High Weald AONB. Previous comments made in relation to the requirements of the NPPF in relation to AONB for other allocations apply equally to this site.

SA 24 Land to the north of Shepherds Walk, Hassocks

- 5.34 The access for this site is through an adjacent parcel of land which has a ransom strip over this land. The deliverability of this site is therefore in doubt unless a right of access can be confirmed by the site owners.

SA 25 Land west of Selsfield Road, Ardingly

- 5.35 This site is located within the AONB and comments made in this regard to other proposed allocations apply to this site. The SA references this impact as follows:

There is a 'Very Negative' impact against objective (9) due to its location within the High Weald AONB, however the AONB unit have concluded that there is Moderate Impact as opposed to High Impact

- 5.36 The conclusions of the AONB unit have not been provided as part of the evidence base and requires further scrutiny in order to assess the impact of development of this site in this regard.

SA 26 Land south of Hammerwood Road, Ashurst Wood

- 5.37 The site is within the AONB and it is considered it is inappropriate to allocate this site for development without thorough appraisal of reasonable alternatives as previously set out.

SA 27 Land at St. Martin Close, Handcross

- 5.38 No comments.

SA28 Land South of The Old Police House, Birchgrove Road, Horsted Keynes

- 5.39 No comments.

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

- 5.40 The site is within the AONB and it is considered it is inappropriate to allocate this site for development without thorough appraisal of reasonable alternatives as previously set out.

SA 30 Land to the north Lydon, Reeds Lane, Sayers Common

- 5.41 The sustainability of this site has been considered in the SA which sets out that the site is more than 20 minutes away from services such as GP and the School. It is therefore not considered that the development of this site would be justified in sustainability terms.
- 5.42 The site is located within the Brick Clay (Weald) Mineral Safeguarding Area. No further evidence has been provided which demonstrates that the site is required for further mineral extraction.

SA 31 Land to the rear Firlands, Church Road, Scaynes Hill

- 5.43 The site is located within the Building Stone (Cuckfield) Mineral safeguarding Area. No further evidence has been provided which demonstrates that the site is required for further mineral extraction.

SA 32 Withypitts Farm, Selsfield Road, Turners Hill

- 5.44 The site is within the AONB and it is considered it is inappropriate to allocate this site for development without thorough appraisal of reasonable alternatives as previously set out.
- 5.45 The site is located within the Brick Clay (Weald) Mineral Safeguarding Area. No further evidence has been provided which demonstrates that the site is required for further mineral extraction.

SA 33 Ansty Cross Garage, Cuckfield Road, Ansty


- 5.46 This site is not considered to be a sustainable location. A total of four separate sites were considered within Ansty with this being the only one accepted. The only difference between this and the other sites was that this scored slightly higher in the SA due to it being PDL. Whilst this is correct it is not considered that the PDL nature of this site makes it appropriate for allocation within the Sites DPD.

6. Conclusions


- 6.1 Detailed consideration of the sites identified for allocation within the SADPD show that there are some significant technical constraints and policy issues with many of the sites. These are matters which have been previously raised as part of regulation 18 representations and the council has done nothing to address these matters.
- 6.2 The analysis of the proposed allocations demonstrates there are some significant failings in the deliverability of the sites which requires reconsideration of the appropriateness of these allocations and selection of alternative sites.
- 6.3 The selection of sites with significant heritage constraints and also location within the AONB is not considered to be a sound approach. The assessment of reasonable alternatives is significantly lacking and requires further retesting which would logically include this site. As a result, it is not considered that the SADPD is positively prepared or justified and therefore fails the test as set out in the NPPF as a result.
- 6.4 It is clear that the adoption of the SADPD is of significance importance to Mid Sussex in demonstrating a robust and deliverable five year housing land supply. It is therefore suggested that consideration is given to the allocation of the site as set out within these representations which can deliver much needed housing in the early part of the plan period.

7. Appendix 1 – SHELAA Extract – February 2020

Stage 1 Site Pro-Forma – All Sites

SHELAA Ref	508	Parish	Haywards Heath
Site Location	Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath		
			
Site uses	Agriculture		
Gross Site Area (ha)	1		
Potential Yield	30		
Site History			
Absolute Constraint	Flood Zone 2 or 3	x	
	Site of Special Scientific Interest	x	
Other Constraints	Ancient Woodland	x	
	Area of Outstanding Natural Beauty	x	
	Local Nature Reserve	x	
	Conservation Area	Development would not have a negative impact on Conservation Area and Areas of Townscape Character	
	Scheduled Monument	x	
	Listed Buildings	Development will not affect listed building/s	
	Access	Safe access to site already exists	
Suitable	No known constraints - assessed as Suitable at Stage 1, progress to Stage 2 assessment		
Availability	Controller of site has expressed intention to make the site available		
Achievability	There is a reasonable prospect that site could be developed within the Plan period		
Timescale	Medium-Long Term		

8. Appendix 2 – Site Selection Paper 3: Housing (SSP3) Extract

Site Selection - Housing		
Haywards Heath		
ID	508	Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath
		
Site Details		
Units:	25	Site Area (ha): 0.85
Part 1 - Planning Constraints		
1 - AONB	N/A	The site is remote from the High Weald AONB
2 - Flood Risk	None	The site lies entirely within Flood Zone 1, the area of lowest fluvial flood risk.
3 - Ancient Woodland	None	The site is not affected by Ancient Woodland
4 - SSSI/SNCI/LNR	None	This site is not adjacent to any Sites of Special Scientific Interest or Local Wildlife Site
5 - Listed Buildings	None	There are no listed buildings within or adjacent to the site
6 - Conservation Area	None	There are no conservation areas within or adjacent to the site
7 - Archaeology	None	
8 - Landscape	Low/Medium	Development would have a significant and detrimental effect on the character of the landscape as a whole
9 - Trees/TPOs	None	Site is not affected by trees
Part 2 - Deliverability Considerations		
10 - Highways		
11 - Local Road/Access	None	Safe access to site already exists
12 - Deliverability	Reasonable prospect developability	No housebuilder in control of site. Advanced discussions with potential developers/Contractors. Pre application submission within a couple of months.
13 - Infrastructure	Infrastructure capacity	Developer Questionnaire - normal contributions apply.

Site Selection - Housing**Part 3 - Sustainability / Access to Services**

14 - Education	More than 20 Minute Walk	Note: facilities are likely to be provided at Hurst Farm
15 - Health	More than 20 Minute Walk	
16 - Services	15-20 Minute Walk	
17 - Public Transport	Poor	

Part 4 - Other Considerations

Neighbourhood Plan	Minerals
None	Minerals considerations unnecessary as site does not progress past detailed assessment stage.
Waste	Environmental Health
Water and wastewater considerations unnecessary as site does not progress past detailed assessment stage.	Environmental health considerations unnecessary as site does not progress past detailed assessment stage.
Sustainability Appraisal	Notes
Assessment indicates site is not a reasonable alternative and is therefore not tested through the SA.	

Part 5 - Conclusion

Summary	The assessment finds that the site is not suitable for allocation.
Recommendation	Site is not proposed for allocation.

2080

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA32

ID: 2080

Response Ref: Reg19/2080/22

Respondent: Mr A Black

Organisation: Andrew Black consulting

On Behalf Of: Vanderbilt homes - CDR

Category: Promoter

Appear at Examination? x



Mid Sussex District Council

Draft Site Allocations DPD (Regulation 19)
Consultation

Representation on behalf of Vanderbilt Homes –
Land South of 61 Crawley Down Road, Felbridge

September 2020

Project MSDC Draft Site Allocations DPD

ABC Reference ABC/0072/07

Local Authority Mid Sussex District Council

Client Vanderbilt Homes

Issue Final

Author Andrew Black

Date September 2020

Disclaimer: This report has been prepared for the above named client for the purpose agreed in Andrew Black Consulting's (ABC) terms of engagement. Whilst every effort has been made to ensure the accuracy and suitability of the information contained in this report, the results and recommendations presented should not be used as the basis of design, management or implementation of decisions unless the client has first discussed with ABC their suitability for these purposes and ABC has confirmed their suitability in writing to the client. ABC does not warrant, in any way whatsoever, the use of information contained in this report by parties other than the above named client.

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1. Introduction

- 1.1 These representations for the Draft Site Allocations DPD (Regulation 19) Consultation (Herein referred to as the ‘SADPD’) are submitted by Andrew Black Consulting on behalf of Vanderbilt Homes regarding a site within their control at Crawley Down Road in Felbridge.
- 1.2 The site under the control of Vanderbilt Homes is known as Land South of 61 Crawley Down Road, Felbridge and was previously considered in the SHELAA as Available, Achievable and Deliverable.
- 1.3 It is understood that the SADPD has been produced in accordance with the Planning and Compulsory Purchase Act 2004, and other relevant regulations.
- 1.4 The NPPF states that Development Plan Documents should be prepared in accordance with the legal and procedural requirements. To be found to be ‘sound’, plans must be:
 - a) *positively prepared*
 - b) *justified*
 - c) *effective, and*
 - d) *consistent with national policy.*
- 1.5 It is with this in mind that these representations are made.
- 1.6 The draft SADPD has been prepared using an extensive and legally compliant evidence base including a Sustainability Appraisal, Habitat Regulations Assessment, Community Involvement Plan, Equalities Impact Assessment, and various technical reports and studies. Of particular note is the Built Up Area Boundary and Policies Map Topic Paper (TP1) produced in August 2020.
- 1.7 The Site Allocations DPD proposes to allocate 22 sites to meet this residual necessary to meet the overall agreed housing requirement for the plan period as reflected in the ‘stepped trajectory’ and in accordance with the District Plan.
- 1.8 These representations set out the detail of the Site and Surroundings and a response to the detailed parts of the SADPD.

2. Site and Surroundings

- 2.1 The Site is located to the South of Crawley Down Road and is in an area that has experienced significant housing growth in recent years.



Figure 1 – SHELAA Extract

- 2.2 The site was assessed in the most recent SHELAA (Ref 676) as Suitable, Available and Achievable in the Medium to Long Term (The full extract of the SHELAA is set out in Appendix 1). Each of the constraints within the SHELAA for are taken in turn below:

Flood Risk

- 2.3 Whilst the location of the site in flood zone 2/3 is noted within the SHELAA Proforma, the extract from the Environment Agency Flood Risk Map shows this to be negligible. It is only the very southern extent of the site that is potentially within an area of flood risk. In any event, the site can clearly demonstrate the ability to provide a safe access and egress to any housing on site which can equally be located well outside of any areas prone to flooding.

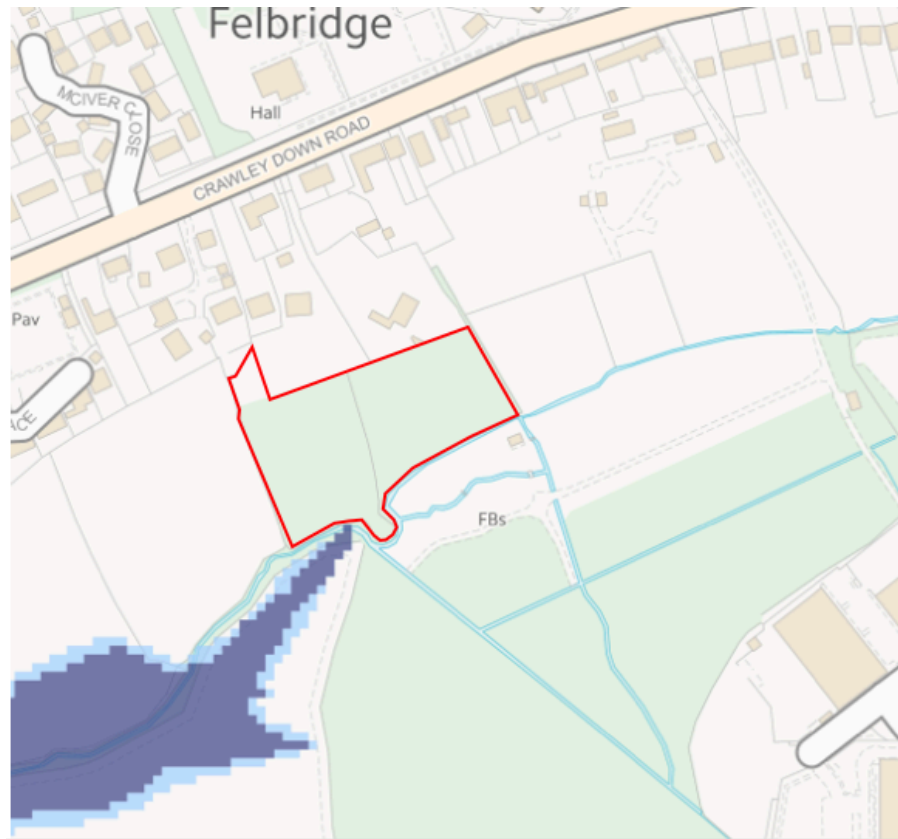


Figure 2 – Extract from Environment Agency Flood Risk Map

Ancient Woodland

- 2.4 The SHELAA report also makes reference to proximity to Ancient Woodland. The map below shows the extent of the nearby ancient woodland which is to the south of the existing site.

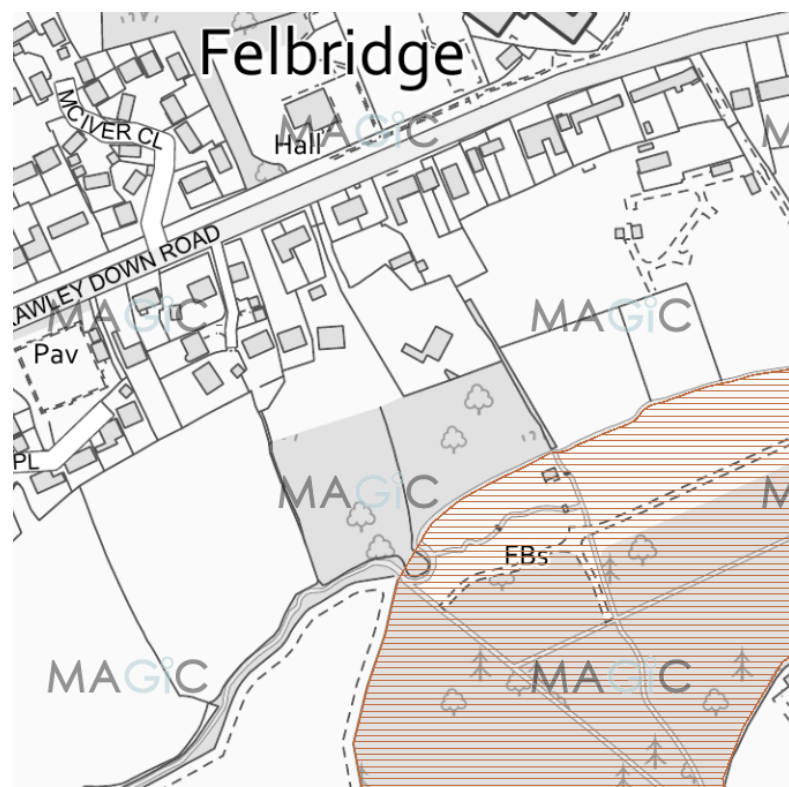


Figure 3 – Location of Ancient Woodland

- 2.5 It is evident that development could be incorporated on the site without any impact on the Ancient Woodland and that an adequate buffer could be provided between any proposed houses and the ancient woodland to the south.

Site of Special Scientific Interest

- 2.6 The site is not within, nor in proximity to, a SSSI

Area of Outstanding Natural Beauty

- 2.7 The site is not within, nor in proximity to, an AONB

Local Nature Reserve

- 2.8 The site is not within, nor in proximity to, a Local Nature Reserve

Conservation Area

- 2.9 The SHELAA specifically states that *development would not have a negative impact on Conservation area and /or Area of Townscape*

Scheduled Monument

- 2.10 There are no scheduled monuments in proximity to the site.

Listed Buildings

- 2.11 The SHELAA confirms that *development will not affect listed buildings*.

Access

- 2.12 The SHELAA sets out that *safe access to the site already exists*.
- 2.13 As set out the site directly adjoins the land to the east which has the benefit of outline planning permission for residential development. This land is also in the control of Vanderbilt Homes and it is possible that access could be provided through this land into this site as indicated below:



Figure 4 – Potential Access.

- 2.14 If the site was assessed against the criteria for Reasonable Alternatives as set out in the Sustainability Appraisal then it would perform identically to the adjoining allocated site. Furthermore it performs better against each of the criteria than the sites at ‘Land south and west of Imberhorne Upper School, Imberhorne Lane’ for 550 dwellings and ‘East Grinstead Police Station, College Lane’ for 12 dwellings. It is therefore entirely logically that this site should be allocated for development within the Site Allocations DPD.

Planning History

- 2.15 The site itself has been subject to a number of previous applications which are set out below:

App Ref	App Date	Description of Development	Decision
12/02577	Jul 2012	Residential development comprising 7 dwellings (3 detached properties and 2 pairs of semi-detached houses) with associated garaging, new road layout and landscaping.	Refused / Appeal Withdrawn
13/02528	Jul 2013	Residential development comprising 5 detached dwellings with associated garaging, new road layout and landscaping	Refused / Appeal Dismissed
16/5662	Dec 2016	Residential development comprising 4 no. detached dwellings.	Refused / Appeal Dismissed.

- 2.16 The previous applications were refused on the basis of the site being outside of the settlement boundary and therefore any development would have been considered to be in direct conflict with the adopted District Plan at the time of determination. The outcome of these applications would clearly have been different had the sites been within the Built Up Area Boundary
- 2.17 No other issues were identified which would warrant refusal of an application if the site was within the Built Up Area Boundary as proposed within the draft SADPD.

Surrounding Developments and Proposed Allocations

- 2.18 The site located directly to the east has the benefit of an outline planning permission for the *erection of 63 dwellings and new vehicular access onto Crawley Down Road required [sic] the demolition of existing buildings and structures at no's 15 and 39 Crawley Down Road (DM/17/2570)*
- 2.19 The access to the site is located within Tandridge District Council which was granted under application TA/2017/1290.



Figure 5 – Approved Parameters Plan of adjoining site – Outline Planning Application

- 2.20 Reserved matters applications have been made against both of the outline applications. The reserved matters application for the access was approved by Tandridge Council in July 2020 (TA/2020/555).
- 2.21 At the time of submission of these representations, the reserved matters application for the housing within the Mid Sussex element of the site for the housing is still under determination (DM/20/1078).
- 2.22 It is therefore highly likely that the development of the land directly adjoining the site subject to these representations will come forward in the immediate short term.



Figure 6 – Reserved Matters Plan for adjoining site.

- 2.23 The site (yellow) is therefore directly between the allocated site SA19 for 196 dwellings to the east (pink) and the site subject to approval for 63 dwellings (blue).

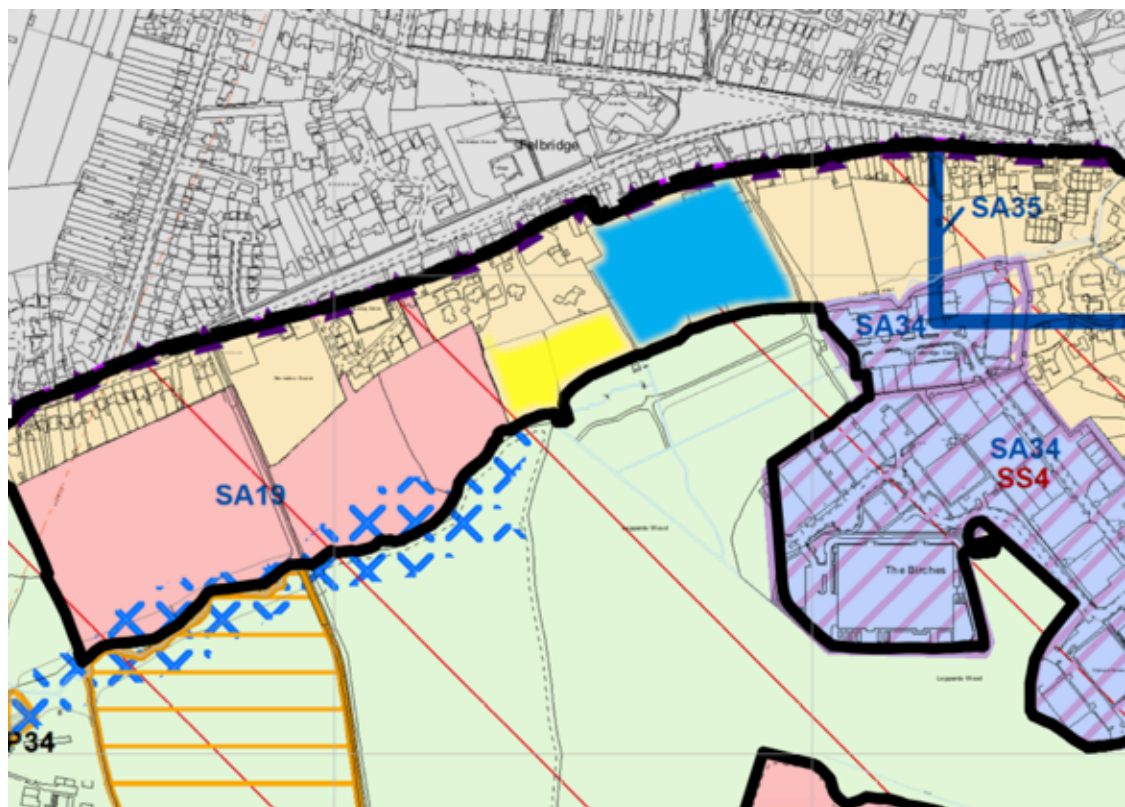


Figure 7 – Map of proposed allocation SA19, BUAB, Consented Land and Proposed Site

- 2.24 Overall, it is considered that the immediate context of this site makes it highly appropriate for allocations within the SADPD.

3. Built up Area Boundary Review

- 3.1 In addition to the allocation of sites for development the SADPD seeks to make changes to the existing Built Up Area Boundary (BUAB) as established under the District Plan Process. The Built Up Area Boundary and Policies Map Topic Paper (TP1) produced in August 2020 forms a vital part of the evidence base for the SADPD.
- 3.2 Paragraph 2.4 of TP1 sets out that the purpose of the review as part of the SADPD is to:
- *Assess areas that have been built since the last review, which logically could be included within the BUA.*
 - *Assess areas that have planning permission which have not yet commenced/completed, which logically could be included within the BUA.*
- 3.3 TP1 goes on to set out the criteria for consideration of changes to the boundary.
- 3.4 Within the adopted District Plan proposals map, the site is outside of the Built Up Area Boundary as illustrated in the extract below:



Figure 8 – Existing District Plan Proposals Map

- 3.5 Within the draft SADPD, it is proposed that the site, and all adjoining land will be now set within the BUAB as highlighted below.

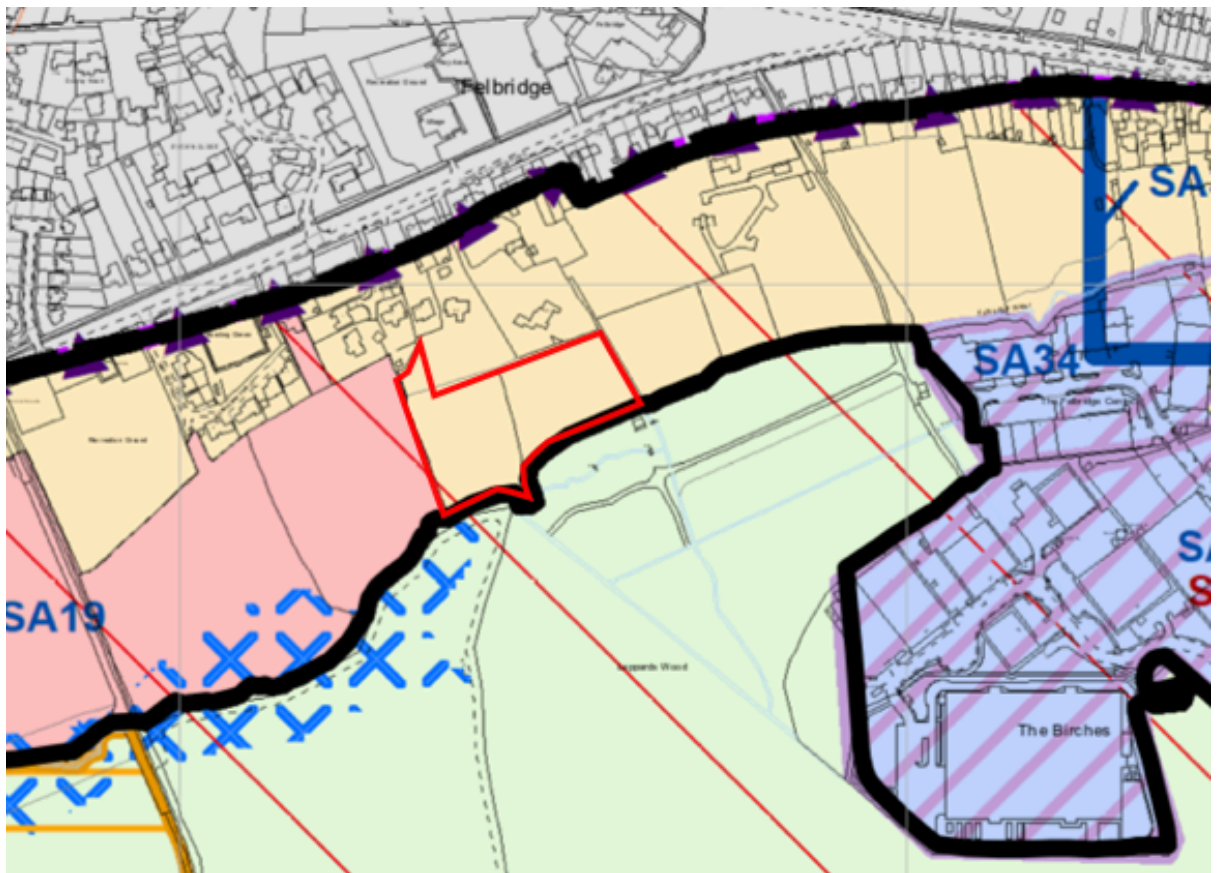


Figure 9 – Proposed BUAB

- 3.6 The principle of including this site within the BUAB is logical and supported. However, for reasons as set out in subsequent sections of these representations, it is considered that it would be appropriate for the site to be allocated for development.

4. Housing Site Allocation Process

- 4.1 The District Plan 2014-2031 sets out the housing requirement for the district for the plan period of 16,390 dwellings. This meets the Objectively Assessed Need (OAN) for the district of 14,892 dwellings in full and makes provision for the agreed quantum of unmet housing need for the Northern West Sussex Housing Market Area, to be addressed within Mid Sussex, of 1,498 dwellings.
- 4.2 The District Plan 2014-2031 established a ‘stepped’ trajectory for housing delivery with an average of 876 dwellings per annum (dpa) between 2014/15 and 2023/24 and thereafter an average of 1,090 dpa between 2024/25 and 2030/31. This represents a significant increase in housing supply compared with historical rates within the district.
- 4.3 The latest data on completions from MSDC was published in *MSDC Housing Land Supply Position Statement* was published in August 2020 (Document H1) and shows a significant shortfall in delivery against the housing requirement since the start of the plan:

Category		Number of Dwellings
Housing Requirement for the full plan period (April 2014 to March 2031)		16,390
Housing Completions (April 2014 to March 2020)		4,917
Completions 2014/15		630
Completions 2015/16		868
Completions 2016/17		912
Completions 2017/18		843
Completions 2018/19		661
Completions 2019/20		1003
Housing Supply (April 2014 to March 2031)	Commitments (including District Plan Allocations)	9,689
	Site Allocations DPD - Allocations	1,764
	Windfalls	504
Total Supply (at 1 April 2019)		16,874

Figure 10 – Extract from MSDC Housing Land Supply Position Statement

- 4.4 The Housing Delivery Test was introduced in the July 2018 update to the NPPF. The Housing Delivery Test is an annual measurement of housing delivery for each local authority and the first results were published in February 2019 by the Ministry of Housing, Communities and Local Government (MHCLG). Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority’s housing requirement over the previous 3 years then it is required to prepare an action plan. Where delivery has fallen below 85% of the housing requirement a 20% buffer should be added to the five year supply of deliverable sites.
- 4.5 The result for Mid Sussex produced in February 2020 was 95%. This result is based on monitoring years 2016-17, 2017-18 and 2018-19. Mid Sussex is therefore not required to add 20% buffer for significant under delivery, or prepare an Action Plan. However, it is clear that under current performance the council will struggle when the housing target steps up to 1,090 in 2024.
- 4.6 Para 4.10 of the previous MSDC Housing Land Supply Position Statement (2019) sets out the five year supply requirement for the district as follows:

Annual Requirement As set out in District Plan	876 x 5 years =	4,380
Shortfall spread over remaining plan period	466 divided by 12 remaining years x 5 years	194
Total		4,574
Buffer (see paras 2.4,4.9 above)	10%	457
Total five year supply requirement		5,032

*Figure 11 – Total Five Year Housing Requirement taken from MSDC Housing Land Supply
Position Statement*

- 4.7 MSDC is seeking to confirm the five year housing land supply under the terms of paragraph 74 of the NPPF through submission of the annual position statement to the secretary of state. Paragraph 74 of the framework states:

A five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan, or in a subsequent annual position statement which:

- a) has been produced through engagement with developers and others who have an impact on delivery, and been considered by the Secretary of State; and*
- b) incorporates the recommendation of the Secretary of State, where the position on specific sites could not be agreed during the engagement process.*

- 4.8 The report on the Annual Position Statement was issued by the Planning Inspectorate on 13 January 2020. It was confirmed that as the council did not have a recently adopted plan in conformity with the definition of the NPPF then the correct process had not been followed and the inspector was unable to confirm that the council had a five year housing land supply.
- 4.9 It is therefore clear that the council does not currently have a five year housing land supply and the demonstration of sufficiently deliverable sites within the SADPD is of critical importance for MSDC.

Deliverability of Sites

- 4.10 Any sites that have been included in the final Sites DPD will need to pass the tests of deliverability as set out in the NPPF. This is defined within the glossary of the framework as follows:

Deliverable: *To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

- 4.11 The Planning Practice Guidance provides a further explanation on how the deliverability of sites should be considered:

A site can be considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available.

The existence of planning permission can be a good indication of the availability of sites. Sites meeting the definition of deliverable should be considered available unless evidence indicates otherwise. Sites without permission can be considered available within the first five years, further guidance to this is contained in the 5 year housing land supply guidance. Consideration can also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions.

Paragraph: 019 Reference ID: 3-019-20190722

Revision date: 22 07 2019

- 4.12 It is with this in mind that the proposed sites within the Sites DPD are scrutinised within subsequent sections of this document. It is considered that many of the proposed sites do not fully accord with the definition of delivery and consideration of alternative sites is required.

Area of Outstanding Natural Beauty

- 4.13 A significant number of the proposed sites are located within, or close to, the High Weald AONB. Paragraph 172 sets out the significant protection which should be afforded to the AONB in planning terms and states that:

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

and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

4.14 It is part b of paragraph 172 that is of particular importance in this instance. It is not considered that MSDC has considered sites outside of the AONB should be used to meet the identified residual housing requirement. It would appear that sites have been selected because of their conformity to the spatial strategy and hierarchy without the proper application of the ‘great weight’ required to protect the AONB.

4.15 The approach of allocating sites within the AONB as opposed to ‘outside the designated area’ should have been tested through a robust analysis of reasonable alternatives within the Sustainability Appraisal. The failure to do this adequately is a matter of soundness and it is considered that the Sites DPD fails the tests within the NPPF on this basis alone.

Historic Environment

4.16 Several of the allocations within the DPD are in close proximity to heritage assets. Paragraph 193 of the framework sets out the approach to heritage assets as follows:

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

4.17 In many instances the council themselves suggest that the development of housing on the sites is likely to have ‘less than significant harm’ on the heritage assets in question. Paragraph 196 of the framework sets out the approach which should be taken in this instance:

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable

4.18 It is not considered that the harm caused to heritage assets has been adequately assessed within the Sustainability Appraisal for many of the proposed sites and further consideration is required of the sites in this regard. This would include assessing sites which would not have an impact on heritage assets through a robust application of reasonable alternatives within the Sustainability Appraisal.

5. Sustainability Appraisal

- 5.1 The SADPD is accompanied by a Sustainability Appraisal (SA) report which is a legal requirement derived from the Planning and Compulsory Purchase Act 2004 (Section 19). Section 39 of the Act requires documents such as the SADPD to be prepared with a view to contributing to the achievement of sustainable development.
- 5.2 The requirement for Strategic Environmental Assessment, in addition to the SA, is set out in the European Directive 2001/42/EC adopted into UK law as the “Environmental Assessment of Plans or Programmes Regulations 2004”.
- 5.3 In line with best practice the SEA has been incorporated into the SA of the SADPD.
- 5.4 The planning practice guidance sets out detailed consideration as to how any sustainability should assess alternatives and identify likely significant effects:

The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. In doing so it is important to:

- *outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option). Criteria for determining the likely significance of effects on the environment are set out in [schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004](#);*
- *as part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them;*
- *provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives.*

Any assumptions used in assessing the significance of the effects of the plan will need to be documented. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.

The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings.

Paragraph: 018 Reference ID: 11-018-20140306

Revision date: 06 03 2014

- 5.5 In response to this guidance and requirement, paragraph 6.16 of the Sustainability Appraisal states that:

The Site Selection Paper 2 (paras 6.2 - 6.3) also recognises that, in order to meet the District Plan strategy, conclusions will be compared on a settlement-by-settlement basis with the most suitable sites at each settlement chosen in order to meet the residual needs of that settlement. This may result in some sites being chosen for allocation which have higher negative impact across all the objectives because this will be on the basis that the aim is to distribute allocations according to the District Plan strategy in the first instance; as opposed to simply selecting only

the most sustainable sites in the district (as this may not accord with the spatial strategy and would lead to an unequal distribution of sites across settlements). 20 sites that perform well individually and on a settlement basis, the residual housing need of 1,507 would be met with a small over-supply of 112 units.

- 5.6 Paragraph 6.45 recognises that this small over-supply *may not be a sufficient buffer should sites fall out of the allocations process between now and adoption (for example, due to delivery issues, reduction in yield, or any other reasons identified during consultation or the evidence base).*

- 5.7 The SA therefore considers reasonable alternatives of option A, B and C as follows:

Option A – 20 ‘Constant Sites’ – 1,619 dwellings

Option B – 20 ‘Constant Sites’ + Folders Lane, Burgess Hill (x3 sites) – 1,962 dwellings.

Option C – 20 ‘Constant Sites’ + Haywards Heath Golf Court – 2,249 dwellings

- 5.8 Paragraph 6.52 of the SA concludes that:

Following the assessment of all reasonable alternative options for site selection, the preferred option is option B. Although option A would meet residual housing need, option B proposes a sufficient buffer to allow for non-delivery, therefore provides more certainty that the housing need could be met. Whilst option C also proposes a sufficient buffer, it is at the expense of negative impacts arising on environmental objectives. The level of development within option C is approximately 50% above the residual housing need, the positives of delivering an excess of this amount within the Site Allocations DPD is outweighed by the negative environmental impacts associated with it.

- 5.9 It is not considered that this assessment of Option A, B and C is a sufficient enough assessment of reasonable alternatives as required by guidance and legislation. All of the options contain the ‘20 Constant Sites’ with no derivation of alternative options such as those which seek to divert housing growth away from the AONB or designated heritage assets.

- 5.10 It is apparent that other sites other than the 20 Constant Sites will need to be assessed if the council is to adequately demonstrate that reasonable alternatives have been considered as required.

6. Assessment of Proposed Sites.

- 6.1 This section analyses each of the proposed allocations against the tests of deliverability as set out in the NPPF and the potential shortcomings of several of the sites which require significant consideration. The findings of *Appendix B: Housing Site Proformas* of the *Site Selection Paper 3* (Appendix B) and the conclusions of the Sustainability Appraisal (SA) are considered in detail.

SA 12 Land South of 96 Folders Lane, Burgess Hill

- 6.2 Appendix B of the reg 18 SADPD set out that this site has *moderate landscape sensitivity and moderate landscape value. This site could be visible from the South Downs National Park*. The SA states that an LVIA is required to determine any impact on the national park. Given the weight that the NPPF requires to be placed on the protection of the national park, any impact must be measured prior to allocation. If it is deemed that mitigation would not minimise the harm caused, then the proposed allocation must fall away.
- 6.3 Appendix B of the reg 18 SADPD also set out that a TPO area lines the norther border and potential access route. It should be noted that an application was submitted in 2019 for the *erection of 43 dwellings and associated works* (DM/19/0276) but was withdrawn in September 2019 due to concerns over highways. The deliverability of this site is therefore not considered to be in accordance with the guidance set out in the framework.
- 6.4 Finally, whilst the priority for sites higher in the settlement hierarchy is acknowledged, this is site is very remote from the services offered by Burgess Hill. This is highlighted within the sustainability appraisal for the site which states that it is more than a 20 minute walk from the site to schools, GP and shops.

SA 13 Land East of Keymer Road and South of Folders Lane, Burgess Hill.

- 6.5 As with SA12, this site is in close proximity to the national park and the conclusions as set out above apply equally to this site.
- 6.6 The SA sets out that this is the only site within Burgess Hill to have any impact on listed buildings where it is stated that development of this site would cause *less than substantial harm (medium) on High Chimneys (Grade II listed)*. This is not mentioned within appendix B and this therefore calls into question the consistency of assessment of the sites in this regard.
- 6.7 Given that site SA12 and SA13 are in close proximity to one another it is notable that the cumulative impact of the development of both of these sites has not been assessed for a number of ‘in-combination’ impacts such as highways and landscape impact.

SA 14 Land to the south of Selby Close, Hammonds Ridge, Burgess Hill

- 6.8 There is a TPO at the front of this site which is potentially why access is proposed through the CALA Homes site (DM/17/0205). No evidence is submitted to suggest that this form of access is agreed or available. The section relating to Highways and Access within the SADPD simply states that this access *will need to be investigated further*.
- 6.9 The SA and appendix B both point towards the Southern Water Infrastructure which crosses the site. The wording in the DPD recommends that the layout of the development is considered to *ensure future access for maintenance and/or improvement work, unless diversion of the sewer is possible*. Given that the site is only 0.16ha it is therefore questionable whether there would be adequate space to develop the site for housing and provide accommodation for the sewage infrastructure crossing the site. The deliverability of this site has therefore not been adequately demonstrated.

- 6.10 As with SA12 and SA13 there are questions of the sustainability of the site given that the SA notes that it is more than a 20 minute walk to the school and GP.

SA 15 Land South of Southway, Burgess Hill

- 6.11 The SADPD describes the site as *overgrown and inaccessible land designated as a Local Green Space in the Burgess Hill Neighbourhood Plan*. It is unclear whether this site was ever previously in use as playing pitches and whether re-provision of this space would be required under Sport England policies.
- 6.12 Appendix B of the reg 18 SADPD points towards issues with relocation of existing parking on the site and states that:

Private parking areas would need to be removed to provide a suitable access point with sufficient visibility. The parking spaces are visitor spaces over which the owners/developers of the subject land have rights to access it to serve new development onto Linnet Lane. Accordingly, a new access into the site can be provided any new development would include two visitor spaces as close as reasonably possible to the existing visitor spaces.

- 6.13 It is clear that there are substantial issues with deliverability and availability of this site given these constraints and the site should be deleted as a proposed allocation until this can be adequately demonstrated.

SA 16 St. Wilfrids Catholic Primary School, School Close, Burgess Hill

- 6.14 The SADPD sets out that the satisfactory relocation of St Wilfrid's Primary School to St Paul's Catholic College site is required before development can commence on the school part of the site. There is also a requirement to re-provide the emergency services accommodation in a new emergency service centre either on this site or elsewhere in the town.
- 6.15 Given that the allocation is for 300 dwellings and requires this relocation first, it is considered that there is insufficient evidence to justify delivery of development of this site in the 6-10 year time period as set out.

SA 17 Woodfield House, Isaacs Lane, Burgess Hill

- 6.16 The SADPD sets out some significant landscape features on site which require retention and it is stated that:

There is a group Tree Preservation Order in the southern and western areas of the site. High quality substantial new planting of native trees is required, should these be lost to provide access from Isaac's Lane. All other TPO trees on the site are to be retained.

Retain and enhance important landscape features, mature trees, hedgerows and the pond at the south of the site and incorporate these into the landscape structure and Green Infrastructure proposals for the development. Open space is to be provided as an integral part of this landscape structure and should be prominent and accessible within the scheme.

- 6.17 Given that the site is only 1.4 hectares in size it is questionable whether there is adequate space on the site for 30 dwellings after retention of these landscape features.
- 6.18 It is clear from the Sites DPD that access to site is envisaged to be from the Northern Arc where it is stated that:

Integrated access with the Northern Arc Development is strongly preferred, the details of which will need to be investigated further.

- 6.19 This is also set out in appendix B of the reg 18 SADPD where it is stated that:

Entrance drive to house. Access on bend with limited visibility. 50 mph road. Would involve removal of trees that are subject to TPO. Objection for tree officer. However, future access is anticipated to be provided via the Northern Arc. Whilst the specific details of this remain uncertain on the basis that the enabling development is still at an early stage, it is considered that the identified constraints will no longer apply.

- 6.20 Given the uncertainty of the deliverability of the land immediately adjoining the site as part of the Northern Arc it is considered that the deliverability of this site is not clear enough to justify allocation within the sites DPD. The uncertainty of this deliverability also has an implication of the sustainability of the site and proximity to adequate services. This is highlighted within the SA where it is stated that:

The impact of option (h) on these objectives (Health/Retail/Education) is uncertain; currently the site is a long distance from local services, however, this will change once the Northern Arc is built out.

- 6.21 Overall it is not considered that this site is suitable for allocation and should be removed from the Sites DPD

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

- 6.22 We have no comments to make in relation to this allocation.

SA 19 Land south of Crawley Down Road, Felbridge

- 6.23 As set out, this allocation is directly to the west of the land under the control of Vanderbilt Homes which is also adjoined to the east by land with the benefit of planning permission for 63 dwellings.

- 6.24 Given that the entire area will be included within the revised Built Up Area Boundary, then it is considered logical that the adjoining sites are also identified for allocation within the SADPD.

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

- 6.25 There is a requirement in the SADPD for this site to provide a detailed phasing plan with agreement from key stakeholders to secure:

- Land for early years and primary school (2FE) provision – 2.2 ha
- A land exchange agreement between WSCC and the developer to secure 6 ha (gross) land to create new playing field facilities in association with Imberhorne Secondary School (c.4 ha net - excluding land for provision of a new vehicular access onto Imberhorne Lane).

- 6.26 It is unclear when these requirements are to be provided by within the development of any site and whether it is considered that the site would be suitable for allocation should these uses not come forward.

- 6.27 There are clear concerns over the suitability of this site in terms of ecology as set out in appendix B of the reg 18 SADPD which states:

Natural England have concerns over the high density of housing south of Felbridge. Hedgecourt SSSI is accessible from the proposed site allocations via a network of Public Rights of Way. In

line with paragraph 175 of the NPPF, Mid Sussex District Council should determine if allocations are likely to have an adverse effect (either individually or in combination) on SSSI's. The NPPF states that "if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused." We would be happy to provide further advice if requested, although this may need to be on a cost recovery basis. The LWS adjacent to the site is an important recreational route and therefore consideration needs to be given to additional recreational disturbance to its habitats. We are unable to advise you on specific impacts as we have no details of the scale or type of proposed development consider further impacts of disturbance of the LWS and Ancient woodland arising from people and domestic pets, connectivity, light and noise pollution, appropriate buffer and cumulative impact. This site is adjacent to the Worth Way. The SHELAA should be redrawn to remove the section of LWS. The site is an important recreational route and therefore consideration needs to be given to additional recreational disturbance to its habitats. Further consideration be given to impacts of disturbance on LWS and Ancient Woodland from people and pets, impacts on connectivity, impacts of light and noise pollution, need for Ancient Woodland buffer. Cumulative impact with SHELAA 686 and 561.

- 6.28 It is clear that the impacts upon ecology and the SSSI have not been adequately addressed.
- 6.29 As with other sites there is potential for impact upon local heritage assets of Gullege Farm, Imberhorne Farm and Imberhorne Cottages as set out below. The harm in terms of less than strategic harm is inappropriately weighted in the assessment as a means for justification of allocation.

APPENDIX B : Gullege Farm, Imberhorne Lane

This isolated farmstead has historically had a rural setting and continues to do so today. The introduction of a substantial housing development to the north, east and south of the listed manor house would have a fundamental impact on the character of that setting and would detract from the way in which the special interest of this Grade II listed rural manor house and the of the historic farmstead is appreciated.

NPPF: LSH, high

Imberhorne Farm and Imberhorne Cottages

In its original incarnation Imberhorne Cottages was probably constructed as a dwelling providing accommodation between London and Lewes, on Lewes Priory lands. It may have acted as the manor house to the substantial manor of Imberhorne, which was owned by the Priory. It seems likely that the building became farm cottages when the new farmhouse (Imberhorne) was constructed in the early 19th century. The currently rural setting of both buildings within the Imberhorne farmstead informs an understanding of their past function and therefore contributes positively to their special interest.

The proposed development site would engulf the farmstead to the west, north and east and would have a fundamental impact on the character of the greater part of its existing of rural setting and on views from both listed buildings. It would adversely affect the manner in which the special interest of the two listed buildings within their rural setting is appreciated, including by those passing along the PROW to the north of the farmstead.

NPPF: LSH, high

- 6.30 The potential harm to heritage is also referred to in the SA which states that:

option (e) which is not constrained by a conservation area, but would have a less than substantial harm (high) on Gullege Farm (Grade II listed) and Imberhorne Farm and Imberhorne Cottages (Grade II listed). As this is a large site, there is potential to still achieve the yield whilst providing necessary mitigation to lower the impact on these heritage assets.*

- 6.31 Notwithstanding the significant constraints to delivery from this site it is notable that the delivery of 550 in 6-10 years as set out in the SADPD is particularly optimistic and would need to be revised in order to be realistic on the constraints to delivery including the requirement for provision of education on the site.

SA 21 Rogers Farm, Fox Hill, Haywards Heath

- 6.32 This site is also significantly constrained by the presence of heritage assets. This is referenced in the SA which states that:

Site option (b) is constrained in terms of impact upon a listed building; it would have a less than substantial harm (medium) on Cleavewater (Grade II listed) and The Old Cottage (Grade II listed).

- 6.33 Appendix B also references these heritage assets together with an assessment of the likely impact as follows:

*Cleavewaters, Fox Hill there would be a fundamental impact not only on views from the building and associated farmstead but on the context and manner in which the farmhouse and farmstead are appreciated by those travelling along the road which runs between the farmstead and the site. **NPPF: LSH, MID***

*Olde Cottage, there would be some potential impact on views from the Cottage and its garden setting. The belt of woodland between the asset and the site is relatively narrow and development on the site is likely to be visible, particularly in winter. There would also be an impact on the setting in which the Cottage is appreciated by those approaching along the access drive from Ditchling Road. **NPPF: LSH, MID***

- 6.34 The impact on heritage assets and character of the area has been assessed in an appeal decision on the site (APP/D3830/W/17/3187318) issued in January 2019 following an application for up to 37 dwellings on the site (DM/16/3998).

15 The combination of the buffer and local topography would mean that any development would be clearly visible on the approach down Lunce's Hill and perceived as a separate and distinct residential development. I am not persuaded that it would be seen within the context of an urban fringe setting as the appellant suggests. On the contrary it would be a harmful encroachment into the countryside and the rural character of the approach into the settlement would be irrevocably changed and harmed through the loss of this open land.

16 Overall, the proposal would result in an unacceptable suburbanisation of the appeal site that would fundamentally change the character and appearance of the rural setting of the settlement. The effects would also be exacerbated somewhat by the loss of part of the existing mature hedgerow for the access. Proposed mitigation, in the form of additional landscaping would restrict the visibility of the proposal from a number of viewpoints. However, it would take a substantial amount of time to mature and be dependent on a number of factors to be successful. Moreover, I am not persuaded that it would fully mitigate the visual impacts.

17 For these reasons, the proposal would not be a suitable site for housing in terms of location and would cause significant harm to the character and appearance of the area. It would therefore conflict with Policy C1 of the LP and Policies E5 and E9 of the HHNP. In addition to the requirements set out above, these policies also require new development to be permitted where it would protect, reinforce and not unduly erode the landscape character of the area. There would also be some conflict with Policies DP10 and DP24 which, seek to protect the countryside in recognition of its intrinsic character and beauty and promote well located and designed development.

- 6.35 Overall it is not considered that the site represents a logical, justified or deliverable site and should not be considered for allocation within the Sites DPD.

SA 22 Land north of Burleigh Lane, Crawley Down

- 6.36 No comments.

SA 23 Land at Hanlye Lane to the east of Ardingly Road, Cuckfield

- 6.37 The site is within close proximity to the High Weald AONB. Previous comments made in relation to the requirements of the NPPF in relation to AONB for other allocations apply equally to this site.

SA 24 Land to the north of Shepherds Walk, Hassocks

- 6.38 The access for this site is through an adjacent parcel of land which has a ransom strip over this land. The deliverability of this site is therefore in doubt unless a right of access can be confirmed by the site owners.

SA 25 Land west of Selsfield Road, Ardingly

- 6.39 This site is located within the AONB and comments made in this regard to other proposed allocations apply to this site. The SA references this impact as follows:

There is a 'Very Negative' impact against objective (9) due to its location within the High Weald AONB, however the AONB unit have concluded that there is Moderate Impact as opposed to High Impact

- 6.40 The conclusions of the AONB unit have not been provided as part of the evidence base and requires further scrutiny in order to assess the impact of development of this site in this regard.

SA 26 Land south of Hammerwood Road, Ashurst Wood

- 6.41 The site is within the AONB and it is considered it is inappropriate to allocate this site for development without thorough appraisal of reasonable alternatives as previously set out.

SA 27 Land at St. Martin Close, Handcross

- 6.42 No comments.

SA28 Land South of The Old Police House, Birchgrove Road, Horsted Keynes

- 6.43 No comments.

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

- 6.44 The site is within the AONB and it is considered it is inappropriate to allocate this site for development without thorough appraisal of reasonable alternatives as previously set out.

SA 30 Land to the north Lydon, Reeds Lane, Sayers Common

- 6.45 The sustainability of this site has been considered in the SA which sets out that the site is more than 20 minutes away from services such as GP and the School. It is therefore not considered that the development of this site would be justified in sustainability terms.
- 6.46 The site is located within the Brick Clay (Weald) Mineral Safeguarding Area. No further evidence has been provided which demonstrates that the site is required for further mineral extraction.

SA 31 Land to the rear Firlands, Church Road, Scaynes Hill

- 6.47 The site is located within the Building Stone (Cuckfield) Mineral safeguarding Area. No further evidence has been provided which demonstrates that the site is required for further mineral extraction.

SA 32 Withypitts Farm, Selsfield Road, Turners Hill

- 6.48 The site is within the AONB and it is considered it is inappropriate to allocate this site for development without thorough appraisal of reasonable alternatives as previously set out.
- 6.49 The site is located within the Brick Clay (Weald) Mineral Safeguarding Area. No further evidence has been provided which demonstrates that the site is required for further mineral extraction.

SA 33 Ansty Cross Garage, Cuckfield Road, Ansty


- 6.50 This site is not considered to be a sustainable location. A total of four separate sites were considered within Ansty with this being the only one accepted. The only difference between this and the other sites was that this scored slightly higher in the SA due to it being PDL. Whilst this is correct it is not considered that the PDL nature of this site makes it appropriate for allocation within the Sites DPD.

7. Conclusions

- 7.1 Overall, the principle of extending the Built Up Area Boundary to the south of Crawley Down Road to include the site within the control of Vanderbilt Homes is logical and supported.
- 7.2 The site has been identified within the SHELAA as being Suitable, Available and Achievable. However, given that the site is adjoined on one side by an allocated site and on another side by a site with the benefit of planning permission, it is considered that it would be entirely appropriate for the site to be allocated for development.
- 7.3 Detailed consideration of the sites identified for allocation within the SADPD show that there are some significant technical constraints and policy issues with many of the sites. These are matters which have been previously raised as part of regulation 18 representations and the council has done nothing to address these matters.
- 7.4 The analysis of the proposed allocations demonstrates there are some significant failings in the deliverability of the sites which requires reconsideration of the appropriateness of these allocations and selection of alternative sites.
- 7.5 The selection of sites with significant heritage constraints and also location within the AONB is not considered to be a sound approach. The assessment of reasonable alternatives is significantly lacking and requires further retesting which would logically include this site. As a result, it is not considered that the SADPD is positively prepared or justified and therefore fails the test as set out in the NPPF as a result.
- 7.6 It is clear that the adoption of the SADPD is of significance importance to Mid Sussex in demonstrating a robust and deliverable five year housing land supply. It is therefore suggested that consideration is given to the allocation of the site as set out within these representations which can deliver much needed housing in the early part of the plan period.

8. Appendix 1 – SHELAA Extract – February 2020

Stage 1 Site Pro-Forma – All Sites

SHELAA Ref	676		Parish	East Grinstead
Site Location	Land south of 61 Crawley Down Road, Felbridge			
				
Site uses	Dwellings			
Gross Site Area (ha)	1.6			
Potential Yield	6			
Site History	Planning Application - Refused			
Absolute Constraint	Flood Zone 2 or 3	✓		
	Site of Special Scientific Interest	✗		
Other Constraints	Ancient Woodland	✓		
	Area of Outstanding Natural Beauty	✗		
	Local Nature Reserve	✗		
	Conservation Area	Development would not have a negative impact on Conservation area and/or Area of Townscape Character		
	Scheduled Monument	✗		
	Listed Buildings	Development will not affect listed building/s		
	Access	Safe access to site already exists		
Suitable	Relatively unconstrained - assessed as Suitable at Stage 1, progress to Stage 2 assessment			
Availability	Recent relevant planning history shows the site is considered available			
Achievability	There is a reasonable prospect that site could be developed within the Plan period			
Timescale	Medium-Long Term			

