

SA35: Safeguarding of Land for Delivery of Strategic Highway Improvements - Index by ID Number

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
602	Mr J Beale	East Grinstead Society		Organisation	<input type="checkbox"/>
625	Mrs J Nagy	Worth Parish Council		Town & Parish Council	<input checked="" type="checkbox"/>
738	Ms K Lamb	DMH Stallard	Welbeck - Imberhorne	Promoter	<input checked="" type="checkbox"/>
748	Ms L Brook	Sussex Wildlife Trust		Statutory Consultee	<input type="checkbox"/>
784	Mrs D Thomas	Bolney Parish Council		Town & Parish Council	<input type="checkbox"/>
910	Ms V Riddle	Tandridge District Council		Local Authority	<input type="checkbox"/>
1436	Ms M Collins			Resident	<input type="checkbox"/>
2016	Mr A Fox	Quod	Mayfield Market Towns	Promoter	<input checked="" type="checkbox"/>
2016	Mr A Fox	Quod	Mayfield Market Towns	Promoter	<input checked="" type="checkbox"/>

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA35

ID: 602

Response Ref: Reg19/602/1

Respondent: Mr J Beale

Organisation: East Grinstead Society

On Behalf Of:

Category: Organisation

Appear at Examination? x

Site Allocations and Development Plan Document (DPD) - July 2020

Response by The East Grinstead Society

We commented on the Draft of this plan in November 2019 and regret that so little has been varied in the ensuing period to July 2020.

As before our comments relate to both the general context of East Grinstead and the three specific sites in the DPD, SA18, SA19 and SA20. We end with some general conclusions

Context

Our start point is that we see no evidence of unmet demand for housing in East Grinstead when there is so much unfilled accommodation. We believe that there is an overwhelming view in the Town that it is necessary to protect its unique market town heritage and not let it slip further into being a satellite of Crawley. This view is not simply an unnecessarily negative response but one underpinned by serious and long recognised issues around traffic congestion and an inadequate local road system.

Regarding the general situation SA35 – Safeguarding of land for and Delivery of Strategic Highway Improvements – is of particular relevance. This effectively concedes that the developments now proposed in the DPD will cause unacceptable road congestion throughout the East Grinstead area without major road improvements. It identifies the land that should be safeguarded to support the delivery of transport schemes, particularly the A22/A264 corridor upgrades at Felbridge, Imberhorne Lane and Lingfield Road. It goes on to suggest that there will be a need for further consultations between MSDC, WSCC, and other relevant parties, presumably Surrey County Council and Tandridge District Council but particularly East Grinstead Town Council.

Considering the long history of the congestion issue and its continuing impact on the issue of development in and around East Grinstead it is wishful thinking in the extreme to offer consultation as a key to unlock the issue without any evidence of any chance of success this time.

Thus until these consultations have taken place, a plan of action agreed and the works commenced it would appear to be imprudent to commence the housing developments envisaged in the DPD .

There is a major omission from the proposed list of safeguarded land in SA35. This is the junction of the Crawley Down Road and the A264. The two roads meet at a very acute angle and we are led to understand that the green space at this junction which would apparently allow expansion of the junction is protected by the terms of a gift to the people of Felbridge so this is a non-starter as congestion mitigation.

Specific Sites

SA18 Police Station East Court

The site is adjacent to the East Court Mansion which is a listed building with a large conservation area around it. The existing parking facilities relate to the needs of the council offices and the hirers of the public buildings on the site. The private road that services these buildings is narrow and is only provided for visitors and not for through traffic. The junctions for this private

road with the public road network are not suitable for significant extra traffic. Any parking facilities required for this proposed development will have to be within the site and not spill over into the Mansion parking facilities. There is a childrens' playground close by which must be protected from the potential threat of through traffic.

Furthermore, we think there are some important underlying questions. What are the implications for the Old Court House which is joined to the Police Station and could it be incorporated into the scheme? Have any surveys been undertaken to study the stability of the land to ensure that the development would not slip into Blackwell Hollow?

SA19 Backland along Crawley Down Road

This proposal is complicated by the fact that the 200 houses would be in Mid-Sussex but the road access would be in Surrey. There is a well-filled primary school in Felbridge and an indifferent bus service but for all other services the inhabitants would have to look to East Grinstead. It has been established that to prevent coalescence of communities there should be no internal routes to connect the site with East Grinstead so access to these services would have to be by road using the road network referred to earlier in this note which has been recognised as unsatisfactory and congested. This is another problem for the joint councils working party on traffic mitigation to resolve before the housing scheme could be commenced.

SA20 Imberhorne Farm

This scheme for 550 houses has major implications for the road network. The scheme would be accessed by a substantial roundabout opposite Heathcote Drive on Imberhorne Lane. Imberhorne Lane will have to bear the pressure of traffic from the Hill Place Farm development on the Turners Hill Road, the Imberhorne and Garden Wood estates, traffic to and from Hazelden crossroads and, of course, that accessing the enlarged secondary school.

Regarding the enlarged secondary school much has been made of the benefit of combining the upper and lower portions. We look for clarification as to whether the proposal merely provides space for a school that caters for today's population or will there be adequate facilities for the children of these new developments as well?

General Conclusions

We note that the DPD is based on the world as it existed when the District Plan was originally prepared and things have moved on since then. In consequence the needs of the area have altered substantially, the DPD has not.

We have little office space available due to permitted schemes (and do not know if such space will ever be in demand again), with office space changing into flats with further ones in prospect. Added to this may be redundant shops. Changing working practices may alter the demand and we cannot be certain that all the new housing is going to be filled, with current schemes yet to be filled.

We are concerned that the character of the Town will be sacrificed for an empty prize, leaving its residents with congestion and a Town that is a dormitory of Crawley but with a load of empty accommodation.

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA35

ID: 625

Response Ref: Reg19/625/7

Respondent: Mrs J Nagy

Organisation: Worth Parish Council

On Behalf Of:

Category: Town & Parish Council

Appear at Examination? ✓



WORTH PARISH COUNCIL

Clerk: Mrs Jennifer Nagy
CiLCA; PLCC

24th September 2020

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

Dear Sirs,

Draft Site Allocations DPD (Regulation 19) Consultation

Following a thorough review of the above DPD and the associated documents, Worth Parish Council has the following comments.

Employment

Site SA4 – Land north of the A264 at Junction 10 of the M23

In the original application for development of this area (13/04127/OUTES refers), this site was designated as informal open space. It was to be used as landfill with spoil from the site – “the landfill site will provide an interesting sculptured landform which will be retained as informal open space. The landform will also help screen the development from potential views from the A264”.

Despite the existing permission for industrial units on the site specifying B1/B8 use, only B8 units have been approved under reserved matters applications. The landscaping originally proposed for this area is now more than justified, in order to screen the large mass and height of the B8 units already in situ.

The amenity space also serves to avoid perceived coalescence with Crawley.

Removal of this 2.7-hectare site can be justified, given its current designation as protection for an existing development, whilst still leaving sufficient residual employment land to meet the revised economic development targets.

Should the site be allocated despite these objections, the Council asks that only B1 smaller business units be permitted, with the provision for any B8 units to be removed. This would give a wider range of industrial development, providing more opportunities for local businesses and thus meeting sustainability and economic objectives.

Given the location right on the junction, smaller low rise B1 units would be more suitable to mitigate the impact on the area. The landscaping screen should be of sufficient mass and depth as to provide protection both against perception of coalescence and against traffic noise and pollution from the M23 and Junction 10 itself.

As land levels have been heightened as part of the landfill operations, this should be taken into account to ensure that buildings are low rise from the A264 road level, and that screening is of sufficient depth and height to fulfil its purpose.

Site Specific Housing

Site SA19 – Land South of Crawley Down Rd, East Grinstead; 200 dwellings.

Site SA20 – Land South and West of Imberhorne Upper School; 550 dwellings.

The proximity of these developments means that their impact on local infrastructure should be assessed as a single development and should be undertaken in the context of existing permissions to the South of SA20 for 200 new homes and East of SA19 for 100 new homes (approx.).

Both Worth Parish Council and Surrey County Council have expressed concerns over capacity along the A22/A264 corridor. The associated local road network at the Turners Hill crossroads and the Sandy Lane, Vicarage Road and Wallage Lane junctions with the Turners Hill Road through Crawley Down should also be considered– see comments on Transport below.

Site SA22 – Land north of Burleigh Lane, Crawley Down; 50 dwellings

Worth Parish Council commented as part of Regulation 18 consultation that the location of the access is not clear. MSDC has responded by including reference to possible access via Sycamore Lane or Woodlands Close.

The Parish Council reiterates its concerns over access to this site. Both Sycamore Lane and Woodlands Close lead to the junction of Kiln Rd and Woodlands Close, a junction which has already been highlighted to WSCC Highways as being dangerous due to lack of clarity with regard to priority, and due to problems with obstructive parking.

An alternative access to the site via Burleigh Lane has obviously been discounted as it is a private, single track lane.

Therefore, this site should be removed on highways grounds

Housing Numbers

It was noted that during the various iterations of the Site Selection Paper, the wording as to supply across settlement categories has changed. SPP2 refers to unmet residual need being passed down i.e. unmet need to be passed from Category 2 to Category 3 (para 2.10 refers). However, SSP3 refers to unmet need to be passed up (para 2.4.5 refers) This should be clarified.

The DPD allows for 1764 homes, when the residual need is 1280, which is an over- provision of 484. Whilst this figure seems reasonable, it should be noted that it is an over-provision of 37.8% which could be deemed excessive.

In the DPD itself, the residual requirements are tabled by Category and not by individual settlement. The figures are as follows

Category	Minimum Requirement	Minimum Residual	Allocated	Difference
1	10653	706	1409	+703
2	3005	198	105	-93
3	2200	371	238	-133
4	82	5	12	+7
Total	16390	1280	1764	+484

Category 2 settlements have been successful in achieving 93.41% of their target, whilst Category 3 settlements have only achieved 83.1% of their target. The Council argues that more effort could have been made to see what could have been done to mitigate the sites discounted for consideration in the Category 3 settlements.

The Parish Council considers that the methodology used by MSDC to calculate Minimum residual requirements penalises those settlements who have already met their DP6 minimum requirement targets by ignoring the completions and commitments in excess of the DP6 figure for each

settlement. If the excess above the DP6 minimum requirement was included, then the six Category 2 settlements have already met 102% of their over DP6 minimum requirement of 3005.

DP6 Settlement Hierarchy states that “the amount of development planned for in each settlement will need to have regard to the settlement hierarchy, and also take into account of existing delivery, local development needs including significant local infrastructure, and other constraints to development”

1005 of the 1764 additional houses are on sites in the northern half of the district. Worth Parish Council believes that the district would be best served by an equitable distribution of housing throughout the area. The Council recognises the need to concentrate housing around the three district towns which are best placed to support the increased demand on infrastructure; two of these towns are in the south.

Worth Parish will also be adversely impacted by significant development on its border with East Grinstead, with an additional 750 homes being proposed. (See comments on Transport below)

Windfall Sites

In responding to the Draft DPD in 2019, the Parish Council said that the windfall contribution of 588 dwellings was underestimated, and that evidence would justify 972 from small windfall sites and 500 from large windfall sites.

In the final version of the DPD, the windfall contribution has been reduced to 504 dwellings. This presumably is due to updated empirical evidence.

Para 70 of the NPPF requires compelling evidence that windfall sites will provide a reliable source of supply.

PPG Housing and Economic Land Availability Assessment states that Local Planning Authorities have the ability to identify broad locations in years 6-15, which could include a Windfall allowance.

However, other LPAs such as East Hampshire, have recorded a constant supply of Windfall numbers, so have justified including figures from Year 3 onwards, rather than Year 6.

The District Plan adopted March 2018 allowed for 450 windfall dwellings. With allowances for 450 in 2018, 588 in 2019 and 504 in 2020. Using the East Hampshire model, these figures could be re-visited to see if the 504 figure is realistic or has been under-estimated.

Worth Parish Council has noted Cuckfield Parish Council’s comments relating to Windfall Sites, in that Cuckfield PC is of the opinion that “the allowance for windfall sites within the plan period has been underestimated by 168 dwellings (through the use of inconsistent methodology); 128 dwellings from small windfall sites (up to 9 dwellings) and 480 windfall sites over 9 dwellings.”

Worth Parish Council concurs with this view that contribution from windfall sites have been incorrectly assessed, further evidence that the calculation needs to be re-visited.

Neighbourhood Plans

The DPD allows for known commitments of 9689, which includes allocations made in Neighbourhood Plans. The majority of parishes have made Plans, which should now be due for review. Some reviewed Plans may incorporate additional allocations, but no reference has been made to these.

Therefore, the Council believes that there is little justification to allocate an additional 50 homes to Crawley Down given that

- The parish has fulfilled its housing allocation
- Category 2 settlements have performed well in the delivery of previous allocations
- The distribution of additional sites has been unfairly biased to the north of the district
- This in turn has put unacceptable strain on the local road network, especially the A264 between East Grinstead and M23 J10.

- The over-provision of 484 dwellings/37.8% is too great, and that the windfall contribution of 504 is too small.
- No consideration has been given to future allocations via revised Neighbourhood Plans within the district.

It is noted that provision of supporting infrastructure is more site specific for strategic sites. Smaller allocations generate lower levels of contributions that are insufficient to fund improvement projects; little consideration is given to the cumulative impact of piecemeal development. It could be argued that larger strategic site allocations provide necessary infrastructure more efficiently and cohesively than smaller sites.

Transport

MSDC last carried out a Transport Study in November 2015 in preparation for the District Plan in 2018. DP21 of the District Plan makes reference to the West Sussex Transport Plan 2011 to 2026. The WSCC Plan only cites areas around the three towns – East Grinstead, Burgess Hill and Haywards Heath as being in need of improvement. It is noted that East Grinstead is affected by the A264 and the A22, but no reference is made to the impact of traffic on these roads as they travel away from the town.

Completion (almost) of the M23 Smart Motorway and Gatwick Airport's progression of a second runway have taken place since the date of the study; it should be updated as a matter of urgency.

Both Worth Parish Council and Surrey County Council has commented on the impacts of increased levels of housing in East Grinstead upon the A22/A264 network.

DP25 Transport requires any development scheme to "avoid traffic congestion, individually or cumulatively, taking account of any proposed mitigation"; any additional housing sites should be compliant with this policy.

SA35 in the DPD only identifies three transport schemes – A22 corridor upgrades at Felbridge, Imberhorne Lane and Lingfield Rd junctions, A264 upgrades at Copthorne Hotel roundabout, and A23 upgrade at Hickstead.

Junction improvements at all three East Grinstead locations will channel traffic more easily onto the A264.

Worth Parish Council argues that the Dukes Head roundabout should be considered for inclusion in SA35. The B2028 Turners Hill Rd joins this roundabout bringing traffic from the south to head on westwards on the A264 to access local employment centres at Gatwick and Crawley, and also to access the M23 itself for onward journeys.

Capacity studies should take place on all major junctions from M23 J10 eastbound on the A264 until its junction with the A22. This is particularly important given that the 772 homes proposed for East Grinstead are all on the eastern border of Worth Parish, so would have significant impact on the local road infrastructure.

Air quality assessments and modelling should take place to analyse the impact of increased traffic along this corridor to ensure compliancy with SA 38 Air Quality.

In addition, junction capacity on the associated local road network at the Turners Hill crossroads and the Sandy Lane, Vicarage Road and Wallage Lane junctions with the Turners Hill Road through Crawley Down needs to be considered.

Indeed, the Plan would benefit from a District Transport Strategy to promote sustainable development.

NB: There is an error in SA35 in that the maps for "A264 corridor upgrades at Copthorne Hotel Junction" and for A23 Junction upgrades at Hickstead" have been transposed.

Utilities

It is of concern that Southern Water has indicated that the local sewerage network within the parish has limited capacity.

Indeed, evidence was supplied to the Secretary of State in relation to the Call In of two sites in Crawley Down in 2017 that Copthorne pumping station was at capacity. Whilst developers can fund improvements, piecemeal contributions will not be adequate to address the wider issue of lack of local capacity

There have been very recent issues with water supply in Mid Sussex, in that the processing plants could not purify enough water to meet demand, leaving some household without water for days.

Summer heatwaves seem be the norm, leading to increase in overall demand.

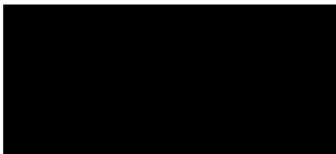
Provision of an adequate water supply must be an inherent part of any Local Plan.

Digital infrastructure has historically been left up to commercial providers. However, recent Covid-19 events have highlighted the need to have access to efficient broadband speeds in order to support the local and national economy.

Oral Representation at the Examination

Worth Parish Council would like to send representation to the Examination hearing to argue the case for a District Transport Strategy to assess the impact of cumulative development along the A264 corridor, to include capacity and air quality studies. This should encompass feeder routes onto this corridor, such as the A22, the B2028 Turners Hill Rd, and the B2220 Copthorne Rd.

Yours faithfully,



Jennifer Nagy
Clerk to the Council

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA35

ID: 738

Response Ref: Reg19/738/2

Respondent: Ms K Lamb

Organisation: DMH Stallard

On Behalf Of: Welbeck - Imberhorne

Category: Promoter

Appear at Examination? ✓



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

Date 28 September 2020
Your ref SA20
Our ref 0704/296724-8

Dear Sirs

Mid Sussex Site Allocations DPD Regulation 19 Consultation
Land south and west of Imberhorne Upper School, East Grinstead – Policy SA20
On behalf of Welbeck Strategic Land (II) LLP

DMH Stallard LLP act on behalf of Welbeck Strategic Land (II) LLP (“Welbeck”) in relation to the promotion of land west of East Grinstead (also known as land at Imberhorne Farm), allocated at policy SA20 of the Regulation 19 Site Allocations DPD (“SA DPD”). Welbeck wholly support the inclusion of the site within the SA DPD; it accords with the strategic policies of the District Plan and is based on robust evidence base. We therefore submit that policy SA20 is sound, in accordance with the tests set out in the NPPF.

Welbeck and DMH Stallard have consulted with Mid Sussex District Council (MSDC), West Sussex County Council (WSCC) and East Grinstead Town Council (EGTC) for some time, to bring forwards an appropriate proposal for the land west of East Grinstead, that delivers against the housing need for East Grinstead, including the need for housing for older people, whilst also providing for wider infrastructure needs such as the provision of secondary, primary and early years education, GP provision and a Strategic SANG (Suitable Alternative Natural Green Space).

It is recognised that there are local concerns that the proposal is, in part, are contrary to the East Grinstead Neighbourhood Plan (EGNP), Welbeck wholly support neighbourhood plans as an important part in shaping communities and delivering against local development needs. However, the EGNP was adopted in 2016, prior to the adoption of the District Plan in 2018, and as such, it does not reflect the latest calculation of housing, or other, needs. The EGNP does however, at policy SS8 promote public open space, including SANGS, playing fields, allotments and cemetery on land west of Imberhorne Farm, the proposal delivers against the majority of these uses. Furthermore, it has the ability to release land at Imberhorne School, Windmill Lane, as allocated at Policy SS3 for housing development. As such, the proposal

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seeks to unlock allocations within the EGNP whilst also meeting housing needs as identified in the higher order District Plan.

Policy SA20 - A Sustainable, Healthy Community for East Grinstead

Policy SA20 allocates the land west and south of Imberhorne Upper School (Imberhorne Farm) for a range of uses that will deliver a new sustainable community for East Grinstead, reducing the need to travel through significant on-site opportunities, but also benefiting from connectivity to the existing area through good bus links and footway / cycleways such as the Worth Way. The allocation will deliver against the identified housing need for East Grinstead and Mid Sussex, as adopted in the District Plan, boosting housing in accordance with the NPPF.

Welbeck are committed to the delivery of the proposal as set out in Policy SA20 and wholly support the Council's identification of the site through the Local Plan process, acknowledging the significant evidence base that has been undertaken and shared with the Council. It also reflects significant site assessment which has been undertaken by the Council at site level and strategically, particularly in relation to transport and highway capacity.

In summary and as defined by Policy SA20, Welbeck are committed to delivering:

- Approximately 550 dwellings, including 30% affordable housing;
- A Care Community;
- Land for a 2FE primary school and early years provision;
- 4ha (net) of land for expansion and consolidation of Imberhorne Secondary School;
- Local centre, including GP provision;
- Public open space; and
- 40ha of Strategic Suitable Alternative Natural Greenspace (SANG).

At present, the Concept Masterplan is in draft form, however this is enclosed within these submissions. It is based on the significant evidence base undertaken so far and considerable consultation with the Council to date. As such, it is considered to be a sound approach to masterplanning for all the proposed uses, demonstrating deliverability of the scheme.

The evidence base has been submitted to MSDC throughout the process, from initial site submission through to the Council's Regulation 19 'Site Library'. Welbeck commend the Council for sharing a suite of 'Site Library' documents, to share the evidence base with members of the public in the interests of transparency. The latest documents are submitted alongside these representations and include:

- Concept Masterplan 2020
- Care Community Capacity Sketch Layout 2020

- Vision Document 2020
- Landscape and Visual Impact Appraisal 2020
- Transport Appraisal 2020
- Heritage Statement 2020
- Flood Risk and Drainage Strategy 2020
- Ecological Report 2020
- Care Community Demand Study 2019

These reports, combined with MSDC's own evidence base, demonstrate that the site is suitable for development, and should be read alongside these representations.

The District Plan did not allocate any housing in East Grinstead notwithstanding it being a Category 1 settlement. It is acknowledged that the EGNP allocates some sites for housing (including land at Imberhorne Lower School), but the District Plan followed the EGNP and identifies a minimum residual housing requirement (post 2017) of 1,145 for East Grinstead. The residual housing need has been revised as part of the SA DPD process to account for further commitments and the Sustainability Appraisal supporting the SA DPD (February 2020) states that the revised residual housing figures for East Grinstead is 706 dwellings (paragraph 6.31 – Table 13).

East Grinstead is a Category 1 settlement, as defined by policy DP6 of the District Plan, which recognises it as a *"Settlement with a comprehensive range of employment, retail, health, education, leisure services and facilities. These settlements will also benefit from good public transport provision and will act as a main service centre for the small settlements."* The Sustainability Appraisal (SA) supporting the Regulation 19 document recognises that the SA DPD should plan for at least the residual housing need. Furthermore, that in accordance with Policy DP4, the residual requirement should be spatially distributed in general accordance with the established settlement hierarchy, this approach was found sound through the District Plan process and we support the Council's continued application of the spatial distribution of housing. The allocation of land at Imberhorne Farm (policy SA20) will contribute towards that residual need of the district, and of East Grinstead (c706 dwellings) and in accordance with the settlement hierarchy.

Acknowledging that there is a residual housing need in Category 1 settlements, all of which arises from an unmet need in East Grinstead, the Council have rightly considered all options for development around the town. However, there are few remaining directions in which to expand the town without impinging on nationally protected areas. The land west of East Grinstead is one of the least environmentally constrained areas around the town; land to the north (within Tandridge District) is Green Belt and land to the east and south forms part of the High Weald Area of Outstanding Natural Beauty (AONB). Furthermore, the Council's landscape evidence base comprising the 'Capacity of Mid Sussex District to Accommodate Development 2014' and 'Landscape Capacity Study 2007', identifies land to the west of East Grinstead as one of only 3 locations within the District considered to have Medium /

High capacity for development. As such, there are very few locations to meet the residual housing need, and land at Imberhorne Farm has the capacity to accommodate development without an impact on nationally protected areas, on a site which is relatively unconstrained.

Paragraph 72 of the NPPF acknowledges that the supply of new homes can often be best achieved through planning for larger scale development, such as extensions to towns, providing that they are well located and designed. East Grinstead is a Category 1 Settlement, and the only top tier settlement in the north of the District, it is therefore a highly sustainable settlement. Furthermore, the NPPF acknowledges that this is often a way of meeting needs in a sustainable way, such proposals are able to:

- a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;*
- b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*
- c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;*
- d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and*
- e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.*

In accordance with this criteria, Policy SA 20 will deliver a sustainable community, with sufficient access to services and employment. The proposed development will deliver a range of additional land uses in addition to the 550 dwellings proposed, including; land for a primary school (and early years provision), land for expansion of Imberhorne Secondary School, a Care Community (housing for older people), and significant open space including a Strategic SANG. The development will provide social and economic opportunities within the proposal itself, as well as being well located close to existing employment opportunities (Birches Industrial Estate and the Town Centre).

The development will also promote healthy communities, as required by Section 8 of the NPPF. Paragraph 91 of the NPPF requires that policies should aim to achieve healthy, inclusive and safe places, the development of land west of East Grinstead, will deliver against these objectives as follows:

- It will promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other, through the delivery of primary and secondary education, mixed housing tenures and housing for older people (paragraph 91 of the NPPF).
- The scheme will deliver additional early years, primary and secondary education on the site, to meet the needs of the local area as well as the need arising from the proposal itself (paragraph 94 of the NPPF).
- It will reduce the need to travel by car. The site is well linked to existing bus routes and is within walking/cycling distance of a Train Station. It will include significant opportunities for new footways and cycleways, linking the site to the Worth Way and other existing routes and will promote active travel (paragraphs 91 and 98 of the NPPF)
- It also has a range of uses on the site, which will reduce the need to travel, including a local centre, education and employment needs and is close to existing employment opportunities, and a wider range of local shops.
- The significant open space, including strategic SANG, totalling over 50ha will provide opportunities for healthy lifestyles such as walking and cycling, it will also promote social interaction. The additional land for Imberhorne Secondary School will provide superior sports provision for the School, but will also be available for use by the wider community (paragraph 96 of the NPPF).
- The local centre and Care Community provides an opportunity to deliver new health care services to the west of East Grinstead (subject to local need, defined by the CCG) (paragraph 91 of the NPPF).

Importantly, the proposal delivers much more than simply standard housing to meet the residual housing needs of East Grinstead and the wider area, it delivers a suite of additional benefits to deliver a new sustainable community. The details of the proposal are outlined below, and reflect the Council's criteria as set out in Policy SA20.

Access

The main scheme access will be via Imberhorne Lane, through the creation of a new junction with Heathcote Drive. In addition, there is a secondary point of access for the Care Community and for emergency vehicles only, to the south of the main access point, also onto Imberhorne Lane. This has been subject of assessment by West Sussex Highways Authority, who are in agreement with the design and approach to site access.

Meeting the needs of Imberhorne Secondary School

The proposal will deliver an additional 4ha (net) of land to Imberhorne Secondary School, enabling the consolidation of Imberhorne School campuses as identified within the EGNP at Policy SS3.

Imberhorne Secondary School is currently split across 2 sites over 1.5km apart. Lower School, which serves School Years 7 – 9, is on Windmill Lane and Upper School is on Imberhorne Lane, and serves School Years 10 – 13. The Lower School site is allocated within the EGNP (Policies EG6 and SS3) for c200 dwellings and is therefore included within the MSDC housing trajectory for the delivery of housing across the plan period.

The Lower School is in need of significant investment, but there are also management and financial issues arising from having split school sites, including onsite administration, commuting of teaching staff between the campuses, but also the availability of facilities to all students. WSCC and Imberhorne School have long been committed to consolidating the school campuses on the Imberhorne (Upper) Lane site, as outlined in the EGNP. Welbeck have worked with WSCC to agree a land swap which would provide a net increase in school land of 4ha, to include enhanced sports facilities and allow for consolidation of the school sites onto the Imberhorne Lane site. The land swap will also provide a second point of access to the wider site, which can also serve the new school facilities which will be made available to the wider community.

Therefore, the delivery of policy SA20, enables the consolidation of Imberhorne School campuses to include significant enhanced, modern facilities as well as the release of land at Imberhorne Lower School for housing, in accordance with the EGNP (policies EG6 and SS3) and the MSDC housing trajectory. As such, the proposal not only delivers enhanced secondary educational facilities, but it provides c550 dwellings towards the residual housing need and unlocks the c200 dwellings already allocated in the EGNP. It also accords with the approach set out in the NPPF (paragraph 94) which highlights the importance of providing a sufficient choice of school places to meet the needs of existing and new communities, taking a collaborative approach to meeting this requirement.

2FE Primary School and Early Years Provision

The proposal will deliver c2.2ha of land for a new two form entry primary school and early years provision. It is acknowledged that due to the expansion in population, local school are nearing capacity, additionally, the development itself will generate a need for more school spaces. As such, to meet these needs, which have been confirmed by West Sussex County Council, and ensure the needs of future generations are met, the proposal will deliver land for a 2FE entry primary school.

The Concept Masterplan seeks to deliver the school in initial phases of the proposal, adjoining the existing built up area boundary (BUAB) and existing residential development. It is also located close to the new playing fields for Imberhorne Secondary School, to enable sharing of the sports facilities if appropriate. Furthermore, the siting of the school also provides an active entrance to the development whilst providing a green buffer between built form and the listed buildings of Imberhorne Farm.

Community Hub

The proposal will deliver a small mixed-use community hub at the entrance to the site. The mixed-use hub can deliver a range of community facilities to meet the needs of the development and the wider area, including a GP surgery, as outlined in Policy SA20. East Grinstead currently benefits from only three GP surgeries, all of which are on the east of the town, the inclusion of a GP surgery within the site will offer health care provision on the west of the town to both existing and future residents. It is intended at this stage, that the mixed-use hub could provide a range of community uses, whilst ensuring that it does not detract from other local shopping parades.

Care Community

A Care Community is proposed in the south east parcel of the site, it will have a direct access onto Imberhorne Lane (although it is proposed that further access into the site will be for emergency vehicles only). The proposals, at this stage, are indicative, but a draft scheme layout is enclosed, this will provide a mix of extra care and independent care dwellings all at a maximum of two storeys.

The indicative proposal will deliver a total of 141 units, of which 109 would be defined as 'extra care' and 32 'independent care', both fall within Use Class C2.

A Demand Study has been produced by Avison Young (enclosed), this identifies that the population of 65 and over, is expected to increase 12.1% between 2017 and 2022, within a 10 mile radius of the site. Additionally, the report identifies a total need for extra care of 1,827 dwellings but a supply of only 165 dwellings in the catchment of the site. As such, there is a significant unmet need for extra care housing within the site area. Additionally, the Council acknowledge within the HEDNA, and through policy DP25 of the District Plan, that there is a need for specialist housing for older people, that would be met through the SA DPD.

Paragraph 61 of the NPPF requires that the housing needs of different groups, including older people, should be assessed and reflected in planning policies. The Planning Policy Guidance has a number of paragraphs on the importance of planning for the needs of older people. It acknowledges that people are living longer and the proportion of older people in the population is therefore increasing. It therefore states that *"Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems."*

The Council have undertaken an assessment of housing needs for older people through the HEDNA Addendum 2016 supporting the District Plan. The HEDNA Addendum identifies shortfalls (at 2014) for nearly all types of housing for older people, including Sheltered

Housing (Independent living) (-9%), Enhanced Sheltered Housing (Independent Living) (-61%) and Extra Care provision (-36%). Additionally, the Demand Study undertaken for Welbeck, by Avison Young, and enclosed herewith, expands on that assessment, demonstrating the extent of housing need for older people within the broad locality of the site.

The NPPF and PPG place great weight on ensuring that the housing needs of all groups are met, including housing for older people. The delivery of a care community on the site, through Policy SA20, will deliver towards this current unmet need, particularly in the absence of alternative site provision.

Strategic SANG, Public Open Space and Allotments

The proposal will deliver a Strategic SANG of c42 hectares to the west, beyond the north/south track between The Gullege and Felbridge (locally known as 'The Gullege'). The Strategic SANG has been designed by specialist consultants (Barton Willmore – Landscape, and Ecology Partnership – Ecology) and in consultation with MSDC to ensure that it provides the appropriate environment in accordance with Natural England's guidance, including a circular walk of 3km. It provides a wildlife pond, additional native tree and scrub planting, a wildflower meadow and points of interest including a possible look out tower and benches. The proposed SANG masterplan is shown on the Concept Masterplan.

The 3km walk will also connect to a wider network of public rights of walk, including 'The Gullege' towards Felbridge, the Imberhorne Farm track, within the green corridors to be provided within the site, and also towards the Worth Way, a linear Country Park. As such, there are myriad of opportunities for walking in addition to onsite provision.

The provision of 42ha is considerably in excess of that required by the development itself. The Strategic SANG will provide mitigation against recreational activity on the Ashdown Forest Special Protection Area (SPA), encouraging existing and future residents to use this area for recreation and dog walking. It provides mitigation for the proposed development, but also for schemes in the north of the District, enabling continued housing growth against the identified housing needs, whilst ensuring the continued protection of the Ashdown Forest SPA. Therefore, complying with national and local planning policy and the relevant environmental legislation.

The scheme has also been designed to provide significant formal and informal open space and green corridors throughout the site, which is identified in the EGTC at policy SS8. Furthermore, the provision of a SANG to the west of the development safeguards against further encroachment of development in this location, protecting from coalescence with Crawley Down beyond. This can be used by existing and future residents. This will include children's play space, an equipped area of play and allotments.

Delivery

Welbeck support the Council's identification of the timescales for development of the proposal. Welbeck have undertaken significant site assessments which could support a planning application at the earliest opportunity, there are no constraints to the delivery of the site in the 1 – 5 year plan period.

Furthermore, there is a pressing need to deliver the site to enable the expansion and consolidation of Imberhorne Secondary Schools onto the Imberhorne Lane site, which can only be realised through the release of the land identified through Policy SA 20. Any delay to the release of the site would result in future deterioration of the facilities and therefore education provision at the Imberhorne Lower School site, as well as a delay to the release of that site for housing, as set out in the EGNP. The early delivery of the school proposals will also unlock the development of land at Imberhorne Lower School, as identified within the EGNP, which is also critical to housing delivery in the plan period.

Policy SA20 amendments

Welbeck acknowledge the considerable work undertaken by MSDC to produce the SA DPD and the detailed policies within it. Welbeck also welcome the amendments to the policy arising from the Regulation 18 consultation. However, we still have concern with the reference to the possible provision of plots for Gypsies, Travellers and Travelling Showpeople.

Policy SA20 will deliver significant local infrastructure over and above that normally required of a site of this size and significantly more than other sites within the District Plan and SA DPD. Whilst this is a reflection of local infrastructure needs, any further district level infrastructure provision puts at risk the viability of the site and would place onerous burden on the proposals.

Furthermore, detailed masterplanning of the site has been undertaken, which shows how the proposed uses can be assimilated onto the site. The masterplanning to date, does not account for land for gypsies, travellers and travelling showpeople and it is questioned how this could be delivered on the site in a satisfactory way without the loss of other land uses proposed through the policy requirements. Welbeck therefore object to the inclusion of this provision through policy SA20.

MSDC SA DPD Evidence Base

SHELAA Site Assessment (Site Ref. #770)

Welbeck have undertaken a suite of site assessments which have been shared with the relevant statutory consultees, including the District Council as part of the Call for Sites, the

Regulation 18 Consultation, Site Allocation Library and throughout the process of site promotion. The latest site assessment, submitted to the Council as part of the Site Allocation Library (in addition to the Concept Masterplan and Vision Document), and contained herewith includes:

- Highways Appraisal
- Landscape and Visual Impact Appraisal
- Ecology Report
- Flood Risk and Drainage Strategy
- Heritage Statement

Tree surveys have also been undertaken, but as trees and hedgerows are confined to field boundaries and will be largely untouched by the development, they are not enclosed as they are also large documents. However, they have been made available to the Council at earlier stages of the site promotion process, and can be made available again if necessary, but it is welcomed that the Council acknowledge in the SHELAA that trees are not a constraint to development.

The above site assessment has enabled MSDC, their external consultants and statutory consultees to make an informed assessment of the site through the SHELAA process, which Welbeck largely support as a detailed and sound appraisal of the suitability of the site for development. Welbeck support the robust SHELAA process, the Council commenced with early engagement with developers and the public on the methodology prior to commencing the site selection process. The Council have then undertaken a number of steps (a 'sifting' exercise) to determine whether sites are compliant with the strategic policies of the District Plan and then assess individual sites for suitability.

As part of the sifting exercise, the Council identified a short list of 51 sites (as set out in the Sustainability Appraisal 2020), the land west of Imberhorne Lane (SHELAA #770) is included within this short list. The site assessment process then goes further within the SA process both individually and in comparison with other sites.

Generally, Welbeck support the SHELAA assessment of the site, which concludes that the site offers considerable development potential. Additionally, we welcome the acknowledgement of infrastructure improvements that are associated with the proposals, most notably, the secondary school, primary school (and early years), GP, housing for older people and a Strategic SANG. However, Welbeck object to parts of the site assessment which do not reflect the in-depth site assessment undertaken, nor the amendments that have been carried out throughout the site promotion process and in conjunction with the Council, which has resulted in an amendment to the site boundary. These include:

1. Ecology

The site assessment suggests that Natural England have concerns regarding high density housing south of Felbridge, however, those representations are a collective response to wider land at Imberhorne Farm (site #770), a site in Crawley Down (site #686) and the additional land at Imberhorne Farm (site #561), which is proposed as a Strategic SANG and not for housing development. Given that the SHLEAA capacity of these sites collectively is 2,800 dwellings, we strongly object to the assessment and advice of Natural England and its use within the SHELAA which is wholly inappropriate as the basis to assess the potential impacts arising from the development of c550 dwellings on the edge of East Grinstead as a standalone site.

We contest the SHELAA assessment of impacts on the Worth Way Local Wildlife Site (LWS) and Hedgecourt SSSI, which conflicts with the findings of the Ecology Report contained herewith. It is acknowledged that Hedgecourt SSSI is a popular local walking route. However, Hedgecourt is approximately 1.9km away from the nearest point of the development proposed on land at Imberhorne Farm. Furthermore, Hedgecourt Lake is separated from the site by the A264, a main road. Alternatively, residents of the proposed development will have access to an onsite Strategic SANG and the Worth Way, so it is highly unlikely that there will be significant recreational use of Hedgecourt Lakes by residents of the proposed development.

The response from Natural England as summarised in the SHELAA site assessment, suggests that there could be harm to the Worth Way Local Wildlife Site, however, the summary also advises that Natural England have no details of the scale or type of the proposed development and have assessed the cumulative impacts of 2,800 dwellings (of which only 550 are allocated) and as such, it must follow that there assessment can be given very little weight. The Worth Way is already a well used recreational route, it is on the national cycle route (Route 21), it provides an important recreational route but also a safe pedestrian and cycle link to the Town Centre, as such, it is not considered that any further recreational use should be discouraged.

Furthermore, the SHELAA assessment only acknowledges the potential for biodiversity net gain within the consultation, it does not include it within the assessment of ecological impacts. The site is farmland and significant open space is proposed, including an onsite Strategic SANG and a range of ecological improvements, this has the potential to offer significant biodiversity net gain. This should be included within the assessment.

We request that MSDC and Natural England review the impacts of the proposed development individually (ie. not in conjunction with other sites, particularly those not promoted for housing development) and in light of the evidence. The SHELAA process is an assessment of individual sites and not of cumulatively effects of combined, not allocated sites. This would alter the assessment of the impacts on SSSI/SNCI/LNR, which would

become 'amber', noting the lower level of harm and the potential for mitigation (as concluded on site #686).

2. Heritage

Welbeck also object to the Council's assessment of heritage impacts as set out in the SHLEAA, this does not reflect the most recent evidence submitted to the Council, the specialist advice provided to Welbeck by Orion Heritage, or the amendments which have been made to the proposals as part on ongoing dialogue with MSDC's Conservation Officer. Furthermore, the SHLEAA site boundary is wider than the area proposed for allocation, disregarding the removal of the south-west field from the proposals in accordance with feedback from the Council's Heritage Officer.

The SHLEAA assessment states that the development would engulf Imberhorne Farm and Imberhorne Cottages, which would lead to high levels of Less Than Substantial Harm. We do not agree with this assessment, but nonetheless, have amended the concept masterplan prior to the Regulation 19 consultation (and included within the Site Library) to remove development from the field to the west of Imberhorne Farm and Imberhorne Cottages. This will retain a sense of rurality to the remaining farmstead, this is reflected in the latest site allocation boundary and has been agreed by the Council.

Furthermore, the indicative layout for the Care Community has been prepared to retain views of Imberhorne Cottages (the Care Community is proposed as two storey buildings only). Our specialist advisors have therefore concluded that there will be Less than Substantial Harm on the low end of the scale in respect of Imberhorne Farm and Imberhorne Cottages.

Similarly, the Council's SHLEAA assessment concludes that the introduction of housing around Gullege Farm would erode its rural setting resulting in Less Than Substantial Harm on the high end. We strongly disagree. The predominant outlook of Gullege Farmhouse is to the south towards the Worth Way, and not from the north. The concept masterplan and site allocation boundary have been amended to reflect discussions with the Council's Conservation Officer, removing the field between Gullege Farm and Imberhorne Farm, which our specialist advisors conclude would result in only a low level of Less than Substantial Harm.

As such, we respectfully request that MSDC review the evidence submitted in support of the proposals and the changes that have been made since the Regulation 18 proposal as a result of consultation with the Council and consequently reflected in the change in the site allocation boundary.

Notwithstanding the above, we welcome the Council's application of the NPPF (paragraph 196) and balancing the perceived harm to these listed building against

the public benefits of the proposal.

Sustainability Appraisal

Welbeck support the Council's thorough assessment of the 'sifted sites' which subject to minor amendments is a sound evidence base to support the SA DPD.

Following the SHELAA process, the Council have appropriately assessed the sites through the Sustainability Appraisal (SA) categorising the land west of Imberhorne Upper School (Site Ref #770) as one that performs well and should therefore be taken forwards to site allocation. Crucially, this supports the delivery of housing at East Grinstead, to meet the identified residual housing need.

Welbeck support the Council's sustainability appraisal of the site at pages 129 and 130 of the SA (referred to as Option E), acknowledging that the site will positively contribute ('++') towards the residual housing need of East Grinstead.). As a large site, it is also capable of accommodating a range of housing types and sizes, including small family dwellings and affordable housing; the site will also delivery housing for the older population through the proposed Care Community.

In conclusion, the SA (page 130) notes that weight should be afforded to those sites that can contribute towards this residual requirement, where the positives would outweigh the negative impacts, this wholly accords with the presumption in favour of sustainable development set out in the NPPF.

Although we wholly support the SA process and assessment of the land west of East Grinstead (now referred to as land east and south of Imberhorne Upper School), it does not appear to identify the additional positive contributions the proposal will make towards education and health through the delivery of a 2FE primary school, land for Imberhorne Secondary School, a Care Community and GP surgery. Paragraph 3.30 of the SA identifies that primary schools are at 93% capacity in the East Grinstead area, whilst East Grinstead secondary schools are at 89%. The delivery of land for the expansion and consolidation of Imberhorne Secondary School and land for a new primary school, will allow for further capacity within the wider area over and above that required for the site alone. Additionally, Welbeck are committed to delivering a GP surgery where supported by the CCG, which would improve the assessment of the health objective from a negative score to a positive one.

Additionally, it is questioned how sites in Felbridge (SHELAA sites 196 and 595 for example) are stated to have positive regeneration outcomes whereas strategic development at East Grinstead will has a lesser effect on regeneration. Felbridge is a small settlement with minimal services, furthermore, the majority of Felbridge is in Tandridge District and Surrey County and therefore it is questioned what regeneration could be delivered through

these small sites, which would benefit Mid Sussex District. Conversely, strategic development at East Grinstead will positively support the Town Centre through an increase in population and therefore footfall, encouraging new investment in the Town Centre, we therefore submit that the assessment of regeneration impacts arising through the development of land at Imberhorne (Option E) should be enhanced to '++'.

Furthermore, we submit that the assessment of the biodiversity impacts should be improved to at least 'O'. It is acknowledged that the site is adjacent to Ancient Woodland and the Worth Way, a Local Wildlife site, however, there will be no direct impact on these designations as they fall outside the site. Additionally, through the delivery of the proposal, significant landscaped open space will be delivered, including 17ha of formal and informal open space and c40ha of Strategic SANG, both of which will deliver ecological enhancements over the current farmed use of the land. Additionally, the Environmental Bill has had its second reading and is likely to become made legislation over the Plan Period, requiring biodiversity net gains.

Policy 35 – Safeguarding of Land for and Delivery of Strategic Highway Improvements

Welbeck support policy SA35 which seeks to safeguard land for, and deliver, strategic highway improvements, and commends MSDC for identifying and seeking to deliver improvements to existing infrastructure, such as local road networks. MSDC have undertaken a sustainability appraisal of the policy and delivery of these improvements, which unsurprisingly gives rise to overwhelming positive outcomes. Welbeck in conjunction with MSDC and WSCC have considered a range of possible highway improvement projects which could be secured through policy SA35 and have provided sufficient evidence to the Highways Authority that these schemes will offer a betterment to future journey times along the corridor; all proposed developments in the area which would have an impact on the A264/A22 corridor would be required to make contributions towards these improvements. The SA DPD does not need to identify the scheme of improvements but be confident that there are schemes which could be delivered, furthermore, to secure the detailed scheme would be inflexible.

Plan making should look to the future and set a framework not only for addressing housing and economic needs, but also social, environmental and infrastructure priorities (paragraphs 15 and 20 of the NPPF). Policy 35 seeks to identify improvements to the A22 Corridor at the Felbridge, Imberhorne Lane and Lingfield junctions; development in and around East Grinstead, including that allocated at policy SA20, will be expected to make contributions towards these strategic highways improvements for the overall betterment of the traffic movement through the Town. Paragraph 22 of the NPPF requires that strategic policies look to a minimum period of 15 years from adoption, to anticipate and respond to long-term requirements, including infrastructure, policy 35 wholly accords with this principle.

Conclusion

In summary, Welbeck wholly support Policy SA20 and SA35 of the SA DPD and the evidence base underpinning these policies, which seek to meet the housing and future infrastructure needs of East Grinstead in accordance with the NPPF and the District Plan. It is submitted that the SA DPD accords with the strategic policies of the District Plan and seeks to positively deliver against the residual housing requirement in accordance with the spatial strategy and settlement hierarchy.

Welbeck believe that the SA DPD is:

- a) **Positively prepared** – it provides a strategy which seeks to meet more than the residual housing requirement in order to ensure flexibility in the market and to account for the potential for some sites not to come forwards, whilst according with the principles of sustainable development by focusing on the most sustainable settlements. It also unlocks land at Imberhorne Lower School, as identified in the EGNP, which is included in the Council's housing trajectory.
- b) **Justified** – the SA DPD is the most appropriate strategy, the Council have reviewed a large pallet of sites and then undertaken further detailed site assessment through the SA process, identifying a suite of sites which perform well individually but also against the spatial distribution set out within the District Plan.
- c) **Effective** – the Council have confirmed with site proponents that sites are deliverable and the SA DPD identifies the delivery timescales for each site. In relation to policy SA20, the Council in consultation with Welbeck have evidenced that the site is capable of being delivered within the plan period.
- d) **Consistent with national policy** – these representations demonstrate how the allocation of land at policy SA20 is consistent with national policy, including additional meeting infrastructure needs (housing for the older population, education, health care, highways, ecology and access to open space).

We submit that policies SA20 and SA35 meet the tests of soundness as set out in the NPPF subject to the minor amendments set out in these representations.

Welbeck would like to be kept up-to-date with the progress of the SA DPD and reserve the right to participate in the forthcoming Examination Hearings. For further information, or to discuss, please contact Katie Lamb on 01293 605192 or katie.lamb@dmhstallard.com.

Yours faithfully



DMH Stallard LLP

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA35

ID: 748

Response Ref: Reg19/748/8

Respondent: Ms L Brook

Organisation: Sussex Wildlife Trust

On Behalf Of:

Category: Statutory Consultee

Appear at Examination? x



Sussex
Wildlife Trust

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Mid Sussex District Council Submission Draft Site Allocations Development Plan Document (DPD) (Regulation 19 Consultation August – September 2020)

The Sussex Wildlife Trust wish to submit the following comments to the Regulation 19 consultation for the - Mid Sussex District Council Submission Draft Site Allocations Development Plan Document (DPD)

Overview comments - Site Allocations

As stated in our Regulation 18 comments The Sussex Wildlife Trust (SWT) appreciates that the DPD site selection methodology led to the exclusion of sites that were likely to result in an impact on locally designated sites, as explained in figure 3.1 of the Site Selection Paper 3. This is very welcome and SWT considers this approach to be in line with the NPPF requirement to distinguish between the hierarchy of designated sites and allocate land with the least environmental or amenity value (paragraph 171). Local Wildlife Sites act as core areas within the district's ecological network and therefore should be maintained and enhanced.

That said, overall SWT is very concerned about the proportion of greenfield sites being allocated within the DPD, particularly given that no site specific ecological data appears to have been provided or considered in the site selection process.

The NPPF is clear that local authorities should make as much use as possible of previously developed land. However with over 60% of housing allocations obviously on greenfield, and another 18% appearing to contain some element of greenfield, SWT are particularly concerned

SWT therefore does not believe that the DPD is consistent with national policy as it does not comply with paragraph 118 of the NPPF.

In the Regulation 18 Consultation submitted by SWT, we highlighted that The NPPF is clear that plans and policies need to be justified – based on proportional and up-to date evidence (paragraphs 31 and 35). SWT acknowledge that we were given the opportunity in October 2018 to comment on a number of candidate sites which had the potential to impact on locally designated sites. In our letter to MSDC (dated 15/10/18) we stated that:

'Should MSDC decide that SHELAA sites proceed to allocation within the DPD, SWT recommends that they are subject to up to date ecological surveys. This will enable MSDC to evaluate each allocation's suitability for delivering sustainable development, in line with the Mid Sussex Local Plan evidence base and in particular, policies 37 (Trees woodland and Hedgerow) and 38 (Biodiversity).'

SWT note that all of the housing site allocation policies include requirements under 'Biodiversity and Green Infrastructure' which is welcome. However, these do not appear to be strategic in nature in terms of considering a robust evidence base. In particular, it appears that it is assumed that sites will be able to deliver both the number

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of dwellings allocated and net gains to biodiversity, when no evidence has been provided of the current biodiversity value or how this is likely to be impacted.

SWT is therefore disappointed that we are unable to identify any site-specific ecological evidence by this final round of consultation. Given the current uncertainty of the ecological value individually and cumulatively of the site allocations. **It is not clear how MSDC can ensure the net environmental gains will be delivered by the DPD as required by paragraphs 8, 32, 170 and 174 of the NPPF.**

Overview comments – Sustainability

We also see no evidence that consideration has been given to the capacity for the district's natural capital to absorb this level and location of development. The NPPF is clear that delivering sustainable development means meeting the needs of the present without compromising the ability of future generations to meet their own needs. In achieving this, local planning authorities must pursue all three objectives; economic, social and environmental, in mutually supportive ways ensuring net gains across all three.

It is not clear that any of the greenfield sites allocated meet the environmental objective. In Particular, none of the allocated greenfield sites are considered to have a positive impact on any of the 8 environmental objectives within the Sustainability Appraisal (SA). Many have negative or unknown impacts, and for biodiversity it appears that only formal designations have been considered.

Although the lack of ecological information available makes it very hard for SWT to assess the potential impact of any of the site allocations or the assessment of their suitability against the SA objectives, we are particularly concerned about additional sites that are not considered to be sustainable, namely SA12 and SA13.

The addition of these two 'marginal' sites takes the number of units allocated within Category 1 settlements to 1409, this is 703 units above the minimum residual housing figure for Category 1 as demonstrated in *Table 2.4: Spatial Distribution of Housing Requirement*. If you take account of the undersupply for some of the other sized settlements, there is still a total oversupply of 484 dwellings as demonstrated in *Table 2.5 Sites DPD housing Allocations*. This oversupply is not justified within the DPD or supporting evidence base. Removing these 'marginal' sites will still result in the DPD that delivers more than the minimum housing requirement in the lifetime of the local plan. We note that again the impacts on biodiversity for these sites are listed as unknown in the SA simply because no site specific ecological information has been assessed.

SWT asks MSDC to reduce the amount of greenfield land allocated within the DPD and consider the environmental capacity of the district in a more robust fashion. Any assessment of allocated sites should look at their individual, collective and multifunctional role in delivering connectivity and function for biodiversity. This would ensure the DPD reflects the requirements under sections 170 & 171 of the NPPF.

SA GEN: General Principles for Site Allocations

It appears that this policy has now been placed in the main body of the Draft Plan. SWT welcomes the inclusion of wording within this policy that recognises the importance of biodiversity informing planning applications. We also acknowledge that it highlights the importance of delivering biodiversity net gains through forthcoming development.

For clarity SWT would propose that there is an amendment to the wording relating to ecological information as we want to ensure that developers are aware that this information is required before validation/determination of the application, so earliest opportunity is not misunderstood as after permission has been approved.

SWT propose the following amendment to the first bullet point under the section references Biodiversity and Green Infrastructure (~~struck through~~ means a proposed deletion and **bolded text** references a proposed addition)

- Carry out **and submit** habitat and species surveys at the earliest opportunity in order **to inform the design and** ~~to~~ conserve important ecological assets from negative direct and indirect effects.

Comments for Site Allocations

As stated previously, without more detailed ecological information for each of the allocated sites it is difficult for SWT to assess their suitability for development. However, we will make some site specific comments based on the aerial photographs and desktop information available to us.

A lack of comments does not constitute support for the allocation.

SA12: Land South of 96 Folders Lane, Burgess Hill

As stated under our general comments, SWT does not believe that the allocation of this greenfield site is justified. It is not required to deliver the overall minimum residual housing requirement or that required for Category 1 settlements and is not considered sustainable within the SA. We acknowledge that the number of the dwellings for the site has been reduced by 3, however the biodiversity impacts for this site are still listed as unknown as no site specific ecological information has been provided. The site appears to contain hedgerow and trees and is clearly connected to a wider network of linear habitats.

SWT therefore does not believe that the Allocation is consistent with national policy as it does not comply with paragraph 171 of the NPPF.

SA13: Land East of Keymer Road and South of Folders Lane, Burgess Hill

As with SA12, SWT objects to the allocation of this greenfield site. It is not justified by MSDC's own evidence base and does not represent sustainable development. Again the biodiversity impacts for this site are still listed as unknown as no site specific ecological information has been provided. However, the site appears to contain rough grassland, hedgerows and trees and is clearly connected to a wider network of linear habitats and ponds with potential for priority species.

SWT therefore does not believe that the Allocation is consistent with national policy as it does not comply with paragraph 171 of the NPPF.

SA15: Land South of Southway, Burgess Hill

SWT objects to the allocation of a designated Local Green Space for housing. This is not compliant with NPPF paragraph 101 which states that policies for managing development within Local Green Space should be consistent with those for Green Belts i.e. in line with the requirements of chapter 13 of the NPPF.

We do not believe that MSDC have justified the 'inappropriate construction of new buildings' within a local green space. In particular, the fact that this area of the LGS is 'overgrown and inaccessible' does not negate its value. The Burgess Hill Neighbourhood Plan states that this LGS is an important "green lung" for the west of Burgess Hill, a function which does not require accessibility. The NPPF is clear that LGSs should only be designated where they are demonstrably special. The Planning Inspector who examined the Burgess Hill Neighbourhood Plan clearly felt that this had been demonstrated and therefore the site should be protected.

SWT therefore does not believe that the Allocation is consistent with national policy as it does not comply with paragraphs 99-101 of the NPPF.

SA19: Land south of Crawley Down Road, Felbridge

SWT is very concerned about this significant greenfield allocation given the lack of any baseline biodiversity data and its proximity to Hedgecourt Lake SSSI and The Birches ancient woodland. SWT would like to see much more evidence of the current value of the site, in particular in terms of ecosystem services delivery. There also needs to be further consideration of the cumulative impacts when combined with policy SA20.

SWT therefore does not believe that the Allocation is consistent with national policy as it does not comply with paragraph 171 & 175 of the NPPF.

SA20: Land south and west of Imberhorne Upper School, Imberhorne Lane, East Grinstead

SWT commented on this allocation in our letter dated (dated 15/10/18) and stated that up to date ecological surveys should be conducted in order to assess the site's suitability for delivering sustainable development. It is disappointing that this information has not been provided. Without it we cannot assess the ability of this site to meet the environmental objectives required by the NPPF. We note that the allocation boundary appears to be amended from the Regulation 18 consultation and that a section of the Worth Way LWS, namely part of Imberhorne Cottage Shaw ancient woodland, appears to no longer be within the allocation. We would ask MSDC to inform SWT if this is not the case.

SWT remain concerned that this Allocation is not consistent with national policy as it does not comply with paragraph 171 & 175 of the NPPF

SWT note the policy requirements under Biodiversity and Green Infrastructure heading includes a bullet point which states:

Potential impacts of the development on Hedgecourt Lake SSSI, which is accessible via existing PRoW to the north and the Worth Way LWS to the south should be understood and adequately mitigated.

SWT propose the following amendment to this bullet point to ensure clarity of the importance of avoid within the mitigation hierarchy is fulfilled as per 175 of the NPPF (~~struck through~~ means a proposed deletion and **bolded text** references a proposed addition)

*Potential impacts of the development on Hedgecourt Lake SSSI, which is accessible via existing PRoW to the north and the Worth Way LWS to the south should be understood **so they can be avoided and if this is not possible** adequately mitigated **or, as a last resort, compensated for.***

DEVELOPMENT POLICIES

SA35: Safeguarding of Land for delivery of Strategic Highways improvements

SWT acknowledges that the Regulation 19 consultation now includes maps of the broad locations for the safeguarding, which did not appear to be present in the main body of the Regulation 18 draft DPD.

We note that the policy refers to how new development in the area of safeguarding should be carefully designed. Given that the NPPF encourages a net gain to biodiversity through development, we would expect the policy wording to reflect that biodiversity gains are design carefully into the development to ensure they are not compromised by future schemes. We therefore propose the following amendments to the policy wording to ensure that it complies with sections 170 & 171 of the NPPF.

SWT propose the following amendment to the Policy Wording (~~struck through~~ means a proposed deletion and **bolded text** references a proposed addition)

*'New Development in these areas should be carefully designed having regard to matters such as building layout , noise insulation, landscaping , the historic environment, **biodiversity net gains** and means of access.'*

SA36: Wivelsfield Railway Station

While we support the integrated use of sustainable transport it is disappointing to see another area allocated as Local Green Space within a made Neighbourhood Plan being developed. As stated in our comments for policy SA15, the suitability of the LGS designation was assessed by a Planning Inspector and found sound. It should therefore be preserved through the DPD. SWT is particularly concerned as the Burgess Hill Neighbourhood Plan states that this Local Green Space is:

'Land immediately west of Wivelsfield Station, north and south of Leylands Road: The land parcel is rich in birdlife and reflective of the historic field pattern. The Land is an important open space that is particularly well used by dog walkers.'

Whilst it appears that not all of the LGS has been allocated for the upgrading of the station, we are not clear of the biodiversity value of the area that has been allocated. If MSDC are minded to retain the policy, SWT would like to see consideration of the compensation required for the loss of the LGS and in particular the rest of the LGS managed/enhanced in a way that benefits the assets lost.

SWT therefore does not believe that the Development Policy is consistent with national policy as it does not comply with sections 99-101 of the NPPF.

SA37: Burgess Hill /Haywards Heath Multifunctional Network

SWT remain supportive of measures to embed multifunctional networks in delivering non-motorised sustainable transport options, but remain concerned at the level of uncertainty from this policy. We appreciate that the regulation 19 consultation now embeds a map within the main document, which provides an indication of safeguarded routes for the cycleway. As stated in our Regulation 18 comments the creation of a network could aid or hinder connection and function in the natural environment, therefore the policy should be clear in its intention. In particular, we are unclear how this route has been selected and what ecological information has been considered. Any impacts on biodiversity should be avoided through good design and particular consideration should be given to the value of sensitive linear habitats such as hedgerows. Lighting and increased recreational use both have the potential to harm biodiversity and must be considered at an early stage. It would not be appropriate to safeguard a route that has not yet been assessed in terms of potential biodiversity impacts.

Yours sincerely,

Laura Brook
Conservation Officer
Sussex Wildlife Trust

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA35

ID: 784

Response Ref: Reg19/784/5

Respondent: Mrs D Thomas

Organisation: Bolney Parish Council

On Behalf Of:

Category: Town & Parish Council

Appear at Examination? x

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

General comments:

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

Comments about specific policies:

SA5: Land at Bolney Grange Business Park.

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

SA6: Marylands Nursery, Cowfold Road, Bolney.

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

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

SA9: Science and Technology Park

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

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

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

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

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

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

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

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA35

ID: 910

Response Ref: Reg19/910/1

Respondent: Ms V Riddle

Organisation: Tandridge District Council

On Behalf Of:

Category: Local Authority

Appear at Examination? x

Planning Policy Team
Mid Sussex District Council
(via email)

If calling please ask for *Vivienne Riddle*
on 01883 732883

E-mail: LocalPlan@tandridge.gov.uk

Date: 30 September 2020

Dear Planning Policy Team,

Thank you for providing us with the opportunity to comment on the Draft Site Allocations DPD (Regulation 19).

Under the Duty to Cooperate, as set out within the most up-to-date Statement of Common Ground, Tandridge and Mid Sussex have engaged on an ongoing basis throughout the preparation of the Sites DPD.

However, and as highlighted in our Reg 18 response, we are aware that there are two schemes which are of a scale and proximity to our district such that they have the potential to impact on our residents. They are SA19: Land south of Crawley Down Road, Felbridge (200 units) and SA20: Land south and west of Imberhorne Upper School, Imberhorne lane, East Grinstead (550).

Highways

One of the main issues in this locality is that of highway capacity at various locations. As set out in the most up-to-date Statement of Common Ground it is agreed that transport schemes are required at various locations, including the A22/A264 junction, and that we will continue to work together, along with the respective county councils, to investigate potential mitigation options. It is recognised that the preferred option may require cross boundary land and policy SA35: Safeguarding of Land for and Delivery of Strategic Highway Improvements, which sets out a requirement to identify, secure and protect any land needed for this purpose, is supported. We would expect that a mitigation option to have been agreed by all parties before the commencement of any development in the vicinity, so that we can be ensured that the impact will be mitigated and contributions towards the highways improvements are sought. As such, that wording to this effect is included within the policies (SA19 and SA20) as a main modification.

Site Allocations

It is noted that the site allocation policies for each sets out detailed requirements, including a requirement to work collaboratively with Surrey and West Sussex County Council Highway Authorities to mitigate development impacts by maximising sustainable transport enhancements, and where additional impacts remain, consider highway mitigation measures. Furthermore, they also seek to secure contributions towards necessary capacity and safety improvements to junctions impacted by the development in the vicinity of the site along the A22/A264 corridor, having taken account of any sustainable transport interventions. Tandridge supports the detailed requirements given the known capacity issues but as above would like to see more commitment in having an agreed mitigation scheme that the sites contribute towards before the developments commence.

customerservices@tandridge.gov.uk www.tandridge.gov.uk

Settlement Hierarchy

Tandridge notes that site SA19 has been identified as being within the proposed built-up boundary of East Grinstead and as such has the same settlement category (Category 1). However, it is also being described as an extension to Felbridge, with its vehicular access off Crawley Down Road and policy requirements setting out that the any proposals maximise connectivity with Felbridge. It is also noted that, at present, the built-up boundary narrows to a thin line between the main built up area of East Grinstead and development to the south of Crawley Down Road but this boundary is being amended to include an area of land located between this site allocation and the main built-up area of East Grinstead. Notwithstanding this it is noted that policy DP13 of the Mid Sussex Development Plan 2014-2031 seeks to prevent the coalescence of settlements which harms the separate identity and amenity of settlements and the maintenance of this undeveloped gap reinforces the fact that they are separate settlements.

Our Settlement Hierarchy (2015 and 2018 Addendum) identifies Felbridge as a Tier 3 Rural Settlement which demonstrates a basic level of provision. However, it also recognises the relationship with out-of-district settlements, noting that residents rely on East Grinstead for services such as healthcare facilities, secondary schools and a train station. In arriving at our Preferred Strategy we considered a number of different approaches, including an approach with development focused on our Tier 3 settlements. Our Sustainability Appraisal concluded that such an approach would be unsustainable, with limited gains when compared to the impact on the environment and the settlements themselves. Tandridge's approach therefore does not include directing development towards this settlement.

Health

Tandridge supports the proposed approach of either on-site provision or contributions for off-site expansion of GP surgeries. (SA20) These requirements are welcomed as they will help mitigate the impact on GP surgeries within our administrative area.

SANG

The provision of SANG to the west of SA20 is supported. As set out in the Statement of Common Ground we agree to continue to engage positively on an ongoing basis to ensure the proposed SANG provision is appropriately defined and designed and makes best use of opportunity for strategic provision if this is shown to be appropriate. We would like to continue discussions about whether Tandridge District Council could utilise the SANG to offset the impact on Ashdown Forest from development on our border.

Education

The provision of land and financial contribution for early years and primary school (2FE) provision with Early Years pre-school and facilities for Special Educational Needs (2.2ha) on SA20 is noted. This coupled with the proposed measures to protect and improve the PROW which would provide linkages between SA19 and SA20 are welcomed in terms of the additional provision and providing the potential opportunity to access the education provision on SA20 by non-car means thereby lessening the potential impact on education provision within Tandridge.

Flooding

It is noted that part of site allocation SA19 contains Flood Zone 3. The site allocation policy wording sets out that, informed by a Flood Risk Assessment, a sequential approach shall be applied to ensure all development avoids the flood extent for the 1 in 100 year event, including a climate change allowance and Tandridge supports this.

Yours sincerely,

Sarah Thompson
Head of Strategy

customerservices@tandridge.gov.uk www.tandridge.gov.uk

Tandridge District Council, Council Offices, 8 Station Road East, Oxted, Surrey RH8 0BT
Tel: 01883 722000 - Monday-Thursday 8.30-5pm, Friday 8.30-4.30pm - Dx: 39359 OXTED

1436

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA35

ID: 1436

Response Ref: Reg19/1436/4

Respondent: Ms M Collins

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	Margaret Collins
Job title	Local resident
Organisation	-
Respondent ref. number	-
On behalf of	Myself
Address	[REDACTED]
Phone	[REDACTED]
Email	[REDACTED]
Name or Organisation	Local resident
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA18, SA19, SA 20, SA35
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	Yes
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Sound
Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	<p>SA18 - East Grinstead Police station site - 22 number of dwellings. How many parking slots per housing unit will be provided? Is it incorrectly anticipated there will be spare capacity in the current East Court car parks?</p> <p>The questions of the East Court through road ownership, maintenance & access at both ends of the through road have not been addressed in the document.</p> <p>SA 19 -Land south of Crawley Down Road - 200 dwellings. Access on to the A264 currently causes tailbacks at the junction with the Crawley Down Road. If it is acceptable that it is " not deemed appropriate to add capacity, solutions shall include measures to boost sustainable modes and/or re-route traffic" I think more information is required before decisions are taken re further additional vehicular movements.</p> <p>SA20 - I welcome the expansion of Imberhorne School which should as a consequence be able to house the whole school on one site.</p> <p>SA35 - Safeguarding of land and delivery of Strategic Highway improvements. I am concerned that finance will be wasted on further studies of the three junctions on the A22 - Felbridge, Imberhorne Lane & Lingfield Road. The need for a radical improvement for traffic flow on the A22 has been recognised in previous studies sponsored by West Sussex County Council.</p>

Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

The problems of traffic flow on the A22 & A264 leading to the Felbridge junction and the London Road have been recognised for many years. Air quality issues need to be addressed and the considerable inconvenience to local residents, local businesses and through traffic have a detrimental effect. The traffic problems should be addressed and solutions implemented prior to any further dwellings in the area.

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

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

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

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

yes

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

yes

Please notify me when-The Site Allocations DPD is adopted

yes

Date

31/08/2020

2016

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA35

ID: 2016

Response Ref: Reg19/2016/2

Respondent: Mr A Fox

Organisation: Quod

On Behalf Of: Mayfield Market Towns

Category: Promoter

Appear at Examination? ✓

Name	Adrian Fox
Job title	Associate Director
Organisation	Quod
On behalf of	Mayfield Market Towns Ltd
Address	Ingeni Building 17 Broadwick Street London W1F 0DE United Kingdom
Phone	07710-303820
Email	adrian.fox@quod.com
Name or Organisation	Quod
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA35
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound
Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	<p>Adjoining authorities should work closely together to ensure that their respective local plans are consistent with each other, particularly with regard to cross-boundary infrastructure – and to ensure that plans do not unwittingly prejudice one another.</p> <p>This means that account should be given to the approach being undertaken by neighbouring authorities. Horsham District Council has identified the need for significant new housing-led allocations in order to meet the scale of outstanding housing need in the area. This potential includes a new settlement being promoted by Mayfield Market Towns Limited (known as Mayfields).</p> <p>As currently drafted the DPD fails to provide a sound and effective approach.</p> <p>Further details are provided in the supporting letter</p>
Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.	<p>It would be appropriate to safeguard land for highway improvements under draft Policy SA35 for the proposed travel corridor to be delivered alongside a future allocation at Mayfields.</p> <p>Further details are provided in the supporting letter</p>
If you wish to provide further documentation to support your response, you can upload it here	https://forms.midsussex.gov.uk/upload_dld.php?fileid=972d4fdd55c1824dcf62b6b35884f26d
If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary	Given the significance of the issue and implications it is considered that we should have the opportunity to fully discuss and explore the issue raised.
Please notify me when-The Plan has been submitted for Examination	yes
Please notify me when-The publication of the recommendations from the Examination	yes
Please notify me when-The Site Allocations DPD is adopted	yes
Date	28/09/2020

From: Adrian Fox <adrian.fox@quod.com>
Sent: 15 October 2020 12:47
To: ldfconsultation
Subject: RE: Site Allocations DPD Consultation Response (Ref: DPDCon-1601311425)
Attachments: Representations to Mid Sussex Sites DPD on behalf of Mayfields Market Towns Ltd.pdf

Dear Sir / Madam,

Further to our recent correspondence and submission of representations to consultation on the Site Allocations DPD, attached is a revision to the supporting map following confirmation of the client's landownership. Therefore, the attached should supersede the previous submission. We can confirm that there is no change to the written representations.

We apologise for any inconvenience caused and please do not hesitate to contact me should you have any queries or wish to discuss further.

Kind regards,

Adrian



Adrian Fox
Associate Director
adrian.fox@quod.com

Main: 020 3597 1000
Mobile: 07710 303 820
Direct: 020 3597 1067
www.quod.com

Ingeni Building, 17 Broadwick Street
London
W1F 0DE

From: Adrian Fox
Sent: 29 September 2020 08:52
To: LDFconsultation@midsussex.gov.uk
Subject: Site Allocations DPD Consultation Response (Ref: DPDCon-1601311425)

Dear Sir / Madam,

We submitted representations to the Site Allocations DPD yesterday ahead of the midnight deadline (confirmation attached), but noticed that Appendix 1 of our submission was missing. Please see attached an updated version with the relevant appendix included.

I apologise for any inconvenience caused. Please do not hesitate to contact me should you have any queries.

Kind regards,

Adrian

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Our ref: Q50093/AF
Your ref: -
Email: adrian.fox@quod.com
Date: 28th September 2020



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

By Email (LDFconsultation@midsussex.gov.uk)

Dear Sir / Madam,

Mid Sussex District Council Submission Draft Sites Development Plan Document – Regulation 19 Consultation

We submit these representations on behalf of Mayfield Market Towns Limited ('MMT'), in relation to the above consultation.

A completed consultation response form is enclosed.

The Draft Sites Development Plan Document ('DSDPD') seeks to identify sufficient housing sites to provide a five-year housing land supply. It also seeks to safeguard land for other uses, including delivering strategic highway improvements – as set out under draft Policy SA35.

As the Council will be aware, MMT is promoting a new settlement (known as Mayfields) for the delivery of c. 7,000 homes and associated uses through the emerging new Horsham District Local Plan being prepared by the neighbouring authority of Horsham District Council ('HDC'). Mayfields was identified by HDC as one of nine strategic sites in the Draft Horsham District Local Plan 2019-2036 (Regulation 18) dated February 2020. As Mid Sussex District Council ('MSDC') is aware, HDC has identified the need for significant new housing-led allocations in order to meet the scale of outstanding housing need in the area. The Regulation 19 version of the Horsham District Local Plan is due to be published in November 2020 and MMT has made representations to HDC that a new settlement at Mayfields would be a suitable and sustainable part of any future local plan strategy.

Whilst the proposed allocation currently being advanced by MMT falls entirely within the administrative boundary of Horsham District, a new eastern access travel corridor (for vehicles, cycles and foot) on land to the south of Sayers Common (within the administrative boundary of MSDC) is also proposed to further improve Mayfields' overall accessibility. The proposed travel corridor is entirely consistent with the strategic objectives of the adopted District Plan and the objectives of the West Sussex Transport Plan.

It is appropriate to expect that adjoining authorities work closely together to ensure that their respective local plans are consistent with each other, particularly with regard to cross-boundary infrastructure – and to ensure that plans do not unwittingly prejudice one another.

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Accordingly, it would be appropriate for the DSDPD to safeguard land for highway improvements under draft Policy SA35 for the proposed travel corridor to be delivered alongside a future allocation at Mayfields.

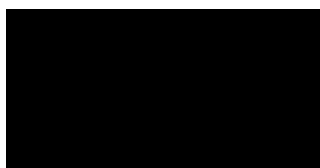
A plan showing the extent of land identified by MMT for the new link road is contained at **Appendix 1**. The identified land is fully under the ownership of MMT. The full extent of the transport corridor is entirely deliverable and requires no external funding.

MMT has assessed the implications of this proposed new infrastructure in this location in terms of both the impact on the existing highway network and landscape / environmental impacts. This information will be shared with MSDC, but it is apparent that the new route would bring benefits to existing and proposed new development without causing significant adverse effects. This includes benefits to the existing business parks located in and around Reeds Lane, where the current road network is narrow and constrained. The new road would also reduce traffic through Albourne. Part of the safeguarded land identified for this transport corridor has previously been assessed by MSDC in terms of its suitability for development (known as 'Land south of Furzeland Way, Sayers Common'), which was included within the SHELAA and Site Selection Paper (Site Ref. 491) prepared by MSDC. When considering this land's suitability for development, although not recommended for allocation due to the limited size of the site (instead potentially being a windfall site), it was acknowledged that there are very few environmental constraints, and that the land is largely free of biodiversity, heritage and landscape constraints.

We propose that the Local Plan provides for this important safeguarding pending the adoption of the Horsham Local Plan at which point it will be known whether the Mayfields proposal has been allocated.

We trust these representations will be given due consideration by the Council in the preparation of the DSDPD and we would welcome the opportunity to discuss further our proposals and potential wording of any future revised policy. In the meantime, we would appreciate being kept updated on progress of the DSDPD and reserve the right to appear at any future Examination.

Yours faithfully,



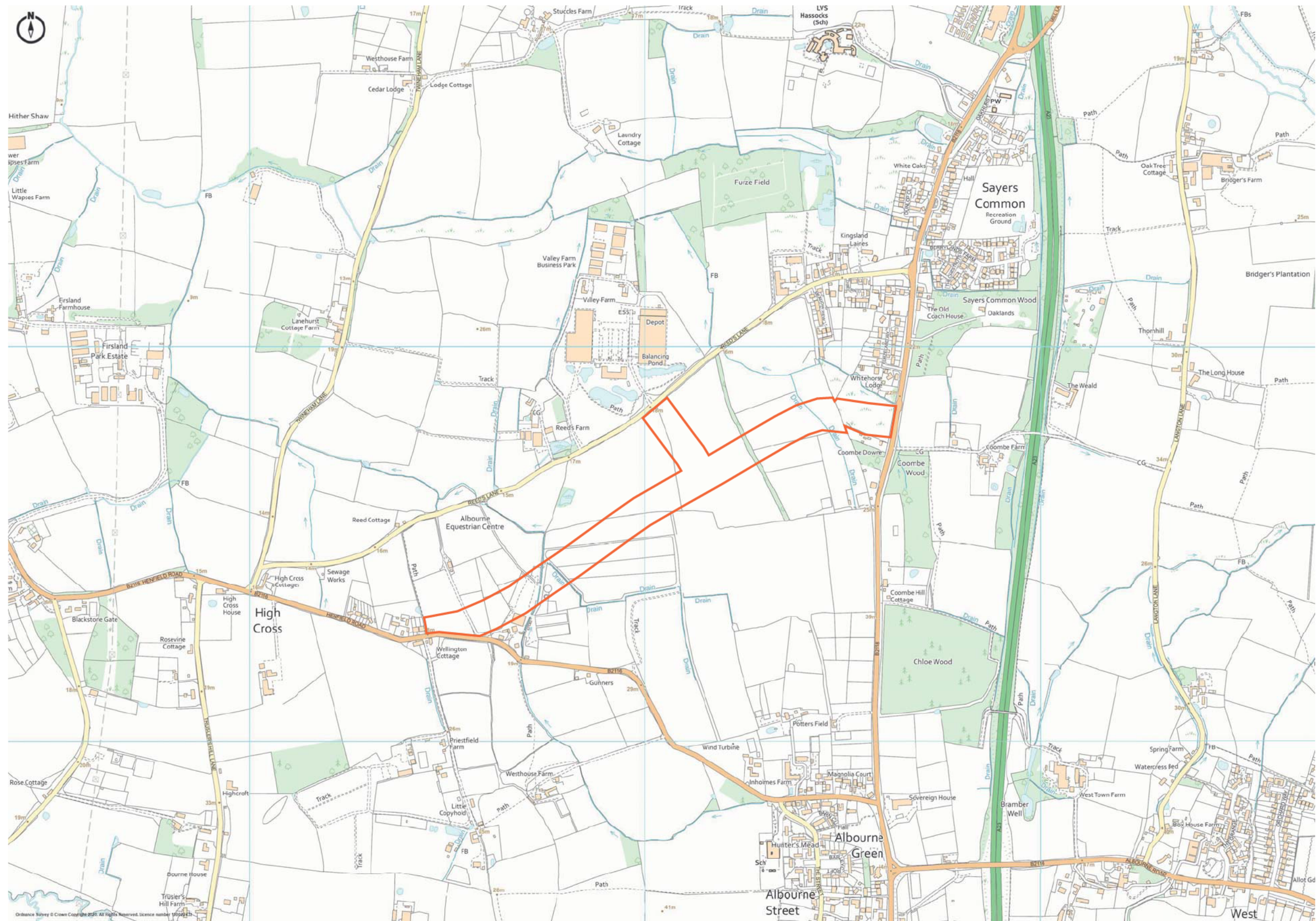
Adrian Fox
Associate Director

enc.




Appendix 1

Suggested Land to be Safeguarded for new Link Road



Quod · Ingeni Building 17 Broadwick Street London W1F 0AX
Tel: 020 3597 1000 · www.quod.com

KEY

 Proposed land to be safeguarded

Project:
Mayfield Towns

Client:
Mayfield Towns

Drawing Title:
Proposed Travel Corridor

Drawn: CR	Checked: AF	Date: 09.10.20	Scale: 1:10,000	Paper Size: A3
Job Number: Q50093			Figure No: Q01	Rev: -