

**MID SUSSEX LOCAL PLAN 2014-2031**  
**SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT**  
**EXAMINATION**  
**INSPECTOR'S MATTERS, ISSUES AND QUESTIONS (MIQS)**

**HEARING STATEMENT FOR MATTER 3.3**

**PREPARED ON BEHALF OF BURGESS HILL TOWN COUNCIL  
AND SOFLAG (SOUTH OF FOLDERS LANE ACTION GROUP)**

**MATTER 3 - DOES THE PLAN DELIVER BOTH THE QUANTITATIVE AND QUALITATIVE ASPECTS OF  
HOUSING PROVISION IN THE DISTRICT PLAN TO MEET MID SUSSEX'S REQUIREMENTS OVER THE  
PLAN PERIOD IN ACCORDANCE WITH NATIONAL POLICY?**

3.3 *Housing Delivery over the Plan Period: Does the Plan provide sufficient evidence to demonstrate that the proposed new homes total in each of the allocations can be implemented over the plan period, in accordance with the housing trajectory? Can each of the following housing allocations demonstrate their sustainability and deliverability in relation to the following considerations.*

1. Each of the considerations set out has been applied to the proposed allocations at Site References SA12 and SA13, with all relevant matters set out below under each point.

*(iii) any conflict with a made Neighbourhood Plan;*

2. As stated above within Paragraphs 9-13 of our Hearing Statement in respect of Matter 1.1, it is clear that the submitted DPD does not accord with the provisions of the Made Burgess Hill Neighbourhood Plan, and, (contrary to the NP), seeks to allocate additional land at this town, over and above any residual residential requirement, despite the specific content of the Neighbourhood Plan (and District Plan), which indicates that there is no need to identify further land for residential development.
3. Again, whilst it is recognised that the policies of the DPD can supersede the content of the Made Neighbourhood Plan, this must be fully justified and rationalised. No such justification has been put forward by the Council. Instead, it is currently proposed that a significant quantum of additional land is allocated at Burgess Hill, which is neither necessary nor robustly justified, thus leading to an inequitable and harmful pattern of development.

*(iv) any conflict with national planning policy;*

4. There are fundamental conflicts with the content of the NPPF, which result in an in principle objection to the proposed allocation of Site References SA12 and SA13. In particular, we would point to the following paragraphs:
  - Paragraphs 7-10, and Paragraph 16(a) – Set out the heart of the Framework, which is the presumption in favour of sustainable development, which requires the consideration of the three overarching objectives: economic, social and environmental. In particular, Paragraph 16(a) highlights the need for Plans to be prepared with the objective of contributing to the achievement of sustainable development. As set out previously, within our Hearing Statements relating to Matter 3.2, the proposed allocations at SA12 and SA13 do not represent sustainable development options, and will result in an unsustainable pattern of development, which will result in harm to all three objectives.

- Paragraphs 102 – 104 – Stress the need to promote sustainable transport and to consider transport issues at the earliest stages of plan-making, so that the potential impacts of development on transport networks can be addressed. In particular, significant development should be focused on locations which are, or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. It is our contention that the traffic and transport implications of further residential allocations within this part of Burgess Hill have not been robustly considered and evidenced. This matter will be set out in full within the accompanying Hearing Statement produced by GTA Civils & Transport.
  - Paragraphs 170 – 172 – We suggest that there is significant and fundamental conflict with these paragraphs, particularly owing to the lack of recognition of the intrinsic character and beauty of the countryside in the location of proposed Site Allocations SA12 and SA13. In addition, Paragraph 172 clearly states: “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks.....which have the highest status of protection...” and as such, Local Planning Authorities are encouraged (through Paragraph 171), to “allocate land with the least environmental or amenity value”. The proposed allocations of SA12 and SA13 directly contradict this aim, and envisage the development of land which is of incredibly high landscape quality, and which forms the critical interface between the edge of the urban form of Burgess Hill and the SDNP.
- (v) *any significant infrastructure considerations, including vehicular access, traffic circulation and highway and pedestrian safety, flooding, drainage and sewerage implications; are any of these ‘showstoppers’;*
5. The separate Hearing Statement produced by GTA Civils & Transport fully addresses the highway, traffic and transportation impacts of the proposed allocations at Site References SA12 and SA13, and the cumulative impacts of these possible developments, when considered alongside other allocations. In summary however, it is our submission that the highway impacts of the proposals at SA12 and SA13 are significant, with the mitigation measures outlined by the Site promoters being poorly evidenced and inadequate in their scope.

*(vii) any significant impact on the quality of the landscape, e.g. the integrity of any green gaps, and the ecology of the site and the surrounding area, and proximity to ancient woodland;*

6. It has been detailed within Paragraphs 2-14 (within our Hearing Statement in respect of Matter 3.2, sub-points i and iii), that Site References SA12 and SA13 lie within an area of high landscape quality and sensitivity and will irreversibly erode the integrity of the green gap between the edge of the built form of Burgess Hill and the SDNP. The loss of this beautiful, open landscape setting will have a highly detrimental effect on this designated area, which is afforded the highest status of national protection. Moreover, these Sites have been shown to comprise ancient farmland, which offers habitats, flora and fauna of the highest value and which is irreplaceable; the usual mitigation measures will not therefore, overcome the fundamental objection to the loss of such biodiverse and ecological important land.

*(ix) access to shops, schools, health provision and services, community facilities, public transport and employment, i.e. is the location sustainable*

7. It is fully acknowledged that Burgess Hill is identified through the District Plan as a Tier 1 Settlement (alongside East Grinstead and Haywards Heath) and therefore is a main focus for the delivery of the development required to meet the needs of Mid-Sussex. However, the District Plan sets out a clear Spatial Strategy, and identifies the appropriate quantum of residential development for each settlement, according to the settlement hierarchy.

8. With this in mind, it must be stressed that the amount of additional allocations at Burgess Hill will result in a harmful and disproportionate amount of new development at this settlement, resulting in an imbalance in housing delivery. This will place an undue burden upon the facilities and services at Burgess Hill, as well as upon the highly valued rural fringes to the town. Far from offering a sustainable location for further development therefore, the inappropriate quantum of housing proposed through the additional allocations at SA12 and SA13 will result in a distribution of development will conflicts with all three overarching sustainability objectives.

### Delivery of Sustainable Development

9. Taking the above matters into account, and in considering the three interlinked strands of sustainable development, we contend that the DPD fails to deliver a sustainable pattern of growth, and specifically that the proposed allocations at Site References SA12 and SA13 will result in developments which perform poorly, when assessed against the environmental, economic and social elements of sustainable development.
10. It has been demonstrated herein, that the proposed developments at SA12 and SA13 will have significant, irreversible detrimental impacts upon the landscape character and setting of the SDNP, which, given the relationship, proximity and level of importance as a transitional green space between Burgess Hill and the NP, cannot be mitigated or overcome.
11. Furthermore, the Council's own evidence points to the environmental importance of these Sites, both in landscape and visual amenity terms, as well as owing to their biodiversity and ecological offerings, which again, would be irretrievably lost through these development proposals.
12. These critical matters, coupled with the lack of any robust justification for the significant 'over-loading' of new development at Burgess Hill, which is entirely at odds with the spatial strategy and employment strategy as set out within the District Plan, results in a demonstrable pattern of unsustainable development and a clear conclusion that the proposed allocations at Site References SA12 and SA13 are unnecessary, undesirable and unsustainable.

### **CONCLUSIONS ON MATTER 3**

13. The Site Allocations Development Plan Document fails to deliver a distribution of development to meet the minimum residual housing requirement in a manner which accords with the principles of sustainable development, and should therefore, found to be 'unsound.'
14. The proposed distribution of development envisages an unbalanced pattern of growth, with a disproportionately high level of development proposed at Burgess Hill. This does not accord with the Spatial Strategy for the District, and will place an undue burden upon the facilities and services of this town, which has not been adequately addressed through the Infrastructure Delivery Plan, or through traffic and transportation mitigation measures.
15. Of fundamental concern however, are the proposed allocations at Site References SA12 and SA13. Not only are these allocations unnecessary, given the disproportionate quantum of development envisaged at Burgess Hill, they are also considered highly unsustainable and detrimental to the landscape setting of the SDNP. These Sites form an integral part of the historic and beautiful rural fringe to Burgess Hill and play a critical role in forming the interface and transitional green space between the urban fabric and the nationally important SDNP landscape. The loss of this land to further development will irreversibly and irrevocably destroy this important green space, which currently provides a sensitive and high quality setting to the NP.
16. Coupled with this loss of landscape, is the associated loss of land which provides a vital biodiversity resource, and which is evidenced to provide habitats to a significant number of protected species.
17. In combination therefore, these factors lead to the conclusion that the proposed allocation of Site References SA12 and SA13 does not present a sustainable development option or contribute towards a sustainable pattern of growth and would lead to conflict with the three overarching strands of sustainability.

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