



The countryside charity  
Sussex

**Mid Sussex District Council draft Site Allocations DPD Public Examination**  
**– post hearing action points response from CPRE Sussex (689)**

**18th June 2021**

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AP3- Update on progress with strategic sites DP8-11

CPRE Sussex has no comments on any of the documents MSDC-05a – to MSDC-05d.

AP4- Matter 3.4

1. CPRE Sussex has no comment on document MSDC-06a.
2. As to document MSDC-06b, in the context of proposed allocation SA25 at Ardingly:
  - 2.1 If as Inspector you accept the conclusion there that the District Plan is in line to deliver what MSDC calls an “oversupply”, or in our terminology a buffer, of 937 housing units in excess of the minimum District Plan target of 16,390 dwellings, rather than the 484 anticipated in the SADPD document, it fortifies our case that it is unsound to allocate the Ardingly showground site SA25 for housing at a level that exceeds the community’s own needs.
  - 2.2 Given the substantially larger housing buffer accompanied by the additional comfort provided by the up-to-date developer-agreed evidence on deliverability of housing at other major sites, there is no justification for parking excess housing within the High Weald at this location when taking into account:
    - the heavy development pressures affecting the High Weald AONB, with MSDC having already made commitments for over 1,400 units there over the Plan period to date, and the great weight that must be given by the Council to the conservation and enhancement of the AONB;
    - the local housing need being far less than 70 units. Our view is that local need (in terms of numbers, housing mix and location) should be for discussion between the District and Parish Councils, and that the logical starting point would be the Ardingly Neighbourhood Plan (especially policies ARD2 and ARD3) and the Sites Allocation DPD Regulation 19 Sustainability Appraisal. There has already been a steady stream of modest scale development within the village, such that the SA identifies at p.41 a residual local housing need in Ardingly of up to 16 dwellings over the residual life of the Plan with a number of potential local sites to meet that local need; and
    - the availability of alternative sustainable sites elsewhere in the District outside the AONB for further housing if you decide that a buffer of 937 units should be maintained.
  - 2.3 Our other written and oral arguments against the SA25 allocation still stand.

3. On the same basis, as to document MSDC-06b, in the context of proposed allocation SA15 within the Local Green Space at Southway, Burgess Hill:
  - 3.1 If you accept the conclusion in MSDC-06b that the District Plan is in line to deliver a much larger buffer of 937 housing units in excess of the minimum District Plan target, it weakens the case for allocating site SA15 at Southway, Burgess Hill.
  - 3.2 The loss of part of a Local Green Space (LGS) designated only recently in the Burgess Hill Town Council's Neighbourhood Plan as a wildlife resource in the District's most heavily populated town undermines not only the Council's professed environmental conservation credentials but also the credibility of the LGS and community involvement concept given the hoops that the Town Council has had to go through to satisfy the requirements of NPPF para 100 to justify its designation. It is a core principle of LGS designation that it is to be there for the long term (see NPPF para 99), and that development within an LGS should only be permitted in very special circumstances: i.e. the para 101 rule that any development proposal there should be managed in a similar way to green belt land as governed by NPPF chapter 13 which sets very restrictive special needs rules around new housing. Nor is the purpose of the LGS served by "improving" it as a product of partial residential development and associated prettification.
  - 3.3 The special need case for this small allocation has always been weak. The increased size of the expected housing buffer weakens that case further: it is all the harder to say that there are very special circumstances that require the allocation. We call on the Council to withdraw this unnecessary allocation in the light of this additional evidence, failing which we ask the Inspector to rule that it is not sustainable or sound on the basis that it is unjustified and contrary to planning policy. The removal of this allocation would have no material impact on the purposes of the SADPD.