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Dear Mr Fox

## Inspectors Actions Point- ID08 NPPF July 2021 Update

Further to Banks Solutions email dated 26<sup>th</sup> August, we are grateful for the invite and opportunity to comment on the July 2021 Update to the National Planning Policy Framework (NPPF), and its implications for the MSDC Site Allocations Development Plan Document. We would like to provide comment as to how we believe the updates are consistent with the proposed Science & Technology Park SA9 allocation, as proposed by MSDC.

As you will be aware from the supporting information submitted on behalf of our clients, Dacorar (Southern) Ltd and Wortleford Trading Ltd, to both the Regulation 19 submissions, and our examination sessions, the Science & Technology Park (STP) project team are fully supportive of the Draft Policy SA9.

We believe that the unique opportunity of SA9 to provide a quality STP development on our site, is not adversely affected by the NPPF July 202021 update, and indeed the principles of enhanced design codes and ecological improvements to the site are consistent with the ethos of our development.

The new NPPF does not therefore have any implications for our proposed development, nor the drafted wording in the Policy SA9 as previously considered by yourself at the MSDC examination sessions.

We are aware that the new NPPF will apply to all plans that were submitted for examination after 24 January 2019, which of course includes the Mid Sussex Site Allocations DPD.

Further to your Action Point ID08 we believe that the changes to the July 2021 NPPF in Chapter 2 'Achieving Sustainable Development' emphasise the 17 Global Goals for Sustainable Development agreed by the UN, and that the changes to the social objective of 'beautiful and safe places', as well as changing the emphasis of the environmental objective to improve biodiversity, are consistent with our principles for development.

We also support that Goal 7 Affordable Clean Energy, is addressed through our evidence base submissions, whilst Goal 8 "Decent Work and Economic Growth" is central to the wider objectives of the site and its intention to be a key component in developing the STP as a regional heart of economic growth in the wider C2C LEP region.





As you know, the STP would also contribute to the goals above, in terms of providing Clean Energy for the STP and potentially the wider local area, providing work and economic growth in a sustainable way, and also providing innovation through its proposed development principles. This will be further enhanced by the potential those occupiers on the site, which will align with the Science Park Association STP definition. The STP will also improve infrastructure and public transport hubs, ensuring sustainable development occurs.

In the new NPPF, Chapter 8 'Promoting healthy and safe communities' and Chapter 9 'Promoting Sustainable Transport' has inserted cycle routes as well as pedestrian routes as being 'clear and legible'. Our indicative Masterplan and the supporting Mobility Strategy, demonstrate that cycle and pedestrian routes have been considered and are integral to our design of the site.

Paragraph 106 (was previously paragraph 104) has been amended, with requiring attractive and well designed cycling and walking networks and this would be achieved by the STP by providing an attractive and well-designed network within the site. The new network will naturally assimilate with the wider transport network, as well as providing on site amenities to reduce the need for travel. This is demonstrated in the illustrative Masterplan within our Positioning Document.

It also highlights in paragraph 110 that the 'design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code...". We believe that our allocation at SA9 would meet these Design Standards and it is the ambition of our clients to make the site as sustainable and attractive as possible to encourage all sustainable transport modes to and from the site.

Chapter 11 'Making Effective Use of Land' inserted the following into paragraph 125; 'Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places.' As you are aware, we have developed a high level masterplan which demonstrates the effective and efficient use of land, creating a sustainable place for Science and Technological innovation, whilst ensuring it would protect and enhance the natural environment of the site and surrounding area.

Para 125 reiterates the need to ensure that high quality design is central to any detailed design at formal application stage and that any application and design ethos will need to address both national and local design policy guidance. Again this update is not considered to have any implications for the STP or its allocation under SA9 that will not be addressed at application stage.

Chapter 12 'Achieving Well-designed Places' puts a greater focus on place making and making 'beautiful' and 'sustainable' places, which requires additional emphasis on tree planting and the benefits trees make to the quality and character of a place. In terms of place making, the site would be cohesively master planned and we would anticipate a design guide being developed for the site ahead of a planning application. This would include the provision of trees to soften the appearance of our site and to assimilate development into the natural environment as a sustainable place.

Chapter 14 'Meeting the Challenge of Climate Change, Flooding and Coastal Change' has put greater emphasis on flooding and mitigation and resilience to flooding from all sources. Again, we have addressed this as part of our master planning and this was also discussed at examination. Therefore we do not believe there are any wider implications for the SA9 allocation as a result.

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Therefore, in response to ID08, we do not consider that there are any implications in the revised NPPF (July 2021) which adversely affect our proposals as set out in our submissions to Regulation 19 and the recent planning examination sessions, but rather our proposals would contribute to achieving the changes to national policy.

Should you require any further information, please do not hesitate to contact me.

Yours sincerely

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Partner

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