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Date 13 September 2021  
Your ref AP12  
Our ref 298182-8

Dear Sir / Madam,

**Mid Sussex Site Allocations DPD (SADPD)**  
**Post Hearing Actions AP12**  
**SA22: Land North of Burleigh Lane, Crawley Down**  
**Hurst Farm, Turners Hill Road, Crawley Down (SHELAA Site ref: 743)**  
**Representations on behalf of Reside Developments Limited (Reside)**

DMH Stallard Planning act on behalf of Reside in relation to the promotion of land at Hurst Farm, Turners Hill Road, Crawley Down. The site has been promoted through the Call for Sites exercise and has been assessed as Site ref.743. Representations made on behalf of Reside through the DPD consultation and examination have commented on the uncertainty of delivery of the site in Crawley Down and the comparative merits of the Hurst Farm site.

The Statement of Common Ground (SoCG - AP12) relates solely to the question of whether there is a realistic prospect that a safe and convenient means of access can be provided to the site to enable delivery of the proposed housing allocation within the plan period.

Two potential points of access are considered (Sycamore Lane or Woodlands Close). The SoCG indicates that the potential Sycamore Lane route is being pursued but the land required to gain access to the site is not within the control of the site promoter/landowner (my underlining). The SoCG then goes on to set out somewhat fanciful timeline for securing this access. Many points within the timeline are totally outside the control of either the promoter or the Council. Woodlands Close is then mentioned but again there is no indication the this access is within the control of the promoter or Council. The promoter has been aware of the lack of access issue for years and the only realistic conclusion that can be drawn is that there is absolutely no certainty of delivery of the site as the promoter has no control over either potential point of access.

The National Planning Policy Framework (2021) at para 16 and 35 makes the point that deliverability is key to effective plan making and the delivery of housing. It is clear that the delivery of proposed allocation SA22 is at best uncertain and, therefore should be omitted from the SADPD. Other sites are available in the village such as the Land at Hurst Farm which merit inclusion in the SADPD for the key reasons that;

- The part of the site proposed for development is consistent with the nearby development form of the village immediately to the south.
- Mature trees lie on all four boundaries resulting in a very well enclosed site where development would have no substantive impact on the character of the locality.
- The site is a predominantly brownfield site where there is substantial built form of utilitarian buildings across the site, including a farm shop with associated activity and car parking.
- The fact that this site is a brownfield site should weigh heavily in its favour, and brownfield sites / Previously Developed Land (PDL) should be considered over other greenfield sites in choosing site allocations. The NPPF echoes this and states at paragraph 119 that: "Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land".
- The site could potentially be progressed via Prior Notification/Permitted Development rights, however, this would be a less attractive/comprehensive manner through the change of use of some existing buildings for commercial/residential purposes.
- The site benefits from a wide existing established access which farm vehicles, lorries and cars use on a daily basis when entering and leaving the site. No issues have been raised by WSCC Highways in relation to visibility and access.
- The site is promoted by Reside, a well-respected local developer, with an excellent track record of delivering high quality developments in Mid Sussex. Reside have an option agreement in place, to bring the Site forward for housing development at the earliest opportunity, making the Site available for development now. The recent pre-application discussions with both the Parish and District Council in respect of this site also demonstrates that the site is available and that it is deliverable in the short term.

In conclusion, we consider that the site at Hurst Farm is eminently suitable for development and if taking a sequential approach, the allocation and development on



brownfield sites must be considered preferable to Greenfield land - this being a key provision in achieving sustainable development which lies at the heart of national and local planning policies. There are no constraints to development at Hurst Farm which would affect the viability of residential development at the site and therefore it is achievable within the terms defined by the Planning Practice Guidance.

Conversely, the Burleigh Lane site, has no certainty over access and, therefore, cannot be considered deliverable.

Yours faithfully



DMH Stallard LLP