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Mid Sussex District Council
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5th November 2021

MSDC Site Allocations DPD (SDP) & MSDC 20 Response to AP 21 Re SA13

To The Government Inspector,

Sir,

I would like to register my comments to the response submitted by MSDC, the SDNPA and the site Developers on the 12th October 2021 to Action Point 21 from your hearings on producing a Statement Of Common Ground regarding the Site Allocations (SDP) with particular regard to site SA13.

Before going into the details on the sites suitability or lack of it for the large scale development that is being proposed I would like to point out that we have lived alongside SA13 for 30 years and can attest to it's very special nature and position in terms of its biodiversity and totally unspoilt wilderness setting, which apart from supporting a rich and varied range of wildlife from mammals such as Badgers, Bats, Deer (Roe & Muntjac) and Foxes and reptiles from Slow Worms to Great Crested Newts plus numerous species of birds from Buzzards to Wrens it also plays a very important role in absorbing the area's carbon footprint.

Burgess Hill is very fortunate to have such an area on its doorstep and no matter what MSDC and the site developers say once it is lost it can never be replaced. This year more than any in living memory is highlighting the value of retaining our green spaces especially those close to urban areas, not only for the health of the people but most importantly for the health of the planet.

From your site visits Sir you will no doubt have noted how dense the vegetation is particularly towards the Southern end of Site SA13. This substantial area not only includes mature specimen tree species such as Oak, and Ash but also many hundreds of saplings which because of the special almost unique undisturbed history of the site, for literally centuries, have been able to self seed and if allowed to mature will in time create a veritable great Oak forest.

In the year of COP26 when the whole world is being reminded and educated on the crucial role forests in particular are playing in keeping the carbon levels in our atmosphere to liveable levels then can we really justify destroying all of this for the sake of 300 homes, homes I would add which could easily be accommodated elsewhere in the district.

MSDC and the SDNPA seem to agree that all development plans should be based upon the landscape led study that MSDC commissioned known colloquially as the

'LUC Report' see (<https://www.midsussex.gov.uk/media/3205/ep29-shlaa-landscapereview-combined.pdf>)

This report is built on capacity studies performed in 2007 & 2014 by assessing all the sites in the MSDC Strategic Housing Land Availability Assessment (SHLAA) and rating them based on a number criteria with a focus on landscape and visual impact considerations.

However I would urge you not to make landscape considerations the only deciding criteria and give equal weight to the environmental impacts that developing SA13 will bring.

Let us look in detail at what the LUC Report says about SA13 and the amount of proposed development in Burgess Hill as a whole.

Firstly in para 1.9 on page 5 the LUC states *"It is appropriate to follow the methodology used in the 2007 and 2014 Capacity studies to ensure a consistent approach to judgements. Continuity and consistency between the different levels of capacity assessment will help to assist understanding and ensure that the conclusions can stand up to scrutiny"*.

I would respectfully ask you keep this in mind when considering the following points.

The LUC report in para 3.8 on page 16 it states the following:

"The chief conclusions to be drawn from the maps in Figures 1-4 are that there are more sites with higher levels of suitability in the central and southern parts of the District than in the north, and that the Haywards Heath area offers the highest potential yields at the lowest potential landscape 'cost'."

This is relevant because the history of when and why sites SA12 & 13 were adopted by MSDC for the SDP is somewhat contentious. Originally both sites were excluded both from the draft SDP and the various iterations of the SHLAA over the years (plus the Atkins study in 2004) because SA13 in particular was considered unsuitable for large development particularly because of the limitations in the local road network.

However, at the eleventh hour both SA12 & SA13 were suddenly included in the draft SDP and the Haywards Heath Golf Club site previously slated to provide up to 500 dwellings was removed. The justification and reason for this has to my knowledge never been provided by MSDC.

Notwithstanding this, SA13 was designated site number 557 in the SHLAA and Table 6 on page 19 of the LUC report states site 557 has a Low-Medium rating in terms of Landscape Suitability and a Medium rating in terms of Development Yield.

Table 5 on page 14 of the LUC states a Low-Medium landscape suitability rating indicates that quote *"Landscape has medium-high sensitivity to housing use.*

Development would be very likely to give rise to adverse landscape and/or visual effects but these may not reach an unacceptable level."

This echoes the findings in the 2014 capacity study which the LUC refers to in Table 2.1 on page 13 which states a site with a Low-Medium capacity rating has quote

"A Low/medium capacity rating indicates that development is likely to have an adverse effect on most of the character area and while smaller development may be possible in a very few locations within the character area, it will not be suitable for strategic scale development."

In terms of development yield the LUC also indicates in Table 4 on page 14 **that the 2014 capacity study would mean SA13s development yield medium rating would mean it would be suitable for no more than 21-50 dwellings, nowhere near the 300 now being proposed by the current SDP?**

It goes on to state in para 2.14 on page 14 that quote **"It should be noted that, whilst a development yield figure is given where landscape suitability is assessed as low-medium, there would, depending on the precise nature of the development and mitigation proposed, still be considerable potential for unacceptable landscape effects"**

Finally I would also draw your attention to the **Mid Sussex District SHLAA: Review of Landscape and Visual Aspects of Site Suitability map on page 22 of the LUC report which shows site 557 (SA13) as having a low-medium suitability rating in the Northern most section of the site only but the vast majority of the site to the South is ranked as only having a low suitability rating and table 2.1 on page 13 of the LUC states quote.**

"A Low rating for landscape capacity indicates that development is likely to have a significant and adverse effect on the character of the landscape area as a whole and is thus unsuitable for strategic scale development."

I hope you take these points into consideration when reaching your decision on Site SA13.

Yours Sincerely

Peter Egan