

## Main Modification 1 - Index by ID Number

ID	ResponseRef	Name	Organisation	On Behalf Of
598	598/1/MM1	Michael Naish		
642	642/1/MM1	Claire Tester	High Weald AONB Unit	
689	689/1/MM1	Michael Brown	CPRE	
703	703/1/MM1	Graham Wilson	Savills	Site Promoter
705	705/1/MM1	Oliver Bell	Nexus	Miller Homes
710	710/1/MM1	Richard Cobb	Natural England	
714	714/1/MM1	Bernadette Cox	Ardingly Parish Council	
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**598**

## Site Allocations DPD: Main Modifications Response

**Main Modification:** MM1

**ID:** 598

**Response Ref:** 598/1/MM1

**Respondent:** Michael Naish

**Organisation:**

**On Behalf Of:**

**From:** Michael Naish [REDACTED]  
**Sent:** 29 November 2021 20:47  
**To:** Policy Consultation  
**Cc:** Helen Schofield  
**Subject:** SA25 Ardingly Development  
**Attachments:** 20190913 SA25 Ardingly MSDC Site Allocation DPD - Resident Letter From Michael Naish.pdf

**Categories:** SITES DPD MM

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Dear MSDC Planning,

Further to reviewing the changes proposed by the Independent Inspectorate, I would like to express my support for the reduction to 35 dwellings. This is in line with the results of the community survey conducted by Ardingly Parish Council and the 'reason for modification' outlined by the Inspectorate.

I am pleased to see the allocation of the remaining site to the West and North of the school as either unchanged or preserved in the spirit of the AONB, in which the site resides. This is a valuable community asset and the construction impact on the school has been mostly mitigated.

I note the latest revision is vastly in line with my original suggestions, attached herein.

Ideally, I feel the area allocated in my report as B, to the South West of the latest SA25 development curtilage, should not be developed into housing, but would be acceptable as a permeable paved car park / drop off area, easing traffic through the village on the school run, whilst serving as a parking facility for those wishing to enjoy the walk around the showground, and overflow for the often congested parking on the recreational ground. A small facility building on this site shared by the school, scouts, etc. would also be of huge community benefit.

I appreciate that the legislative powers for details like this may be restrictive at this stage and subject to further consultation down the line.

As my report states, the village of Ardingly has already surpassed its quota of recent housing developments, however, a development of 35 dwellings in the proposed location, in my view is proportionate and one would hope that this would be the last development for many years to come, and not serve as a catalyst for further in the near future.

I feel if an appeal was lodged by the South of England Showground or its representing development company, seeking to increase from the 35 dwellings, that sizable objection to any development would prevail, based on the findings of the community survey, and from living in and talking to others in the community.

I would like to take this opportunity to commend Ardingly PC and MSDC and, as per the above afformentioned points, I am broadly in favour.

Warm regards,

Michael Naish  
[REDACTED]

Michael Naish  
BSc Hons (1<sup>st</sup> Class)  
RICS Accredited  
Quantity Surveying



Correspondence Number: 1

Date: 12/09/2019

**RE: SA25 Land west of Selsfield Road, Ardingly on the South Of England Showground**

To whom it may concern at Mid Sussex District Council Planning,

I wish to raise my concerns, considerations and opportunities for the proposed development 'SA25' within the 'MSDC Site Allocations DPD – Scrutiny Version 30/08/19', herein referred to within this document.

**Foreword**

I understand the statutory requirements for MSDC to find and allocate land for the creation of more residential homes and agree with the government's policy for this. I also appreciate the need for the construction of more housing within Mid Sussex. I believe the proposed aforementioned plan needs to have adequate consultation within communities, and I would like to enquire and understand more from MSDC with regards to the process for keeping residents adequately informed, also with the timetable for this consultation. I hope that local resident's comments and input will be received, thoroughly considered and appropriately responded to, with adequate feedback provided.

**Personal Significance**

I am a local resident with very close proximity to the proposed allocation, less than 125m with partial views over. My family frequents this area on a once or twice daily basis. The proposed area is extremely important to my family and the wider community, and a major part of our wellbeing and mental health. My daughter will in the future attend St Peters Primary School.

**The South of England Agricultural Society (SEAS) Charity Funding Requirement**

I support the notion that, as SEAS is a charity, it is far more desirable to see them profit from a development of this kind, over a private land owner. However, my only concern is the driver behind their need to generate revenue from the sale of this land. If this is due to cash flow issues, could these developments pave the way for residential developments in the future?

Thus, if planning was granted for housing on this site by MSDC, would it not be better to offer assurances to the community, with a restrictive covenant to limit all future residential developments on the site for a fixed period of time. This would also drive an incentive on SEAS to negotiate and drive the maximum revenue from the sale of this site to a developer, or incentivise them to potentially use the Construction Management form of Procurement for this development themselves, thus retaining the risk/reward and a larger cut of the profits.

## **Potential conflict with proposal under community consultation by Fairfax Properties for the development of Butchers Field, Street Lane**

The development previously rejected at Butchers Field is currently under consultation by Fairfax Properties (through the use of flyers). Appeal Decision APP/D3830/A/12/2172335 rejected the proposal for development previously in 2014.

This area is also identified in Ardingly Parish Neighbourhood Development Plan, as Policy 6 'Proposed Local Green Space'.

I feel it is important that MSDC is aware of the imminent resubmission of this planning application, especially in relation to the current driver for 2,000 homes, and any precedent that may be set, by any decision, and the way these two schemes could coincide to the detriment of the community.

### **Review of Current Proposals**

Having read the current proposal, I wish to voice the following objections, considerations and opportunities:

#### **Construction Impact to building adjacent to St Peters School, Playground, Children's Playing Area & Existing Dense Residential Communities**

Construction noise, traffic and dust are likely to have a significant detrimental impact on the children and local community. These will probably be outlined in the Environmental Impact Assessment (to be provided later with the submission). However, these will be difficult to mitigate without the serious consideration of certain construction techniques (i.e. prefabrication).

However, the impact of construction when building on the land north of the mound and north of the existing recreational ground, immediately adjacent to Selsfield Road, whilst still a consideration, are unlikely to cause the same level of impact.

#### **Additional Play Area**

I question whether an additional play area would be needed for any development on the south side of the Showground, especially considering the proximity of the existing play area. This may create a community divide, and would not help the new community integrate. Furthermore, it may leave the existing play area redundant if another one provides better facilities. I personally feel that it would better to provide further upgrades and facilities within the existing fenced off play area of the recreational ground that the Parish Council currently manages. Any development to the north of the showground, of course would require a separate play area, as was provided with the recent development at Ibis Close on College Road.

#### **The scale of the development**

The population of Ardingly was around 1,900 during the 2011 census. Recent developments have provided 36 new dwellings at Ibis Close, and further new build residents behind the rear of the Ardingly Inn. With an average occupancy rate of 2.4 (2011 census), these have increased the population of the village (within the last 3 years) by around 98 people (approximate 5% increase). Within this time, it has been subjectively observed that traffic flow has increased, especially around the bottleneck on Street Lane at peak times (most likely caused by increased numbers of parked cars). Thus my concern is that the new development of 100 residents (approx. 240 people) could, without careful design, detrimentally impact existing infrastructure. An increase of circa. 10% population to a small community could significantly cripple existing infrastructure, and be at the detriment to existing and new residents.

### ***Opportunity (i) – Highway Improvements Street Lane***

It is inevitable that some of the new residents will use Street Lane as a route out of the village, and also it is very likely to have a positive affect (from increase demand) for facilities including the Koorana Centre, Bakers, Café, Etc. However, I feel strongly that highway and parking improvement works need to be implemented in these areas, and procured prior to construction of any more homes in the village. The Section 106 payment could allow an amount for highway improvements for the creation of perpendicular parking spaces, where the grass verges are on Street lane opposite the Koorana Centre. With sufficient double yellow line restrictions, to restore two way traffic flow over most of the road, this would help mitigate some of the impact from the new development. This area currently, with the long chicane of parked cars, is dangerous for crossing, especially with young families. A Zebra Crossing could also be considered and funded through S106.

### ***Opportunity (ii) – New vehicular access to St Peters School***

A drop off area could be created in the field adjacent to the existing northern gated pedestrian entrance to the school. This gate currently overlooks the field and after school I have observed children going out into this field to play. A tarmac path could then be provided from this area to the northern gate of the school, which backs onto the field.

### ***Opportunity (iii) – Reduce the scale of the development***

There are circa. 148,000 people in Mid Sussex. With the need for 2,000 homes at an occupancy rate of 2.4, this would constitute an addition of 4,800 residents. Thus each community needs to be increased by an average of 3.2%. As Ardingly Parish Council and MSDC have already accepted, agreed and implemented a 5% increase within the last 3 years, I feel strongly that the scale of the development be reconsidered to reflect a more appropriate percentage, which considers the best outcome for the community (including existing and future residents) as a whole.

### ***Opportunity (iv) – Density***

The current UK average density of new build dwellings constructed is 32 per hectare. Thus the area allocated to the construction of this new development could be reduced considerably, reducing its impact further. This density could be increased further with careful design and the implementation of 3 or 4 storey townhouses.

***Opportunity (v) – Split Site*** – The development could be split between the Northern and Southern Parts of the South of England Showground immediately adjacent to Selsfield Road.

### **Areas of Outstanding Natural Beauty**

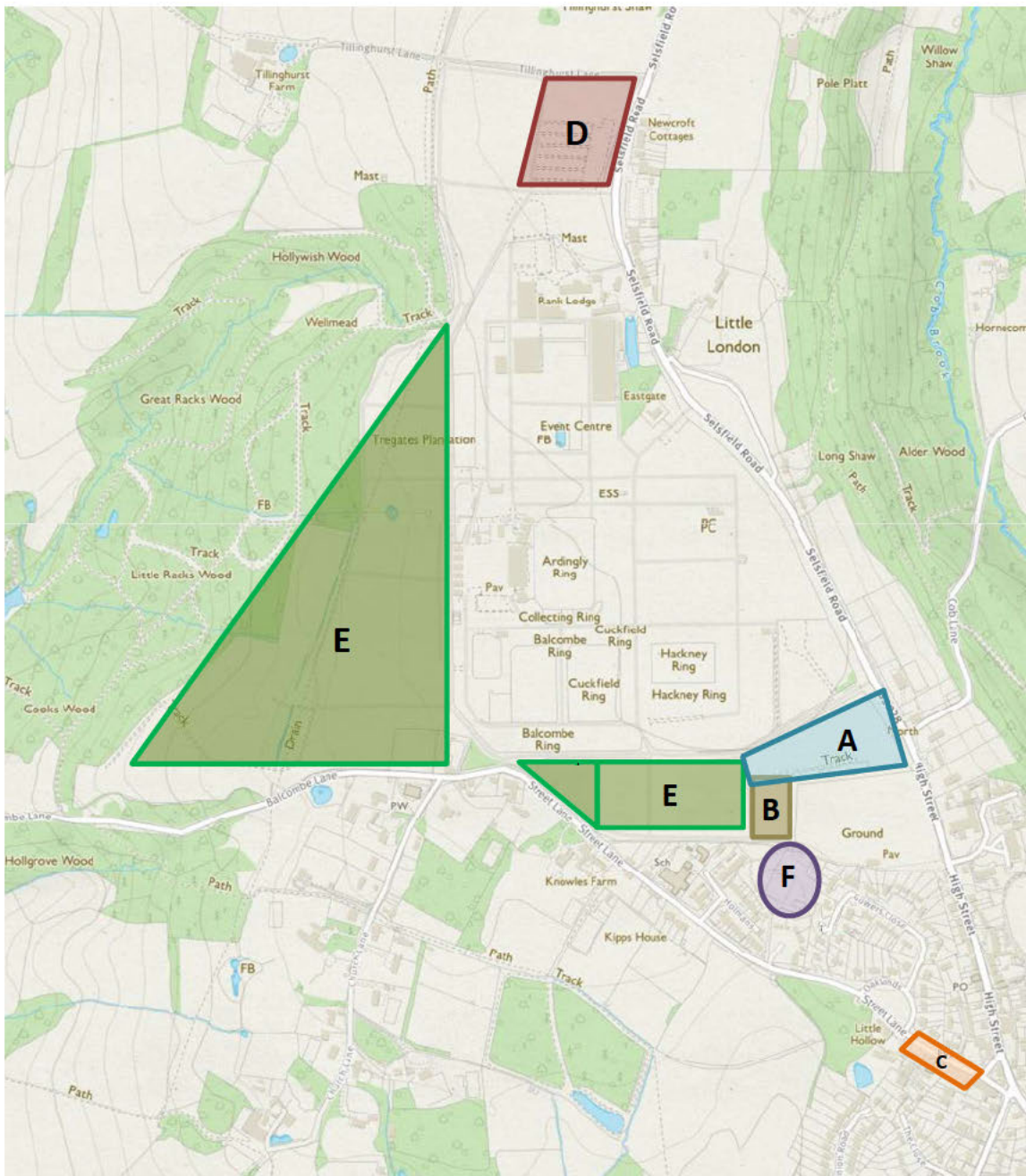
The existing areas I feel need to be protected as they are of significant natural beauty, assets to the community, and if removed or built on, would have a detrimental impact on the community, are defined in diagram 'Appendix A – Supportable Proposal'.

### **Freedom of Information Act 2000**

Please be aware that in parts, this correspondence falls within the legislative timeframe of the Freedom of Information Act 2000. Thus, I would expect the timeframe for response from MSDC to align with those specified in the Act. Failure to comply, may result in referral to the Information Commission.

## Supportable Proposal - Appendix A

Based on the aforementioned points, I would like to propose the following alternate plan, which I feel would deliver the best outcome for the existing and future community, and may be acceptable to the community.

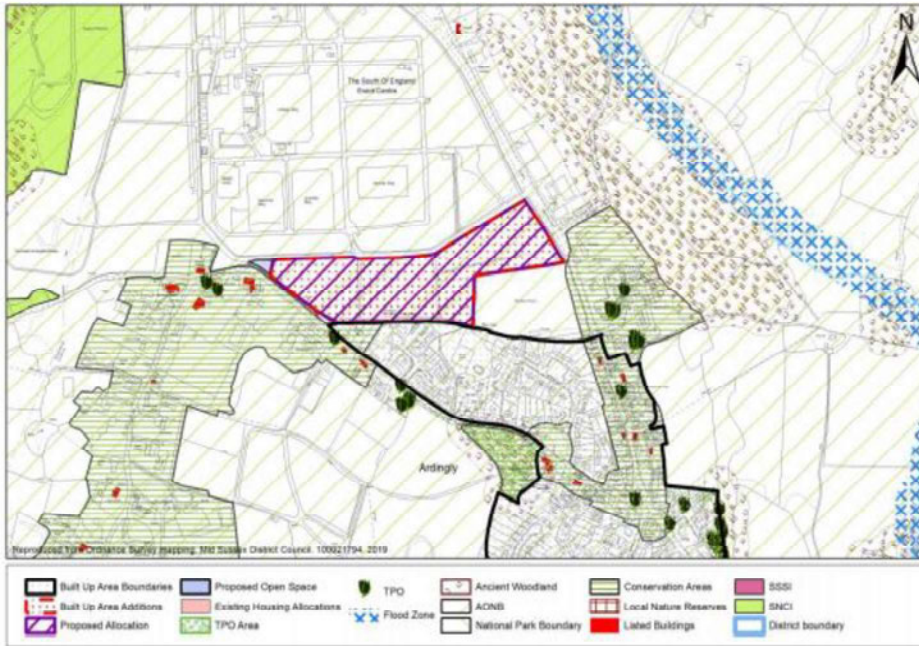


- KEY**
- A – Phase 1 Development Area I would Support [1.75 hectares = 50 dwellings]**
  - B – New Drop off Area for St Peters School & Scout Hut Facility**
  - C – S106 Highways Fund - Grass verge conversion to parking to improve flow on Street Lane**
  - D – Phase 2 Additional Development Option [1.8 hectares = 50 dwellings] (Currently brownfield hard standing with few nearby residents)**
  - E – Areas that should be protected as AONB and/or assets to the community**
  - F – Additional and improved facilities at the existing Children’s Playing Area**

# SA25 Diagram - Appendix B

MSDC Site Allocations DPD – Scrutiny Version 30/08/19

<b>SA 25</b>			
Land west of Selsfield Road, Ardingly			
<b>SHELAA:</b> 832		<b>Settlement:</b> Ardingly	
<b>Gross Site Area (ha):</b> 5.17		<b>Number of Units:</b> 100 dwellings	
<b>Description:</b>	Housing allocation with on site public open space, equipped children's playspace and scout hut and parking.		
<b>Ownership:</b>	Private land owner		
<b>Current Use:</b>	Greenfield/parking for showground	<b>Indicative Phasing:</b>	6 to 10
<b>Delivery Mechanisms:</b>	Land owner has confirmed intent to bring the site forward for development.		







642

## Site Allocations DPD: Main Modifications Response

**Main Modification:** MM1

**ID:** 642  
**Response Ref:** 642/1/MM1  
**Respondent:** Claire Tester  
**Organisation:** High Weald AONB Unit  
**On Behalf Of:**

<b>Name</b>	Claire Tester
<b>Job title</b>	Planning Advisor
<b>Organisation</b>	High Weald AONB Partnership
<b>Address</b>	
<b>Email</b>	
<b>Name or Organisation</b>	High Weald AONB Partnership
<b>Which document are you commenting on?</b>	Site Allocations DPD Main Modifications
<b>Main Modification (MM)</b>	MM1 Policy SA25, page 73
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	Yes
<b>(1) Positively prepared</b>	Sound
<b>(2) Justified</b>	Sound
<b>(3) Effective</b>	Sound
<b>(4) Consistent with national policy</b>	Sound
<b>Please outline why you either support or object to the Main Modification?</b>	<p>The High Weald AONB Unit welcomes the Inspector's decision that 70 homes on this site would constitute major development and that there are not the exceptional circumstances that would justify such a development in the AONB. The Unit supports the reduction in scale of the proposed development to 35 dwellings.</p> <p>The Unit also welcomes the incorporation of its other recommended amendments to policy wording here and elsewhere in the Plan.</p>
<b>If you wish to provide further documentation to support your response, you can upload it here</b>	
<b>Please notify me when-The publication of the recommendations from the Examination</b>	yes
<b>Please notify me when-The Site Allocations DPD is adopted</b>	yes
<b>Date</b>	12/01/2022

689

## Site Allocations DPD: Main Modifications Response

**Main Modification:** MM1

**ID:** 689

**Response Ref:** 689/1/MM1

**Respondent:** Michael Brown

**Organisation:** CPRE

**On Behalf Of:**

**From:** [Michael Brown](#)  
**To:** [Policy Consultation](#)  
**Subject:** Draft SitesAllocation DPD: Modifications consultation response from CPRE Sussex  
**Date:** 23 January 2022 17:28:30  
**Attachments:** [MainMods.responseFINAL.pdf](#)

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On behalf of CPRE Sussex, the Sussex countryside charity I am attaching our comments on the modifications that your Council is proposing to the draft Sites Allocation DPD.

I would be grateful for your confirmation of its safe receipt.

Yours sincerely

Michael A Brown  
for CPRE Sussex, the Sussex countryside charity  
[www.cpresussex.org.uk](http://www.cpresussex.org.uk)



The countryside charity  
Sussex

CPRE Sussex

info@cpresussex.org.uk  
www.cpresussex.org.uk

Planning Policy Dept.,  
Mid Sussex District Council

22nd January 2022

By e-mail to: [policyconsultation@midsussex.gov.uk](mailto:policyconsultation@midsussex.gov.uk)

Dear Sirs

**This response is submitted by CPRE Sussex, the Sussex countryside charity, in respect of the proposed November 2021 Main Modifications to Mid Sussex District Council's examined draft Sites Allocation Development Plan Document.**

## **1 SAGen.**

1.1 Under the heading "Historic environment and cultural heritage", in the modification to the second bullet, add "*and, in the case of all developments within the AONB or its setting, cultural heritage*" after "*the historic landscape*". This addition reflects NPPF para 176 which states that "The conservation and enhancement of wildlife and cultural heritage are also important considerations in [AONBs]", and is an appropriate modification given the title of this section of SAGen.

1.2 Under the heading "Biodiversity and Green Infrastructure", first bullet, please add "*assess its compatibility with DP38 (Biodiversity) and*" before new modifying words "*inform the design*". The purpose of the required habitat and species surveys is not limited to design information, but also wider decisions on whether the development is environmentally sustainable from a biodiversity standpoint and, if so, whether mitigating planning conditions are appropriate.

## **2. SA25 (Land west of Selsfield Road, Ardingly) (MM1)**

2.1 Whilst we welcome the proposal further to reduce this proposed allocation from 70 dwellings, it is unfortunate that no explanation is provided to explain or justify how the revised proposed allocation for as many as 35 dwellings is arrived at. Without that explanation, comment on the change cannot be informed comment. It has been CPRE Sussex's contention that any allocation at this AONB location should be no more than is required to meet Ardingly's own housing need, and of a size, type and mix that satisfies that need, having regard to priority need for affordable homes for locally working people and their families. And that the quantification of this need should be a matter for agreement between your Council and the Parish Council having regard to the Ardingly Neighbourhood Plan and commitments made since that plan was made. We understand that no such inter-council discussion has taken place.

2.2 Now that the Council has accepted, subject to this further consultation exercise, that the site allocated under policy SA25 is to be divided into two defined areas, one for the development of 35 dwellings, and the other to be retained as a "public open area" there is a need to address a number

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of practical issues that arise from that decision. Those issues include quantifying the area of the two areas, any development's compatibility with its prominent AONB location, and ensuring accessibility to, and identifying responsibility for maintenance of, the public open area. These are fundamental issues that are necessary and appropriate to identify within the policy SA25 allocation description to ensure that, if and when a planning application follows, the basis on which they are to be dealt with at that stage is clear. We therefore propose the following additions to the SA25 descriptive paragraphs:

2.2.1 Please quantify the land area of the pink, developable area within the heading in addition to the gross site area in order to preclude future misunderstanding.

2.2.2. Add the following paragraphs under the heading "Urban Design Principles":

- (i) *"The public foot and cycle inside the southern edge of the allocated site shall be preserved and maintained as a green corridor between the recreation ground and the public open space at the western end of the site."* This is to ensure continued direct connectivity between the two public open spaces now that the Plan is to be modified to define the scope of the area accepted for development. Otherwise these two public areas will be cut off from each other with no accepted public access point to the new public open space;
- (ii) *"If and to the extent that Ardingly's local housing needs at the time when full planning permission is granted based on the best available evidence (as agreed between the Council and Ardingly Parish Council) requires the development of fewer than 35 net units, the excess units are to comprise additional affordable housing of differing tenures and their occupancy is to be restricted in perpetuity to those with a genuine local need for affordable housing. Viability of all required affordable housing provision to be demonstrated at application."* The evidence base for the District Plan describes the housing area's affordable homes shortage as "acute"<sup>1</sup>. The most critical rural housing shortage lies in the provision of affordable and social housing for families working in sectors that service rural communities and who maintain core rural services and vitality. Given that shortage, and the absence of any rural exception site developments anywhere in the District since the Plan's adoption, homes for such families should be given priority over general market housing if the proposed 35 unit allocation exceeds local need. Giving the Parish Council a voice in determining their parish's housing need reflects repeated Governmental assurances of the importance of giving local people an important voice in planning for their locality.

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<sup>1</sup> Chilmark Consulting October 2014 report for the North West Sussex Housing Market Area (p.7) <https://www.midsussex.gov.uk/media/2464/affordable-housing-needs-model-update.pdf>. Nationally, "There is compelling evidence that England needs at least 90,000 net additional social rent homes a year." (from House of Commons MHCLG Select Committee report: Building More Social Housing" (20 July 2020). However, only 52,100 new affordable homes were delivered in the whole of England in 2020/21 of which only 21,723 were new rural affordable homes (ONS). See also recent research: <https://www.cpre.org.uk/about-us/cpre-media/homes-for-heroes/> (July 2020) and <https://englishrural.org.uk/rural-homelessness-focus-of-new-study/> (November 2021).

- 2.2.3 Add the following words to the first paragraph under the heading "AONB": *"design, materials"* before *"and mitigation requirements"*. This is a sensitive AONB location with the area now chosen for development in the most prominent and widely visible area of the overall site, as pointed out in the evidence provided by the High Weald AONB Unit. It is therefore imperative, in our view, that this sensitivity be addressed not only in terms of layout and capacity but also of design and materials. The required LVIA can also assist in guiding those aspects in conjunction with the relevant High Weald and MSDC Design Guides. (See also para 3.1 re another suggested amendment to this paragraph).
- 2.2.4 Add an additional paragraph under the heading "Social and Community" as follows: *"Covenant with Ardingly Parish Council on behalf of the residents of Ardingly to maintain the area marked on the plan as public open space in good order as open, undeveloped land for safe public leisure use and enjoyment in perpetuity"*. As this proposed allocation includes land which is to be kept as public open space, it needs to be made clear within the SADPD, absent anywhere else at this stage, that the landowner must maintain that open space in good order, so that the land is not just abandoned, and a covenant mechanism will be required to make that obligation enforceable, for the public benefit.
- 2.2.5 Add the following sentence at the beginning of the third bullet under the heading "Highways and Access": *"Vehicular access to the allocated land to be off Selsfield Road only."* This to protect the narrow lane leading to the primary school and Street Lane from increased or heavy vehicular use, for which purpose they are both wholly unsuited.
- 2.2.6 For convenience we have set out in the attached Annex the text of SA25, as recorded in the Major Modifications document, with our suggested changes (and a couple of minor misspellings) highlighted in red.

### 3. Consistency and typos

3.1. There is internal inconsistency within different individual allocation policies in the language used to describe the AONB compliance requirement in respect of allocations within the High Weald AONB.. Thus policies SA7, SA8 and 26 – SA29 have been amended at this modifications stage by adding the words *"and scenic beauty"* to track the explanatory language of Plan policy DP16. However, we presume inadvertently, those words have not been added to the equivalent AONB paragraphs in SA25 and SA32. There is no good reason not to include the same additional words in those two policies, and we ask that they be inserted into SA25 and SA32,

3.2. **Appendix 1 (MM15):** There is what we assume to be a typographical error in column 1 to this new appendix: Should not the words "SA2-SA28: Employment Site Allocations" refer to SA8 rather than SA28?

Yours sincerely,

**Michael A. Brown**

**On behalf of CPRE Sussex, the Sussex countryside charity**



Annex (see para 2.2.6)

Policy SA25 as set out in Site Allocations DPD Main Modifications consultation document showing, in red, additions requested by CPRE Sussex

SA 25 Land west of Selsfield Road, Ardingly

**SHELAA:** 832

**Settlement:** Ardingly

**Gross Site Area (ha):** 5.17      **Net developable site area (ha) (pink on plan) [to be inserted]<sup>2</sup>**

**Number of Units:** 35 dwellings

**Description:** Housing allocation with on site public open space.

**Ownership:** Private land owner

**Current Use:** Greenfield/parking for showground      **Indicative Phasing:** 6 to 10

**Delivery Mechanisms:** Land owner has confirmed intent to bring the site forward for development.

[Plan as per Major Modifications consultation document]

**Objectives**

To deliver a sympathetic and well integrated extension to the village of Ardingly informed by a landscape led masterplan, which conserves and enhances the landscape character of the High Weald AONB and the setting of nearby heritage assets.

**Urban Design Principles**

Locate the development at the eastern end of the open land between the South of England Showground and the Recreation Ground, fronting onto Selsfield Road. The proposed development should include strategic landscaping at its western end.

Respect the distinctive character of the village and the existing settlement pattern.

Orientate development to positively address existing and proposed areas of open space.

Orientate development to have a positive edge to all site boundaries and to the adjacent recreation ground, facilitated by and including the removal of the existing bund providing a focal

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<sup>2</sup> See para 2.2.1 above.

point for the development where sensitively designed higher density housing could be located; close boarded fencing should be avoided where visible from outside the site.

Provide a permeable layout and enhance the connectivity of the site with Ardingly village and existing PRoW.

The public foot- and cycle inside the southern edge of the allocated site shall be preserved and maintained as a green corridor between the recreation ground and the public open space at the western end of the site.<sup>3</sup>

If and to the extent that Ardingly's local housing needs at the time when full planning permission is granted based on the best available evidence (as agreed between the Council and Ardingly Parish Council) requires the development of fewer than 35 net units, the excess units are to comprise additional affordable housing of differing tenures and their occupancy is to be restricted in perpetuity to those with a genuine local need for affordable housing. Viability of all required affordable housing provision to be demonstrated at application.<sup>4</sup>

## AONB

Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity, design, materials<sup>5</sup> and mitigation requirements, in order to conserve and enhance the landscape and scenic beauty<sup>6</sup> of the High Weald AONB, as set out in the High Weald AONB Management Plan.

Retain and substantially enhance existing trees and hedgerows incorporating them into the landscape structure and layout of the development and reinstate the historic field boundary through the centre of the site adjacent to the area of open space to the west, with native species-rich hedgerow and native trees, incorporating the existing mature Oak tree.

Incorporate retained landscape features into a strong new landscape setting, containing the new housing and limiting the impact on the wider landscape.

Protect and enhance the character and amenity of existing PRoW which run along the northern and southern boundaries and provide connections from the new development.

## Social and Community

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<sup>3</sup> See para 2.2.2(i) above.

<sup>4</sup> See para 2.2.2(ii) above.

<sup>5</sup> See para 2.2.3 above.

<sup>6</sup> See para 3.1 above. The same additional wording should be inserted into the equivalent paragraph of policy SA32.

In consultation with the Local Planning Authority, address requirements for suitably managed open space and equipped children's playspace, either on-site or by financial contribution to upgrade existing adjacent facilities.

Covenant with Ardingly Parish Council on behalf of the residents of Ardingly to maintain the area marked on the plan as public open space in good order as open, undeveloped land for safe public leisure use and enjoyment in perpetuity.<sup>7</sup>

### **Historic Environment and Cultural Heritage**

Provide appropriate design, layout and landscaping mitigation to protect the rural setting of the adjacent Ardingly Conservation Area and nearby listed St Peter's Church (Grade I) and the listed group which surrounds the Church (Grade II); ensure development is not dominant in views from within the conservation area and the setting of the listed buildings.

Retain the western end of the site as an undeveloped area of public open space in order to protect the rural setting of these assets and maintain separation of the two historic cores of the village.

Establish the need for Archaeological pre-determination evaluation and appropriate mitigation and undertake a geophysical survey shall be undertaken, the results of which will identify appropriate archaeological mitigation.

### **Air Quality / Noise**

Noise assessment shall inform any necessary mitigation required to provide an acceptable standard of accommodation for each of the dwellings, arising from the Ardingly Showground operations.

### **Biodiversity and Green Infrastructure**

Undertake an holistic approach to Green Infrastructure and corridors, including retention of existing landscape features and enhancement with new native species-rich hedgerows, native tree planting and wildflower seeding in areas of open space to provide a matrix of habitats with links to the surrounding landscape.

Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss.

Incorporate SuDS within the Green Infrastructure to improve biodiversity and water quality.

### **Highways and Access**

Provide a Sustainable Transport Strategy which identifies sustainable transport infrastructure improvements and demonstrates how the development will integrate with and enhance the

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<sup>7</sup> See para 2.2.4 above.

existing network providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks in Ardingly.

Mitigate development impacts by maximising sustainable transport enhancements; where addition impacts remain, highway mitigation measures will be considered.

**Vehicular access to the allocated land to be off Selsfield Road only.**<sup>8</sup> Investigate access arrangements onto Selsfield Road and make necessary safety improvements.

### **Flood Risk and Drainage**

- Provide a Flood Risk Assessment which includes details of ground investigations and permeability testing to inform an appropriate method for disposal of surface water and explores the potential use of infiltration SuDS.

### **Contaminated Land**

- Provide a detailed investigation into possible sources of adjacent/on-site contamination together with any remedial works that are required.

### **Minerals**

The site lies within the building stone (Cuckfield and Ardingly stone) Minerals Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.

### **Utilities**

Occupation of development will be phased to align with the delivery of necessary sewerage infrastructure, in liaison with the service provider.

Southern Water's Infrastructure crosses the site. Easements may be required with the layout to be planned to ensure future access for maintenance and/or improvement work, unless diversion of the sewer is possible.

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<sup>8</sup> See para 2.2.5 above.

**703**

## Site Allocations DPD: Main Modifications Response

### **Main Modification: MM1**

**ID:** 703  
**Response Ref:** 703/1/MM1  
**Respondent:** Graham Wilson  
**Organisation:** Savills  
**On Behalf Of:** Site Promoter

**From:** Graham Wilson [REDACTED]  
**Sent:** 24 January 2022 18:07  
**To:** Policy Consultation  
**Cc:** Guy Dixon  
**Subject:** Response to the Main Modifications consultation - Site Allocations DPD - SA25  
**Attachments:** 22.01.24 Main Modifications Representations - SA25.pdf; sadpd\_mainmods\_consultationform SA25.pdf

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear MSDC Planning Policy

Please find attached the consultation form and representations to the Main Modifications consultation on behalf of our client Charterhouse Strategic Land.

If you require any further information please let me know


Many Thanks

Graham

Graham Wilson MSc MRTPI  
Senior Planner  
Planning

Savills, 74 High Street, Sevenoaks TN13 1JR  
Tel: [REDACTED]  
Email: [REDACTED]  
Website: <http://www.savills.co.uk>



 Before printing, think about the environment

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# Representations to the Site Allocations DPD

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Main Modifications Consultation

Land West of Selsfield Road, Ardingly







## Contents

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# 1. Executive Summary

- 1.1. On behalf of our clients Charterhouse Strategic Land and The South of England Agricultural Society (SEAS) (herein referred to as “our client”), Savills has prepared this representation to the Mid Sussex District Council (MSDC) Site Allocations Development Plan Document (DPD) Main Modifications Consultation.
- 

## The Purpose of the Representations

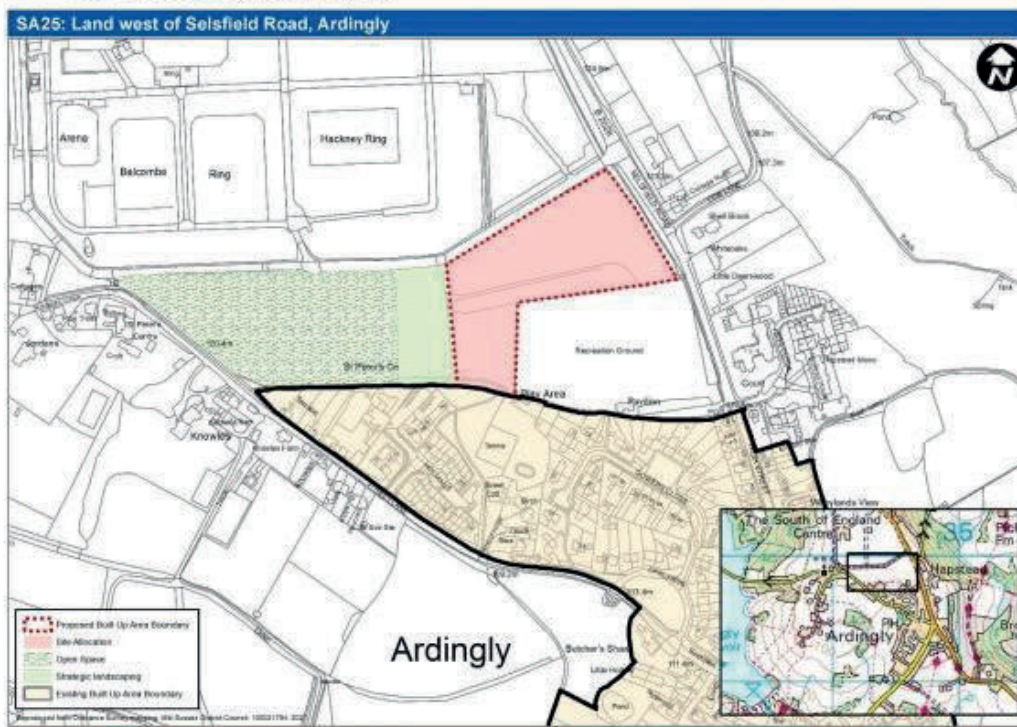
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- 1.2. These representations seek to support the allocation of Land west of Selsfield Road (identified as Site SA25 in the Draft Site Allocations DPD).
- 1.3. The allocation of site SA25 is fully supported. The Site is suitable, available and deliverable. The Site is adjacent to the existing Ardingly settlement boundary, and is not located in a prominent location in the countryside. The development of the site would result in a sustainable addition to the settlement of Ardingly.
- 1.4. The amendments made to the Site Allocations DPD are clearly disappointing from our perspective, and particularly so given the detailed assessment work that has been conducted demonstrating the appropriateness of the site for development, and the affordability issues of living in Ardingly. The need for a greater quantum of new homes, and in particular affordable homes, has been set out and it is very disappointing that this has not been considered as suitable justification for at least the retention of the site allocation of 70 dwellings.
- 1.5. The approach of inserting a defined ‘strategic landscaping’ area into the site plan is objected to. It is agreed that a strategic landscaping area should feature at the western end of the developed area, however it should not be annotated into the policies map/Site Allocation plan. This should be addressed through the masterplanning of the site as a holistic scheme and through discussions with officers, as a fixed rectangle of landscaping could appear unnatural and incongruous.

## 2. Draft Allocation – Site SA25

2.1. Site SA25 constitutes approximately 5.2ha. In the Site Allocations DPD that was submitted for Examination, approximately 3.2ha was proposed for development as part of a residential development scheme and associated green infrastructure that will deliver approximately 70 dwellings. As part of the Main modifications, this has been reduced to 35 units, with approximately 2.3ha proposed for development, and 0.6ha of strategic landscaping. (Extract below).

<b>SA 25</b>			
Land west of Selsfield Road, Ardingly			
<b>SHELAA:</b>	832	<b>Settlement:</b>	Ardingly
<b>Gross Site Area (ha):</b>	5.17	<b>Number of Units:</b>	70-35 dwellings
<b>Description:</b>	Housing allocation with on site public open space.		
<b>Ownership:</b>	Private land owner		
<b>Current Use:</b>	Greenfield/parking for showground	<b>Indicative Phasing:</b>	6 to 10
<b>Delivery Mechanisms:</b>	Land owner has confirmed intent to bring the site forward for development.		



### Objectives

- To deliver a sympathetic and well integrated extension to the village of Ardingly informed by a landscape led masterplan, which conserves and enhances the landscape character of the High Weald AONB and the setting of nearby heritage assets.

### Urban Design Principles

- Locate the development at the eastern end of the open land between the South of England Showground and the Recreation Ground, fronting onto Selsfield Road. The proposed development should include strategic landscaping at its western end.
- Respect the distinctive character of the village and the existing settlement pattern.



- 2.2. Residential development will be located on the eastern part of the site, and utilise an existing track as a delineation point between the proposed development and the remainder of the site. The western part of the site is proposed to be designated as informal open space, to provide an open buffer between the Conservation Area and listed buildings that are close to the western end of the site along Street Lane. As part of the Main Modifications, a formal area of strategic landscaping has been included between the development and the area of Open Space.

### 3. Considerations

- 3.1. According to the Main Modifications to the Site Allocations DPD, provision is made for 1,704 dwellings. The Main Modifications schedule is supported in principle, however aspects of the changes, and in particular to policy SA25, are objected to and necessitate further comment:

#### **Policy SA25: Land West of Selsfield Road, Ardingly**

- 3.2. Policy SA25 is the Individual Housing Allocation Policy for Land West of Selsfield Road, Ardingly. The Main Modifications have resulted in amendments to the Policy. Some of the policy is largely supported, however there are aspects to the policy over which amendments are sought.

#### Quantum of Housing

- 3.3. The policy seeks the delivery of Land West of Selsfield Road, Ardingly for 35 dwellings on approximately 2.3ha of the site, with an area of approximately 0.6ha of '*strategic landscaping*' and 2.3ha of '*on site public open space*'. This is a significant reduction from the 70 units on 3.2ha of land (including open space) previously set out in the DPD submitted for examination.
- 3.4. This reduction in the quantum of housing to be provided, and the reduction in the identified area for development, is disappointing. As set out in the representations made to the Regulation 19 consultation, and in the statement submitted to the Examination in Public, the cost of living and the associated affordability of housing in Ardingly is extremely high. An independent report was commissioned by Chilmark Consulting, on behalf of Charterhouse Strategic Land, which found that the existing sale and rental values demonstrated worsening housing affordability. Structural change in the population of Ardingly has occurred as a result (i.e. new forming households were unable to easily find suitable accommodation or to afford to purchase it) as there was insufficient new market or affordable housing being delivered. The report also found that the delivery of 70 units (as set out in the original allocation) would not meet the housing needs of Ardingly.
- 3.5. Given this, the allocation of some new housing in Ardingly is welcomed, but it is disappointing that the number of units included in the allocation has been reduced from 70 to 35, and that the developable area has also been reduced. The allocation of 70 units would have a far greater impact in addressing the acute housing affordability issues in Ardingly, and whilst the allocation to 35 dwellings will allow for some impact to be made, it greatly reduces the impact that the proposals can have on affordability.

### Landscaping Area

- 3.6. The introduction of a formalised area of approximately 0.6ha of Strategic Landscaping is objected to. The inclusion of landscaping on the western end of the developed area is understood and agreed with, but the formalisation of this through a 0.6ha 'box' set out on the allocation plan under policy SA25 is objected to. The precise area of landscaping should be left to the masterplanning process and MSDC Officers, in order to determine the most appropriate layout that accords with the finalised layout. Insisting that there is a 0.6ha 'box' of landscaping will result in the landscaping appearing incongruous with the surroundings and the proposed development
- 3.7. The simpler approach of relying on policy wording that there will be a strategic landscaping area between the developable area and the open space is considered the most appropriate step in this situation. Through utilising text alone, the design needs can be understood as the scheme evolves and it allows such an area to be more appropriately shaped to reflect the development. It would also allow the landowner (which for the undeveloped area will remain the South of England Agricultural Society) more control over the future form of the land. The text should therefore remain and the strategic landscaping area indicated on the proposals map should be removed.
- 3.8. The designation of the western end of the site as informal public open space is also objected to. If the western end of the site is not part of the residential development, the landowners (the South of England Agricultural Society) wish to retain it in its current form, and utilise it as an area for overflow parking and for showground operations as and when required. The allocation of the site as informal public open space restricts this from occurring and affects a key local asset.

### **Summary**

- 3.9. The reduction in size of developable area, and the reduction in the amount of dwellings the site is allocated for, is disappointing. MSDC need to ensure that a suitable range of sites, of varying sizes and scales, are allocated in the Site Allocations DPD to ensure the delivery of a sufficient number of new market and affordable homes.
- 3.10. The introduction of a formal box of strategic landscaping is objected to. This does not allow for appropriate landscaping to be achieved when a finalised scheme is produced, and will potentially result in an incongruous rectangle of landscaping. The need for landscaping between the developed part of the site and the open space is understood, however it would be better achieved through setting out in the policy wording that this should be in place, and its ultimate format determined through the final Masterplanning approach and Officer input provided to determine the most appropriate layout of landscaping when a proposal scheme has been refined. A box of landscaping will appear incongruous, and would not be in keeping with the site or setting.



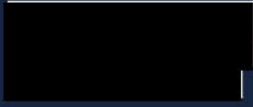
- 3.11. The designation of the western end of the site as informal public open space is also objected to. In the event that the western end of the site is not part of the residential development, the landowners would prefer to retain it in its current form. The site could continue to be utilised as overflow parking and for showground operations as and when required. The allocation of the site as informal public open space could unnecessarily prohibit these operations from occurring.

## 4. Conclusion

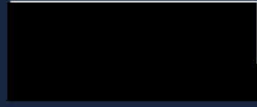
- 4.1. Savills has prepared this representation to the Mid Sussex District Council (MSDC) Site Allocations Development Plan Document (DPD) Main Modifications Consultation on behalf of Charterhouse Strategic Land and the South of England Agricultural Society (SEAS).
- 4.2. This representation supports the allocation of Land west of Selsfield Road (identified as Site SA25 in the Site Allocations DPD) for residential development, and the additional text regarding the inclusion of strategic landscaping but objects to the changes made to the Policy Map/Site Plan for a formalised 'box' of strategic landscaping.
- 4.3. However the key amendment made to the Site Allocations DPD policy is extremely disappointing, given the detailed assessment work (including detailed landscape and heritage assessment work), that has been conducted demonstrating the appropriateness of the site for development, and the current issues with affordability in Ardingly. The need for a greater quantum of new homes, and in particular affordable homes, has been set out and it is very disappointing that this has not been considered as suitable justification for at the very least retaining the site allocation of 70 dwellings.
- 4.4. The approach of inserting a graphically defined 'strategic landscaping' area into the site plan is objected to. It is agreed that a strategic landscaping area should feature at the western edge of the developed area, however it should not be annotated into the policies map/Site Allocation plan. The landscaping should simply be addressed through the policy text and can be appropriately refined through the master planning process and through discussions with MSDC's Officers. The proposed 0.6ha rectangle of landscaping will need to accord with the finalised scheme on the development site, and this can only be determined when a scheme comes forward. A rectangle of landscaping will appear unnatural and incongruous given the site and its setting and should therefore not be included.
- 4.5. This representation therefore requests the following changes to the Main Modifications:
- The allocation size and developable area of SA25 returned to its original allocation of 70 units on 3.2ha
  - The graphically defined 'strategic landscaping' area removed from the site plan of Site Allocation SA25. The need for landscaping on the western end of the developed area can be most appropriately addressed through policy text.
  - The allocation of Public Open Space on the western end of the site should be removed, and the existing Showground Operations be allowed to continue unrestricted.



**Guy Dixon MRTPI**  
Director



**Graham Wilson MRTPI**  
Planner





## Site Allocations Development Plan Document Main Modifications Consultation Form

At the Inspector's request the District Council is inviting comments (also known as representations) on the proposed Main Modifications (MM) to the Submission Draft Site Allocations Development Plan Document, which supports the strategic framework for development in Mid Sussex until 2031.

### What can I make comments on?

The consultation is only about the proposed Main Modifications (and no other aspect of the plan), Sustainability Appraisal addendum and Habitats Regulations assessment addendum and are put forward without prejudice to the Inspector's final conclusions. All representations made will be taken into account by the Inspector. The Main Modifications, and a track-change version of the Sites DPD can be found at:

[www.midsussex.gov.uk/SitesDPD](http://www.midsussex.gov.uk/SitesDPD)

*N.B. this consultation is not an opportunity to raise matters which either were, or could have been included in earlier representations, or at the examination hearings; representations should not be repeating what has previously been submitted to the Inspector.*

**Please return to Mid Sussex District Council by 23:59 on 24<sup>th</sup> January 2022**

### **How can I respond to this consultation?**

**Online:** A secure e-form is available online at:

[www.midsussex.gov.uk/SitesDPD](http://www.midsussex.gov.uk/SitesDPD)

The online form has been prepared following the guidelines and standard model form provided by the Planning Inspectorate. To enable the consultation responses to be processed efficiently, it would be helpful to submit a response using the online form, however, it is not necessary to do so.

Consultation responses can also be submitted by:

**Post:** Mid Sussex District Council  
Planning Policy  
Oaklands Road  
Haywards Heath  
West Sussex  
RH16 1SS

**E-mail:** [PolicyConsultation@midsussex.gov.uk](mailto:PolicyConsultation@midsussex.gov.uk)

A guidance note accompanies this form and can be used to help fill this form in.


## Part A – Your Details (You only need to complete this once)

---

### 1. Personal Details

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Guy"/>
Last Name	<input type="text" value="Dixon"/>
Job Title (where relevant)	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Savills"/>
Respondent Ref. No. (if known)	<input type="text"/>
On behalf of (where relevant)	<input type="text" value="Charterhouse Strategic Land"/>
Address Line 1	<input type="text" value="Mocatta House"/>
Line 2	<input type="text" value="Trafalgar Place"/>
Line 3	<input type="text" value="Brighton"/>
Line 4	<input type="text"/>
Post Code	<input type="text" value="BN1 4DU"/>
Telephone Number	<input type="text" value="██████████"/>
E-mail Address	<input type="text" value="████████████████████"/>

.....

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The information gathered from this form will only be used for the purposes described and any personal details given will not be used for any other purpose.

## Part B – Your Comments

---

You can find an explanation of the terms used in the guidance note. Please fill this part of the form out for each representation you make.

Name or Organisation:

Savills

3a. Does your comment relate to:

Main  
Modification

Sustainability  
Appraisal  
Addendum

HRA  
Addendum

3b. Which Main Modification does your comment relate to?

SA25

4. Do you consider the Main Modifications to the Submission Draft of the Site Allocations DPD make it (pleas tick as appropriate):

4a. Legally Compliant

Yes

No

4b. Sound

Yes

No

5a. If you wish to support the legal compliance or soundness of the Main Modifications to the Site Allocations DPD, please use this box to set out your comments. If you selected 'No' to either part of question 4 please also complete question 5b.

5b. Please give details of why you consider the Main Modifications to the Site Allocations DPD not to be legally compliant or unsound. Please be as precise as possible.

The changes made result in changes to the allocation at Site SA25 that impact upon the delivery of the site.

Please see accompanying Representation for details

6. Please set out what modification(s) you consider necessary to make the Submission Draft of the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful, if you are able, to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- The allocation size and developable area of SA25 should be returned to its original allocation of 70 units on 3.2ha
- The graphically defined 'strategic landscaping' area needs to be removed from the site plan of Site Allocation SA25. The need for landscaping on the western end of the developed area can be most appropriately addressed through policy text and subsequent masterplanning process with input from Officers
- The allocation of Public Open Space on the western end of the site should be removed, and the existing Showground Operations be allowed to continue unrestricted.

Please see accompanying representation for further details.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

**7. Please notify me when:**

(i) The Inspector's Report is published

(ii) The Site Allocations DPD is adopted

Signature:



Date:

24.01.22

**Thank you for taking time to respond to this consultation**

**705**

## Site Allocations DPD: Main Modifications Response

**Main Modification:** MM1

**ID:** 705

**Response Ref:** 705/1/MM1

**Respondent:** Oliver Bell

**Organisation:** Nexus

**On Behalf Of:** Miller Homes



**From:** eforms  
**Sent:** 20 January 2022 17:20  
**To:** ldfconsultation  
**Subject:** Site Allocations DPD Consultation Response (Ref: DPDCon-1642698905)  
**Attachments:** Site Allocations DPD Consultation Repsonse Form.pdf

<b>Name</b>	Oliver Bell
<b>Job title</b>	Director
<b>Organisation</b>	Nexus Planning
<b>On behalf of</b>	Miller Homes
<b>Address</b>	3rd Floor, Suite 3 Apex Plaza 3 Forbury Road Reading Berkshire RG1 1AX United Kingdom
<b>Email</b>	[REDACTED]
<b>Name or Organisation</b>	Nexus Planning obo Miller Homes
<b>Which document are you commenting on?</b>	Site Allocations DPD - Main Modifications
<b>Main Modification (MM)</b>	MM1, MM7, MM8, MM9, MM10, MM11
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	Yes
<b>(1) Positively prepared</b>	Unsound
<b>(2) Justified</b>	Unsound
<b>(3) Effective</b>	Unsound
<b>(4) Consistent with national policy</b>	Unsound
<b>Please outline why you either support or object to the Main Modification?</b>	<p>Miller Homes control land south of Lewes Road, Haywards Heath ("the Site") (SHELAA ref. 844). The Site measures approximately 5 hectares, is available for development now and has an indicative capacity of 100 dwellings.</p> <p>Main Modifications Ref. MM1, MM7, MM8, MM9, MM10 and MM11 cover a range of amendments to the Site Allocations Plan but principally relate ensuring the site allocations have suitable regard to their location within the High Weald Area of Outstanding Natural Beauty (AONB), having regard to the policies contained within the National Planning Policy Framework (NPPF).</p> <p>As outlined in our Matter 4 Hearing Statement we noted that the District Plan Inspector considered only "modest" housing schemes may come forward in the AONB and that "no evidence" existed to support major development in the AONB. We also outlined that Paragraph 172 of the NPPF (now para 176) states that "great weight should be given to conserving and enhancing landscape and scenic beauty</p>

in...Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.”, that the scale and extent of development in the AONB should be “limited” and that major development in the AONB should be refused other than in “exceptional circumstances, and where it can be demonstrated that the development is in the public interest”.

The principal purpose of providing residual housing figures by settlement was to guide the preparation of neighbourhood plans. The use of settlement figures is much less appropriate in the context of preparing a District-wide site allocations document, as the settlement specific figures simply serve to unduly restrict the growth strategy despite, as the Council freely admit, not being robustly tested such that the figures are actually known to be deliverable.

It is accepted that the Site Allocations Plan should not simply allocate all sites in Category 1 settlements as allocations should broadly align with the spatial strategy set out in the District Plan, but only where it is sustainable to do so. Despite the aforementioned modifications to the Site Allocations Plan, we still do not consider that the overall scale of growth proposed in the AONB is justified, particularly when suitable, available and achievable sites exist on the edge of highly sustainable settlements outside of the AONB.

**Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.**

Reduced growth around villages within the AONB and further growth at sustainable settlements outside the AONB.

**If you wish to provide further documentation to support your response, you can upload it here**

**Please notify me when-The publication of the recommendations from the Examination**

yes

**Please notify me when-The Site Allocations DPD is adopted**

yes

**Date**

20/01/2022



<b>Name</b>	Oliver Bell
<b>Job title</b>	Director
<b>Organisation</b>	Nexus Planning
<b>On behalf of</b>	Miller Homes
<b>Address</b>	3rd Floor, Suite 3 Apex Plaza 3 Forbury Road Reading Berkshire RG1 1AX United Kingdom
<b>Email</b>	[REDACTED]
<b>Name or Organisation</b>	Nexus Planning obo Miller Homes
<b>Which document are you commenting on?</b>	Site Allocations DPD - Main Modifications
<b>Main Modification (MM)</b>	MM1, MM7, MM8, MM9, MM10, MM11
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	Yes
<b>(1) Positively prepared</b>	Unsound
<b>(2) Justified</b>	Unsound
<b>(3) Effective</b>	Unsound
<b>(4) Consistent with national policy</b>	Unsound
<b>Please outline why you either support or object to the Main Modification?</b>	<p>Miller Homes control land south of Lewes Road, Haywards Heath ("the Site") (SHELAA ref. 844). The Site measures approximately 5 hectares, is available for development now and has an indicative capacity of 100 dwellings.</p> <p>Main Modifications Ref. MM1, MM7, MM8, MM9, MM10 and MM11 cover a range of amendments to the Site Allocations Plan but principally relate ensuring the site allocations have suitable regard to their location within the High Weald Area of Outstanding Natural Beauty (AONB), having regard to the policies contained within the National Planning Policy Framework (NPPF).</p> <p>As outlined in our Matter 4 Hearing Statement we noted that the District Plan Inspector considered only "modest" housing schemes may come forward in the AONB and that "no evidence" existed to support major development in the AONB. We also outlined that Paragraph 172 of the NPPF (now para 176) states that "great weight should be given to conserving and enhancing landscape and scenic beauty in...Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.", that the scale and extent of development in the AONB should be "limited" and that major development in the AONB should be refused other than in "exceptional circumstances, and where it can be demonstrated that the development is in the public interest".</p> <p>The principal purpose of providing residual housing figures by settlement was to guide the preparation of neighbourhood plans.</p>



**710**

## Site Allocations DPD: Main Modifications Response

**Main Modification:** MM1

**ID:** 710  
**Response Ref:** 710/1/MM1  
**Respondent:** Richard Cobb  
**Organisation:** Natural England  
**On Behalf Of:**

**From:** Cobb, Richard [REDACTED]  
**Sent:** 17 January 2022 15:41  
**To:** Policy Consultation  
**Subject:** Mid Sussex District Council Site Allocations DPD: Main Modifications Consultation - 375995  
**Attachments:** Natural England\_Mid Sussex Site allocations main modifications\_375995.pdf

You don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Planning Policy Team,

Thank you for your consultation. Please see our response attached.

Kind regards  
Richard

Richard Cobb  
Senior Adviser | Sustainable Development  
Natural England | Sussex and Kent  
[www.gov.uk/natural-england](http://www.gov.uk/natural-england)



---

**From:** Planning Policy - Mid Sussex District Council  
<[planning.policy.mid.sussex.district.council@notifications.service.gov.uk](mailto:planning.policy.mid.sussex.district.council@notifications.service.gov.uk)>  
**Sent:** 29 November 2021 15:00  
**To:** SM-NE-Consultations (NE) <[consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)>  
**Subject:** Mid Sussex District Council Site Allocations DPD: Main Modifications Consultation



## Mid Sussex District Council – Planning Policy

29th November 2021

## Site Allocations DPD: Main Modifications Consultation

Following hearing sessions held in June 2021, the Planning Inspector appointed to examine the Council's Site Allocations DPD has suggested modifications, which will now be subject to consultation.

The role of the Sites DPD is to set out how the Council plans to meet the District's outstanding housing and employment needs up to 2031. The Sites DPD recommends 22 housing and 7 employment sites at locations across Mid Sussex, plus a Science and Technology Park.

The independent Inspector appointed by the Secretary of State held hearing sessions in June 2021 and heard evidence from all interested parties. Following this the Inspector is suggesting a small number of modifications to the Sites DPD to ensure it meets legal and soundness requirements.

The proposed modifications are now subject to consultation which will run for 8-weeks from 29th November 2021 until 24th January 2022.

The schedule of Main Modifications and accompanying documents are available online at [www.midsussex.gov.uk/SitesDPD](http://www.midsussex.gov.uk/SitesDPD). The website also provides details on how to respond to the consultation.

Note that comments must be focussed only on the suggested modifications, which are put forward without prejudice to the Inspector's final conclusions. All representations will be taken into account by the Inspector who will aim to provide his final report for consideration by Council early in the new year.

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Date: 17 January 2022  
Our ref: 375995  
Your ref:



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### **BY EMAIL ONLY**

Dear Planning Policy Team,

### **Site Allocations DPD: Main Modifications Consultation**

Thank you for your consultation on the above dated 29<sup>th</sup> of November which was received by Natural England on the same date.

#### **Overarching comments**

We welcome the stronger policy wording for environmental and landscape protection and enhancement that has been added throughout the main modifications including:

- The changes outlined in MM1 that make the allocation more sensitive to the High Weald AONB in terms of scale and design
- The reference to conserving and enhancing landscape and scenic beauty of the AONB, National Park and their settings (e.g. MM4, MM5, MM6, MM7, MM8, MM9, MM10, MM11, MM14)
- The greater emphasis on protecting and enhancing biodiversity and meeting Biodiversity Net Gain (BNG) (e.g. MM13, MM14, Appendix 1: MM5)
- The retention of trees (MM20) to recognise their important contribution to urban environments in line with the NPPF.
- The strengthening of the SANG policy within MM22 regarding management and monitoring to help ensure effectiveness

#### **Appendix 1: MM15 comments**

We support the proposed addition to Site Allocations DPD Appendix B regarding biodiversity net gain which we are pleased to see addresses our Regulation 19 consultation feedback made 28<sup>th</sup> September 2020 (Our ref 324095). This is an important part of ensuring the benefits of BNG are delivered in practice. Since the Regulation 19 consultation was developed, guidance regarding BNG has advanced so we would now like to take the opportunity to advise that the following additions to this appendix table should also be made:

- All BNG indicators and targets should be monitored in line with good practice guidance from Defra/Natural England regarding BNG and the Biodiversity Metric 3.0, as appropriate. For example, the indicator 'Maximise the

biodiversity units gained' is welcome but should also ensure that appropriate habitat is created or enhanced based on the local context of the site. There should be a clear reference to relevant supplementary planning documents to ensure that wider good practice guidance is followed when delivering, reporting and monitoring BNG. We remain committed to working with the Council to develop supplementary guidance that reflects our latest advice.

- As well as a measurable BNG target (10% or higher), the appendix should reflect other requirements from the Environment Act including 1) the need for developers to submit a BNG Plan for Council approval 2) habitat sites considered as part of BNG calculations will need to be secured for at least 30 years and 3) details will need to be uploaded onto the national register once this is available to ensure there is a robust and transparent record of BNG plans and contributions.

Please see these FAQs for helpful guidance regarding BNG:

<https://www.local.gov.uk/pas/topics/environment/biodiversity-net-gain/biodiversity-net-gain-faqs-frequently-asked-questions>

We are committed to working with the Council to help ensure the best possible outcomes for people and the environment. For any queries relating to the specific advice in this letter only please contact Richard Cobb at [Richard.cobb@naturalengland.org.uk](mailto:Richard.cobb@naturalengland.org.uk). For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Richard Cobb  
Senior Adviser  
Sussex and Kent Area Team



**714**

## Site Allocations DPD: Main Modifications Response

**Main Modification:** MM1

**ID:** 714  
**Response Ref:** 714/1/MM1  
**Respondent:** Bernadette Cox  
**Organisation:** Ardingly Parish Council  
**On Behalf Of:**

[REDACTED]

---

**From:** Bernadette Cox [REDACTED]  
**Sent:** 24 January 2022 13:15  
**To:** Policy Consultation  
**Subject:** Ardingly Parish Council Response to Site Allocations Document  
**Attachments:** Site Allocations DPD modifications APC comments FINAL.docx

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Dear Sir/Madam

Please see attached Ardingly Parish Councils response to the Site Allocations Document consultation

Kind Regards

Bernie

**Bernadette Cox**  
Clerk to Ardingly Parish Council  
[REDACTED]



## Site Allocations DPD main modifications.

To: The Inspector of Mid Sussex District Council's Site Allocations DPD.

Dear Sir,

Ardingly Parish Council are grateful for the modifications you have proposed to SA25 and accept the reduction in quantity of dwellings.

Ardingly Parish Council would request that it is made clear that the proposed development would be subject to all the policies within our Neighbourhood Plan, particularly the references to it that we have made in the following sections.

Yours faithfully

Bernadette Cox

Clerk to Ardingly Parish Council

# Ardingly Parish Council's comments on SA25.

## 1. Boundaries.

The exact area and boundaries of the proposed development shown on page 74 of the MSDC document 'Site Allocations Development Plan Document Main Modifications – Consultation' are not clear.

The independent Inspector recommended 'Reducing the size of the allocation to 35 dwellings at the same density as the proposal in the submitted Plan (i.e. about 20 dph) reduces the required area for development of SA25 to approximately half the area in the submitted allocation, but with an allowance for strategic landscaping.'

This proposal would mean that that built up area for 35 dwellings should be no greater than 1.75 Ha. ( $35/20 = 1.75$ ). Ardingly Parish Council (APC) agrees with this approach and therefore suggests the boundaries are designated as follows:

### **Built Up area**

The original plot size for 100 dwellings covered some 5.17 Ha. The subsequent revision to 35 dwellings covered 3.41 Ha (~ 20dph) including screening. The map below shows a plot size of 1.75 Ha in the North East corner of the original plot that comfortably accommodates 35 dwellings.

### **Screening**

A small allowance could then be made for screening along the south west boundaries of the new built up area in line with Policy ARD 3 in the Ardingly. The screening boundary on the west should fall well short of the oak in the middle of the original plot. Screening on the boundaries with the Recreational Ground should also be included to reinforce that already existing and mitigate the visual impact.

### **Public Open Space**

The rest of the original plot size can be returned to public open space.



## **2. Public Open Space**

The definition of public open space and the implications thereof are not clear to APC. We suggest this is discussed and agreed between the owners, MSDC and APC. See Policy '*ARD4: Suitable Alternative Natural Greenspace.*'

## **3. Housing style.**

APC requests that the DPD for SA25 should explicitly state that the design and style of the houses should reflect the mix of character and styles within the village in line with Policy '*ARD5: Housing Design*'.

## **4. Housing mix**

The housing mix should reflect the need of the village with mix of sizes and provision for social housing and affordable homes for local people in line with Policy ARD3.

## **5. Footpaths**

The DPD should stipulate that all existing footpaths will be preserved, particularly the one along the southern border of the original plot.

**731**

## Site Allocations DPD: Main Modifications Response

**Main Modification:** MM1

**ID:** 731

**Response Ref:** 731/1/MM1

**Respondent:** Jeremy James

**Organisation:**

**On Behalf Of:**



24<sup>th</sup> January 2022

Planning Policy Department  
Mid Sussex District Council  
Via email: [policyconsultation@midsussex.gov.uk](mailto:policyconsultation@midsussex.gov.uk)

Dear Sir/Madam,

I welcome the inspector's conclusion that the number of dwellings on this site be reduced to 35. However, I say this without prejudice to the point that 35 dwellings in the context of Ardingly is a major development in the normal sense of the word, the site is wholly within an Area of Outstanding Natural Beauty, and that there is no local need for this number of dwellings. Therefore, the site allocation should be reduced further or removed from the DPD to ensure its soundness.

Now that the number of dwellings has been reduced the land area for development should be clearly defined, along with a clear definition of responsibility and level of maintenance, in perpetuity, of the area defined for public open space.

The extent of landscaping should also be more fully defined to ensure that any landscaping is in keeping with the AONB principles and the site's proximity to the Ardingly conservation area.

The public rights of way on the southern and northern boundaries of the allocated site should be maintained and kept connected to ensure ease of access between and to different areas of public space.

The access to the developed site should be clearly defined as being only from Selsfield Road to minimise the impact of traffic through the village and especially on Street Lane. Car parking provision for the public should also be made, as the main entrance on Selsfield Road is currently used by dog walkers and other users of the showground for parking.

Thank you for the opportunity to respond to this consultation and I look forward to hearing when the final inspectors report is published and the DPD is adopted.

Yours faithfully,

Jeremy James

**1001**

## Site Allocations DPD: Main Modifications Response

**Main Modification:** MM1

**ID:** 1001  
**Response Ref:** 1001/1/MM1  
**Respondent:** Fiona Rocks  
**Organisation:**  
**On Behalf Of:**



**From:** fiona rocks [REDACTED]  
**Sent:** 24 January 2022 23:54  
**To:** Policy Consultation  
**Subject:** Site allocation document ,Main Modifications,for SA25 ....Land west of Selefield Road Ardingly

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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In response to the Inspector's Main Modification suggestions I would like to add the following comments:  
This land on SA 25 should not be developed as it is AONB land bordering on a conservation area of historical value.  
If the inspectors suggestion of 35 dwellings is considered then it is necessary that :  
The description of the site should be more specific and not include the hectare of the whole SA25 to prevent mission creep. The landscaping need to specify that it will obscure the development from the conservation area /grade listed buildings on street Lane /Church lane and the recreation ground.  
As specified in the document the open spaces need to be suitably managed .  
The addition traffic movements can only have access to the highways from Selefield road.A sustainable transport strategy needs to be identified in the light of the current state problems Ardingly is facing with traffic speed and volume at this time. With additional housing public transport needs to be looked at .  
If the objective of the additional housing is to deliver a sympathetic and well integrated extension to the village of Ardingly as stated in development plan document,then these houses ,if allowed to be developed , should be considered in the same light as a rural exception site and be affordable and offered to Ardingly residents first.

Fiona Rocks MA Consultant Psychologist  
Ardingly Resident.

Sent from my iPad

**1090**

## Site Allocations DPD: Main Modifications Response

**Main Modification:** MM1

**ID:** 1090  
**Response Ref:** 1090/1/MM1  
**Respondent:** Katherine Surgeoner  
**Organisation:**  
**On Behalf Of:**

[REDACTED]

---

**From:** Katherine Surgeoner [REDACTED]  
**Sent:** 24 January 2022 16:31  
**To:** Policy Consultation  
**Cc:** Katherine Surgeoner; stephenjsurgeon@gmail.com  
**Subject:** Mid Sussex Consultation Response re SA25  
**Attachments:** Submissions re Site Allocations DPD Main Modifications Consultation Document.pdf

**Importance:** High

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Dear Sirs

Please find attached submissions regarding the Mid Sussex DPD Main Modifications Consultation in relation to SA25.

Kindly acknowledge safe receipt.

Yours faithfully  
Katherine Surgeoner

## **STEPHEN SURGEONER'S COMMENTS ON POLICY SA25 AS SET OUT IN SITE ALLOCATIONS DPD MAIN MODIFICATIONS CONSULTATION DOCUMENTS**

I have read the Mid Sussex DPD Examination Main Modifications Consultation Document and the Schedule of Main Modifications Document under Ins Ref MM1 (“**Proposed Modifications Documents**”).

I note that in relation to SA25 the Proposed Change is to reduce the number of dwellings from 70 to 35. My position remains that in order for the DPD Document to be made sound SA25 must be removed. AONB land has the highest status of legal protection and should only be built upon as a last resort if required to meet local need. It is not. There is no justification for the allocation of a major housing development on this land which has the highest status of legal protection.

Furthermore, there is no methodology provided to determine how the number of 35 dwellings was arrived at. In the context of Ardingly such a number remains “major development” within any ordinary meaning of the word; moreover, there is no evidence to suggest that 35 houses are required to meet local need.

Without prejudice to this primary position, if SA25 is to be included in the DPD document with 35 dwellings then I have the following observations, which I should be grateful if the Planning Inspector and MSDC would respectively consider:

### **Description of Site**

The gross site area is set out as being 5.17ha. In order to avoid any future misunderstanding, I would submit that the size of both the developable site area and the landscaping area at the western end of the development should be specifically identified.

### **Urban Design Principles**

Given that the impact of development on the character and appearance of the Ardingly Conservation Area was a material consideration, I would submit that the wording should be clearer in relation to the definition and extent of landscaping which is to be undertaken. The aim should be to reduce the impact of development on the Conservation Area on and around Street Lane, and on the broader, rural AONB, especially to the west and south west of Ardingly.

The 35 dwellings should be designated as affordable homes and offered first to current Ardingly residents who have a demonstrable need for affordable housing.

### **Social and Community**

The reference to a requirement for “suitably managed open space” is noted. This needs to be both practicable and enforceable. I would submit that a mechanism needs to be put in place to ensure this is a long term commitment to the residents of Ardingly, to ensure that the area marked on the plan as public open space is retained as open, undeveloped land for public enjoyment and leisure in perpetuity.

### **Highways and Access**

Given the narrow and dangerous state of Street Lane which has both a pre-school and a primary school running off it, it should be stipulated that vehicular access to the allocated land is to be off Selsfield Road only. This is particularly important as many sat-nav systems direct traffic off the M23 to Ardingly via Street Lane.

Improvements should also be made to parking provision as many dog walkers park in what will become the entrance to the development, and Ardingly village is already congested. Public transport is woeful so I look forward to reading the Sustainable Transport Strategy.

I would ask to be notified when:

1. The Inspector's report is published; and
2. The Site Allocations DPD is adopted.

Thank you for considering these submissions.

**Stephen Surgeoner**