

Main Modification 15 - Index by ID Number

ID	ResponseRef	Name	Organisation	On Behalf Of
666	666/1/MM15	Julie Holden	East Grinstead Town Council	
689	689/1/MM15	Michael Brown	CPRE	
710	710/1/MM15	Richard Cobb	Natural England	
748	748/1/MM15	Jess Price	Sussex Wildlife Trust	

Site Allocations DPD: Main Modifications Response

Main Modification: MM15

ID: 6660
Response Ref: 666/1/MM15
Respondent: Julie Holden
Organisation: East Grinstead Town Council
On Behalf Of:

From: Julie Holden [REDACTED]
Sent: 14 January 2022 12:07
To: Policy Consultation
Subject: consultaion response to examiners main modifications
Attachments: EGTC_Letter_Head consultation MM MSDC SA DPD Jan 2022.pdf

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

Dear Sirs

Please see attached the response from East Grinstead Town Council.

With best wishes



Julie Holden (Mrs)
Town Clerk
East Grinstead Town Council



This email is confidential and intended for the use of intended recipient only. If you have received this email in error, please inform us immediately and then delete it. Any disclosure, copying, distribution or other action taken in reliance on it is unauthorised and may be unlawful. Although this transmission and any attachments are believed to be free of any virus or other defect that might adversely affect any computer system into which it is received and opened, it is the responsibility of the recipient to ensure that it is virus free and no responsibility is accepted by East Grinstead Town Council or its associates for any loss or damage arising in any way from its use. East Grinstead Town Council, East Court, College Lane, East Grinstead, West Sussex, RH19 3LT 01342 323636



EAST GRINSTEAD TOWN COUNCIL

Council Offices, East Court, College Lane, East Grinstead, West Sussex, RH19 3LT

Web site: www.eastgrinstead.gov.uk E mail: townclerk@eastgrinstead.gov.uk

Town Clerk: Mrs J W Holden EDMS, IRRV (Hons), Cert HE Comm Gov, PSLCC



INVESTOR IN PEOPLE

Your Ref:

My Ref:

When calling please ask for: Mrs J Holden

14th January 2022

By email to: policyconsultation@midsussex.gov.uk

Dear Sirs

The East Grinstead Town Council wishes to comment on the Main Modifications of the Examiner as published by Mid Sussex District Council in November 2021.

The Council is disappointed to see that many of the points raised in our submissions of 19th November 2019 and 24th September 2020 have not been included by the Examiner. We have grave concerns that the points supported by the local residents as to the provision of road and community infrastructure have not been included in the plan. We do not believe that the plan goes anywhere near far enough to guarantee that investment will be forthcoming from developer contributions to maintain a safe and sustainable community. As the examiner has in effect disregarded previous professional assessments such as road traffic surveys, an understanding as to why this is the case would be expected.

The road systems in and around East Grinstead were acknowledged to be over capacity over 10 years ago, yet many years of piecemeal and continued non planned development contributing numbers far in excess of the original models are now being referred to as not at capacity and further development will not result in severe affects to key junctions. This position is simply unfathomable by this Council and the residents of the town. For all future development It is vital that developer contributions are allocated to approved road improvements and plans and not vague promises of infrastructure which sound good but may never come forward; such as dedicated bus lanes on impractical routes.

To the Specific modifications we would reply as follows;

MM2 / SA20 / MM3– We have concerns as to the requirement for elderly persons accommodation fronting on to the busy and getting busier Imberhorne Lane. As the justification for this must be the availability of access to local services, we do not agree that this will satisfy this as the nearest corner shop is on Heathcote Drive an estimated uphill walk of 20 minutes. The developments should be required to provide an appropriate facility. There are likewise no other community facilities in the area other than a recreation / play area and the school. This requirement in MM2 will be at odds with the requirement of MM3 as it simply will not be satisfied.

MM12 - We do not support this. The policy and amendment will provide for continuation and furtherance of the existing permitted development rules currently in place. The permitted development practices of turning offices in to residential accommodation has had a severe effect on East Grinstead in the past ten years, to the point that the District Council has acknowledged that this has caused concern as to the remaining levels of business premises. East Grinstead town centre cannot absorb the continued loss of business premises which SA34 as amended will support. The amendment does not go far enough as the conditions can be easily satisfied by developers and will simply result in yet further loss of the limited business premises that is left, turning East Grinstead in to a dormitory town with limited sustainable employment offers.

We are supportive of MM13, MM15 and MM22 regarding the biodiversity requirements.

We hope that these comments are helpful, we cannot stress enough to the Examiner that the challenges faced by East Grinstead lead the Town Council and residents to press our concerns to ensure that the District plans and policies spell out and deliver the best deal on infrastructure to accompany development. To ensure the towns retain their sense of community, improving the town for the existing and the new residents.

Yours sincerely

Julie Holden
Town Clerk
East Grinstead Town Council

Site Allocations DPD: Main Modifications Response

Main Modification: MM15

ID: 6890
Response Ref: 689/1/MM15
Respondent: Michael Brown
Organisation: CPRE
On Behalf Of:

[REDACTED]

From: Michael Brown [REDACTED]
Sent: 23 January 2022 17:28
To: Policy Consultation
Subject: Draft SitesAllocation DPD: Modifications consultation response from CPRE Sussex
Attachments: MainMods responseFINAL.pdf

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

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



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

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

To promote, enhance and protect a thriving countryside for everyone's benefit

President: Lord Egremont

Campaign to Protect Rural England Sussex Branch CIO | Registered charity number: 1156568

Facebook : www.facebook.com/CPRESussex | Twitter : @cpresussex

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"¹. 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.

¹ 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]²**

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

² 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.³
- 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.⁴

AONB

- Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity, design, materials⁵ and mitigation requirements, in order to conserve and enhance the landscape and scenic beauty⁶ 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

³ See para 2.2.2(i) above.

⁴ See para 2.2.2(ii) above.

⁵ See para 2.2.3 above.

⁶ 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.**⁷

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

⁷ 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.**⁸ 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.

⁸ See para 2.2.5 above.

Site Allocations DPD: Main Modifications Response**Main Modification: MM15**

ID: 7100
Response Ref: 710/1/MM15
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,

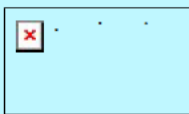
Thank you for your consultation. Please see our response attached.

Kind regards
Richard

Richard Cobb
Senior Adviser | Sustainable Development
Natural England | Sussex and Kent
www.gov.uk/natural-england

Thriving Nature
for people and planet

From: Planning Policy - Mid Sussex District Council
<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>
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. 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.

You are receiving this email because you are a statutory consultee, provided comments to the consultation on the document above, or have signed up to receive Planning Policy

updates from Mid Sussex District Council. If you would no longer like to receive these updates, please let us know at LDFnewsletter@midsussex.gov.uk

This message has been sent using TLS 1.2 This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

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



Planning Policy – Mid Sussex District Council,
Oaklands,
Oaklands Road,
Haywards Heath,
RH16 1SS

policyconsultation@midsussex.gov.uk

BY EMAIL ONLY

Dear Planning Policy Team,

Site Allocations DPD: Main Modifications Consultation

Thank you for your consultation on the above dated 29th 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 28th 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. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Richard Cobb
Senior Adviser
Sussex and Kent Area Team

Site Allocations DPD: Main Modifications Response

Main Modification: MM15

ID: 7480
Response Ref: 748/1/MM15
Respondent: Jess Price
Organisation: Sussex Wildlife Trust
On Behalf Of:

Name	Jess Price
Job title	Conservation Officer
Organisation	Sussex Wildlife Trust
Respondent ref. number	748
On behalf of	Sussex Wildlife Trust
Address	[REDACTED]
Phone	[REDACTED]
Email	[REDACTED]
Name or Organisation	Sussex Wildlife Trust
Which document are you commenting on?	Site Allocations DPD - Main Modifications
Main Modification (MM)	MM15
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	Yes
(1) Positively prepared	Sound
(2) Justified	Sound
(3) Effective	Sound
(4) Consistent with national policy	Sound
Please outline why you either support or object to the Main Modification?	The Sussex Wildlife Trust strongly supports the inclusion of the additional monitoring indicators and targets in MM15. We believe these are necessary to ensure consistency with NPPF paragraph 174.
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.	N/A
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	06/01/2022