

General Comment /No Main Modification - Index by ID Number

ID	ResponseRef	Name	Organisation	On Behalf Of
74	74/NoMM	Amanda Purdye	Gatwick Airport Limited	
112	112/NoMM	Carole Williams		
320	320/NoMM	Gerry Canning	Worlds End Association	
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672	672/NoMM	Jonathan Ordidge	Thakeham	
689	689/NoMM	Michael Brown	CPRE Sussex	
695	695/NoMM	Philip Allin	Boyer Planning	Barratt Developments
712	712/NoMM	Elizabeth Cleaver	Highways England	
713	713/NoMM	Marguerite Oxley	Environment Agency	
751	751/NoMM	Ian Turnbull		
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863	863/NoMM	Pippa Hildick-Smith		
1380	1380/NoMM	Adrian Podmore		
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2502	2502/NoMM	Robert Monroe		
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2507	2507/NoMM	Chris Roots		
2518	2518/NoMM	Chris Bedekovic	Terence O'Rourke Ltd	St Modwen Developments
2563	2563/NoMM	Finlay McPherson	Crest Nicholson	

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 74
Response Ref: 74/NoMM
Respondent: Amanda Purdye
Organisation: Gatwick Airport Limited
On Behalf Of:

[REDACTED]

From: Amanda Purdye [REDACTED]
Sent: 08 December 2021 10:02
To: Policy Consultation
Subject: Re: Site Allocations DPD: Main Modifications Consultation - LGW4613
Attachments: Safeguarding Comments - LGW4007 24-10-19.pdf; Advice LGW4613 08-12-21.pdf
Categories: SITES DPD MM

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Hi
Further to your email dated 29 November 2021 regarding the above mentioned consultation, please find our response attached. I have also attached our response to the previous consultation back in October 2019 ref LGW4007 for information.

If you have any queries please do not hesitate to contact me.

Best Regards Mandy
Amanda Purdye
Aerodrome Safeguarding Officer
Email: gal.safeguarding@gatwickairport.com

www.gatwickairport.com

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08 DECEMBER 2021

Planning Policy
Mid Sussex District Council
Oaklands
Oaklands Road
Haywards heath
West Sussex RH16 1SS

Dear Sir/Madam

Re: Site Allocations DPD: Main Modifications Consultation
Our Ref: LGW4613

Thank you for your email dated 29 November 2021, regarding the above mentioned document.

I understand that under this consultation we can only comment on the proposed modifications, which we have no objections to. However when we responded to the previous consultation back in October 2019, see letter attached, we requested that mention is made of aerodrome safeguarding requirements, as follows:

We would ask that mention is made of aerodrome safeguarding considerations. Gatwick Airport Ltd are a statutory consultee and aerodrome safeguarding is a statutory requirement under ICAO (International Civil Aviation Organisation) & EASA (European Aviation Safety Agency), it is embedded in the Town & Country Planning process by way of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes, Technical Sites & Military Explosives Storage Areas Direction 2002.

We would request the following be added to each site under 'Site Specific Requirements':

Aerodrome Safeguarding Requirements

Ensure that proposed development on this site does not impact on the safe operation of Gatwick Airport. The following must be taken into consideration:

- Impact of buildings & structures on navigational aids & instrument flight procedures*
- Schemes that contain large areas of landscaping, water bodies including SUDS schemes, buildings with large areas of flat/shallow pitched roofs and waste & recycling sites could attract birds in large numbers which could increase the birdstrike risk to the airport*
- Large and/or coloured lighting schemes close to the airport*

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- *Wind turbines or large areas of solar panels*

It appears that these requirements have not been included in the proposed documents or amendments which is disappointing.

Thank you for giving us the opportunity to comment on this document. If you have any queries please do not hesitate to contact me.

Yours sincerely

Amanda Purdye, Aerodrome Safeguarding
For and on behalf of Gatwick Airport Limited

Email: gal.safeguarding@gatwickairport.com

24 OCTOBER 2019

Planning Policy
Mid Sussex District Council
Oaklands
Oaklands Road
Haywards heath
West Sussex RH16 1SS

Dear Sir/Madam

Re: Draft Site Allocations Development Plan Document – Regulation 18 Consultation
Our Ref: LGW4007

Thank you for your email dated 09 October 2019, regarding the above mentioned document.

We would ask that mention is made of aerodrome safeguarding considerations. Gatwick Airport Ltd are a statutory consultee and aerodrome safeguarding is a statutory requirement under ICAO (International Civil Aviation Organisation) & EASA (European Aviation Safety Agency), it is embedded in the Town & Country Planning process by way of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes, Technical Sites & Military Explosives Storage Areas Direction 2002.

We would request the following be added to each site under 'Site Specific Requirements':

Aerodrome Safeguarding Requirements

Ensure that proposed development on this site does not impact on the safe operation of Gatwick Airport. The following must be taken into consideration:

- Impact of buildings & structures on navigational aids & instrument flight procedures
- Schemes that contain large areas of landscaping, water bodies including SUDS schemes, buildings with large areas of flat/shallow pitched roofs and waste & recycling sites could attract birds in large numbers which could increase the birdstrike risk to the airport
- Large and/or coloured lighting schemes close to the airport
- Wind turbines or large areas of solar panels

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Thank you for giving us the opportunity to comment on this document. If you have any queries please do not hesitate to contact me.

Yours sincerely

Amanda Purdye, Aerodrome Safeguarding
For and on behalf of Gatwick Airport Limited

Email: gal.safeguarding@gatwickairport.com

112

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 112
Response Ref: 112/NoMM
Respondent: Carole Williams
Organisation:
On Behalf Of:

[REDACTED]

From: Carole Williams [REDACTED]
Sent: 03 January 2022 14:10
To: Policy Consultation
Subject: site allocation

Categories: SITES DPD MM

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I am writing to support the main modification.
I also support the deletion of SA 22 from the plan.
Carole Williams

320

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 320
Response Ref: 320/NoMM
Respondent: Gerry Canning
Organisation: Worlds End Association
On Behalf Of:

Name	Gerry Canning
Job title	Chairman
Organisation	Worlds End Association (residents association)
On behalf of	Worlds End Association
Address	[REDACTED]
Phone	[REDACTED]
Email	[REDACTED]
Name or Organisation	Worlds End Association
Which document are you commenting on?	Site Allocations DPD - Main Modifications
Main Modification (MM)	Wivelsfield Station policy SA36
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?	<p>The Worlds End Association, being the elected representative of the residents of the area served by Wivesfield station, fully supports the designation of more land at the station. The reasons for this are -</p> <ul style="list-style-type: none"> - the provision of improved passenger facilities - the fact that a large housing development is planned for the period 2014 - 2031, many of whose residents will travel via the station. New home building has been completed or started already - there is a very small drop off point in Leylands Road <ul style="list-style-type: none"> there are only two car spaces, designated as disabled, at the Gordon Road entrance - on street parking is currently largely taken up by commuter car parking in the surrounding area, - the facilities at the station are completely inadequate for today's passengers - there is ample land space for use by the travelling public close to the station
If you wish to provide further documentation to support your	

620

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 620
Response Ref: 620/NoMM
Respondent: Charlotte Mayall
Organisation: Southern Water
On Behalf Of:

From: Policy, Planning <Planning.Policy@southernwater.co.uk>
Sent: 20 January 2022 16:45
To: Policy Consultation
Subject: FW: Mid Sussex District Council Site Allocations DPD: Main Modifications Consultation

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Dear Sir/Madam,

Thank you for informing Southern Water of the above consultation. I confirm we have reviewed the schedule and have no comments to make on the proposed modifications.

We look forward to being kept informed of the Plan's progress.

Yours faithfully,

Charlotte Mayall
Strategic Planning Lead
Hampshire, West Sussex & Isle of Wight



From: Planning Policy - Mid Sussex District Council
<planning.policy.mid.sussex.district.council@notifications.service.gov.uk>
Sent: 29 November 2021 15:00
To: Policy, Planning <Planning.Policy@southernwater.co.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

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668

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 668
Response Ref: 668/NoMM
Respondent: Alan Byrne
Organisation: Historic England
On Behalf Of:

[REDACTED]

From: Byrne, Alan [REDACTED]
Sent: 21 January 2022 13:47
To: Policy Consultation
Subject: RE: Mid Sussex District Council Site Allocations DPD: Main Modifications Consultation
Attachments: Mid Sussex District Council Site Allocations DPD Main Modifications Consultation (HE response)-19.01.22.pdf

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Dear Sir or Madam,

I attach Historic England's response to the above consultation.

Yours faithfully,

Alan Byrne BSc MSc IHBC
Historic Environment Planning Adviser

[REDACTED]



Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.

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Historic England

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

Our ref: PL00627206

Your ref:

Telephone

Email

e-east@historicengland.org.uk

19 January 2022

Date

[By email only to policyconsultation@midsussex.gov.uk](mailto:policyconsultation@midsussex.gov.uk)

Dear Sir or Madam

Mid Sussex District Council Site Allocations DPD: Main Modifications Consultation

Thank you for your email of 29 November 2021 inviting comments on the above consultation document.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. In our view, the proposed Main Modifications do not raise any further matters that we feel it is necessary for us to comment on.

We should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. We hope that these comments are useful.

Yours sincerely

Alan Byrne
Historic Environment Planning Adviser



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Correspondence or information which you send us may therefore become publicly available.



672

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 672
Response Ref: 672/NoMM
Respondent: Jonathan Ordidge
Organisation: Thakeham
On Behalf Of:

From: Jonathan Ordidge [REDACTED]
Sent: 21 January 2022 10:49
To: Policy Consultation
Cc: Olivia Forsyth
Subject: Site Allocations Development Plan Document Main Modifications – Consultation (November 2021)
Attachments: MSDC Main Mods - SA13 Rep v1.pdf

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Dear Sir / Madam,

Please find attached our representation to the Site Allocations Development Plan Document Main Modifications – Consultation (November 2021).

We would be grateful if receipt of this document could be confirmed.

Many thanks

Jonny

Jonathan Ordidge
Planning Manager

[REDACTED]
[REDACTED]
[REDACTED]
www.thakeham.com



THAKEHAM



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THAKEHAM

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

21 January 2022

Dear Sir / Madam,

Mid Sussex District Council - Site Allocations Development Plan Document Main Modifications – Consultation (November 2021)

Introduction

This consultation relates to the Main Modifications suggested by the Inspector to ensure the Site Allocations DPD is legally compliant and sound.

This representation considers the suggested Main Modifications to the draft policy SA13 (Land South of Folders Lane and East of Keymer Road) only.

Engagement with South Downs National Park Authority

Following the Site Allocations DPD Examination in Public (held June 2021), Thakeham Homes Limited, Persimmon Homes and Mid Sussex District Council (MSDC) engaged with the South Downs National Park Authority (SDNPA) and collaboratively prepared a Statement of Common Ground (SoCG).

The SoCG related to the relationship between the proposed allocation SA13 (Land South of Folders Lane and East of Keymer Road) and the South Downs National Park (SDNP).

Draft policy SA13

The suggested Main Modifications to draft policy SA13 are consistent with the agreed SoCG and accordingly, we have no objection to the suggested amendments to the draft policy.

Separately, there are a couple of typographical errors within the wording of draft policy SA13 which could be corrected:

- Urban Design Principles, Bullet 1, Line 1 – “masterplanned”.
- Urban Design Principles, Bullet 3, Line 1 – “ehanced”.

This is the full extent of comments we wish to make on the Main Modifications to the draft policy SA13.

We would be grateful for confirmation of receipt of this letter.

Yours faithfully,



Jonathan Ordidge
Planning Manager

689

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 689

Response Ref: 689/NoMM

Respondent: Michael Brown

Organisation: CPRE Sussex

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



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

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President: Lord Egremont

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

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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"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.

695

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 695

Response Ref: 695/NoMM

Respondent: Philip Allin

Organisation: Boyer Planning

On Behalf Of: Barratt Developments

Name	Philip Allin
Job title	Associate Director
Organisation	Boyer
On behalf of	Barratt Developments
Address	[REDACTED]
Email	[REDACTED]
Name or Organisation	Boyer (on behalf of Barratt Developments)
Which document are you commenting on?	Site Allocations DPD - Main Modifications
Main Modification (MM)	General
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?	See attached letter
If you wish to provide further documentation to support your response, you can upload it here	https://forms.midsussex.gov.uk/upload_dld.php?fileid=6d7c7800be1fd6ef0ba666cc71f8b8c0
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	21/01/2022

712

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 712
Response Ref: 712/NoMM
Respondent: Elizabeth Cleaver
Organisation: Highways England
On Behalf Of:

From: Cleaver, Elizabeth [REDACTED]
Sent: 21 January 2022 15:42
To: Policy Consultation
Cc: Planning SE
Subject: National Highways response: Site Allocations DPD: Main Modifications Consultation

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For attention of: Planning Policy Team

Consultation: Site Allocations DPD: Main Modifications.

National Highways' reference: #15453

Dear Sir / Madam,

Thank you for notifying National Highways (formerly known as Highways England) of this consultation on the proposed modifications to the Site Allocations DPD suggested by the Inspector following the hearing sessions held in June 2021.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the strategic road network.

We do not have any comments on the proposed modifications.

For future consultations, please note that from 14 February 2022 our team inbox address will be changing to PlanningSE@nationalhighways.co.uk to reflect our organisation's name change.

Kind regards,

Elizabeth Cleaver, Assistant Spatial Planning Manager
[REDACTED]

Web: <http://nationalhighways.co.uk/>

[REDACTED]

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National Highways Limited | **General enquiries: 0300 123 5000** | **National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF** | <https://nationalhighways.co.uk> | info@highwaysengland.co.uk

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713

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 713
Response Ref: 713/NoMM
Respondent: Marguerite Oxley
Organisation: Environment Agency
On Behalf Of:

From: Oxley, Marguerite [REDACTED]
Sent: 11 January 2022 14:57
To: Policy Consultation
Subject: Mid Sussex District Council Site Allocations Development Plan Document Main Modifications Consultation

Follow Up Flag: Follow up
Flag Status: Completed

Categories: ALI DPD MM

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Dear Planning Policy

Thank you for consulting the Environment Agency on the Site Allocations Development Plan Document Main Modifications.

Having looked through the proposed main modifications, I can confirm that we have no comments to make for areas within our remit.

Kind regards

Marguerite Oxley

[Marguerite Oxley](#) | [Technical Specialist](#) | [Sustainable Places](#) | [Solent and South Downs Area](#)

[REDACTED]
[REDACTED] (or PlanningSSD@environment-agency.gov.uk)
www.gov.uk/environment-agency

My pronouns are She/Her
([why is this here?](#))

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751

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 751
Response Ref: 751/NoMM
Respondent: Ian Turnbull
Organisation:
On Behalf Of:

From: ian turnbull [REDACTED]
Sent: 06 January 2022 16:01
To: Policy Consultation
Subject: MSDC Site Allocations DPD - section SA36

Categories: Laura to move

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As a frequent user of Wivelsfield train station, I wish to express my support for the improvements proposed under the Council's plan. I believe these will greatly strengthen the case for the long-overdue provision of 'step-free' access to the station platforms (and ticket office) directly from Leylands Road, rather than by making more use of the existing access from the Gordon Road 'drop off' area.

I would suggest that a further improvement to complement the Council's plans would be to introduce a step-free footway connection between the Gordon Road 'drop off' area directly to the ticket office, on the East side of the rail line, between the southbound platform and the large scout hut. It is my understanding that there are plans to demolish the hut and construct a replacement on the same site: it would seem prudent to safeguard sufficient space to enable such a walkway to be brought into use, to prevent the replacement hut occupying the required space.

Ian Turnbull, [REDACTED]

792

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 792
Response Ref: 792/NoMM
Respondent: Tracey Flitcroft
Organisation: West Sussex County Council
On Behalf Of:

[REDACTED]

From: Tracey Flitcroft [REDACTED]
Sent: 24 January 2022 22:28
To: Policy Consultation
Subject: West Sussex County Council Officer Comments - Site Allocation DPD Main Modification Consultation
Attachments: WSCC Officer Comments Site Allocations DPD Modications.docx

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Hello

Please find attached WSCC officer comments on the above consultation.

Many thanks

Tracey

Tracey Flitcroft BA (Hons) PGDip MRTPI
Principal Planning Officer
Planning Policy and Infrastructure | Planning Services

[REDACTED] | Web: www.westsussex.gov.uk

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Site Allocations Development Plan Document Main Modifications

The comments below are officer comments made on behalf of West Sussex County Council to the Main Modifications consultation (MM).

It is considered that the Main Modifications to the Submission Draft of the Site Allocations DPD are Legally Compliant and Sound. However, comments are forwarded to improve clarity. As they are factual amendments and do not go to the heart of the DPD it is hoped they can be considered as Minor Modifications.

The suggested amendments are in **red** and deletions in **black** to distinguish them from your amendments.

Thank you for the opportunity to comment and we look forward to receiving notification when the Inspector's Report is published and the Site Allocations DPD adopted.

SA20 – Land south and west of Imberhorne Upper School, Imberhorne Lane, East Grinstead,

page 60

As written:

Housing allocation with Local Centre and Care Community (C2), early years, ~~and~~ primary school and facilities for Special Educational Needs (2FE), strategic SANG, public open space and children's equipped playspace, provision of land for playing fields associated with Imberhorne School.

In order to improve clarity, it is suggest it is amended to read:

Housing allocation with Local Centre and Care Community (C2), early years, ~~and~~ primary school and facilities for Special Educational Needs (2FE), strategic SANG, public open space and children's equipped playspace, provision of land **and** playing fields s facilities for ~~playing fields associated with~~ Imberhorne School.

Page 61 – Social and Community

In order to improve clarity, it is suggest it is amended to read:

A land exchange agreement between WSCC and the developer to secure 6 ha (gross) **of** land and to provide ~~to create~~ new playing field facilities in association with Imberhorne Secondary School (c.4 ha net - excluding land for provision of a new vehicular access onto Imberhorne Lane).

SA16 St. Wilfrids Catholic Primary School, School Close, Burgess Hill

page 52 – Social and Community

To improve clarity, in case a s77 consent for the disposal of the playing fields is needed, it is suggested it is amended to read:

Redevelopment proposals shall provide evidence that demonstrates how replacement community facilities will be provided to the satisfaction of the Council and relevant key stakeholders, in accordance with the requirements of District Plan Policy DP25 (Community Facilities and Local Services); evidence shall include re-provision of the school playing fields or justification of their loss to the satisfaction of the Council, the Department of Education and Sport England in accordance with the NPPF and Sport England's Playing Field Policy.

863

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 863
Response Ref: 863/NoMM
Respondent: Pippa Hildick-Smith
Organisation:
On Behalf Of:

Name	Pippa Hildick-Smith
Address	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Site Allocations DPD - Main Modifications
Main Modification (MM)	Proposed multifunction network route between Burgess Hill and Haywards Heath
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound
Please outline why you either support or object to the Main Modification?	<p>A cycle route is clearly needed between Burgess Hill and Haywards Heath - I have no argument with this and agree it is needed</p> <p>However the route must be safe and viable</p> <p>The proposal for a route for pedestrians and cyclists to share the road under the bridge on Rocky Lane is highly dangerous. There is no room to widen the bridge There are accidents at this point on Rocky Lane several times a year In recent months a double decker bus hit the bridge at this point. Expecting pedestrians and cyclists to not only share this tight access route but also cross the road here is going to put them at risk. The lines of sight for motorists are very poor as the road turns on either side of the bridge</p>
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.	<p>Cyclists will usually choose the shortest and most direct route - and currently many cyclists use Valebridge Road and Rocky lane to reach Haywards Heath from Burgess Hill and vice-versa. It would make more sense to provide a safer route alongside Valebridge Road and Rocky Lane for cyclists to use. As this land is already owned by Mid Sussex Council it is hard to understand why this route is not being proposed? This route can avoid the busy/dangerous bridge on Rocky Lane making it much safer.</p>
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	10/01/2022

1380

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 1380
Response Ref: 1380/NoMM
Respondent: Adrian Podmore
Organisation:
On Behalf Of:

[REDACTED]

From: Adrian PODMORE [REDACTED]
Sent: 22 January 2022 12:58
To: Policy Consultation
Subject: Site Allocations DPD: Main Modifications Consultation

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Dear Sir / Madam,

I would like to make the following comment with regard to the modifications consultation.

You refer to many of these planning proposals as 'conserving and enhancing' the 'AONB'.

While of course, I realise mankind has had an impact on the whole of our landscape, in terms of open green spaces and our countryside and its associated wildlife, all of this is still fashioned by natural processes and is still part of the 'natural' world and its beauty.

I would be grateful if you could therefore explain very clearly as to how concrete, tarmac, pollution and cars will actually 'conserve and enhance' the natural beauty' of the AONB.

Yours faithfully
Adrian Podmore
[REDACTED]

1488

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 1488
Response Ref: 1488/NoMM
Respondent: Tim Johnston
Organisation:
On Behalf Of:

From: Tim Johnston [REDACTED]
Sent: 24 January 2022 07:58
To: Policy Consultation
Subject: DPD Main Modifications Consultation

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Hi

I believe you have received a response from Infrastructure First (https://eur02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fmcusercontent.com%2F546a4b16f84ae0549d247d64%2Ffiles%2F941f9d20-17ac-1268-7f35-7f23ddc18de4%2FIFG_Representation_Main_Modifications_DPD_Consultation.pdf&data=04%7C01%7Cpolicyc onsultation%40midsussex.gov.uk%7C1977bdd0c7e24d2bfbe308d9df0f47cd%7C248de4f9d13548cca4c8babd7e9e8703%7C0%7C1%7C637786078990563711%7CUnknown%7CTWFPbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzli LCJBTiI6Ik1haWwiLCJXVCi6Mn0%3D%7C3000&data=5CTuMYa5oEVwjrgTJIUYeGVQ2cbt7y2OcXiQaK9kcRk%3D&reserved=0)

I would like to reiterate three of the points that they make that I feel are particularly relevant and add one of my own:

Firstly

The up to date residual need is now around 400 homes , however, the main modification version of the DPD still allocates schemes for a total of 1,704 homes. This represents an official oversupply of 907 as at April 2021 ... and using up to date figures, an oversupply nearer to 1,300. The Council's position stated during the public hearings that they do not accept the need for a buffer due to the robustness of their housing commitments

Secondly

Existing traffic issues do not seem to have been considered relevant The Competent Highway Authorities in West Sussex and Surrey and the District Planning Authorities in Mid Sussex and Tandridge ALL recognise and acknowledge the severe traffic problems in Felbridge and East Grinstead. In particular, that the Felbridge junction is already operating over capacity at peak times of the day. Drivers using the A22 corridor into East Grinstead face significant delays during much of the day due to congestion at the Felbridge, Imberhorne Lane and Lingfield Road junctions ... and this is BEFORE the traffic from the 1,400+ homes already committed in and around East Grinstead start to have an impact on the network. Mid Sussex District Council insist that the serious traffic issues are not a reason to resist further large scale housing close to the main bottlenecks; arguing that the severe congestion is an existing situation. They simply say that the DPD allocations SA19/SA20 will have limited practical impact on the already congested network.

Thirdly

The councils have failed in previous commitments on traffic improvements: (1) Synchronisation of signals at Felbridge and Imberhorne Lane junctions were developer funded, which has not happened; (2) Reconfiguration of the Felbridge junction A264 tried but withdrawn; (3) Atkins Stage 3 junction improvements: still no timetable for their implementation Given total failure to deliver existing road improvements, how can councils (or transport authorities) be relied on to deliver any improvements? Relying on future improvements as a condition of granting new development cannot be right as not only is there no guarantee of success, the chance of success seems low based on historic cases. The A264/A22 junction is just too complex with too little space for improvements.

Fourthly

Education has not been considered enough. At the time of writing, the website for one development (<https://eur02.safelinks.protection.outlook.com/?url=https%3A%2F%2Flandsouthofcrawleydownload.com%2Fthe->

site%2F&data=04%7C01%7Cpolicyconsultation%40midsussex.gov.uk%7C1977bdd0c7e24d2bfbe308d9df0f47cd%7C248de4f9d13548cca4c8babd7e9e8703%7C0%7C1%7C637786078990563711%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCi6Mn0%3D%7C3000&sdata=qjlrAIRuaR6BonUfGt4HXeELyTetSgOMLsTWBw%2FdLk%3D&reserved=0) still lists Whittington College under local schools, when in fact it is an old people's home. There is clearly no appreciation for the local education situation in any of these developments. Crawley Down village primary school recently expanded (four years ago?) due to increased population from existing housing development, and ALREADY it is oversubscribed with village children travelling out of the village every day for school - adding to the traffic congestion and pollution.

Tim Johnston



1686

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 1686
Response Ref: 1686/NoMM
Respondent: David Stow
Organisation:
On Behalf Of:

From: David Stow [REDACTED]
Sent: 24 January 2022 14:00
To: Policy Consultation
Subject: DPD Main Modifications Consultation

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Dear Sir/Madam

I am writing to express my disappointment at the MSDC's Site Allocations Main Modifications Consultation.

It is fairly clear that MSDC have chosen to ignore the blindingly obviously traffic issues which already affect the A22/A264 junction and their apparent position that "things are already bad, it doesn't matter if we make them worse" beggars belief. It is also perverse that having conducted a traffic survey in this area they have claimed that the detailed analysis of this survey was not available in time for the Site Allocations enquiry so was not relevant. That this has been published by a neighbouring authority and undermines MSDC's previous traffic survey, which flew in the face of the daily reality experienced by those living in this area, simply shows the mendacity of MSDC's position.

It should also be noted that traffic improvement schemes required to be implemented as a condition of previously approved developments have not been delivered. This immediately casts in to doubt whether any other infrastructure improvements discussed/required for developments now being proposed will actually be delivered. As a general point of principle developers should be required to implement promised/required infrastructure improvements ideally before commencing work on the developments to which they relate and certainly no later than contemporaneously with such developments. The simple reality is that it is not just the road infrastructure that is at/beyond capacity in the East Grinstead area, other elements such as doctors and dentists are too.

The site allocations plan was based on an indicated requirement with MSDC's area of 1,500+ homes. This has subsequently been revised down and taking account of developments already constructed/in progress/approved, the requirement seemingly is now just circa 400 homes! Why then are MSDC still intent on pushing ahead with plans to still build 1,500+ homes?

The would-be developer for the homes proposed off Crawley Down Rd in Felbridge held an on-line consultation for local residents before Christmas. This was a complete sham. The developers seemed to only answer their own questions! Questions could only be submitted on-line and there was no dialogue with the developer's representatives. Like several other residents I submitted several questions via the on-line portal, none were addressed. This was simply a box ticking exercise so the would-be developer can say that they conducted a local consultation and all points presented at the live element of the consultation were addressed.

Yours faithfully

David Stow



1754

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 1754
Response Ref: 1754/NoMM
Respondent: John Benstead
Organisation:
On Behalf Of:

From: John Benstead [REDACTED]
Sent: 24 January 2022 13:45
To: Policy Consultation
Subject: DPD Main Modifications Consultation

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Sirs,

The text of this email is also sent as an attachment.

DPD Main Modifications Consultation

I am aware that Mid Sussex District Council (MSDC) needs to prepare a Site Allocations Development Plan Document (Sites DPD)

I followed the Hearings in June 2021 regarding MSDC's Plan. Unfortunately, the Inspector in his report does not seem to have included some of the arguments put forward by objectors to the MSDC Proposals. The Inspector has now suggested modifications to the Sites DPD.

Further consideration must be the adverse impact of the Mid Sussex DPD Plan policies SA19 and 20 upon Felbridge and local roads. It is not made clear in any of the reports that The Felbridge junction contains the meeting of boundaries between Tandridge DC and MSDC. Indeed some 75% of land that may be defined as junction is within Tandridge. Has there been a failing to consult, or a failing to agree between these two authorities.

Several study reports on roads within East Grinstead have been commissioned in recent years. Two of which refer to the Felbridge junction - Atkins and Jubb. Every report has addressed issues which have been reviewed by MSDC. Since I have been monitoring MSDC activities no significant action has been taken to alleviate the congestion set against an ever-rising density of traffic, on the A22 and A264 and related roads.

There are traffic impacts that the proposed site allocations in East Grinstead, specifically SA19 and SA20, will have on the A22 Felbridge Junction and adjacent roads. I do not feel that proposed modifications in any way address the need. The Felbridge Junction has existing issues which are known to be severe and to bring sites forward in that immediate area can only add to the severity of the transport issues. Accordingly, significant improvements to the Felbridge Junction are needed.

I am given to understand that West Sussex County Council, in their response to the DPD, noted that no scheme has been identified and also the possibility that the necessary significant junction improvements required at the Felbridge Junction will not be delivered. Only by incorporating such improvements can you hope to gain any support for additional development from the population of East Grinstead.

We who are concerned about East Grinstead are amazed that when MSDC has a housing availability projected as in excess of the Local Plan, you are coming forward at the behest of developers to exceed your targets. If Crabbett Park were to be developed, then this would be nearer to a centre of employment and put less pressure on a road configuration that is already judged as severe. Additionally, the proposals violate the continuing acceptance of maintaining the gap between settlements.

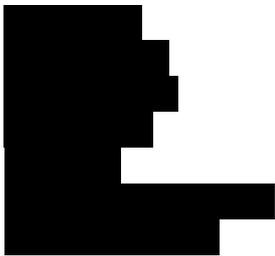
May I remind MSDC that when it was necessary to have a Local Plan supported by the Neighbourhood Plan, The Post Referendum Campaign (a volunteer organisation supported by the East Grinstead population with the purpose of endeavouring to curb the excesses of MSDC unnecessary and unwanted development plans) endeavoured to get its supporters to vote at referendum by supporting the Neighbourhood Plan. This as an aid to MSDC achieving

acceptance of the Local Plan. At least we thought that by having a local plan, MSDC would honour its commitments to it. The Local Plan that came forward sought to prevent the coalescence of settlements that would harm the separate identity and amenity of settlements. The maintenance of this undeveloped gap reinforces the fact that they are separate settlements.

I am therefore objecting to the modifications proposed on the bases:-

- 1. That they do not take sufficient notice of the objections put forward at the hearings.**
- 2. That no firm proposals have come forward to mitigate or modify the Felbridge junction.**
- 3. Previous road congestion and transport plans have been overlooked in terms of extant validity and environmental needs.**
- 4. That the proposals do not take account of the MSDC Local Plan regarding a gap between settlements.**
- 5. That the DPD Plan seeks to over allocate housing development against the established needs of the area as committed to in the Local Plan**

John Benstead



2502

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 2502
Response Ref: 2502/NoMM
Respondent: Robert Monroe
Organisation:
On Behalf Of:

Name	ROBERT MONROE
Address	[REDACTED]
Phone	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Site Allocations DPD - Main Modifications
Main Modification (MM)	Wivelsfield Station SA36
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?	<p>I fully support the designation of additional land at Wivelsfield Station for passenger facilities.</p> <p>At present the facilities are inadequate and there will be growing demand as housing is developed</p>
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

[REDACTED]

From: Robert Monroe [REDACTED]
Sent: 15 January 2022 20:14
To: planningpolicy
Subject: Main Modifications (November 2021) to Site Allocations Document

Follow Up Flag: Follow up
Flag Status: Completed

Categories: SITES DPD MM

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Dear Sir/Madam

I am writing as someone who is fully supportive of policy SA36; Wivelsfield Railway Station which features on pages 103 and 104 of the MSDC Site Allocations DPD - Main Modifications 2021 Document.

If there is an opportunity to do so I would like to support this policy. However, having read through the documentation on your website, it seems to me that you are not classifying the change to the area of land designated at Wivelsfield Station as a "Main Modification" and therefore there is no opportunity at this stage to submit a formal comment as part of the consultation process which is open until 24 January.

Please could you confirm that my understanding is correct.

Thank you

Yours sincerely

Robert Monroe
[REDACTED]

2507

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 2507
Response Ref: 2507/NoMM
Respondent: Chris Roots
Organisation:
On Behalf Of:

[REDACTED]

From: Chris Roots [REDACTED]
Sent: 19 January 2022 15:09
To: Policy Consultation
Subject: Proposal for building behind woodlands close, Crawley down

[You don't often get email from [REDACTED] Learn why this is important at <http://aka.ms/LearnAboutSenderIdentification>.]

To Whom it may concern,

We would like to inform you that we do not support the proposal for houses in the field behind Woodland Close, Crawley Down. As a property owner of Woodlands close we have significant concerns regarding potential access to this land and the infrastructure of the roads is far from suitable. The local school is already significantly over subscribed as is the GP surgery. We also have witnessed the wildlife the live within this area which will undoubtedly suffer.

Thank you,

Mr and Mrs Roots
[REDACTED]

2518

Site Allocations DPD: Main Modifications Response

Main Modification: General Comment / No MM Specified

ID: 2518
Response Ref: 2518/NoMM
Respondent: Chris Bedekovic
Organisation: Terence O'Rourke Ltd
On Behalf Of: St Modwen Developments

From: Chris Bedekovic [REDACTED]
Sent: 19 January 2022 10:51
To: Policy Consultation
Cc: Steve Molnar; Hollie Howe
Subject: Site Allocations DPD Main Modifications Consultation Representation
Attachments: 220119_185004M_Site Allocations Development Plan Document Main Modifications rep.pdf

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Good morning

Please find attached a representation on behalf of St Modwen Developments in response to the Main Modifications to the Site Allocations DPD, policies SA1 and SA4.

I would appreciate if you could confirm receipt of the attached representation.

Kind regards
Chris

--
Chris Bedekovic MRTPI
Senior Planner

[REDACTED]



TERENCE
ROURKE



+think ●rchestrate }esolve

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23 Heddon Street London W1B 4BQ

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**Mid Sussex Site Allocations Development Plan Document Main Modifications
Submission January 2022**



Representations on behalf of St Modwen Developments

This document comprises a formal submission of a representation submitted on behalf of St Modwen Developments in response to the Main Modifications to the Site Allocations Development Plan Document.

Part A – Your Details

1. Personal details

Title	Mr
First Name	Chris
Last Name	Bedekovic
Job Title (where relevant)	Senior Planner
Organisation	Terence O'Rourke Ltd
On behalf of	St Modwen Developments
Address Line 1	
Line 2	
Line 3	
Line 4	
Post Code	
Telephone Number	
E-mail Address	

Part B – Your Comments

Name or Organisation	Terence O'Rourke Ltd (obo St Modwen Developments)
----------------------	---

3a. Does your comment relate to:

Main Modification	X
Sustainability Appraisal Addendum	
HRA Addendum	

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

SA1 / SA4

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

4a. Legally Compliant

Yes	X
No	

4b. Sound

Yes	X
No	

Policy SA1: Sustainable Economic Development- Additional site allocations
Policy SA4: Land North of the A264 at Junction 10 of the M23 (Employment Area)



The Inspector provided a schedule of main modifications and a version of the SA DPD with the main modifications incorporated. We acknowledge and support the modifications of the use class E(g) change from B2, which reflects the change of the Use Classes Order through the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (1 September 2020).

On 29 November 2021, Terence O'Rourke (TOR) submitted a planning application at the site on behalf of SMD in relation to the site in Policy SA4 (application reference DM/21/3805) for the following proposal:

Construction of a building falling within Use Class B8 (storage and distribution) including ancillary offices, associated hard and soft landscaping, parking, access and ancillary works.

Whilst the policy would be modified to refer to E(g) in accordance with the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2021, SMD considers that the site is not large enough for a mix of E(g) and B8. A viable use would leave no space for E(g) use alongside, or vice versa. It should be noted that the submitted planning application for an employment unit (DM/21/3805) comprises B8 use with ancillary offices.

It is acknowledged that the wording as proposed by the main modifications potentially provides scope to promote a single use (either E(g) or B8) with sufficient justification to show that there will be no significant quantum of one or the other.

SMD, by way of submission of an application for a B8 employment unit (ref. DM/21/3805), demonstrates that the site use in the current market is for B8, and provides the following supporting information to support the use of the site for a B8 unit:

- A report prepared by JLL (Employment Land Need and Market Review, September 2021), provides a justification that demonstrates that B8 use is the predominant use both needed and demanded. The report additionally provides some analysis of supply of available units in the Gatwick market area to show that there is a shortage of large units serving this market. Calculations undertaken by Mid Sussex District Council (December 2018) revealed a projected land requirement of 27 ha for B2 and B8 premises for the period 2019 to 2031. The SA4 site enjoys a number of necessary attributes to accommodate and attract industrial and warehouse occupiers, including direct access to the A264, separation from housing, pleasant landscape setting and established industrial location.
- A layout for a B8 building (ref 19226 P1003 rev H), comprising a warehouse with ancillary office space and ancillary parking and servicing areas was submitted to support the planning application ref. DM/21/3805. The layout is set towards the western side of the site to allow space for a community park on its eastern edge next to the main site access road serving the site. The service yard is located to the north of the building, and car parking is to the east between the building and the community park. The existing footpath/cycleway is relocated to run alongside the park and south of the building to the A264 underpass. New planting in and around the park and around the building to complement existing vegetation will ensure that it does not appear dominant and help to screen it in views from the A264 and the site access road to the south and east.

This material clearly illustrates that the site is suitable for a single B8 unit that can be accommodated successfully on the site with high quality design and layout, with a comprehensive landscape scheme and screening as required by SA4.



7. Please notify me when:

The Inspector's Report is published	X
The Site Allocations DPD is adopted	X

Signature:



19 January 2022

2563

Site Allocations DPD: Main Modifications Response

Main Modification: NoMM General Comment / No MM Specified

ID: 2563
Response Ref: 2563/NoMM
Respondent: Finlay McPherson
Organisation: Crest Nicholson
On Behalf Of:

From: Finlay McPherson [REDACTED]
Sent: 24 January 2022 19:05
To: Policy Consultation
Cc: Sebastian Skinner; Matthew Parsons; Farhiya Aden
Subject: Main Modification Consultation Representations
Attachments: 2022-01-24 Mid Sussex Consultation (002).docx; 2022-01-24 Mid SussexDistrict Main Modifications.docx

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Good evening,

Please find appended to this email a completed consultation form with accompanying letter, in response to the legal compliance and soundness of the Mid Sussex District Draft Site Allocations Development Plan Document Main Modification consultation.

I would be grateful if you could please confirm receipt of this email.

Many thanks,

Finlay McPherson
Assistant Strategic Land & Planning Manager

Crest Nicholson Partnerships and Strategic Land
[REDACTED]

www.crestnicholson.com

Classified as General



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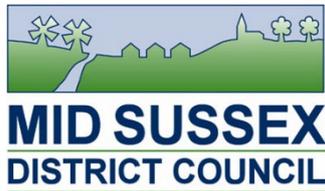


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Site Allocations Development Plan Document Main Modifications Consultation Form

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

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 24th January 2022

How can I respond to this consultation?

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

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

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="Finlay"/>
Last Name	<input type="text" value="McPherson"/>
Job Title (where relevant)	<input type="text" value="Strategic Land & Planning Manager"/>
Organisation (where relevant)	<input type="text" value="Crest Nicholson"/>
Respondent Ref. No. (if known)	<input type="text"/>
On behalf of (where relevant)	<input type="text"/>
Address Line 1	<input type="text" value="[REDACTED]"/>
Line 2	<input type="text" value="[REDACTED]"/>
Line 3	<input type="text" value="[REDACTED]"/>
Line 4	<input type="text" value="[REDACTED]"/>
Post Code	<input type="text" value="[REDACTED]"/>
Telephone Number	<input type="text"/>
E-mail Address	<input type="text" value="[REDACTED]"/>



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:

Crest Nicholson

3a. Does your comment relate to:

Main
Modification

Sustainability
Appraisal
Addendum

HRA
Addendum

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

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.

Please refer to the letter appended to this email.

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.

Please refer to the letter appended to this email.

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

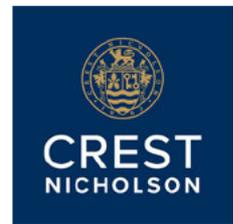
Signature:

Finlay McPherson

Date:

24/01/2022

Thank you for taking time to respond to this consultation



REF: Main Modifications to the Submission Draft Site Allocations Development Plan Document

Monday 24th January 2022

Sent by email to: PolicyConsultation@midsussex.gov.uk

Dear Sir or Madam

Response by Crest Nicholson to the consultation on the proposed Main Modification to the Submission Draft Site Allocations Development Plan Document.

1. These representations are submitted by Crest Nicholson in respect of land north of Old Wickham Lane, Haywards Heath.
2. Crest Nicholson is promoting the land north of Old Wickham Lane for circa 80 residential dwellings. The site (approximately 13 acres), if allocated, would create future housing in the town of Haywards Heath.
3. At the Inspector's request, Mid Sussex District Council is undertaking a consultation on the proposed Main Modifications to the Submission Draft Site Allocations Development Plan Document, which supports the strategic framework for development in Mid Sussex until 2031.
4. For the Site Allocations Development Plan to meet the tests of legal compliance and soundness, it will need to meet the following criteria. The Site Allocation Development Plan must be:
 - **Justified:** Is the Site Allocation Development Plan an appropriate development strategy, based on an appropriate, logical, and credible evidence base?
 - **Effective:** Can the Site Allocation Development Plan deliver what it sets out to do, and with the agreement of neighbouring authorities?
 - **Positively prepared:** Will the Site Allocation Development Plan meet the areas objectively assessed needs as a minimum, and show that homes, jobs, services, and infrastructure, can be sustainably delivered?
 - **Consistent with National Policy:** Does the Site Allocation Development Plan accord with the National Planning Policy Framework?
5. Crest Nicholson is not supportive of the emerging Site Allocation Development Plan in its current form and would draw the Council's attention to the following key matters that must be addressed or amended to ensure the Site Allocations Development Plan can be found sound. These matters are:
 - The Site Allocation Development Plan period to 2031, is not sufficient to meet the requirements of the NPPF so is not consistent with National Policy.
 - Further evidence on the delivery rates, constraints, and delivery assumptions should be provided to support the proposed strategy by the council.
 - The Site Allocation Development Plan does not have sufficient flexibility on its housing delivery should one or more of the proposed allocations fail to deliver, particularly the larger sites identified for housing delivery.
 - The Site Allocation Development Plan fails to recognise sufficient housing delivery at Haywards Heath, despite its extensive sustainable credentials.
 - The Council should update its evidence base in line to respond to these representations and undertake a review of the proposed allocations to ensure the current Local Plan strategy can be effective.

6. Mid Sussex District, including the agreed quantum of unmet housing need to be addressed within the district, aims to deliver at least 16,390 dwellings in the plan period between 2014 and 2031. Delivery will be at an average of 876 dwellings per annum (dpa) until 2023/24. Thereafter an average of 1,090 dpa will be delivered between 2024/25 and 2030/31.

7. The proposed spatial approach set out in the Site DPD is to direct a significant proportion of housing growth to Burgess Hill (612 new dwellings) and East Grinstead (772 new dwellings), both Tier 1 settlements. In delivering new homes and jobs, new development should be supported by necessary infrastructure, new developments should therefore be directed to the right places to capitalise on existing strategic and social infrastructure before committing to new infrastructure, which requires recourse and land use. This approach of utilising the services and infrastructure in place, is one of the most climate-friendly spatial development strategies, in terms of delivery of new infrastructure and making existing infrastructure more efficient. It is for these reasons that it is surprising that only strategic site allocation, of 25 units, is identified in Haywards Heath, a fellow Tier 1 settlement.

8. Haywards Heath should be central and imperative to the housing and job growth strategy for the district, given the location of the settlement on the strategic transport network and its existing facilities and amenities. For the reasons set out below, Haywards Heath, as a Tier 1 Town, should be given greater weight and a larger proportion of housing growth.
 - In the *District Plan Review: Sustainability Appraisal Scoping Report (November 2021)*, Haywards Heath area is identified to have 93% capacity of Secondary School provision, compared to the Burgess Hill planning area at 95 capacity and East Grinstead area at 99%. A new secondary school is to be developed as proposed in the Site DPD between Haywards Heath and Burgess Hill. Locating housing delivery, in proximity to school provision is a sustainable strategy.
 - Haywards Heath benefits from a railway station located within the centre of the settlement. The rail line is operated by Southern, Thameslink, and Gatwick Express, creating a link to London Victoria within 47 minutes. Other popular destinations on the rail line, include Brighton, Cambridge, and Eastbourne. The proximity to a railway station for residents is that they can travel to key destinations of work, education, and leisure without the need to travel by private car.
 - The Mid Sussex District commissioned *Retail Study Update (2016)* found that there is no District-wide capacity for new retail floorspace over the study period, as any expenditure growth will largely be taken up the Waitrose store permitted as part of the station redevelopment in Haywards Heath, the benefit of centrally located supermarket facilities (Waitrose, M&S and Sainsbury's) as well as increased retail floorspace as part of the station redevelopment allows people that live in Haywards Heath to have a lifestyle that is not dependent on the requirement to travel by car, by living in Haywards Heath, the distance is achievable by walking or cycling. Housing growth should be located in Haywards Heath rather than other settlements that do not benefit from such economic and social amenities.
 - The retail facilities, leisure facilities, Hospital (Princess Royal Hospital), offices, and industrial estates, all provide employment in proximity to existing and new suitable residential areas in Haywards Heath.
 - Where travel by car is required, Haywards Heath is linked to the rest of the district by the A272 and the A273, which connects Haywards Heath to Burgess Hill and Hassocks and meets the A23 to access Brighton.
 - Haywards Heath benefits from a leisure centre, offering a range of sporting activities with additional outdoor recreation facilities provided by the Town Council.
 - In addition to the Sites Allocations DPD policies relating to site allocation, the District Plan policies are complemented by additional strategic policies to help ensure that the Development Plan supports the delivery of sustainable development when considered as a whole. Policy SA37: *Burgess Hill/Haywards Heath Cycle Network* provides a policy for the Burgess Hill/Haywards Heath Multifunctional Network which supports the delivery of a programme of sustainable transport infrastructure improvements to support development, this will further improve the connectivity of Haywards Heath to the wider district, enabling people to travel more sustainably to get to key destinations.

- The edge of settlement location for growth offers access to the adjoining countryside, providing an expanse of green infrastructure for people to enjoy while exercising (walking running, cycling), dog walking, or taking a moment of rest from the urban environment, providing a benefit to community health and wellbeing. Access to green spaces in conjunction with safe and accessible routes and public transport options is inclusive to all parts of the community.
9. Additional housing growth at Haywards Heath should be welcomed as it will assist as a buffer if an existing identified draft allocation is undeliverable, or is faced with significant delays, which would create a housing shortfall of the plan period. The Site Allocations DPD is required to allocate sufficient housing sites to address the residual housing requirement for the district up to 2031, in accordance with the Spatial Strategy set out in the District Plan. To respond positively to the eventuality of a shortfall in housing numbers, growth should be identified as Haywards Heath given the list of reasons presented above.
10. Crest Nicholson believes the plan should recognise the importance of providing sufficient affordable housing at Haywards Heath, for the sustainable credentials listed earlier in this letter. The affordability of housing at Haywards Heath is a key issue, particularly for younger people and others who work in the area on lower incomes. The need for a greater focus on affordability tenure type and mix of housing to be delivered in Mid Sussex is an impact aspect of delivering sustainable communities. The housing stock is the most appropriate indicator of housing supply and housing need. Where past housing delivery has not met housing needs, this results in suppressed household formation in younger age cohorts and an imbalance between housing supply and housing demand. In turn, this has influenced the increasing gap between average incomes and average house prices. If we draw upon the evidence from the Office for National Statistics, the median affordability ratio for Mid Sussex District currently stands at 12.6, based on 2021 data. There is pressure on the affordability of housing in Mid Sussex and there should be an objective to stimulate the provision of “affordable” market housing, by increasing supply in places where people want to live, such as Haywards Heath, to bring the aspiration of homeownership back within the reach of the local people. It is important the solutions for addressing the affordability gap are addressed at the earliest stages of policy-making and site assessments for allocations.