

Dear sir

Please find my comments as invited on the MSDC website to document (MS-12)

1. I agree that it is prudent to re-examine sites that have previously been discounted as a result of the “showstopper” constraints as set out in point 4 of the MS-12 document. This is especially important for sites that are within or adjacent to a Conservation Area. There are potential sites within the village of Staplefield which had a Conservation Area allocated in the late 1980’s yet MSDC has not yet defined the character or what is actually worth conserving. This conservation area is preventing this sustainable village from being able to meet its identified housing needs or support its numerous services with controlled sustainable additional houses.
2. I agree with point 7 that sites that were previously discounted at Stage 2(a) should be reviewed to enable MSDC to accurately match housing growth to known needs in a sustainable location and not be constricted by out of date Neighbourhood plans or site allocations fixed upon false parameters such as BUAB which is not a marker of sustainability. Staplefield for example is a very sustainable village with 2 churches, 2 schools, 2 pubs, a shop, library, village hall, regular bus service, sports facilities yet does not have a BUAB which prevents it from ever meeting its own housing needs. The lack of a BUAB also relegates this sustainable village from demonstrating its true place in the settlement hierarchy. Many of the Neighbourhood plans have been in place for more than 10 years without review or amendment which makes them an impedance to sustainability not a benefit. It is worthy of note that the NPPF does not include the presence of a BUAB to denote sustainability but the provision of & proximity to services and facilities both in the location and shared with adjacent villages.
3. With regards to point 8, I would ask that MSDC review all sites within or adjacent to villages with recognised services not just those previously rejected at Stage 2(b). The settlement hierarchy does not yet match the level of services and sustainability of settlements with some villages being stifled and their services not being supported through the lack of any controlled sustainable development to meet known and recorded needs. MSDC have collected data on service provision in SETTLEMENT SUSTAINABILITY REVIEW ADDENDUM 22 JULY 2015, which forms part of the MSDC evidence base, yet this has not fed into the process with some sites that are located in an excellent sustainable location being dropped in favour of sites with no or only limited access to services and facilities. If MSDC have the data on services and facilities in place this should be key to any future site selection process rather than pinning hope on developers upgrading and building new services to make their unsustainable location pass the MSDC selection process.

4. It is vital that MSDC review sites to ensure benefits are considered not just reasons to prevent much needed new homes. In previous MSDC site assessments sites were dismissed prior to any consideration of potential benefits.
5. MSDC settlement hierarchy has not been reviewed to reflect the changes to working patterns such as increased home working and the progress within sustainable transport such as e bikes, electric cars etc even though this information is available through the ONS etc. This is most odd when MSDC have recognised that some smaller villages, Staplefield included, have a good level of self-containment in travel to work terms within MSDC Settlement Sustainability Review May 2015 and its addendum paragraph 3.25 which forms part of the MSDC evidence base.
6. With regards to point 9, I do not believe MSDC has reviewed its settlement hierarchy and has relied on the single point of a BUAB to determine sustainability of smaller villages. As I have previously noted the village of Staplefield does not have a BUAB allocated but is rich in a choice of services that match much larger settlements. The current settlement hierarchy actually prevents the village of Staplefield from being able to play its part in a sustainable future.
7. With regards to point 9 the current MSDC settlement hierarchy and spatial strategy has focused only on the towns and largest of villages in the district and ignored the place smaller villages have in this district this is picked up in the following point: *“the need for thriving centres that deliver a range of services and facilities to meet needs, provision of and support for existing/new services and facilities”* and it would be very beneficial to enable a selection of smaller sites within smaller villages to enable them to thrive going forwards and not be reliant on just the large towns for our services and facilities, dooming smaller villages to a slow death.
8. With regards to point 10, I support this approach and have not yet seen how MSDC has considered unmet need within its current approach. This should go beyond a district wide approach to a more granular level to enable people to have a new home within the community they grew up in or have links to. With development only being focused on large sites this is not possible and will impact the quality of life for those wishing to remain within their community but not being able to through a lack of suitable housing being available. We have in increasing population but have not matched this to the number of new homes being built.
9. I support point 11 and would ask that a wider mix of sites be allocated, the reliance on large sites has hindered MSDC in being able to meet its housing targets for some years. It is a know fact smaller sites can be delivered in a much more controlled timeframe.

Thank you for taking time to consult on this vital process and please contact me if you require any further information or if I can be of any assistance in the ongoing process.

Regards

Elliott Fielding