



Mid Sussex District Plan 2021-2039

**Consultation Statement (Regulation 22)
Appendix 2 – Schedule 2: Summary of main
issues raised during the Regulation 19
consultation and the Council’s response**

July 2024

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District Plan

Chapter: Intro Chapters 1 - 7

Number of Comments Received

Total: 215

Sound: 3

Unsound: 212

Key Issues Raised

Regulation 19 Proposed Site Promoter:

Antler Homes (1190705)

- Plan period should be extended by at least one more year.

Taylor Wimpey UK Ltd (1190898)

- Plan should cover the period to 2041.
- Anticipated date of adoption (Autumn 2024) is not realistic.

Statutory stakeholder:

Network Rail (1190753)

- The policies within the plan should reflect the aspirations of Network Rail and the wider rail industry.
- Impact of new development should be assessed and mitigated – this needs to be reflected in the policies.
- There is scope for improvements at BH station – improve connections through active and sustainable modes of travel.

Natural England (1196374)

- The vision is undermined by the inclusion of "where possible" - making it inconsistent with national policy, p. 7-11.
- A clearer articulation could be made within the objectives in relation to the protection and enhancement of the natural environment.
- Objective 4 and the District Plan Strategy might not meet the test of soundness as they are not consistent with p. 35d and 182 of the NPPF.

Sport England (1189870)

- The Council's evidence base should include an up to date Playing Pitch Strategy (PPS) and also an Indoor Sports Facility strategy as required by paragraph 102 of the NPPF.
- The existing PPS is not referred to in the Plan and it is out of date.

Town/ Parish Councils:

Balcombe Parish Council (1190447)

- Housing growth is not the only way to support village services and facilities. Active support and initiatives are needed, especially in areas where growth is constrained due to AONB.
- Support removal of sites in AONB.
- Pleased to rely on the neighbourhood plan for bringing forward appropriate development.

Lindfield Rural Parish Council (1190732)

- The Council should be promoting active travel networks in support of the 20-minute neighbourhood concept.

Bolney Parish Council (1189073)

- The strategy is contradictory, promoting 20-minute neighbourhoods while no longer focusing growth at the largest urban centres where 20-minute neighbourhoods would be achievable.
- Development in Bolney has not been tested against reasonable alternatives and the village is not a sustainable location for development.

Wivelsfield Parish Council (1191188)

- There should be greater emphasis on regeneration of town centres and brownfield land. Burgess Hill town centre is in decline and the Council should be lead promoter of mixed-use redevelopment.

Worth Parish Council (1190873)

- There should be a district-wide strategy to consider health and education provision, and all allocations should be coordinated to ensure cumulative impacts are properly mitigated through timely infrastructure provision.
- MSDC should continue to lobby government regarding the standard method for calculating the district's housing requirement.

Hurstpierpoint and Sayers Common Parish Council (1191151)

- Site Selection Methodology (October 2023) indicates there are sites in and around EG and HH that could be allocated to balance the distribution of housing.
- Level of housing growth supported and allocated in and around settlements within AONB locations within the Submission Draft Plan is insufficient - Its fails to reflect the NPPG and HWMP
- Housing requirement should not have been calculated using the standard method, as there is justification for an alternative approach. Exceeding local need will result in developers slowing down, constricting supply. (1191144)
- The strategy recognises the importance of making effective use of land but then fails to take up opportunities for brownfield development. MSDC should be proactive in finding sites in EG, HH and BH that are council-owned or require land assembly and prioritise these over greenfield allocations. (1191149)
- Insufficient evidence to show that the strategy of making settlements more sustainable through development is achievable. No programme of planned infrastructure delivery. (1191152)

Local Authorities:

Crawley Borough Council (1189681)

- Unclear why the Plan is dated back to 2021.
- Part of the Plan could be improved by including reference to the Gatwick Diamond, as another long-established strategic planning area of cross boundary relevance.
- Crawley does not form part of the Sussex Coast HMA and FEMA. Reference to Crawley should be removed.
- Page 14 – add reference to the need to protect the Amberley Wild Brooks Site of Special Scientific Interest (SSSI), Pulborough Brooks SSSI and Arun Valley Special Protection Area/Special Area of Conservation and Ramsar site and the challenge of reducing net greenhouse gas emissions within the district to zero.
- 20-minute neighbourhood: CBC recommends that clear recognition is also given to the overarching imperative to limit the need to travel, before different options for mobility are considered.
- Page 20: What engagement has there been with existing residents on east side of Crawley?

- How will existing infrastructure in Crawley be enhanced through settlement extensions to its east and how integration into the Crawley neighbourhoods will take place.
- 'Environment' Objectives should include recognition of the need to mitigate (as well as adapt to) climate change and support the transition to a net zero economy through the planning process.

Other consultee bodies:

Home Builders Federation (1190702)

- Concerns with the plan period proposed.

CPRE (Sussex) (1189028)

- Some policy provisions compromise the vision and objectives of the Plan and therefore undermine the Plan's soundness.

Other comments:

- Volunteers have invested heavily in improving habitats and biodiversity over two decades, with very positive results. Proposed development around Sayers Common will destroy these special habitats.
- No mention of the need to develop and densify the centre of BH and HH
- The Council has misunderstood the concept of a 20-minute neighbourhood and provided no evidence or specific policies for how these principles will be achieved in rural areas. Reliance on the TCPA 20-minute neighbourhood principles is not acceptable – there should be local guidance and policy on how these principles will be applied and enforced.
- Evidence base should be renewed and constantly reviewed.
- Evidence must be put forward to explain how the evidence base as a whole has been reviewed, and how it remains relevant to the current strategic framework.
- Spatial strategy and associated housing allocations are disproportionate to the size of existing settlements and are not supported by sufficient evidence.
- Constraints preventing further growth at largest settlements have not been made clear, and impacts could be mitigated to allow more growth.
- Failing to maximise 20-minute neighbourhood principles as insufficient allocations at Hassocks and Lindfield.
- Supports the Strategy in avoiding significant development in AONB.
- Development should be distributed more evenly around the district, including more allocations in the AONB.
- Support vision and the strategy in making effective use of land.
- Strategy should follow Settlement Hierarchy – no justification for focusing so much development away from the settlements that are already the most sustainable.
- Insufficient due diligence in relation to the viability and deliverability of sites.
- Site Selection Methodology: Evidence based approach taken has missed the opportunity to assess potential allocation sites against the Council's 15 Strategic Objectives.
- Not enough regard to NP policies.
- Needs to be an assessment of roads to reduce congestion on A264.
- Water supply needs to be considered.
- Lack of engagement with the local communities
- There should be a district-wide strategy for health and education provision, and housing delivery should be coordinated to ensure cumulative impacts are mitigated.
- Housing development is not the only way to support local services. Other initiatives should be explored.

- The strategy should focus more on brownfield land and urban regeneration.
- The plan is not meeting local needs, only facilitating influx of people from elsewhere.
- SHMA 2021 calculations don't recognise the runway expansion at Gatwick.
- Growth at Gatwick airport would necessitate an uplift in housing numbers at MSDC above the minimum standard methodology requirements.
- The site allocations don't align with the strategy, with some allocations proposed in locations that are neither sustainable now nor capable of being made sustainable through development.
- Lack of financial planning to justify strategy or show it is deliverable.
- Uneven distribution of development in locations identified as having potential for growth, with some villages taking a disproportionate amount of development and others none at all.
- Insufficient evidence to show how growth capacity of settlements has been assessed. The Sustainability Appraisal lacks full assessment of reasonable alternatives.
- The plan period is not long enough, should be extended by at least a year to be NPPF compliant.
- Over-reliance on windfall development.
- Spatial strategy is developer-led based on what sites put forward, rather than community-led, resulting in unsustainable pattern of development.
- Support for approach of moving away from rigid settlement hierarchy and allowing more flexible growth options at settlements that can be made more sustainable through infrastructure investment.
- Site allocations at Ansty conflict with the plan's strategy, as the village is not sustainable now and will not be made more sustainable through development.
- There is too little housing proposed on small sites under one hectare, contrary to the NPPF.
- Plan lacks a map of important wildlife sites and ecological networks in the district, and makes no reference to the hierarchy of international, national, and locally designated sites as required by the NPPF.
- The plan makes too little provision for custom and self-build housing, given the evidence of demand.

Officer summary response:

- Plan period starts at 2021 to reflect the start of Plan review process and updating of the evidence base.
- Wording amended on page 10 to local authorities involved in Sussex Coast HMA and FEMA.
- The Plan should be read as a whole and different policies will be weighed up in the planning balance.
- The strategy set out in the Plan has been shaped by a number of factors including environmental constraints, infrastructure constraints, existing committed development and location of deliverable/ sustainable sites for potential allocation.
- Evidence supporting the selection of the proposed housing allocations is contained in evidence base, including Strategic Housing and Economic Land Availability Assessment (2023), Site Selection Paper and Sustainability Appraisal.
- The Strategic Housing Market Assessment (2021) considers potential circumstances for increasing housing requirement beyond standard method; concluding that there are no circumstances to indicate a higher housing need should be planned for.
- A full plan Viability Study has been undertaken to test the policy requirements within the Plan are deliverable.

- Only reasonable alternatives are assessed within the Sustainability Appraisal. The process to identify them is set out within the report (from section 6) and within the Site selection methodology.
- Explanation of how the Council sought to consult with local communities in/ out of district is set out in the Community Involvement Plan and Consultation Statement (Regulation 22).

District Plan		
Chapter: Chapter 8: Sustainability		
Number of Comments Received		
Total: 3	Sound: 0	Unsound: 3
Key Issues Raised		
Other comments: <ul style="list-style-type: none"> • Environmental impact is not sound • Extensive evidence of massive decline in wildlife/biodiversity. Plan does not align with Government's commitments to reduce carbon emission by 2030 		

District Plan		
Chapter 8: Sustainability	Policy: DPS1: Climate Change	
Number of Comments Received		
Total: 14	Sound: 7	Unsound: 7
Key Issues Raised		
Regulation 19 Proposed Site Promoter: Thakeham Homes (1191281) <ul style="list-style-type: none"> • Wholly support the requirements of DPS1. 		
Wates Developments (1191812) <ul style="list-style-type: none"> • Support in principle but amend criterion 5 to be consistent with DPN4. How will the 'soils' wording be effective as how will know what soil is used by a tree, woodland or hedgerow. Could define area by linking it to the root protection area or canopy? 		
Antler Homes (1190705 and 1190724) <ul style="list-style-type: none"> • Support policy in principle – proposed amendment to criterion 5. 		
Statutory stakeholders: Environment Agency (1189771) <ul style="list-style-type: none"> • Statutory duty on LPAs to include policies in Local Plans to tackle climate change – support the policy. 		
Natural England (1196374) <ul style="list-style-type: none"> • Support policy and welcome the inclusion of nature-based solutions to help mitigate the impacts of climate change. • Consider this policy meets the NPPF tests of soundness 		
Local Authorities: Crawley Borough Council (1189681) <ul style="list-style-type: none"> • Support policy. 		
Other consultee bodies: CPRE (Sussex) (1189028) <ul style="list-style-type: none"> • Welcome the existence of this overarching strategic policy on climate change but the targets are insufficiently ambitious, the monitoring framework unclear and the delivery of the policy is dependent on other policies in the Plan, some of which are weak. • The carbon reduction targets in the supporting text should, as a minimum, be consistent with the five-yearly Carbon Budgets set out by the Climate Change 		

Committee. Set out how securing greenhouse gas reductions will be measured and reported.

- Provide guidance on how applicants will be expected to meet criteria 4 and 6 and how the Council will assess this.
- Add reference to new hedgerows in criterion 5.

Sussex Wildlife Trust (1190866)

- Pleased to see reference to LNRS.

Other comments:

- Aim for maximum prevention of carbon and other greenhouse gas emissions. Actions that lead to combustion of fossil fuels must be eliminated from the adopted policies. Policies and actions must mitigate the impacts of climate change including increased rainfall, droughts (secure water supplies) and excessive summer heating.
- Support in principle but policy requirements need to be justified by robust evidence and drafted with reference to Building Regulations and emerging Future Homes Standard which offer most appropriate mechanism to deliver low carbon and energy efficient developments.
- Support policy – aspirational approach to climate change that is supported.
- Support policy and welcome recognition that smaller, individual actions to mitigate climate change can cumulatively lead to effective, positive change, which reflects that the opportunities to tackle climate change may vary depending on the type of development – support this proportionate approach.
- New dwellings with car parking should include EV charging points to future-proof housing developments.

Officer Summary Response

- Welcome support for policy.
- The Council is preparing further information and guidance on criteria 4 and 6.
- A proposed modification will add hedgerows to criterion 5. However, other suggested amendments to this criterion would weaken this policy and there is a need to read the Plan as a whole.
- Further guidance will be added to the supporting text of DPN4 regarding trees and their soils.
- EV charging points are addressed in Policy DPT4: Parking and Electric Vehicle Charging Infrastructure.
- Policy DPS2: Sustainable Design and Construction sets out requirements for new development.

District Plan

Chapter 8: Sustainability

Policy: DPS2: Sustainable Design and Construction

Number of Comments Received

Total: 28

Sound: 3

Unsound: 25

Key Issues Raised

Statutory stakeholders:

Natural England (1196374)

- Welcome inclusion of numerical value for water consumption rates for new build residential along with stating measures available to achieve this.

Environment Agency (1189771)

- Support approach to water reduction rates – evidence available to support this as Mid Sussex is a water stressed location.

NHS Property Services Ltd (1190817)

- The NHS requires all new development projects to be net zero carbon, and NHSPS fully support policies that promote carbon neutral development. In considering the implementation of policies related to net zero, we would highlight that NHS property could benefit from carbon offset funds collected where on-site carbon mitigation requirements cannot be met. This would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.

Town/ Parish Councils:

Balcombe Parish Council (1190447)

- Would like to see a requirement for onsite renewable energy applied. This remains aspirational in the plan.

Local Authorities:

Crawley Borough Council (1189681)

- Support the introduction of ambitious but achievable standards, recognising the importance of retaining embodied carbon alongside the need to minimise operational emissions and energy consumption in new builds.

Surrey County Council (1190861)

- A requirement for SuDS should be included in this policy.

Other consultee bodies:

CPRE (Sussex) (1189028)

- Strongly welcome net zero requirement and fabric first approach however HQM 3* is not ambitious enough.
- Policy should be explicit to mandate roof-mounted PV on all new builds.
- Householder requirements should be stronger and more explicit and supported by guidance and policy with specific standards.

Homes Builder Federation (1190702)

- Inconsistent with national policy
- Future Homes Standard (FHS)/ Building Regulations (BR) offers single approach that developers all understand and will achieve same goal of reducing carbon emissions.
- Proposed policy requires a different approach, not supported by Government – WMS2023.
- Should be based on % uplift to dwellings target emission rate (TER) assessed using SAP.
- The council has not undertaken a robust assessment as to the impact of this policy on the viability of development.
- Policy recs not fully costed – costs council are using are lower % uplift in cost than Future Homes Hub (FHH) 'Ready for Zero' report, tested against BR 2021.
- DPS2 higher standard than FHS and not proposed to be phased in – there has been no assessment on the impact against commencement and delivery rates.

Other comments:

- Tripple glazing and alternative energy supplies (heat pumps/ hydrogen) should be mandatory.
- Policy unsound/ unjustified - revert to Building Regs (BR) in line with WMS23.
- Water standards go beyond BR and could impact viability and delivery.
- Water Cycle study only supports 110 l/p/d not 85.
- Policy should include requirements should include Electric Vehicle charging points for all new dwellings.
- Reference to the Design SPD should include: '....or a superseding document produced by MSDC'.
- Water requirement places significant burden on development industry – evidence supports 110l/p/d – issues around abstraction in the Sussex North Water Supply Zone on Arun Valley protected sites is Southern Water’s responsibility.
- Welcome amendments to policy since Regulation 18 – clarifying minimum threshold for where BREEAM applies and BR for smaller schemes.
- Flexibility is requested for ‘non-standard’ forms of development – e.g. historic environment.
- Welcome retention of existing buildings – encourage new wording retrofit and refurbishment to target net zero carbon in operation.
- Householder requirements should be linked to whether they will receive planning permission.
- Requirements are too generic and should be more specific – currently too subjective.
- Net zero and water consumption standards inconsistent with national policy and WMS Dec 2023.
- No need for additional standards – plan should acknowledge implications of transitional period with Future Homes Standard and need for flexibility – revert to Building Regs for energy and water.
- Higher standards for water beyond Building Regulations is unjustified.
- Policy is detailed and clear about necessary requirements and requirement for a proportionate Sustainability Statement is supported.
- Viability evidence not clear.
- Policy should be phased/ stepped introduction in line with BR to allow industry to adjust.
- Policy proposes alternative method for calculating unregulated carbon emissions which will be a major challenge for developers.
- No evidence of unregulated emission calculations - regarded as inconsistent and inaccurate by the industry.
- Requirement will dramatically increase in the need for on-site renewables beyond the area available for roof mounted Photovoltaics particularly on townhouses and flats.
- Training and support will be needed for developers and the planning team to understand the policy and assess whether house types are capable of achieving the requirements.
- Support net zero for regulated energy, which takes into account the trajectory of grid decarbonisation by 2050.
- Revert to Building regulations in terms of energy efficiency standards and water consumption to 110 l/p/day but encourage endeavours to meet 85 l/p/day.

Officer summary response

- The Net Zero evidence base set out the justification for the Council’s position and policy approach, demonstrating it is sound, feasible and what the viability implications are, and the strategic Viability Study and subsequent Viability Notes demonstrate the policies requirements are viable. Should the Inspector find the

policy to be unsound, Main Modifications are recommended which brings the policy more in line with the 2023 Written Ministerial Statement.

- DPS4: Flood Risk and Sustainable Drainage sets out support for incorporation of SuDS.
- Support from the Environment Agency regarding maximum water consumption standard of 85 litres per person per day.

District Plan

Chapter 8: Sustainability

Policy: DPS3: Renewable and Low Carbon Energy Schemes

Number of Comments Received

Total: 7

Sound: 0

Unsound: 7

Key Issues Raised

Statutory stakeholders:

Environment Agency (1189771)

- NPPF paragraph references need updating.

Natural England (1196374)

- Recommend adding wording at p.55 - *'providing they are in conformity with this policy and other policies in the District Plan'*.

Town/ Parish Councils:

Twineham Parish Council (1186086)

- Inclusion of wording regarding cumulative impacts is noted.
- Concern regarding fire risk with battery storage.
- West Sussex Fire and Rescue indicated battery storage should not be near residential properties.

Other consultee bodies:

CPRE (Sussex) (1189028)

- All suitable new and repurposed commercial and residential roof tops should be required to have solar panels.
- The Plan should set, monitor and report on defined increased levels of five yearly targets for roof-top solar.

Gatwick Airport Limited (1190687)

- Policy should include cross reference to safeguarding in the policy wording at criteria 5 and 9.

Other comments:

- Welcome and recognise need for sympathetic siting in sensitive environs but seek some acknowledgement of and guidance around the interaction of the requirements of this Policy DPS3 with others in the Plan – e.g. DPT4
- Solar and other climate change technologies are strongly supported by Government and Historic England and form a material consideration in the determination of applications.

Officer Summary Response

- The plan should be read as a whole, and appropriate weighting applied to relevant policies through the planning application process.

- Modifications recommended regarding guidance on roof top solar array.

District Plan

Chapter 8: Sustainability

Policy: DPS4: Flood Risk and Drainage

Number of Comments Received

Total: 13

Sound: 3

Unsound: 10

Key Issues Raised

Statutory stakeholders:

Environment Agency (1189771)

- Support amendments introduced since the Regulation 18 Consultation

Natural England (1196374)

- Reference to the use of natural flood management solutions and Principle DG5: Water feature and sustainable drainage of the Mid Sussex Design Guide would strengthen the policy.

Southern Water (1187350)

- Support amendments introduced since the Regulation 18 Consultation
- Addition of reference to the combined sewer network would increase the potential effectiveness of this policy in reducing flood risk and encouraging environmentally sustainable surface water drainage solutions as preventing surface water from entering foul and combined sewers during heavy rainfall is the most sustainable and cost-effective way to reduce storm overflows.

Thames Water (1191165)

- Support the proposed policy and the proposed discharge rate.
- Flooding from sewers should be specifically referenced within the policy and an acceptance that flooding can occur away from the flood plain as a result of development where off-site sewerage infrastructure and capacity is not in place ahead of development.
- When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. Flood risk sustainability objectives should accept that water and sewerage infrastructure development may be necessary in flood risk areas.
- Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance. SuDS can play an important role in this process.

Town/Parish Councils:

Hassocks Parish Council (1188771) – Hurstpierpoint and Sayers Common Parish Council (1191158)

- The Council's Strategic Flood Risk Assessment (SFRA) is outdated and should be updated

Other consultee bodies:

Sussex Wildlife Trust (1190866)

- Support for natural flood management options would be welcome.

Gatwick Airport Limited (1190687)

- The policy should include cross-referencing with policy DPB4

Other Comments:

- Support the policy
- Heavier and longer periods of rainfall will exacerbate the risk of flooding on land adjacent to water courses or near-surface groundwater. Existing brownfield sites, where flood management and drainage systems are more likely to be already in place, should be given preference over farmland or other countryside areas for new building development.
- The Council and developers have failed to take measures to deal adequately with heavy rain which, although not causing flooding of buildings, leaves gardens waterlogged and unusable in winter despite the required inclusion of water holding areas.

Officer summary response

- The Council is in the process of updating the published Strategic Flood Risk Assessment (SFRA). It will be submitted alongside the District Plan.
- References to elements repeating National Policy or other policies within the Plan are considered unnecessary. The Plan should be read as a whole and alongside national policy. They will be applied to all relevant proposals.

District Plan

Chapter 8: Sustainability

Policy: DPS5: Water Neutrality

Number of Comments Received

Total: 9

Sound: 5

Unsound: 4

Key Issues Raised

Regulation 19 Proposed Site Promoter:

Elivia Homes (1188304)

- Consider policy unsound as it is not consistent with national policy and is unjustified. The policy places a significant burden on the development industry to provide and fund solutions to the impact of ground water abstraction in the Sussex North Water Supply Zone on the Arun Valley protected sites. Water providers have a duty to provide water to serve their area's needs and we therefore consider that it is Southern Water's responsibility to secure the necessary solutions.

Statutory stakeholders:

Environment Agency (1189771)

- Support policy.

Natural England (1196374)

- Natural England is satisfied that Policy DPS5 is sufficient to rule out an adverse effect on the integrity (AEOI) of Arun Valley Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site, in line with the conclusion drawn in the accompanying Habitats Regulations Assessment (November 2023).
- We consider that this policy meets the NPPF tests of soundness.

Southern Water (1188508)

- Support policy as it accurately sets out the requirements developers need to meet to achieve water neutrality, in accordance with studies undertaken by relevant stakeholders.
- Request updates to the supporting text in relation to Southern Water's provision in the Sussex North WRZ.

Local Authorities:

Crawley Borough Council (1189681)

- Strongly supportive of DPS5 and consider it necessary to the soundness of the Plan.
- The ultimate form of the policy should be informed by the findings of the Crawley Local Plan – additional text has been suggested during the Main Modifications stage.
- The objective is for a joint policy approach to water neutrality.

Horsham District Council (1190711)

- Strongly support this policy which closely reflects a joint policy approach agreed by the local authorities and SDNPA affected by the Arun Valley sites. Factual update required.

Other consultee bodies:**Home Builders Federation (1190702)**

- Consider policy unsound as it is not consistent with national policy and is unjustified. Consider it is the role of the water company to find solutions as they have a responsibility to plan for and provide a sufficient supply of water.

Other comments:

- Difficult to see how an individual developer can ensure there is no net increase in mains supply water within the WRZ compared to pre-development levels.

Officer Summary Response

- Welcome support for policy.
- There is a HRA requirement for water neutrality.
- Policy DPS5 is a joint policy approach to water neutrality for all the affected local authorities. The policy wording and supporting text is consistent for all the affected local authorities.
- Proposed modifications have been made for this policy to reflect the latest version of the joint policy approach.

District Plan**Chapter 8: Sustainability****Policy: DPS6: Health and Wellbeing****Number of Comments Received****Total: 14****Sound: 4****Unsound: 10****Key Issues Raised****Regulation 19 Proposed Site Promoter:****Antler Homes (1190705 and 1190724)**

- Acknowledge value of understanding the health outcomes of development.
- Proposed allocations that accord with the Plan need not undertake a separate HIA as it is likely to meet the health outcomes of the Plan.

Thakeham Homes (1191281)

- Supportive of the Council's commitment towards enabling and supporting healthy lifestyles.

Statutory stakeholders:**NHS Property Services Ltd (1190817)**

- NHSPS welcomes and supports the inclusion of policies that support healthy lifestyles, and the requirement for Health Impact Assessment on major residential developments of 10 units or more. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.

Natural England (1196374)

- Reference should be made to NE's GI Framework and GI Standard for England given the contribution nature and accessible greenspace can make to health and wellbeing. Links to NPPF paragraph 96c)

Local Authorities:

Crawley Borough Council (1189681)

- CBC supports the requirement for major residential and commercial developments to provide Health Impact Assessments, in particular with regard to Crabbet Park. The Crawley Borough Local Plan 2023-2040 includes Policy SD2 which sets out the approach towards ensuring healthy lifestyles and wellbeing within Crawley borough, including the need for Health Impact Assessment

Other consultee bodies:

CPRE (Sussex) (1189028)

- Criterion 8 should be extended to provide space for community members to exercise.

Home Builders Federation (1190702)

- A whole plan HIA should be undertaken and if development accords with policies in the Plan, then it does not need to do a separate HIA. Larger unallocated sites may need a HIA.

Other comments:

- Concern that loss of countryside will have detrimental effects on the physical and mental wellbeing of the local population.
- The policy makes no reference to provision of health services. Should there be a link to the provision of school places?
- Consider policy is ineffective and not positively prepared. HIA requirements should be proportionate. Health impacts of the Plan should have been assessed.
- Welcome commitment to health and wellbeing – increasing specialist older persons' housing is wholly aligned with this objective. Concern with threshold for HIA and some questions are not relevant for smaller schemes. Limited benefit of HIA on small and medium sized sites – amend threshold.
- Agree that HIA is essential part of planning process, but this should be undertaken at a district-wide scale not an individual development scale, and then future developments should accord with the district-wide assessment.

Officer summary response

- Welcome support for policy.
- Include a reference to the Natural England GI Framework and GI Standard for England in the supporting text.
- A proposed modification is suggested for criterion 8.

- Health and wellbeing have been considered as part of the District Plan strategy. The principles of a 20-minute neighbourhood and local living have the potential to significantly improve health and wellbeing. These principles are reflected in the Sustainable Communities policies and other policies in the Plan.
- Health and wellbeing have also been considered through the Sustainability Appraisal process as many of the objectives link to health and there is also a specific objective for health and wellbeing (To maintain and improve access to health, leisure, open space facilities and reduce inequalities in health).
- No proposed modifications in relation to HIA threshold. Further information on the application of HIA will be published on the Council's website.

District Plan		
Chapter 9 : Natural Environment & Green Infrastructure		
Number of Comments Received		
Total: 4	Sound: 0	Unsound: 4
Key Issues Raised		
<p>Other comments:</p> <ul style="list-style-type: none"> • The Plan does not have a biodiversity protection plan. • The Plan does not include a specific policy to protect Worth Forest. • The state of nature report is clear that biodiversity is declining. 		
<p>Officer summary response</p> <ul style="list-style-type: none"> • Policies DPN1, DPN2 and DPN4 seek to protect biodiversity and encourage nature recovery. • As an area of ancient woodland and within the High Weald AONB, Worth Forest is included within the scope of Policies DPN1, DPN4 and DPC4. 		

District Plan		
Chapter 9: Natural Environment and Green Infrastructure	Policy: DPN1: Biodiversity, Geodiversity and Nature Recovery	
Number of Comments Received		
Total: 12	Sound: 5	Unsound: 7
Key Issues Raised		
<p>Regulation 19 Proposed Site Promoter: Thakeham Homes (1191281)</p> <ul style="list-style-type: none"> • Support the policy. • Include a requirement for installing on average one swift brick per house as per the British Standard. <p>Wates Developments (1191806)</p> <ul style="list-style-type: none"> • Impracticable to protect all biodiversity and geodiversity on greenfield. • Suggested amendments to caveat policy. • Buffer should be reduced to 8m. • Review wording in relation to LNRS priority areas. 		
<p>Statutory stakeholders: Environment Agency (1189771)</p> <ul style="list-style-type: none"> • Pleased that comments from the Regulation 18 consultation have been incorporated. <p>Natural England (1196374)</p> <ul style="list-style-type: none"> • Pleased to see advice and recommendations have been included in the policy. • Include a reference to protected species. • Support the policy wording for soils including BMV agricultural land. • Recommend additional wording to clarify what will be expected from development proposals in cases where development of BMV agricultural land cannot be avoided. • Support wording for nature recovery but suggest a proposed modification. 		
Other consultee bodies:		

CPRE (Sussex) (1189028)

- Support the policy and echo the comments made by the Sussex Wildlife Trust.

Sussex Wildlife Trust (1190866)

- Support the policy and its consistency with the NPPF and Environment Act.

Other comments:

- Shouldn't include plans that lead to biodiversity decline.
- Protected species are at risk from several proposed allocations.
- Support the aims and objectives of the policy including the need for long-term management for biodiversity features on developments.
- Swift bricks should be mandatory in taller apartment blocks.
- Provide further standards for swift bricks.
- Specify requirements for integrated swift bricks and other biodiversity enhancements.
- Coastal grazing marsh doesn't exist in Mid Sussex.
- Query the mitigation hierarchy wording as this lets developers harm biodiversity.

Officer summary response

- Welcome support for policy.
- Although Mid Sussex District does not have a coastline, the priority habitat name is Coastal & Floodplain Grazing Marsh, and this priority habitat is present in Mid Sussex District.
- Proposed modifications to address Natural England's comments.
- In relation to the BMV agricultural land suggested amendment, similar wording is within DPC1 and the Plan needs to be read as a whole.
- The mitigation hierarchy is set out in the NPPF paragraph 186 a).
- Proposed modifications in relation to swift bricks and other biodiversity enhancements.
- The Plan should be read as a whole and different policies will be weighed up in the planning balance. No proposed modifications in relation to caveating protecting biodiversity as this may weaken the policy and result in harm to biodiversity.

District Plan**Chapter 9: Natural Environment and Green Infrastructure****Policy: DPN2: Biodiversity Net Gain****Number of Comments Received****Total: 24****Sound: 7****Unsound: 17****Key Issues Raised****Regulation 19 Proposed Site Promoter:****Thakeham Homes (1191281)**

- Support policy and support 20% BNG on Significant Sites.

Antler Homes (1190705)

- May be more helpful to just refer to BNG hierarchy for location of BNG. Otherwise need to reference statutory credits as a last resort.

Welbeck Strategic Land (1190890)

- Welcome the inclusion of this policy in line with legislation – DPSC5 would seek to maximise BNG.

Wates Developments (1191809)

- Updated PPG and 20% BNG, but subject to viability testing, support the Council's aspirations for 20% BNG. Suggested amended wording.

Peacock 5 Ltd (1190878)

- Agree given the location and typography of the site that careful design and massing consideration as part of any design code will be required to successfully complement the transition of the site, to be included with a new amended Built Up Area Boundary, with the external countryside area outside the Built Up Area Boundary.

Berkeley Latimer (1190760 and 1190841)

- Fully committed to maximising as far as possible delivery of BNG.
- Raise concern over justification for 20% BNG for Significant Sites. Suggested amended wording.
- Concerns about deliverability on DPSC3 as a greenfield site which has a higher biodiversity baseline.
- Masterplan needed before certainty over BNG delivery.

Statutory stakeholders:

Natural England (1196374)

- Suggested amended wording re inclusion of BNG aligning with LNRS.

Town/ Parish Councils:

Balcombe Parish Council (1190447)

- BNG should be provided in close proximity to development and preferably on-site.
- Housing figures should be adjusted to take on-site BNG delivery into account.

Local Authorities:

Crawley Borough Council (1189681)

- Support the requirement for 20% BNG on Significant Sites.

Other consultee bodies:

Sussex Wildlife Trust (1190866)

- Encouraged that amendments to supporting text have been made.
- Strongly support 20% BNG – add reference to DPSC1, DPSC2 and DPSC2 for clarity (note already included in DPSC GEN).
- Support providing further guidance to provide clarity on BNG.

CPRE (Sussex) (1189028)

- Support the policy and echo the comments made by the Sussex Wildlife Trust.

Sussex Ornithological Society (1186991)

- Don't think the Metric is enough to realise aspirations for BNG and nature recovery. Difficult to see how birds will benefit.

Home Builders Federation (1190702)

- Consider inconsistent with national policy. Updated PPG.
- 20% BNG needs evidence to show it is needed, deliverable and not impact on viability. Difficult to assess through whole plan viability assessment as the number of biodiversity units is not known until assessed.

- Need to have sufficient headroom. Increased pressure on off-site BNG market. Include reference to statutory credits. Reference to local area is unnecessary given within Metric calculations. More clarity with on-site and off-site provision.

Gatwick Airport Limited (1190687)

- Object to 20% BNG for Significant Sites – could have significant implications for on-site provision and could undermine housing.
- Design of BNG important for Gatwick Airport – bird strike. Include reference to DPB4 and requirement for early engagement on off-site provision.

Other comments:

- Excellent policy – suggested amendment in relation to the submitted documentation.
- Existing countryside provides wildlife corridors and replacement of such areas with narrow corridors between sites is not adequate to maintain threatened populations.
- Long time periods are required for nature recovery.
- Housing allocations have been made without any ecological surveys so the biodiversity impacts are unknown, which devalues any supposed BNG.
- Some flexibility is needed on how BNG is assessed especially in smaller projects or those with multiple phases. Would like the opportunity to comment on further guidance.
- Omission site: On-site BNG provision is preferred and can be delivered on the site.
- Policy provides flexibility in legislation changes.
- Provide further guidance within policy.
- Policy does not set out a local authority credit scheme or delivering off-site BNG which may stifle opportunities to provide BNG within the District.
- Recommended that the Council pursue an off-site delivery scheme.
- Encourage Council to assist with BNG transactions between landowners who want to sell off biodiversity units and developers who need biodiversity units.
- Submit that policy is unsound and not consistent with national policy. Any requirements beyond 10% BNG need to be clearly justified and evidence demonstrating the implications of delivering this policy needs to be provided. 20% BNG likely to require extensive areas of land to be removed from developable area – not efficient use of land. Viability implications. Updated PPG.
- Unsound and not backed up by evidence. Could severely impact delivery of development due to lack of existing market for biodiversity units. Increase of 10% has extreme implications for viability due to purchase of statutory credits.
- Need for 20% BNG is questioned. Updated PPG. Less land available for on-site BNG.

Officer summary response

- Welcome support for policy.
- BNG is secured for 30 years (significant on-site BNG and off-site BNG).
- There is a BNG hierarchy set out in government guidance.
- The off-site BNG market is still emerging and developing nationally. The Council is actively exploring opportunities to provide or facilitate access to off-site BNG in the district.
- To support the ongoing implementation of mandatory BNG, the Council will be preparing guidance for its website.
- The Council is seeking 20% BNG for the Significant Sites; this has been subject to viability testing.
- Proposed policy modifications to address Natural England's comments.
- Proposed policy modifications to address the submitted documentation.

- Additional wording in relation to Gatwick Airport has been added to the supporting text. The Plan should be read as whole (Policy DPB4: Aerodrome Safeguarding Requirements (Air Safety)).

District Plan

Chapter 9: Natural Environment and Green Infrastructure

Policy: DPN3: Green and Blue Infrastructure

Number of Comments Received

Total: 10

Sound: 7

Unsound: 3

Key Issues Raised

Regulation 19 Proposed Site Promoter:

Thakeham Homes (1191281)

- Support the policy and its requirements.

Statutory stakeholders:

Environment Agency (1189771)

- Pleased that policy now refers to green and blue infrastructure.

Natural England (1196374)

- Support policy and consider it meets the NPPF tests of soundness.
- Pleased with reference to the NE GI Framework and that green and blue infrastructure typologies are included in the supporting text.
- Support the requirement for a landscape-led approach and a masterplan and statement.
- Wording should be strengthened in relation to stewardship of GI; replace 'should' with 'must'.
- Welcome the management arrangements will be secured via planning conditions and/or planning obligations.

Network Rail (1190753)

- Network Rail notes the intention to identify land along the railway line to the north and south of Wivelsfield rail station as informal open space as part of the 'Green Circle' on the policies map. Land immediately to the north and south of Leylands Road is proposed to be safeguarded for Wivelsfield Railway Station enhancements. The southern part of the land for enhancements is not part of the identified informal green space designation however the land to the north does fall within this. Network Rail would like to ensure that this designation does not impact on the delivery of the station enhancements and request that the northern portion is removed from the designation to ensure there is no conflict with the Policy in delivering the improvements.

Town/ Parish Councils:

Horsted Keynes Parish Council (1188523)

- Welcome examples of green and blue infrastructure.
- Consider adding Constance Wood as a GI asset.

Other consultee bodies:

CPRE (Sussex) (11892028)

- Support policy.

Sussex Wildlife Trust (1190866)

- Support policy.
- Feel that the identification of sites in the plan and within the policies map demonstrates a commitment to mapping GI as set out in NPPF paragraph 185.

Woodland Trust (1189963)

- Please to see reference to LNRS.

Gatwick Airport Limited (1190687)

- The Gatwick Airport text should be in the policy and not the supporting text.

Other comments:

- Omission site – the site is located in a GI asset.
- Proposed boundary amendment to GI assets.

Officer summary response

- Welcome support for policy.
- The boundaries for the GI assets will be checked and amended if necessary.
- The Plan should be read as a whole. The Burgess Hill Railway Lands has been identified as a green infrastructure asset as part of the Burgess Hill Green Circle and as a Local Wildlife Site.
- No change to the Gatwick Airport text as the Plan should be read as a whole (Policy DPB4: Aerodrome Safeguarding Requirements (Air Safety)).
- Proposed modification to policy wording to address Natural England’s comments.
- It is not anticipated that other areas will be identified as a GI asset. Other policies in the District Plan will provide protection to open space, e.g. DPI5: Open Space, Sport and Recreational Facilities.

District Plan

Chapter 9: Natural Environment and Green Infrastructure	Policy: DPN4: Trees, Woodland and Hedgerows
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Number of Comments Received

Total: 13	Sound: 4	Unsound: 9
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Key Issues Raised

Regulation 19 Proposed Site Promoter:

Wates Developments (1191810)

- Provide clarification regarding extent of soil to be protected.
- Identify where ancient wood pasture and historic parkland are in the district.
- Refer to important trees rather than just trees.
- There is no requirement for trees to be added to the Ancient Tree Inventory.
- More closely align the buffer zone wording with standing advice.

Antler Homes (1190705)

- Support the intent of this policy and welcome the importance of trees, woodland and hedgerows.
- Suggested amendments to wording.

Statutory stakeholders:

Natural England (1196374)

- Support policy.
- Consider this policy meets the NPPF tests of soundness.

- Reference to new planting should be replaced by 'establishment' as this encompasses new tree cover through both natural colonisation as well as new planting.

Town/ Parish Councils:

Balcombe Parish Council (1190447)

- Remove 5th paragraph in supporting text which addresses loss of ancient woodland. This is not NPPF-compliant which only allows for loss of ancient woodland in wholly exceptional circumstances such as nationally important infrastructure projects.
- Large tracts of ancient woodlands to the north of the district need to be recognised.
- Strengthen the need for planning permission for tree works in conversation areas.

Lindfield Rural Parish Council (1190732)

- Policy should include a metric for areas of trees, woodland or hedgerows lost/ cleared.

Other consultee bodies:

CPRE (Sussex) (1189028)

- Add a reference to soils in the paragraph on ancient woodland in the supporting text.
- Effects of SuDS on ancient woodlands and the water table need to also be added – they should not be permitted if they are liable to change the water table.
- Include a further reference to soil in the policy.
- Further requirements for buffer zones need to be added.
- Add wording for new hedgerow planting and reference to the Hedgerow Regulations 1997.
- Tree replacement requirement need to be greater.

Sussex Wildlife Trust (1190866)

- Support the policy and note that our previous comments have been taken on board in relation to soils.

Woodland Trust (1189968)

- Strongly welcome this excellent policy which is robust, detailed and clearly-worded.
- It forms a sound framework to deliver protection for ancient woodland.
- In particular, the following are welcomed:
 - explicit inclusion of wood pasture & historic parkland as irreplaceable ancient woodland habitats
 - robust wording on compensation strategies where ancient woodland is unavoidably lost
 - clear and robust guidance on buffer zones, including hedgerow buffers. While the Woodland Trust recommends a larger minimum buffer, the policy as drafted is in line with standing guidance.
 - a preference for native species, from local or UK sourced stock, which is best practice for nature recovery and biosecurity
 - reference to making a positive contribution to the local nature recovery network and green infrastructure network
 - policy on street trees, reflecting the emphasis on tree-lined streets in the National Model Design Code
 - requirement for tree replacement on a greater than 1:1 basis, supporting biodiversity net gain.

Other comments:

- Buffer zones should be increased to 8m on each side.
- Width of the hedgerow buffer is not sufficient. A 2m buffer would erode the wildlife value of the hedgerow. This buffer should be expanded to a minimum of 8m either side to enable the hedgerow to function both as a habitat in its own right and as a movement corridor. This distance is also necessary to enable trees within the hedgerow to develop. Hedgerows should also not be subject to light pollution to ensure their corridor function for nocturnal wildlife is not negatively affected. Suggested amendment.
- New planting schemes are not compensation for habitat loss due to housing developments.
- Buffer zone section highly commendable. Buffer zones should be strictly enforced. There should be stated conditions when solid fencing is required around a new development.
- There needs to be recognition of other habitats such as grasslands, wetlands, seeps, heathlands, ponds etc - they are equally important for biodiversity.
- Insufficient protection of ancient woodland. Not enough is being done to prevent developers from cutting down ancient woodlands.

Officer summary response

- Welcome support for policy.
- Proposed modifications to provide clarity and to include a reference to soils.
- Buffer zones has a separate section in the policy but proposed modification in relation to width of hedgerow buffer.
- Wood pasture and parkland is a priority habitat. A map showing ancient wood pasture and parkland habitats can be found online.
- Read the Plan as a whole and different policies will be weighed up in the planning balance.
- Further guidance will be added to the supporting text with regards to trees and their soils.
- With regards to the supporting text and the reference to the Ancient Tree Inventory this is a positive aspiration for increasing records of ancient trees and it is not a policy requirement.

District Plan

Chapter 9: Natural Environment and Green Infrastructure

Policy: DPN5: Historic Parks and Gardens

Number of Comments Received

Total: 2

Sound: 1

Unsound: 1

Key Issues Raised**Town/ Parish Councils:****Balcombe Parish Council (1190447)**

- Pleased to see retention of historic parks and gardens.

Other comments:

- Support policy in principle.

Officer summary response

- Welcome support for policy.

District Plan		
Chapter 9: Natural Environment and Green Infrastructure		Policy: DPN6: Pollution
Number of Comments Received		
Total: 3	Sound: 1	Unsound: 2
Key Issues Raised		
Statutory stakeholders: Environment Agency (1189771) <ul style="list-style-type: none"> Support amendments to policy. 		
Other consultee bodies: CPRE (Sussex) (1189028) <ul style="list-style-type: none"> Pollution should be a strategic policy. Add a policy that requires developers to monitor and mitigate the effect of new developments on the water quality of nearby waterbodies. Sussex Ornithological Society (1186991) <ul style="list-style-type: none"> Supports the recognition of water supply stress but this and future water supply needs to be addressed elsewhere in the Plan. 		
Officer summary response <ul style="list-style-type: none"> Welcome support for policy. This policy does not meet the definition of a strategic policy in the NPPF. No proposed modifications to the policy. 		

District Plan		
Chapter 9: Natural Environment and Green Infrastructure		Policy: DPN7: Noise Impacts
Number of Comments Received		
Total: 2	Sound: 0	Unsound: 2
Key Issues Raised		
Statutory stakeholders: Natural England (1196374) <ul style="list-style-type: none"> Consider policy is sound. Add a reference to trees. 		
Other consultee bodies: CPRE (Sussex) (1189028) <ul style="list-style-type: none"> Clarification is needed as to when noise is unacceptable – proposed additional wording in relation to factors of noise impacts. 		
Officer summary response <ul style="list-style-type: none"> Welcome support for policy. The reference in the policy wording to green infrastructure includes trees. Proposed modification in supporting text to refer to intensity of noise. 		

District Plan

Chapter 9: Natural Environment and Green Infrastructure		Policy: DPN8: Light Impacts and Dark Skies	
Number of Comments Received			
Total: 5	Sound: 2	Unsound: 3	
Key Issues Raised			
Statutory stakeholders:			
Natural England (1196374)			
<ul style="list-style-type: none"> • Strongly support policy. • Amend wording to include reference to the High Weald National Landscape. • Outline what would happen if a development did not demonstrate that the requirements of the policy have been met. • Consider policy meets the NPPF tests of soundness. 			
Town/ Parish Councils:			
Lindfield Rural Parish Council (1190732)			
<ul style="list-style-type: none"> • Support policy. • Further guidance and standards on lighting design would be welcomed. 			
Other consultee bodies:			
Gatwick Airport Limited (1190687)			
<ul style="list-style-type: none"> • Add reference to the safe operations of Gatwick Airport in accordance with DPB4 at the end of the second paragraph. 			
High Weald National Landscape Partnership (1194408)			
<ul style="list-style-type: none"> • Support policy. • Amend wording in second paragraph to include reference to the High Weald National Landscape. • Move and re-phrase reference to ILP guidance to become criterion 6. 			
Other comments:			
<ul style="list-style-type: none"> • Support policy. • Further guidance on lighting design would be welcomed. 			
Officer summary response			
<ul style="list-style-type: none"> • Welcome support for policy. • The Plan should be read as a whole. • Proposed modification to include a reference to the High Weald National Landscape. • Proposed modification to move reference to ILP guidance to become criterion 6. • Proposed modification to add reference to Gatwick Airport. 			

District Plan			
Chapter 9: Natural Environment and Green Infrastructure		Policy: DPN9: Air Quality	
Number of Comments Received			
Total: 3	Sound: 0	Unsound: 3	
Key Issues Raised			
Statutory stakeholders:			
Natural England (1196374)			

<ul style="list-style-type: none"> Amend wording for consistency with DPC6, include reference to HRA and clarity on the mitigation hierarchy.
<p>Other consultee bodies: CPRE (Sussex) (1189028)</p> <ul style="list-style-type: none"> In relation to the Ashdown Forest SPA and SAC, replace 'may' with 'must' as traffic impact assessment is a requirement, not an expectation.
<p>Other comments:</p> <ul style="list-style-type: none"> Air quality policies should build on national policy, not rely on them.
<p>Officer summary response</p> <ul style="list-style-type: none"> The HRA for the District Plan assesses a quantum of development and a strategic air quality modelling exercise has been undertaken. This is at a high level and covers the development proposed in the Plan. As such, many development proposals at the planning application stage will not need to do separate air quality modelling. Development proposals are subject to the HRA process as per Policy DPC6. Proposed modifications to address Natural England's comments.

District Plan		
Chapter 9: Natural Environment and Green Infrastructure	Policy: DPN10: Land Stability and Contaminated Land	
Number of Comments Received		
Total: 1	Sound: 1	Unsound: 0
Key Issues Raised		
<p>Statutory stakeholders: Environment Agency (1189771)</p> <ul style="list-style-type: none"> Pleased to see comments from the Regulation 18 consultation have been included. 		
<p>Officer summary response</p> <ul style="list-style-type: none"> Welcome support for policy. 		

District Plan		
Chapter 10: Countryside		Policy: DPC1: Protection and Enhancement of the Countryside
Number of Comments Received		
Total: 12	Sound: 2	Unsound: 10
Key Issues Raised		
<p>Regulation 19 Proposed Site Promoter: Wates Developments (1191792)</p> <ul style="list-style-type: none"> • Appears to be blanket protection of countryside – inconsistent with national policy. • Concern that significant sites in paragraph 3 is left to a case-by-case basis. Suggest it should refer to the 20ha notification criteria set by Natural England. 		
<p>Statutory stakeholders: Natural England (1196374)</p> <ul style="list-style-type: none"> • Welcome and support this policy. • Support the requirements for the protection of BMV land and Grade 3b in the High Weald National Landscape and welcome the requirements should significant development of any grade of agricultural land be demonstrated to be necessary. • Support the requirement for development proposals to be landscape-led and for major applications to be accompanied by a LVIA. • Include cross reference to DPN1 and Significant Sites. 		
<p>Town/ Parish Councils: Balcombe Parish Council (1190447)</p> <ul style="list-style-type: none"> • Welcome strong protection for countryside. • Consider sustainability of agriculture in planning decisions. <p>East Grinstead Town Council (1190665)</p> <ul style="list-style-type: none"> • Include a map to show where Grade 1, 2 and 3 agricultural land is sited in the District. 		
<p>Other consultee bodies: CPRE (Sussex) (1189028)</p> <ul style="list-style-type: none"> • Welcome this policy but countryside needs recognition for its economic value. • Need a specific Low Weald policy. • Define significant development. 		
<p>Other comments:</p> <ul style="list-style-type: none"> • Support protecting BMV land and Grade 3b in the High Weald AONB. • Countryside has benefits for health and wellbeing. • Protect agricultural land for food security. • Staplefield has no BUA boundary and so is treated as countryside which restricts development. • Restrictive policy for development in the countryside. • Agree that the Mid Sussex countryside is a highly valued asset. • Provide clarity on how policies DPC1 and DPC4 interact with each other, as well as DPE9. • Welcome the requirement for a LVIA where major development is proposed. 		
Officer summary response		

- Welcome support for policy.
- Read the Plan as a whole.
- Note NPPF paragraph 180b).
- It is considered that a specific Low Weald policy is not required at this time, but that the Low Weald is covered by this policy (and other policies in the Plan where relevant). The National Character Areas published by Natural England can be used to identify key characteristics of the landscape.
- In relation to development of any grade of agricultural land, significant development is to be assessed on a case-by-case basis.
- The economic aspect of the countryside is addressed by Policy DPE8, however, DPC1 references natural capital which encompasses an economic aspect in the value of ecosystem services.

District Plan

Chapter 10: Countryside

Policy: DPC2: Preventing Coalescence

Number of Comments Received

Total: 14

Sound: 1

Unsound: 13

Key Issues Raised

Town/ Parish Councils:

Balcombe Parish Council (1190447)

- Support policy.
- Formally assess the proposed allocations to see if they result in coalescence.

East Grinstead Town Council (1190665)

- Would prefer a list of known areas to be included to show where coalescence is to be resisted.

Hurstpierpoint & Sayers Common Parish Council (1191154)

- Support principle of policy that seeks to prevent coalescence. Policy DPC2 does not identify specific gaps, and their geographic extent. It defers such identification to Neighbourhood Plans or other Development Plan Documents, which are divorced from the allocation of a significant quantum of development in the Submission Draft Plan. This approach is insufficiently robust and is unsound.

Lindfield Rural Parish Council (1190732)

- Support the principle however there is no detail or clear definition provided. This makes it difficult to be clear on what developments will or will not conflict with this policy.

Other comments:

- Several site allocation policies in the Plan are in conflict with this policy, as they create coalescence between settlements.
- New houses should not be in the strategic gap between East Grinstead and Crawley.
- Even if development proposals meet DPC2 they still need to meet DPC1.
- Omission site – identified as a local gap in neighbourhood plan but don't consider the site would lead to coalescence.
- Policy DCP2 should be amended to ensure that where a Neighbourhood Plan seeks to place reliance upon a local definition of 'local gap' it must be an up-to-date Neighbourhood Plan.

- Local gaps in the Hurstpierpoint & Sayers Common Neighbourhood Plan have been ignored – in relation to DPSC1 and DPSC3.
- Identify local gaps.
- New development should reflect and sustain unique character of settlements.
- Policy DPC2 does not identify specific gaps, and their geographic extent. It defers such identification to Neighbourhood Plans or other Development Plan Documents, which are divorced from the allocation of a significant quantum of development in the District Plan. This approach is insufficiently robust, and is unsound.
- Support the Council’s objectives to maintain the ‘unique characteristics’ and ‘separate identity’ of individual towns and villages, but this must be balanced against the need to accommodate the district’s development needs in appropriate locations. The assessment of coalescence or identification of local gaps must be carefully considered and evidenced to ensure it does not prevent appropriate development in the right locations. This should include landscape and visual assessments, which clearly demonstrate the harm that would result from new development in particular locations.

Officer summary response

- Welcome support for policy.
- The policy sets out that local gaps can be identified in Neighbourhood Plans or Development Plan Documents.

District Plan		
Chapter 10: Countryside	Policy: DPC3: New Homes in the Countryside	
Number of Comments Received		
Total: 3	Sound: 0	Unsound: 3
Key Issues Raised		
Other consultee bodies:		
High Weald National Landscape Partnership (1194408)		
<ul style="list-style-type: none"> • Amend wording to replace “and/or” with “and” 		
Town/ Parish Councils:		
Balcombe Parish Council (1190447)		
<ul style="list-style-type: none"> • Support. Policies restricting building and conversion of new outbuildings should be enforced. 		
Other comments:		
<ul style="list-style-type: none"> • Several site allocation policies in the plan are in conflict with this policy, as they create coalescence between settlements. 		
Officer Summary Response		
<ul style="list-style-type: none"> • Modifications to policy wording made to address comments of HWNLP. • The Plan should be read as a whole, different policies will be weighed up in the planning balance. 		

District Plan	
Chapter 10: Countryside	Policy: DPC4: High Weald Area of Outstanding Natural Beauty

Number of Comments Received		
Total: 7	Sound: 3	Unsound: 4
Key Issues Raised		
Statutory stakeholders:		
Natural England (1196374)		
<ul style="list-style-type: none"> • Pleased that policy has been strengthened since Regulation 18 consultation. • Proposed modifications to policy wording and supporting text. 		
Town/ Parish Councils:		
Balcombe Parish Council (1190447)		
<ul style="list-style-type: none"> • Would like to see a stronger emphasis on protection and suitable development based on established need in the AONB. • There should be more clarity on how this policy interrelates with others in the plan, so that general permissive policies do not apply in the AONB. 		
Local Authorities:		
Crawley Borough Council (1189681)		
<ul style="list-style-type: none"> • Support policy. 		
Other consultee bodies:		
High Weald National Landscape Partnership (1194408)		
<ul style="list-style-type: none"> • Very supportive of this policy. • Welcome great weight given in Local Plan to conserving and enhancing AONB. • Welcome references to AONB MP, HWAONB Design Guide, HW Colour Study. • Consider policy aligns well with NPPF paras 182 and 183. 		
CPRE (Sussex) (1189028)		
<ul style="list-style-type: none"> • Wording in relation to setting should reflect the setting wording for SDNP. Reference to the MP should include as updated from time to time. 		
Other comments:		
<ul style="list-style-type: none"> • Support policy. • Request clarification that development with local policy support will be supported. • Consider the policy is too restrictive. • Clarify major development. 		
Officer summary response		
<ul style="list-style-type: none"> • Welcome support for policy. • Proposed modifications for policy and supporting text to clarify the context for using the High Weald National Landscape and the High Weald Area of Outstanding Natural Beauty. 		

District Plan		
Chapter 10: Countryside		Policy: DPC5: Setting of South Downs National Park
Number of Comments Received		
Total: 5	Sound: 3	Unsound: 2
Key Issues Raised		
Statutory stakeholders:		
Natural England (1196374)		

<ul style="list-style-type: none"> • Need to reflect the new protected landscapes duty under LURA.
Local Authorities: South Downs National Park Authority (1190831) <ul style="list-style-type: none"> • Welcome the amendments that have been made in response to previous comments on this policy. Slight rewording requested.
Other consultee bodies: National Trust (1189774) <ul style="list-style-type: none"> • Support policy.
Other comments: <ul style="list-style-type: none"> • Omission site – development proposals on transitional landscapes should be possible if the proposals are landscape-led and respect, enhance and contribute to the landscape character and appearance in these locations. • Omission site - consider that there will be no harm to the SDNP or its setting.
Officer summary response <ul style="list-style-type: none"> • Welcome support for policy. • Reference to the new protected landscapes duty is within the supporting text. • Proposed modification to policy and supporting text to reflect SDNPA comments.

District Plan		
Chapter 10: Countryside	Policy: DPC6: Ashdown Forest SPA and SAC	
Number of Comments Received		
Total: 5	Sound: 2	Unsound: 3
Key Issues Raised		
Regulation 19 Proposed Site Promoter: Reside Developments Ltd (1189770) <ul style="list-style-type: none"> • In relation to DPA10, there needs to be further consideration and information on the mitigation required for this site. 		
Statutory stakeholders: Natural England (1196374) <ul style="list-style-type: none"> • Pleased that advice given at Regulation 18 to clarify what is expected of larger developments beyond the 7km zone has been addressed. • Satisfied that DPC6 is sufficient to rule out an adverse effect on the integrity of the Ashdown Forest SPA/SAC in line with the conclusion drawn in the accompanying HRA in relation to both recreational disturbance and air quality impacts. • Consider that this policy meets the NPPF tests of soundness. 		
Local Authorities: Tandridge District Council (1190867) <ul style="list-style-type: none"> • Support the 7km zone of influence and the SANG and SAMM mitigation approach. • Support joint working on SAMM and SANG provision. 		
Other comments: <ul style="list-style-type: none"> • How is an acceptable strategic SANG defined? E.g. certain distance, located in Mid Sussex. A 'Super SANG' designated by Natural England can mitigate developments over a longer distance - consider as part of policy. 		

- Support policy. SANG proposed as part of a planning application at West Hoathly Brickworks is likely to have additional capacity which could be used.

Officer summary response

- Welcome support for policy.
- Further liaison is in progress with the site promoters of DPA9 and DPA10 in relation to potential mitigation requirements for the proposed allocations just outside the 7km zone of influence.
- Natural England has produced guidelines for the creation of SANG.

District Plan		
Chapter 11: Built Environment		Policy: DPB1: Character and Design
Number of Comments Received		
Total: 7	Sound: 2	Unsound: 5
Key Issues Raised		
<p>Local Authorities: Crawley Borough Council (1189681)</p> <ul style="list-style-type: none"> Supports policy in broad terms but considers there is only limited reference to efficient use of land/density (criterion 8), though this is one of the District Plan's key principles. 		
<p>Other consultee bodies: High Weald National Landscape Partnership (1194408)</p> <ul style="list-style-type: none"> Amend wording to include reference to HW AONB Housing Design Guide. <p>National Trust (1189774)</p> <ul style="list-style-type: none"> Supports policy. Good urban and landscape design can reduce visual impact of development when viewed from elevated surroundings. <p>Gatwick Airport Limited (1190687)</p> <ul style="list-style-type: none"> The policy does not require development to comply with Aerodrome Safeguarding requirements. 		
<p>Other comments:</p> <ul style="list-style-type: none"> Housing developments look identical around the country. The Design Guide SPD has not prevented this. Concern that the policy will not achieve local distinctiveness. Too much duplication of the Mid Sussex Design Guide SPD. The 20-minute neighbourhood principles should be in a separate policy. Supports the principles of 20-minute neighbourhoods in the policy 		
<p>Officer summary response</p> <ul style="list-style-type: none"> A requirement for development to comply with Aerodrome Safeguarding requirement or a reference to the HW AONB Housing Design Guide are considered unnecessary. The Plan should be read as a whole and both criteria are covered under other policies contained within the Plan that will be applied to relevant proposals. Introducing prescriptive policy on density in different locations is not supported. The proposed policy requires design in accordance with Mid Sussex Design Guide SPD, which includes detail on appropriate densities. 		

District Plan		
Chapter 11: Built Environment		Policy: DPB2: Listed Buildings and Other Heritage Assets
Number of Comments Received		
Total: 3	Sound: 0	Unsound: 3
Key Issues Raised		
Regulation 19 Proposed Site Promoter:		

Wates Developments (1191789)

- The pre-submission plan includes a new requirement for archaeological 'evaluation'. The plan is inconsistent in how impacts to listed buildings are treated, with some site allocation policies referring to 'preservation and enhancement' while others to 'protection'.

Other consultee bodies:**High Weald National Landscape Partnership (1194408)**

- Amend wording to include reference to historic public realm features which contribute to rural landscape character particularly within the AONB.
- It should be recognised in the supporting text that 'Other Heritage Assets are not only buildings but can also include other structures and features.

Town/ Parish Councils:**Balcombe Parish Council (1190447)**

- It is not possible for some site allocations to meet the requirements of this policy.

Officer summary response

- Where appropriate, site allocation policies contain specific policy criteria to mitigate heritage impacts.
- The requirement for archaeological evaluation was included in the regulation 18 version of the plan under DPH4 General principles for housing allocations. A similar approach was approved as part the Site Allocations DPD under SAGEN.

District Plan

Chapter 11: Built Environment

Policy: DPB3: Conservation Areas

Number of Comments Received

Total: 3

Sound: 1

Unsound: 2

Key Issues Raised**Other consultee bodies:****Woodland Trust (1189966)**

- Support

Other comments:

- A Conservation Area Appraisal should be carried out for Staplefield to ensure special characteristics are identified and conserved.

District Plan

Chapter 11: Built Environment

Policy: DPB4: Aerodrome Safeguarding Requirements (Air Safety)

Number of Comments Received

Total: 1

Sound: 1

Unsound: 0

Key Issues Raised**Other consultee bodies:****Gatwick Airport Limited (1190687)**

- Support

District Plan		
Chapter 12: Transport		Policy: DPT1: Placemaking and Connectivity
Number of Comments Received		
Total: 13	Sound: 5	Unsound: 8
Key Issues Raised		
<p>Statutory stakeholders:</p> <p>National Highways (1191183)</p> <ul style="list-style-type: none"> • NPPF does not mandate Travel Plans, Transport Statements or Transport Assessments. • In seeking to move away from a 'predict and provide' approach several aspects are considered critical and Transport Assessments / Transport Statements and Travel Plans will need to be developed and managed in co-ordination across the area (not a series of individual plans managed in isolation) and a 'carrot and stick' approach will be required to mitigate impacts, enforced with financial penalties. 		
<p>Town/ Parish Councils:</p> <p>East Grinstead Town Council (1190665)</p> <ul style="list-style-type: none"> • Policy should be strengthened to say that Highway improvements will be delivered before the housing is occupied. We would also like to see the A22/A264 junction specifically acknowledged as needing improvements due to current over capacity. <p>Lindfield Parish Council (1190732)</p> <ul style="list-style-type: none"> • Policy should support active travel networks linking smaller villages and should acknowledge rural communities are prepared to travel longer if given a choice. 		
<p>Local Authorities:</p> <p>Tandridge District Council (1190867)</p> <ul style="list-style-type: none"> • Acknowledge importance of prioritising sustainable transport and Mid Sussex council's commitment in policy DPT1 to prioritise this over highway mitigation however cross boundary impact concerns have not been addressed and mitigation on the A22/A264 should be developed and linked to development triggers to ensure integrated delivery of housing and infrastructure in a timely manner. <p>Crawley Borough Council (1189681)</p> <ul style="list-style-type: none"> • CBC is concerned that there is no reference to compact development and the benefits of increasing density thresholds in order to support public transport viability. 		
<p>Other consultee bodies:</p> <p>Gatwick Airport Limited (1190687)</p> <ul style="list-style-type: none"> • Support emphasis on prioritising active travel but consider that a proportionate approach that is locationally specific is required. <p>Woodland Trust (1189967)</p> <ul style="list-style-type: none"> • Welcome the addition of references to integration with green infrastructure in points 4 and 6, as we had requested at Reg 18 consultation. • This better reflects para 96 c of the NPPF which identifies both green infrastructure and layouts that encourage walking and cycling as components of healthy places. 		
Other comments:		

- Support policy in principle however in the council's transport modelling report Scenario 5m5 is seeking to address an existing issue which is not caused by the LP development and should be included in the baseline reference case. If the modelling is not updated, supporting text for DPT1 should be updated to acknowledge this.
- Support enhanced connectivity through sustainable modes including electric vehicle charging points.
- Support principles embedded in this policy.

Officer summary response

- Consideration of cross-boundary impacts are agreed in relevant statements of common ground.
- The Mid Sussex Strategic Transport Study has been developed in consultation with and validated by the Highway Authorities and is deemed robust – mitigation has been identified to address cumulative impacts arising from the emerging Development Plan development.
- Site Allocations DPD policy SA34 safeguarding policy covers key junctions along the A22/ A264 corridor within the district. Delivery of mitigation infrastructure is considered on a case by case basis and where appropriate to address the impacts of the development; occupation triggers may be recommended where necessary by the Highway Authority

District Plan

Chapter 12: Transport

Policy: DPT2: Rights of Way and Other Recreational Routes

Number of Comments Received

Total: 4

Sound: 0

Unsound: 4

Key Issues Raised

Statutory stakeholders:

Natural England (1196374)

- Support policy with proposed amendment to wording to include reference to green infrastructure and potential links to South Downs Way National Trail which runs through south of the district.

Network Rail (1190753)

- Suggest reference is made to where existing and future development leads to PRow or other designated pathways interacting with the railway i.e. railway crossings, mitigation is considered in consultation with Network Rail, to ensure users safety and to maintain a safe and reliable running of the railway.

National Highways (1191183)

- Support measures enhance Nation Cycle Network Route NCN20 which is no longer officially a through route - Crawley to Brighton section has been removed and is now only a local route.

Local Authorities:

West Sussex County Council (1190880)

- NCN20 route has largely been undesignated by Sustrans due to the lack of off-road cycle infrastructure - aspiration to connect London to Brighton via Crawley is still held by stakeholders.

- Policy should require new developments to take opportunities to enhance not just protect existing routes.

Officer summary comments

- Modifications are recommended for clarification and to strengthen policy

District Plan

Chapter 12: Transport

Policy: DPT3: Active and Sustainable Travel

Number of Comments Received

Total: 11

Sound: 2

Unsound: 9

Key Issues Raised

Statutory stakeholders:

Natural England (1196374)

- Strengthen wording to include 'good quality...green infrastructure'.

National Highways (1191183)

- Support

Network Rail (1190753)

- Support but suggest wording added: 'Encouraging the improvement of current, and provision of new, active travel connections to public transport hubs, especially rail stations'

Town/ Parish Councils:

Lindfield Rural Parish Council (1190732)

- Strong reservations with the WSCC Active Travel Strategy and failure to include the Scaynes Hill to Lindfield Active Travel Route (SHLAT). LCWIP development is also flawed.

Local Authorities:

West Sussex County Council (1190880)

- In order to be effective at delivering active travel infrastructure, Section 1 of policy should be amended to ensure developments contribute to the delivery of appropriate schemes in the WSCC Active Travel Strategy and the LCWIP – current wording implies the councils will be solely responsible for their delivery.

Crawley Borough Council (1189681)

- Support - recognition of need to take account of neighbouring LCWIPs - policy should state that development on the administrative boundary with Crawley should improve links into the town.

Other consultee bodies:

Home Builders Federation (1190702)

- To ensure policy is applied where necessary and relevant - amend to read "Where appropriate and feasible ..."

Other comments:

- The policy should be amended to explicitly link to addressing capacity impacts from new developments to manage congestion and enhance pedestrian safety.

- Important for policies to support active and sustainable travel to avoid problems arising from traffic and air pollution.
- Inconsistent with national policy

Officer summary comments

- Modifications are recommended to strengthen wording and ensure the policy is effective.
- The plan should be read as a whole Development proposals are considered on their merits and a balanced judgement is made regarding the degree of compliance with all relevant policies and any material considerations including supporting new/ improved links to nearby centres on the basis.

District Plan

Chapter 12: Transport

Policy: DPT4: Parking and Electric Vehicle Charging Infrastructure

Number of Comments Received

Total: 10

Sound: 3

Unsound: 7

Key Issues Raised

Statutory stakeholders:

National Highways (1191183)

- Measures are favourable but unlikely to reduce background growth and/ or development growth to mitigate impacts on the A23.

Town/ Parish Councils:

Balcombe Parish Council (1190447)

- Support - previous concerns now addressed

Other consultee bodies:

Home Builders Federation (1190702)

- Duplication of Building Regulations – delete.

Other comments:

- Essential for all new housing to be built with vehicle charging points. In addition, widespread availability of public charging points should be included in the plans. These issues are very relevant for the mitigation of further climate change.
- Part 2 is unnecessary duplication of Building Regulations.
- Support the policy directing readers to WSCC guidance.
- A statement in policy that development should adhere to building regulations clearly has no purpose given that development is required to meet this standard and has no bearing on planning decisions. Part 2 should therefore be deleted.

Officer summary response

- Modification recommended to provide clarity and ensure the policy is effective – policy seeks to ensure Building Regulations requirements can be met when granting the layout of parking areas.
- The plan should be read as a whole. Development proposals are considered on their merits and a balanced judgement is made regarding the degree of compliance with all relevant policies and any material considerations.

District Plan		
Chapter 12: Transport		Policy: DPT5: Off-Airport Car Parking
Number of Comments Received		
Total: 4	Sound: 3	Unsound: 1
Key Issues Raised		
Town/ Parish Councils: Balcombe Parish Council (1190447) <ul style="list-style-type: none"> • Support restrictive policy. 		
Local Authorities: Crawley Borough Council (1189681) <ul style="list-style-type: none"> • Support policy which is consistent with CBC emerging policy GAT3. Tandridge District Council (1190867) <ul style="list-style-type: none"> • Support policy. 		
Other consultee bodies: Gatwick Airport Limited (1190687) <ul style="list-style-type: none"> • Support changes since Regulation 18 but objects to the policy in relation to relocation of off-airport parking which could result in doubling availability which would undermine GALs ability to achieve its sustainable transport strategy – modification suggested. 		
Officer summary response <ul style="list-style-type: none"> • Suggested changes are not necessary to make the policy sound. 		

District Plan		
Chapter 13: Economy	Policy: DPE1: Sustainable Economic Development	
Number of Comments Received		
Total: 3	Sound: 2	Unsound: 1
Key Issues Raised		
Local Authorities: Horsham District Council (1190711) <ul style="list-style-type: none"> Support. Note government funding for LEPs is being withdrawn and functions transferred to local authorities. 		
Other comments: <ul style="list-style-type: none"> The plan should clarify the interaction between Policies DPE1, DPC1 and DPC4. Support policy. 		
Officer summary response <ul style="list-style-type: none"> The plan should be read as a whole. Development proposals are considered on their merits and a balanced judgement is made regarding the degree of compliance with all relevant policies and any material considerations. 		

District Plan		
Chapter 13: Economy	Policy: DPE2: Existing Employment Sites	
Number of Comments Received		
Total: 10	Sound: 1	Unsound: 9
Key Issues Raised		
Statutory stakeholders: National Highways (1191183) <ul style="list-style-type: none"> More information required on how the Council will determine acceptable levels of traffic from intensification or expansion of existing employment sites. Intensification should be in highly accessible locations that do not exacerbate impacts on the SRN. 		
Town/ Parish Councils: Balcombe Parish Council (1190447) <ul style="list-style-type: none"> Supports marketing requirement in the policy but concerned that unrealistic/token marketing could take place. Welcomes policy reference to layout and design being in keeping with countryside location. 		
Local Authorities: Brighton and Hove City Council (1186995) <ul style="list-style-type: none"> Supports protection of existing employment floorspace in Mid Sussex. There is increasing market demand for distribution uses close to the A23. The NWS EGA Update (2020) recognises economic linkages with the wider West Sussex and Greater Brighton sub-region. It is unlikely that BHCC will be able to meet its own need for additional industrial space. The pipeline supply of industrial land in Mid Sussex should be safeguarded. 		

Other comments:

- West Hoathly Brickworks should be removed and allocated for housing.
- Existing employment sites are scarce in close proximity to planned housing. There will be increased traffic from people travelling to work.
- The policy is not sufficiently flexible in view of the latest Use Classes Order and permitted development rights. The policy is based on an earlier one in the Site Allocations DPD, but legislation and national guidance have changed since then. Marketing exercises are not always genuine.
- Tension between ambition to deliver homes in sustainable locations and the protection of existing employment sites. Sustainable brownfield sites in urban areas may be more suitable for residential development and the policy is unduly restrictive in its requirement for 12 months marketing.
- Policy is unclear on whether existing employment sites are defined in the Policies Map or by use. There should be greater flexibility to allow alternative uses when benefits outweigh the loss, in view of increasing Government emphasis on using brownfield land for housing.
- Land at Woodpeckers/Courtland should be allocated for mixed use development and/or the BUAB expanded to include the existing site. The policy's focus on Eg, B2 and B8 could exclude sui generis employment-generating uses and flexible workspaces. The sequential test in the policy is onerous and stifles innovative solutions.
- Land at Snow Hill, Copthorne, should be allocated as an employment site, as an existing site suitable for intensification or redevelopment for employment use. The policy should allow for intensification and development of sui generis uses as well as Eg, B2 and B8.

Officer summary response

- Proposals for intensification, expansion or redevelopment of existing employment sites will be assessed against other relevant policies in the plan and the WS Local Transport Plan - Transport Assessments and Travel Plans will be required where appropriate.
- Site Allocations DPD Policy SA34 was amended in line with Inspector's Main Modifications following the examination hearings in 2021, after the change to the Use Classes Order and introduction of Permitted Development Rights.
- The majority of sites are identified on the policies map – some developments, particularly following adoption of the plan may not.
- The Economic Growth Update (2022) does not justify allocation of any new employment sites.
- Planning permission, pending signing of a S106 Agreement, has been recommended by Planning Committee which justifies removal of West Hoathly Brickworks.
- A Statement of Common Ground between MSDC and BHCC is being prepared to recognise that employment is a cross-boundary strategic matter and set out the agreed approach.

District Plan

Chapter 13: Economy

Policy: DPE3: Employment Allocations

Number of Comments Received

Total: 6

Sound: 4

Unsound: 2

Key Issues Raised
Statutory stakeholders: Natural England (1196374) <ul style="list-style-type: none"> • Sound
Town/ Parish Councils: Balcombe Parish Council (1190447) <ul style="list-style-type: none"> • Concerned about the impact of the Crabbet Park allocation on the setting of the AONB and conflict with countryside policies.
Local Authorities: Crawley Borough Council (1189681) <ul style="list-style-type: none"> • Supports the policy approach, including the allocation of Class E floorspace at Crabbet Park, which is considered to be an appropriate type and scale of development to promote localised employment. Brighton and Hove City Council (1186995) <ul style="list-style-type: none"> • Supports the allocation of Class E floorspace at Sayers Common. While recognising that this is intended to meet Mid Sussex needs, Sayers Common is on the edge of the Coastal Sussex FEMA and could provide opportunities for Brighton and Hove businesses wishing to expand in the local area. Wealden District Council (1189586) <ul style="list-style-type: none"> • Supports policy. Wealden District Council may have an employment land shortfall in their emerging plan, but at this stage does not request assistance from MSDC to meet this need.
Other comments: <ul style="list-style-type: none"> • The District Plan underestimates employment need due to flaws in the Economic Growth Assessment Update (2022) and changing circumstances since it was produced. The Council has missed an opportunity to create sustainable communities by allocating employment adjacent to areas of housing growth.
Officer summary response: <ul style="list-style-type: none"> • The Economic Growth Assessment Update (2022) provides a focused update which relates specifically to Mid Sussex, within the wider North West Sussex Area and provides a comprehensive and robust evidence base.

District Plan		
Chapter 13: Economy	Policy: DPE4: Town and Village Centre Development	
Number of Comments Received		
Total: 6	Sound: 1	Unsound: 5
Key Issues Raised		
Statutory stakeholders: National Highways (1191183) <ul style="list-style-type: none"> • Supports retail development in existing centres and/or re-occupation of vacant floorspace, to reduce local trips on the A23. Retail development should be in 		

sustainable locations.
<p>Town/ Parish Councils: Balcombe Parish Council (1190447)</p> <ul style="list-style-type: none"> • Policy DPE4 does not meet the needs of smaller villages. There should be a reference to neighbourhood plans.
<p>Local Authorities: Crawley Borough Council (1189681)</p> <ul style="list-style-type: none"> • Supports the 'town centre first' approach. The requirement for a Retail Impact Assessment for any proposed floorspace above 500m2 should be applied to Crabbet Park to ensure this does not compete with Crawley town centre. <p>Horsham District Council (1190711)</p> <ul style="list-style-type: none"> • Supports policy overall, but it needs to ensure that impact of village retail development on town centres in neighbouring LAs is also considered.
<p>Other comments:</p> <ul style="list-style-type: none"> • Existing local villages unsuited to the increased traffic from planned housing development. Hurstpierpoint High Street already gets congested and will be the obvious route from Sayers Common to Hassocks Railway Station. • Concern that village centres are not sufficiently protected. Marketing exercises can be flawed and residential conversions occur under permitted development.
<p>Officer summary response</p> <ul style="list-style-type: none"> • The policy requires a retail impact assessment for development over 500m2 to demonstrate no significant adverse impact on a town/village centre. While Crawley's town centre is not defined on the Mid Sussex Policies Map, Crawley BC will be consulted during masterplanning of Crabbet Park and the impact of retail uses on Crawley town centre will be considered. • The Use Classes Order (as amended in 2021) places main town centre uses in Class E, and there are permitted development rights for change of use to residential in some circumstances. Policy DPE4 cannot override this.

District Plan		
Chapter 13: Economy	Policy: DPE5: Within Town and Village Centre Boundaries	
Number of Comments Received		
Total: 2	Sound: 0	Unsound: 2
Key Issues Raised		
<p>Statutory stakeholders: National Highways (1191183)</p> <ul style="list-style-type: none"> • Consideration should be given to the potential traffic impacts of delivery lockers, including increased trips on the strategic road network. 		
<p>Town/ Parish Councils: Balcombe Parish Council (1190447)</p> <ul style="list-style-type: none"> • Policy wording should refer to town and village centre boundaries as defined on the Policies Map and in any made neighbourhood plans. 		

Officer summary response

- Developments generating significant additional private vehicle trips will be assessed against Policy DPT1, including a requirement for a Transport Assessment and Travel Plan where appropriate.
- By law, the District Council's Policies Map must illustrate geographically the policies in the adopted development plan. The development plan includes neighbourhood plans, and the Policies Map already contains site allocations and designations in made neighbourhood plans.

District Plan

Chapter 13: Economy

Policy: DPE6: Development within Primary Shopping Areas

Number of Comments Received

Total: 1

Sound: 0

Unsound: 1

Key Issues Raised**Statutory stakeholders:****National Highways (1191183)**

- Primary shopping areas attract significant numbers of trips. There should be robust evidence to demonstrate that there are no residual impacts on the SRN.

Officer summary response

- Developments generating significant additional private vehicle trips will be assessed against Policy DPT1, including a requirement for a Transport Assessment and Travel Plan where appropriate.

District Plan

Chapter 13: Economy

Policy: DPE7: Smaller Village and Neighbourhood Centres

Number of Comments Received

Total: 2

Sound: 0

Unsound: 2

Key Issues Raised**Town/ Parish Councils:****Balcombe Parish Council (1190447)**

- Policy considered weak – should be rephrased regarding 'parades' of shops/facilities and define main town centre uses.

Other comments:

- Concern that village centres are not sufficiently protected. Marketing exercises can be flawed, and residential conversions occur under permitted development.

Officer summary response

- Main town centre uses are defined in the NPPF. District Plan policy cannot override legislation which allows for some change of use in town and village centres without planning permission. Rate reductions are not within the scope of this plan.
- The Use Classes Order (as amended in 2021) places main town centre uses in Class E, and there are permitted development rights for change of use to residential in some circumstances. Policy DPE4 cannot override this.

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District Plan		
Chapter 13: Economy	Policy: DPE8: Sustainable Rural Development and the Rural Economy	
Number of Comments Received		
Total: 4	Sound: 1	Unsound: 3
Key Issues Raised		
<p>Town/ Parish Councils: Balcombe Parish Council (1190447)</p> <ul style="list-style-type: none"> Supports the exclusion of sites in the AONB from this policy, but there should also be a reference to the setting of the AONB to make the policy consistent with DPC4. 		
<p>Other comments:</p> <ul style="list-style-type: none"> Support for this policy, which is applicable to planning permission for a hotel development which has been implemented. Support for the policy, but consideration should have been given to small-scale allocations in the northern part of the district. DPE8 is not flexible enough. Land in the AONB should be included in this policy. The restriction to "small-scale" development should be removed. Criterion 1(a) will be impossible to implement for individual proposals as currently worded. 1c) is too vague. Paragraphs 2 and 3 of the policy conflict. 		
<p>Officer summary comments</p> <ul style="list-style-type: none"> The plan should be read as a whole. Policy DPC4 will be applied to any economic development proposed on land that contributes to the setting of the AONB. Informed by consultation with the Development Management team, the definition of 'small-scale' is considered appropriate. Para 3 applies additional criteria regarding the conversion of existing buildings, rather than activities in general on the sites of farms and other rural business. These additional controls prevent proliferation of new buildings to replace those 'lost' to conversion. Modification proposed to criterion 1 a). 		

District Plan		
Chapter 13: Economy	Policy: DPE9: Sustainable Tourism and the Visitor Economy	
Number of Comments Received		
Total: 8	Sound: 1	Unsound: 7
Key Issues Raised		
<p>Statutory stakeholders: Natural England (1196374)</p> <ul style="list-style-type: none"> This policy is considered sound. The policy could be strengthened by having specific reference to Policy DPN1 and DPC5, as has been done with DPC4, to ensure that adequate protection is in place for SDNP and the natural environment. 		
<p>National Highways (1191183)</p>		

- MSDC should ensure that all development proposals manage travel demand, mitigate impacts and support delivery of normal operations. This will enable NH and WSCC to assess what initiatives are most appropriate and how they will be delivered and monitored.

Network Rail (1190753)

- The Bluebell Railway is used for freight, which must not be adversely affected.

Other consultee bodies:

National Trust (1189780)

- Proposals considered under this policy must not conflict with Policy DPC5: setting of South Downs National Park.

Woodland Trust (1189964)

- Welcome references to biodiversity and irreplaceable habitats which had been requested at Regulation 18 stage.

Other comments:

- This policy is applicable to planning permission for a hotel development which has been implemented.
- Broadly support policy, but there should be more flexibility. Several criteria should be softened regarding impacts on highway safety, environment and residential amenity. Criterion 15 is superfluous.
- There could be more clarity on the interaction of policies such as DPE9, DPC1 and DPC4. Welcomes recognition of Wakehurst in the supporting text but suggest some corrections.

Officer summary response

- Welcome support for the policy.
- The Plan should be read as a whole so cross-references are not considered necessary in this case.
- Transport impacts and mitigation strategies will be assessed under Policy DPT1. The Council has engaged with NH and WSCC on the transport policies.
- Proposed modification to the supporting text in relation to RBGK Wakehurst for clarification.
- Proposed modification to the supporting text in relation to the Bluebell Railway to encourage engagement between stakeholders.
- No modifications proposed to the policy wording as this would weaken the policy and allow development that harms highway safety, the environment and residential amenity.

District Plan		
Chapter 14: Housing		Policy: DPH1: Housing
Number of Comments Received		
Total: 217	Sound: 7	Unsound: 210
Key Issues Raised		
<p>Regulation 19 Proposed Site Promoter:</p> <p>Antler Homes (1190705)</p> <ul style="list-style-type: none"> • Supports strategy and buffer of 996 dwellings. • Detailed housing trajectory needed. • The calculation set out in the plan fails to take account for the unmet needs arising from neighbouring authorities. <p>Berkeley Latimer (1190757)</p> <ul style="list-style-type: none"> • Plan period should be extended by a year. <p>Peacock 5 Ltd (1190878)</p> <ul style="list-style-type: none"> • Potential for additional supply of housing at DPSC2: Land at Crabbet Park. 		
<p>Town/ Parish Councils</p> <p>Albourne Parish Council (1190648)</p> <ul style="list-style-type: none"> • SHMA indicates a need for fewer new homes when using 2018-based population projections compared to the 2014-based projections (11,394 vs 19,199). Question the soundness of the LHN figures; may need to be balanced by other relevant or more recent data. <p>Hurstpierpoint and Sayers Common Parish Council</p> <ul style="list-style-type: none"> • SHMA indicates a need for fewer new homes when using 2018-based population projections compared to the 2014-based projections (11,394 vs 19,199). • Housing requirement is significantly above local housing need. Delivering housing above the local housing need is likely to result in more vacant homes. • The level of local housing need should be reduced to 622 dwellings per annum. <p>Lindfield Parish Council (1190730)</p> <ul style="list-style-type: none"> • Concerns that nearby developments will place undue pressure on infrastructure in Lindfield village. MSDC should ensure that infrastructure and services are delivered as agreed and in a timely manner. 		
<p>Local Authorities</p> <p>Brighton & Hove City Council (1186995)</p> <ul style="list-style-type: none"> • Supporting text regarding unmet need should be expanded to include Coastal Sussex HMA which covers southern part of Mid Sussex district. Identified housing provision should not be treated as ceiling. <p>Crawley Borough Council (1189681)</p> <ul style="list-style-type: none"> • Standard Method figure should be updated so has a base year of 2024 resulting in need of 1,076 dpa and total need of 19,368 dwellings to 2039. • Support that Northern West Sussex is recognised as primary Housing Market Area. Paragraph on page 139 should be amended to state that there is an unmet need, not 'likely' to be and 'Agreed priority order' should read 'agreed approach to prioritisation'. 		

- Proportion of oversupply for resilience and unmet needs should be justified and quantified. MSDC should work proactively to identify potential sources of housing supply and ensure land is used efficiently. Oversupply from development 'at Crawley' should contribute to Crawley's unmet needs.

Horsham District Council (1190711)

- Supporting text should include a clear statement that *every effort will be made to contribute to unmet housing needs of Northern West Sussex HMA during the Plan period*, which could include positive approach to considering planning applications of allocations and windfalls. Supporting text should also include *recognition that there is potential to meet greater proportion of unmet HMA needs in future reviews and beyond current local plan period*.

Other consultee bodies:

Home Builders Federation (1190702)

- Mid Sussex should be planning for higher housing number and should be seeking to help address unmet housing needs from neighbouring authorities.
- Identified housing oversupply cannot be both a buffer for resilience and a contribution towards the unmet needs of the HMA. No evidence has been produced as to how each site contributes towards the delivery over the plan period; Plan needs a housing trajectory.
- Plan period needs to be extended.
- No evidence as to how many homes will be delivered on sites of less than one hectare in line with para 69 of the NPPF; 10% of housing requirement should be met on sites less than 1ha.

CPRE (Sussex) (1189028)

- Housing number too high; does not reflect district's actual need.
- Not justified to deliver bulk of housing in Low Weald due to AONB and Ashdown Forest constraints. Significant environmental and infrastructure constraints are constraints on numbers not location.

Other comments:

- Duty to Cooperate not been met; no commitment made to address issue of unmet needs in Northern West Sussex HMA or Lewes district. No DtC or Housing Topic Papers produced. No recent progress on Local Strategic Statement.
- Buffer is insufficient. Housing oversupply of 10 - 20% should be included.
- Failure to apply discount allowance for non-delivery of commitments.
- Over-reliance on strategic sites (existing and proposed); complex infrastructure to be delivered; potential for housing supply in short and medium term.
- Windfall allowance – over-reliance, double counting small sites, inappropriate for plan-led system.
- Housing requirement should be increased to take account of affordability issues in district.
- Not enough housing at sustainable settlement of Haywards Heath
- Plan overdelivers housing by around 1,000 despite the Housing Minister stating that the standard method is not mandatory and LAs can determine their own housing number. The housing target should take account of the latest population projections. District is a rural district; housing number is arbitrary.
- The spatial strategy should focus most development at existing sustainable settlements – the three main towns, with fairer distribution of development around the district, including in the AONB.

- Distribution of development is not justified and there is no definition of “proportionate growth” which can be fairly applied to settlements.
- Alternative spatial strategies have not been adequately explored.
- Housing allocations will have negative impact on the landscape.
- Plan is not consistent with latest government policy that urban regeneration should be prioritised rather than development in the countryside. Too little housing is allocated at brownfield/regeneration sites in urban areas.
- Agricultural land for long-term food security should be preserved, given the impact of climate change on global agriculture and food supplies.
- Piecemeal sites from SHELAA will not deliver strategic infrastructure in the north of the district, such as transport and education infrastructure.

Officer summary response

- Modification proposed to policy to reflect additional year to Plan period.
- Modification proposed to policy to reflect updated standard method figure.
- Justification for the Plan Strategy is set out in the Plan and supporting evidence, including Housing Need Topic Paper.
- Housing trajectory within Appendix 4 of Plan updated and detailed housing trajectory to be published within Housing Supply Topic Paper.
- Strategic Housing Market Assessment (2021) considers potential circumstances for increasing housing requirement beyond standard method; concluding that there are no circumstances to indicate a higher housing need should be planned for.
- Details of how the Council has met the Duty to Cooperate, including on the issue of unmet needs, are set out in its supporting evidence including: Housing Need Topic Paper; Duty to Cooperate Compliance Statement and Statements of Common Ground between Northern West Sussex authorities. Further Statements with other neighbouring authorities are being prepared.

District Plan

Chapter 14: Housing

Policy: DPH2: Sustainable Development – Outside the Built-up Area

Number of Comments Received

Total: 14

Sound: 2

Unsound: 12

Key Issues Raised

Regulation 19 Proposed Site Promoter:

Fairfax Acquisitions Ltd (1191201)

- Policy should clarify how it is applied when considering other protective policies within the Plan.

Elivia Homes (1188302)

- Limit of 10 dwellings across all tiers of settlements is too broad brush; should be proportionate to settlement.
- Currently reads as if principle of allocations needs to be re-established.

Town/ Parish Councils:

Balcombe Parish Council (1109447)

- Policy should not apply in the AONB, in the same way the AONB is excluded from Policy DPE8: Sustainable Rural Development and the Rural Economy. Supporting text should be amended to reflect this.

Other consultee bodies:**National Trust (1189782)**

- Policy allows ad hoc development in the countryside which goes against the planned system.

CPRE (Sussex) (1189028)

- Clarification needed regarding criterion 5 (avoidance of larger sites being brought forward for less than 10 dwellings).

Other comments:

- Limit of 10 dwellings across all tiers of settlements is too broad brush; should be proportionate to settlement or removed.
- Criterion 1 should include where the site is previously development land and is being proposed for more effective purpose.
- Policy is admission that Plan is not meeting housing need.
- Could benefit from cross referencing to 20-minute neighbourhood.
- Policy will not deliver sustainable development.

Officer summary response

- The Plan should be read as a whole, with policies to be weighed in the planning balance.
- Principle of smaller scale development contiguous with built-up area boundary allows for a degree of growth at settlements (including those in AONB) in the district. Such developments would contribute to windfall allowance where not already allocated.
- Applying a standard size threshold to settlements provides consistency and clarity. The proper place for larger sites is considered to be through allocation in the Plan.
- Modifications to criterion 5 proposed to provide clarification.

District Plan**Chapter 14: Housing****Policy: DPH3: Sustainable Development – Inside the Built-up Area****Number of Comments Received****Total: 7****Sound: 0****Unsound: 7****Key Issues Raised****Regulation 19 Proposed Site Promoter:****Fairfax Acquisitions (1191201)**

- Support. Amended wording has addressed previous concerns.

Local Authorities:**Crawley Borough Council (1189681)**

- Should include reference to compact development and benefits of increasing density thresholds to maximise urban capacity and efficient development.

Other consultee bodies:**CPRE (Sussex) (1189028)**

- Policy needs to reflect principle of brownfield first. Suitable BUAB sites should be allocated.
- Delete last sentence of supporting text.

Other comments:

- Policy needs to explicitly identify brownfield development as a priority. Plan should place greater emphasis on urban renewal and redevelopment.

Officer summary response:

- Welcome support for policy.
- Policy requires the consideration of scale in opportunities of infilling and redevelopment.
- The Plan should be read as a whole; DPB1: Character and Design references optimising the potential of a site (criterion 8).

District Plan**Chapter 14: Housing****Policy: DPH4: Older Persons' Housing and Specialist Accommodation****Number of Comments Received****Total: 15****Sound: 3****Unsound: 12****Key Issues Raised****Regulation 19 Proposed Site Promoter:****Berkeley Latimer (1190760)**

- Older persons' accommodation (where classed as either C2 or C3) can and should be seen as legitimate form of social housing; could therefore contribute to the 30% affordable housing requirement.

Thakeham Homes (1191281)

- Support

Wates Developments (1191796)

- Level of provision should be identified in policy.

Welbeck Strategic Land III (1189521)

- Element of flexibility should be introduced to allow for the site to come forward for general housing if it can be demonstrated that there is no demand for the older persons' specialist accommodation.

Statutory stakeholders:**National Highways (1191183)**

- Older population less likely to use walking/ cycling routes and bus services. Seek to understand how the Council will demonstrate revenue funding to secure the long-term viability of public transport in vicinity of such development.

Town/ Parish Councils**Balcombe Parish Council (1190447)**

- Clarification needed for criteria 10 – 12; are all required to be met?

Other comments

- Criterion 1 (*affordable housing*) should be deleted.
- Criterion 3 (*site is allocated or contiguous to BUAB*) should be amended to allow greater flexibility to meet need. Contiguous to BUAB locations not easy to find due to scale.

Officer Summary Response

- Welcome support for policy.
- The Plan should be read as a whole; circumstances for allowing alternative uses where there no longer demonstrated to be a need will be considered on a case by case basis.
- Financial contributions for sustainable transport to be confirmed and agreed between parties through the planning application process.

District Plan

Chapter 14: Housing

Policy: DPH5: Gypsies, Travellers and Travelling Showpeople

Number of Comments Received

Total: 7

Sound: 1

Unsound: 6

Key Issues Raised

Regulation 19 Proposed Site promoter:

Thakeham Homes (1191281)

- Question viability of requirement given other provisions required. No reference to requirement within DPSC1; appears to be a conflict.

Statutory stakeholders:

National Highways (1191183)

- Those living in other forms of vehicles (motor homes, caravans, vans, converted buses) are not acknowledged in policy. No mention of increase in nomadic and digital-nomadic lifestyles (in UK); potential for increased vehicle movements and impacts on SRN (use of lay-bys).

Local Authorities

Brighton & Hove City Council (1186995)

- Brighton & Hove City Council is updating its GTAA; should a need be identified then will seek to address any shortfall through DtC.

Horsham District Council (1190711)

- Plan should seek to help address unmet pitch needs of Northern West Sussex HMA.

Tandridge District Council (1190867)

- Plan should take a proactive approach in meeting Gypsy and Traveller needs. Will continue to work with Council on cross-boundary issues.

Officer summary response

- Policy references requirement for Significant Sites to contribute towards Gypsy and Traveller need. Modifications to wording suggested to clarify requirement.
- The Council is happy for continued working on strategic matters under the Duty to Cooperate.
- Statements of Common Ground between neighbouring authorities set out agreed approach to meeting Gypsy and Travellers accommodation needs.
- Numbers of households residing in other forms of vehicles not currently identified as an area of concern in district.

District Plan		
Chapter 14: Housing		Policy: DPH6: Self and Custom Build Housing
Number of Comments Received		
Total: 17	Sound: 5	Unsound: 12
Key Issues Raised		
<p>Regulation 19 Proposed Site promoter: Antler Homes (1190795) and Fairfax Acquisitions (1191201)</p> <ul style="list-style-type: none"> • If plots not bought, then should revert straight to being built out as market homes (criterion 8). <p>Berkeley Latimer (1190760)</p> <ul style="list-style-type: none"> • Appears to be a disconnect between criteria 2 and 3. No evidence provided for threshold of 100 dwellings. <p>Thakeham Homes (1191281)</p> <ul style="list-style-type: none"> • Level of requirement would lead to over provision. Provision should be focussed on smaller allocations for more even distribution across district. If demand increases, then policy should be 'up to 1%' depending on identified need. 		
<p>Statutory stakeholders: National Highways (1191183)</p> <ul style="list-style-type: none"> • Traffic activities from self-builders need to be managed and coordinated to avoid, minimise and/or mitigate effects on SRN road environment and junctions. 		
<p>Local Authorities Brighton & Hove City Council (1186995)</p> <ul style="list-style-type: none"> • Support policy. <p>Crawley Borough Council (1189681)</p> <ul style="list-style-type: none"> • Support. Would welcome discussions to consider opportunities for self-build to be considered cross-boundary 		
<p>Other consultee bodies: Home Builders Federation (1190702)</p> <ul style="list-style-type: none"> • Policy is unjustified in particular criterion 8. If plots not bought by self-builders in the first instance, homes should revert to the developer to be built out as market homes. 		
<p>Other comments:</p> <ul style="list-style-type: none"> • The 2% requirement on developments of 100 or more dwellings (criterion 3) fails to refer to 'subject to feasibility and viability'. May not be feasible on flatted type developments. Requirement high against Register figures. • 2% considered to be more realistic than 5% and flexibility is now included should the self or custom build plots not be taken up • Identified requirements for self and custom housebuilding hasn't been addressed. • Criterion 3; should include subject to level of demand. • Feasibility is not defined in the plan. • Encouraging the provision of serviced plots for self or custom build housing on all new residential developments with no threshold is not necessary, even with the caveats set out. 		

- Insufficient self build plots would be delivered to meet demand based on 2% of plots on sites of 100+ dwellings; demand considered to be at least 404 plots.
- First priority to households on self build register and the requirement for plots to be sold at competitive prices felt to be unreasonable, also 3 year build restriction.

Officer summary response

- Welcome support for policy.
- Evidence of demand for self- and custom- build housing is taken from the Council's Self & Custom Build Register which is considered to be a more accurate picture of demand in the district.
- The Council is happy for continued working on strategic matters under the Duty to Cooperate.

District Plan

Chapter 14: Housing

Policy: DPH7: Housing Mix

Number of Comments Received

Total: 18

Sound: 4

Unsound: 14

Key Issues Raised

Regulation 19 Proposed Site Promoter:

Thakeham Homes (1191281)

- Affordable ownership mix only applies to First Homes as a result of DPH9; therefore oppose quantum of 3+ bed dwellings required and would support higher proportion of 1 beds.

Reside Developments (1189766)

- Affordable ownership mix conflicts with Policy DPH8: Affordable Housing and DPH9: First Homes; only 25% of affordable housing to be affordable ownership which, with First Homes 30% discount, does not allow for larger properties to be delivered.

Wates Developments (1191797)

- Will not be able to deliver larger affordable home ownership requirement as First Homes without increasing the current 30% discount included in policy DPH9.

Local Authorities

Crawley Borough Council (1189681)

- Policy should reflect use of a blended housing mix (Crawley and MSDC) for strategic development adjacent to Crawley. Criterion 3 should include reference to adjoining settlement.

Town/ Parish Councils

Balcombe Parish Council (1190447)

- Policy should say 'unless set out in made Neighbourhood Plans or set out in specific allocation policies'.

Hurstpierpoint and Sayers Common Parish Council (1191161)

- SHMA may be under representing need for smaller properties; ONS shows high percentage of +2bed under occupied properties.

Worth Parish Council (1190873)

- Cohousing should be considered as an option that could offer opportunity for people to downsize or own first home; would encourage younger people to stay in village improving local demographic and supporting local infrastructure.

Other comments:

- The housing mix should require more affordable housing to buy and rent, and a greater proportion of smaller houses at a higher density.
- High demand for smaller market properties; this should be reflected in the housing mix.
- Not sufficiently flexible.
- Should include a threshold below which the required housing mix does not apply.

Officer Summary Response

- Policy sets out the starting point for housing mix considerations; sufficient flexibility is built into the policy.
- Flexibility built in to allow for variations to mix, where justified, on a case-by-case basis.
- A variety of housing types are considered through the Strategic Housing Market Assessment (2021) and supported through the Plan where applicable.

District Plan

Chapter 14: Housing

Policy: DPH8: Affordable Housing

Number of Comments Received

Total: 20

Sound: 0

Unsound: 20

Key Issues Raised

Regulation 19 Proposed Site Promoter:

Berkeley Latimer (1190760)

- Criterion 10. Flexibility sought for clustering; no evidence that delivers social cohesion and could result in management issues for Registered Providers. Certain types of development (extra care) likely to be more than 10units; clustering criteria should not apply in such circumstances.

Elivia Homes (1188303)

- Policy should allow for where it may be inappropriate or undesirable (from a Registered Provider's perspective) for onsite provision of affordable housing.

Fairfax Acquisitions (1191252)

- Criterion 5. Clarity sought on what type of evidence would be acceptable.
- Currently not delivering sufficient affordable housing; housing requirement should be increased.

Reside Developments Ltd (1189766)

- Conflicts with provision of First Homes; all of which likely to be 1 / 2 bed homes. Provision for Shared Ownership would be welcomed.

Thakeham Homes (1191281)

- Allowance for Shared Ownership provision should be included as an option in policy.

Wates Developments (1191803)

<ul style="list-style-type: none"> • Criterion 10 (clustering) - Clarification needed if First Homes are included. Should also include caveat to allow for requirements of Registered Providers.
<p>Statutory stakeholders: NHS Property Services Ltd (1190817)</p> <ul style="list-style-type: none"> • Policy should consider affordable housing for NHS staff.
<p>Town/ Parish Councils Balcombe Parish Council (1190447)</p> <ul style="list-style-type: none"> • Section should reference MSDC commitment to 50% of affordable housing being allocated in perpetuity to those with a Parish/ Village connection on Neighbourhood Plan allocations within the High Weald AONB. <p>Horsted Keynes Parish Council (1188523)</p> <ul style="list-style-type: none"> • Affordable housing percentage requirement should be higher.
<p>Local Authorities Crawley Borough Council (1189681)</p> <ul style="list-style-type: none"> • Should allow for at least 40% affordable housing provision at DPSC3: Land at Crabbet Park.
<p>Other consultee bodies: CPRE (Sussex) (1189028)</p> <ul style="list-style-type: none"> • Policy fails to address affordability issues. SHMA; 2021 calculations based on past experience of demand, but metrics have changed. SHMA's conclusions of current need of 1,079 households and net annual need of 470 homes should be justified. • Current policy is not delivering 30% affordable housing requirement. • Viability Study should assess alternative levels of affordable housing provision, other neighbouring authorities have higher targets. • 4% wheelchair accessible requirement not supported by SHMA (12%); need will grow due to aging population. • Clarify that commuted sums can be used towards cost of new affordable housing or purchase land for rural exception and first homes sites. Supporting text should clarify that existing AH SPD will continue in effect.
<p>Other comments:</p> <ul style="list-style-type: none"> • Criterion 1 (30% as affordable housing requirement) – floor area of 1,000m2 is not major development and the requirement not consistent with national policy. • Criterion 5 (tenure split) – capped price for First Homes results in provision of only flats, which is less desirable. • Criterion 6 (type and size split) and Criterion 7 (4% of affordable housing units to be wheelchair accessible M4(3)(2)(b)) – should be subject to minimum threshold. • Criterion 9 (minimum floor area standards) – not required to be in policy; already in national standards. • Adjacent areas requiring higher affordable housing percentages. • Concern that viability of older person typologies has not been adequately tested. Viability Study does not reflect current market uncertainty. Viability of older persons' housing overplayed. • Review mechanism; Local Plan needs to be clear on justification for review process and should include exemptions for smaller single phased developments. • 25% affordable ownership as First Homes excludes other low-cost home ownership products such as low-cost and Discount Market Sales.

- Tenure split of 25% First Homes and 75% Social or Affordable Rent does not accord with NPPF; no evidence that 75% should go towards affordable and/or social rent, after First Homes remaining 75% should be split 25% Shared Ownership/ 75% Affordable Rented.
- Older persons' accommodation development should be exempt from providing affordable housing.

Officer summary response

- Level of affordable housing required from developments has been considered, alongside other policy requirements, through the Plan Viability Study.
- Modification to criterion 1 to change to 0.5ha from 1,000sqm for consistency with NPPF.
- Requirements sought through Policy supported by Strategic Housing Market Assessment (2021) and Council held evidence, including the Council's Housing Register.
- Modification to policy to provide flexibility in clustering.

District Plan

Chapter 14: Housing

Policy: DPH9: First Homes

Number of Comments Received

Total: 6

Sound: 0

Unsound: 6

Key Issues Raised

Regulation 19 Proposed Site Promoter:

Berkeley Latimer (1190760)

- Consequence of policy is that the majority of Affordable Home Ownership units will be 1/2 bed flats and skew the other forms of affordable (rented) to be larger units. Should include greater flexibility in wording.
- No reason given for requirement to market First Homes to those with a local connection for three months from date of completion; should allow for marketing to be from off-plan to minimise costly voids and a negative impact on sales rates and after 3 months for them to revert to normal market sale homes.
- Policy prioritises First Homes over Shared Ownership, however there is continued growing demand for SO and it is important to meet housing need and market demand.

Town/ Parish Councils

Horsted Keynes Parish Council (1188523)

- Should require 40% discount rather than 30% as price cap of £250,000 will be lost after re-sale.

Other consultee bodies

CPRE (Sussex) (1189028)

- Should require 40% discount rather than 30%.

Other comments:

- Policy should not include price cap (£250,000) as this will be led by Government so not needed.

Officer Summary Response

- Policy approach enables households to access more affordable units. The 2021 Strategic Housing Market Assessment forms the basis for seeking smaller units as First Homes.

District Plan		
Chapter 14: Housing		Policy: DPH10: Rural Exception Sites
Number of Comments Received		
Total: 2	Sound: 1	Unsound: 1
Key Issues Raised		
Town/ Parish Councils		
Balcombe Parish Council (1190447)		
<ul style="list-style-type: none"> • Support 		
Other comments		
<ul style="list-style-type: none"> • Criterion 2 (meeting needs of current/ recent residents or with local connection to the parish) and Criterion 3 (size of properties justified by Parish Housing Survey undertaken in the last 5 years) felt to be potentially problematic as a valid survey may not already exist. A rural exception site may provide more in excess of need indicated in the survey which should not be discouraged as it will help meet district wide need. • Need for site to be adjacent to or in close proximity to a rural settlement containing a local convenience shop and access to a bus stop with adequate bus services questioned. 		
Officer summary response		
<ul style="list-style-type: none"> • Welcome support for policy. • Proposals under this policy are, fundamentally, exceptional and aimed at meeting local needs. An up-to-date Parish Housing Needs Survey is the required evidence to support such development and will need to be undertaken if a valid one does not exist. 		

District Plan		
Chapter 14: Housing		Policy: DPH11: Dwelling Space Standards
Number of Comments Received		
Total: 2	Sound: 1	Unsound: 1
Key Issues Raised		
Regulation 19 Proposed Site promoter:		
Welbeck Strategic Land (II) (1190890)		
<ul style="list-style-type: none"> • Support 		
Other comments		
<ul style="list-style-type: none"> • Policy not needed; repeating minimum space standards. 		
Officer summary response		
<ul style="list-style-type: none"> • Welcome support for policy. • Inclusion of policy considered to provide clarity in Council's position on space standards, particularly with regards to affordable housing. 		

District Plan		
Chapter 14: Housing		Policy: DPH12: Accessibility
Number of Comments Received		
Total: 4	Sound: 0	Unsound: 4
Key Issues Raised		
<p>Regulation 19 Proposed Site Promoter: Thakeham Homes (1191281)</p> <ul style="list-style-type: none"> • Need to ensure that viability exists for all dwellings to be M4(2). • Flatted M4(2) developments will require a lift; this may result in an undesirable or unviable service charge for residents and/or Registered Providers. 		
<p>Town/ Parish Councils: Balcombe Parish Council (1190447)</p> <ul style="list-style-type: none"> • Support but disadvantages flatted schemes in villages where ground floor could deliver wheelchair accessible units. 		
<p>Other comments:</p> <ul style="list-style-type: none"> • Necessary evidence for all new dwellings to meet Building Regulations Part M4(2) has not been provided. • Requirement of 5% of market homes to meet M4(3) should only apply to 10+ dwellings and should be subject to viability. Wording with regards to 'suitability of the site and the need at the time' is currently vague. 		
<p>Officer Summary Response:</p> <ul style="list-style-type: none"> • Welcome support for policy. • Strategic Housing Market Assessment (2021) forms basis of wheelchair adaptable and accessible provision requirements. • Viability of requirement alongside other policy requirements tested through Plan wide Viability Study. 		

District Plan		
Chapter 15: Sustainable Communities		Policy: DPSC GEN: Significant Site Requirements
Number of Comments Received		
Total: 20	Sound: 6	Unsound: 14
Key Issues Raised		
<p>Statutory stakeholder:</p> <p>National Highways (1191183)</p> <ul style="list-style-type: none"> • Need to be satisfied that the cumulative impact of traffic can be adequately mitigated. We reinforce that achieving good design, particularly for 20-minute Neighbourhood, School Street and Car-free proposals requires early engagement with relevant statutory bodies. <p>Natural England (1196374)</p> <ul style="list-style-type: none"> • Sound – note however the policy no longer includes reference to water consumption. <p>National Trust (1189774)</p> <ul style="list-style-type: none"> • Support criterion 1 <p>Sport England (1189878)</p> <ul style="list-style-type: none"> • Support the golden threads of 20-minute neighbourhoods and Active Travel that runs throughout the plan. 		
<p>Local Authorities</p> <p>West Sussex County Council (1190880)</p> <ul style="list-style-type: none"> • Currently does not secure the delivery of the transport mitigation for the significant sites in accordance with WSTP. Need for regular monitoring of trip generation and travel plan measures. • Additional wording to Criterion 1 suggested to ensure critical infrastructure is delivered in a timely manner to meet needs. • Criterion 6; add either as new criterion or to end of 6 that all significant sites required to undertake regular monitoring of their trip generation and travel plan measures and report to MSDC. • Amended wording to Criterion 8 suggested to strengthen wording. <p>Crawley Borough Council (1189681)</p> <ul style="list-style-type: none"> • Criterion 1: How will MSDC engage with the community on east side of Crawley. • Criterion 6: CBC requests that development at Crabbet Park must take account of planned growth in Crawley and at Gatwick Airport. • Object to the lack of density requirements. Development capacity should be maximised on significant sites to ensure effective use of land. 		
<p>Town/ Parish Councils</p> <p>Hurstpierpoint and Sayers Common (1191158)</p> <ul style="list-style-type: none"> • Evidence of how the sites will meet these requirements should be available prior to the allocation to demonstrate sustainable development can be achieved. 		
<p>Other consultee bodies:</p> <p>CPRE (Sussex) (1189028)</p>		

- 20-minute neighbourhood principles are fully supported however they are only successful in urban context with sufficient density to support infrastructure on site - accepted at DPSC1 and DPSC2 – sites DPSC3-7 (CPRE Sussex)

Other comments:

- Criterion 1 - Needs to be clear how interrelates with smaller sites.
- Criterion 6 – needs to be caveated with viability considerations.
- Criterion 11 – agreement needs to be in accordance with WSCC.
- Criterion 12 – question the evidence to justify 20% BNG; wording amendments suggested.
- The plan should include details of robust processes for MSDC to monitor and enforce 20% BNG requirement on significant sites.
- Lack of evidence all requirements can be met without impacting the quantum of housing.
- In general, the additional requirements are in accordance with each other however lack of clarity between DPSC GEN, Vision and for growth at Sayers Common and DPSC3-7 policy wording. How many masterplans are expected to be prepared? Are sites DPSC4-7 required to progress in accordance with a masterplan? Is the policy wording sufficient to ensure a coordinated approach and collaboration?

Officer summary response

- Modification proposed to criterion 1 to provide clarification on delivery of infrastructure in response to comments from WSCC.
- Modification proposed to criterion 8 to strengthen wording in response to comments from WSCC.
- Standards on water consumption have been transposed into policy DPS2: Sustainable Design and Construction; repetition of requirements not repeated here as Plan should be read as a whole.
- To support the ongoing implementation of mandatory BNG, the Council will be preparing guidance for its website.
- The Council is seeking 20% BNG for the Significant Sites; this has been subject to viability testing.
- The TCPA 20-minute neighbourhood guide sets out the potential of two approaches to rural settlements; the approach will be adapted to best suit the specific location.

District Plan

Chapter 15: Sustainable Communities

DPSC1: Land to the west of Burgess Hill/ North of Hurstpierpoint

Number of Comments Received

Total: 123

Sound: 3

Unsound: 120

Key Issues Raised

Site Promoter: Thakeham Homes (1189800)

- Contribution towards SEND – provision will be made on site therefore no need/ justification to secure contribution in addition. Burgess Hill train station – query evidence of need/ justification for contribution. Sayers Common shared active travel link – needs to be more precise on extent DPSC1 is expected to support delivery.
- The provision of older people’s accommodation needs to be more precise and confirm delivery will be on site as per the proposed masterplan. Site allocation plan

and illustrative masterplan are incorrect.

Transport

- Proposals need to be developed in consultation and conjunction with National Highways (NH). NH need to be satisfied that the traffic associated with the development and the cumulative impact of the local plan traffic can be adequately mitigated. NH seek to further understand provision of sustainable transport mitigation and highway works. Support viable alternatives to private car, a robust travel demand management (TDM) strategy and monitor and manage' approach, detail of mitigation delivery, cost and funding, monitoring strategies triggered through phased development and collecting mitigation/ monitoring funding [**National Highways (1191183)**].
- Allocation will exacerbate existing transport issues on substantially rural network. Insufficient evidence to demonstrate impacts are understood and can be mitigated [**Hurstpierpoint and Sayers Common Parish Council (1191154)**].
- Two parcels with the site are not contiguous affecting the sustainable transport strategy which is insufficient and access arrangements would exacerbate existing road safety issues with no mitigation proposed affecting delivery.
- Bus route/ services to town centre and rail station are required and/or segregated cycleways.
- Existing issues with severe traffic congestion in the area, including historic centre of Hurstpierpoint. Development will generate additional traffic on roads that are already over capacity. A new road would be required to bypass Hurstpierpoint.
- Development will rely on the use of private car which will result in increased emissions and reduced air quality. Inadequate existing transport infrastructure and concern that improvements to bus routes and highways will not materialise.

Landscape

- Allocation includes substantial areas of land within the rural hinterland of the parish breaching the ring road Jane Murray Way and the landscape buffer resulting in coalescence with Goddard's Green – erosion of gap with other settlements to the west. The allocation is not contiguous, is disjointed, and excludes the central and better-connected areas to the east of the allocation. Insufficient detail/ evidence of how the site will be masterplanned/ delivered to meet the requirements of the development plan [**Hurstpierpoint and Sayers Common Parish Council (1191154)**].
- Insufficient evidence regarding potential for significant adverse landscape and visual effects – encroaching beyond the designated area of open space which abuts the western and southern edge of Burgess Hill.
- Agricultural land should be protected for food security.
- It was promised that the Green Crescent around the western perimeter of Burgess Hill would be protected from development, to preserve the countryside.

Biodiversity

- Evidence base is insufficient to demonstrate consistency with the NPPF. Lack of ecological evidence – preliminary ecology appraisals should be provided as a minimum. The site contains various notable habitats and there are records of numerous significant species and the site sits in the Burgess Hill Green Crescent Biodiversity Opportunity Area and is likely to be key within the emerging local Nature Recovery Strategies with potential opportunities to recover nature. Policy requirements need amending to reflect the importance of potential impacts on biodiversity. Wording regarding ancient woodland and veteran trees needs amending to be more robust [**Sussex Wildlife Trust (1190866)**].

- Wording needs strengthening regarding ancient woodland and deciduous woodland priority habitat [**Natural England** (1196374)].
- Fails to demonstrate how protected habitat will be protected/ managed – i.e. ancient woodland, ecological corridors/ connectivity [**Hurstpierpoint and Sayers Common Parish Council** (1191154)].
- Site lies within Low Wealden countryside which contains rich flora, ancient woodland and indicator species where significant work has been undertaken since 2004 to identify biodiversity and identify areas of extreme value and measures to enhance and protect it. Development will lead to fragmentation of remaining countryside corridors and will significantly harm to biodiversity. Developing beyond the Green Circle goes against previous advice/ agreement from the Council. Development contrary to NPPF.
- 20% BNG is unachievable against the existing baseline of wildlife that currently inhabits the area.
- Fail to protect the air quality of the ancient woodland (Northend Copse)

Infrastructure

- Wording changes to education requirements for effectiveness and clarity [**West Sussex County Council** (1190866)].
- Insufficient detail/ evidence of how the site and associated infrastructure will be masterplanned/ delivered to meet the requirements of the development plan. Insufficient space to co-locate new school in the centre of the development [**Hurstpierpoint and Sayers Common Parish Council** (1191154)].
- Homes England supports MSDCs efforts to continue with plan-making and welcomes ongoing engagement and co-ordination between the development of this site and the consented scheme a Brookleigh to ensure the developments are complimentary and benefit the economic and social viability and sustainability of the area and notes specific policy requirements in this regard [**Homes England** (1190657)].
- Contributions towards gypsy and traveller provision – amend requirement to provide a specific number of pitches [**Horsham District Council** (1190711)].
- Inclusion of a requirement to provide financial contributions towards improvements at Burgess Hill train station, sustainable travel and provision of a layout which provides for sustainable travel connections are supported [**Network Rail** (1190753)].
- Detailed infrastructure planning should not be deferred to post-adoption. There should be a 30-year vision for the area.
- Housing will generate additional demand for infrastructure but not the necessary workforce in public services, as most of the homes will be unaffordable.
- Water-stressed area.
- Additional pressure on inadequate sewerage infrastructure.
- Additional pressure on scarce public service infrastructure such as police, health and fire services.
- Onsite primary school unlikely to be delivered, as it is more viable to expand existing schools than open small new schools, making this development unsustainable.

Heritage

- Inappropriate scale of development which will be damaging to the historic rural character of the area.

Flood Risk

- Pleased to see our comments from the Regulation 18 consultation have been incorporated [**Environment Agency** (1189771)].
- Surface water flood risk not accounted for in masterplanning.
- Pookbourne River frequently floods leaving surrounding roads impassable. Heavy clay soil in this area. Previous development has already caused rapid discharge of water into the river and surrounding land.
- Area prone to flooding and poor drainage, with additional flood risk from building on land that absorbs flood water.

Other (i.e. evidence and other comments not fitting into above)

- Development in this location is not consistent with 20-minute neighbourhood principles, and residents will be reliant on cars.
- Development will not deliver more local jobs.
- Unacceptable scale of development in this area, combined with Sayers Common allocations.
- Light, noise and air pollution.
- Trajectory is overly optimistic.
- Allocation offers opportunities for Brighton & Hove residents who are unable to meet their need in the city e.g. larger family-sized homes, extra care provision and services plots for self/ custom build housing – support [**Brighton and Hove City Council** (1186995)].
- Development of these site is contrary to latest government policy on prioritising brownfield – development opportunities in Burgess Hill centre should be exploited first.
- Housing mix will not meet the needs of local residents – it should reflect the ageing population and smaller households.
- Lack of community engagement.
- Conflict with neighbourhood plan.
- Proposal not integrated with existing communities.
- Lack of engagement with local community to develop Master Plan

Officer summary response

- Modification proposed in respect of the wording for education provision.
- Site allocations plan amended to include intervening section of Malthouse Lane.
- The (Systra) Strategic Transport Study has been developed in consultation with and validated by WSCC Highway Authority and National Highways and is fit for purpose. The Study demonstrates that the cumulative impact of the Development Plan traffic can be adequately mitigated.
- The council's evidence base in combination with the site promoters Regulation 19 representation and supporting evidence sets out evidence of suitability and deliverability of the site.
- Detailed masterplanning work is yet to be completed – the location of any older persons' accommodation could provide a key focal point in the neighbourhood centre with opportunity for shared services – café/ hair salon – therefore, the policy should not seek to tie down the location of this facility prematurely.
- Gypsie and Traveller pitches are allocated on-site at DPSC3 – 6 pitches allocated to meet residual need – DPSC1 is required to make financial contributions towards their delivery.

District Plan

Number of Comments Received

Total: 43

Sound: 3

Unsound: 40

Key issues raised

Site Promoter: Wates Developments (1191785) and Peacock 5 Ltd (1190878)

- Amend wording in Retail/ Community row of indicative development capacity to provide clarity.
- Amend wording of criterion 2 with regards to size of primary school to allow for flexibility.
- Criterion 3; current wording is vague and needs justifying.
- Include wording in criterion 4 regarding acceptable uses (E and F) for clarity and flexibility.
- Amend criterion 10 to ensure NPPF compliant.
- Confirms deliverability of site, hybrid application and PPA with Council.
- Criteria 9, 12 and 13 are superfluous - delete (**Wates Developments**).
- Additional capacity could be delivered during the plan period (**Peacock 5 Ltd**).

Transport

- Concerns over the impacts on the B2110/B2028 junction (additional traffic, congestion, pollution, road deterioration) which is in the top 3 of the most critical junctions in MSDC, within a conservation area, in the countryside [**Turners Hill Parish Council (1189358)**].
- Cumulative impact of development in north of the district will have unacceptable impact on highway network. Access to M23 already problematic, A264 and A2220 heavily congested at peak times, as well as A264/ A22 Junction.

Landscape

- South-eastern part of site contains important historic landscape and ecological features (Old Hollow as a sunken historic routeway and ancient woodland) which should be referred to in policy. No access should be taken off southern portion of Old Hollow.
- Building on mosaic field landscape would adversely affect setting; the five key fields in southeast of site should remain open space.
- Amend land use and allocation maps to show AW (Hotel Wood) and omit Layhouse Wood (AW) from allocation area respectively.
- Amend wording of **criterion 8** to be consistent with NPPF.
- Amend wording of **Criterion 9** to ensure conformity with NPPF (para. 186) [**High Weald National Landscape Partnership (1194408)**].
- Amend wording of **criterion 8** to strengthen against potential harm on HWNL.
- Amend wording to **criterion 9** to ensure conformity with NPPF with regard to ancient woodland and deciduous woodland priority habitat.
- SA identifies residual major negative effect from loss of BMV, amended wording suggested against DPN1 seeks to address contradiction (11916374 – Natural England)
- Doesn't meet aims of DP in terms of protection of Natural environment, countryside or built environment. Loss of connectivity between parcels of AW; 15m buffer insufficient. Impact on setting of AONB, undeveloped buffer/ transition zone needed. Lower yield when requirements and constraints taken into account. [**Balcombe Parish Council (1190447)**].
- Development of green gap
- The development will affect the setting of the AONB and encompass/affect parkland, which is contrary to other policies in the plan [**Balcombe Parish Council**]

(1190447)].

Biodiversity

- BNG would be difficult to achieve given high baseline [**Balcombe Parish Council** (1190447)].
- Advice should be sought from HWAONB Unit and consideration given to Management Plan. Site contains AW, watercourses, ponds, open grassland with large standard trees and hedgerow. Should consider impacts of disturbance on LWS and AW, impacts on hydrology, light and noise pollution and need for appropriate buffers to AW. Site is adjacent to Worth Forest BOA; likely to be key area within emerging LNRS; water courses, hedges and linear woodlands are corridors and important for connectivity; should be retained, significantly buffered and enhanced.
- Wording amendments suggested to criterion 9 (Ancient woodland) to ensure consistency with NPPF.
- Additional criterion to reference retention and restoration of linear habitats in their role as wildlife corridors and connectivity. [**Sussex Wildlife Trust** (1190866)]
- Loss of green infrastructure, habitats and biodiversity [**Balcombe Parish Council** (1190447)].

Infrastructure

- Amend wording to ensure effective delivery of education infrastructure requirements and to provide clarity and consistency with regards to Early Years and SEND provision. [**West Sussex County Council** (1190880)].
- Inconsistent reference to highways infrastructure requirements across significant sites; needs clarifying/ defining. Highway works should include J10 of the M23 (additional access and exit ramps in both directions). Concerns over actual delivery of infrastructure; overarching strategy for cumulative need for Copthorne area. Infrastructure impacts outside district not detailed. Specific infrastructure requirements identified by WPC (football facility built to County League Championship Division standards, tennis hard courts, green bowls with clubhouse and changing facilities, community building, playspace (infant to 13 YO, including children with special needs), pod or similar for youths, allotment site. [**Worth Parish Council** (1190873)].
- The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. Early liaison should be sought to agree housing and phasing plan which determine level of spare capacity and any phasing required to ensure development does not outpace delivery of any essential network upgrades to accommodate future development(s). Include reference to capacity and phasing. [**Thames Water** (1191163)].
- Concerns with the use of phasing to reduce development contributions. Concerns over the secondary school provision and infrastructure provision between East Grinstead and M23. Impact of cumulative development on the surrounding area and associated infrastructure [**East Grinstead Town Council** (1190665)].
- Frequent power cuts and inadequate water infrastructure system (lack of water, poor drainage, wastewater)
- Severe lack of school and doctors' surgeries in area
- Strategic view of infrastructure across north part of district needed.

Heritage

- Old Hollow – historic routeway; policy should include specific reference to the historic landscape and ecological importance. No access should be created off the

<p>southern portion of Old Hollow. Further information on access needed. [High Weald National Landscape Partnership (1194408)].</p> <ul style="list-style-type: none"> Concerns regarding potential impacts of heritage assets
<p>Flood Risk</p> <ul style="list-style-type: none"> Frequent flooding of Old Hollow fields
<p>Other comments:</p> <ul style="list-style-type: none"> Development of this site will conflict with other policies in the plan, e.g. DPN1, DPN2, DPN4, DPN5, DPC4, DPB2. To comply with these policies, the quantum of development would need to be much lower [Balcombe Parish Council (1190447)]. Disproportionate level of growth directed at Crabbet Park. Would fundamentally change the character of Copthorne village. Council's own assessment shows that development would have detrimental effects on landscape, setting of AONB, listed buildings and ancient woodland. Relates poorly to Crawley Down and Crawley Coalescence with Copthorne and Crawley Include number of Gypsy and Traveller pitches required to provide
<p>Officer summary response</p> <ul style="list-style-type: none"> Modifications to policy wording proposed in respect of the wording for education provision. Reference to phasing development to align with water infrastructure is considered unnecessary. The Plan should be read as a whole; requested insertion is covered under other policies contained within the Plan. No objection raised by Thames Water or NHS in relation to water infrastructure, healthcare or electricity provision; any improvements needed to support growth are identified in IDP. Infrastructure required to meet growth from site is set out in policy and Infrastructure Delivery Plan. Site allocations plan amended to include ancient woodland (Hotel Wood). Further detailed masterplanning work is required for planning application stage; treatment of sensitive areas will be refined. Statements of Common Ground between Council, Site Promoter and infrastructure providers (where appropriate) have been prepared to outline delivery and phasing of housing and infrastructure. Further detail to be produced with required Masterplan, Phasing Plan and Infrastructure Delivery Strategy through planning application process.

District Plan		
Chapter 15: Sustainable Communities	Policy: Vision and objectives for Growth at Sayers Common	
Number of Comments Received		
Total: 24	Sound: 1	Unsound: 23
Key Issues Raised		
<p>Site Promoter: Berkeley Latimer (1190760)</p> <ul style="list-style-type: none"> Supports broad strategic vision and objectives. Masterplanning should enable a phased approach to site delivery. The plan should explain that the masterplan and infrastructure delivery strategy will identify the infrastructure required to support the 		

total amount of development and how the individual sites will contribute proportionately to the funding and delivery of this infrastructure.

Transport

- No evidence to demonstrate that transport will be sufficiently improved to result in modal shift in transport movements [**Hurstpierpoint and Sayers Common Parish Council** (1191158)].

Landscape

- Coalescence of settlements and fragmentation of the countryside.
- There should be a 30-year vision which should include the holistic planned evolution of the settlement, including its landscape setting and buffering to surrounding countryside and communities.

Biodiversity

- Pleased to see MSDC has considered comments relating to how previously the cumulative impacts of a number of allocations were unclear from the way the allocations were depicted in the plan. However, we remain unclear how MSDC has considered cumulative impacts to biodiversity from the additional 2,393 dwellings for Sayers Common. [**Sussex Wildlife Trust** (1190866)].
- Object to loss of wildlife habitats and the impact this will have on biodiversity.

Infrastructure

- Insufficient existing and proposed infrastructure to support this level of growth, with infrequent/inaccessible public transport, traffic congestion, and insufficient education and health infrastructure.
- Gaps in evidence base in advance of the Sayers Common allocations being finalised, e.g. Strategic Flood Risk Assessment, Infrastructure Delivery Plan, transport study. (Hurstpierpoint and Sayers Common Parish Council 1191158)
- There is no guarantee that infrastructure will be delivered, that delivery will be properly monitored, and developers held to account.

General

- Support Sayers Common allocations as they are on the edge of the Coastal Sussex HMA and FEMA, and might provide housing and employment opportunities for B&H residents. [**Brighton and Hove City Council** (1186995)].
- Approach to Sayers Common is fundamentally contrary to spatial strategy which aims to direct growth to the most sustainable settlements.
- The Sayers Common allocations are neither an urban extension to an existing sustainable settlement, nor a standalone development of sufficient scale to be sustainable.
- There should be a 30-year vision for the evolution of the settlement, supported by evidence to set out the timescale of infrastructure delivery, the setting within the landscape, and countryside buffers to avoid coalescence of settlements [**Hurstpierpoint and Sayers Common Parish Council** (1191158)].
- Sayers Common development cannot meet the principles of 20-minute neighbourhoods as it fails against all TCPA criteria. The plan lacks a high level vision for a sustainable future community at Sayers Common, while stakeholders have different values and objectives [**Sayers Common Village Society** (1190432)].
- Environmental impact including increased risk of flooding.

- The AONB should not be protected at the expense of the remaining parts of the district.
- In a changing climate, it is increasingly important to protect farmland to ensure food security.
- Proposed housing will not be accessible to young local residents.
- Development of this scale at Sayers Common will destroy the character and heritage value of the village.
- There is no need for development at Sayers Common. The plan over-supplies housing.
- Inconsistent with latest national planning policy which prioritises brownfield development.
- Community views and the neighbourhood plan have not been taken into account.

Other comments:

- The contents table at the beginning of the plan excludes the vision and objectives for Sayers Common, so it is difficult to find.

District Plan

Chapter 15: Sustainable Communities

DPSC3: Land at Brow Hill, Janes Lane, Burgess Hill,
DPSC4: Land at Chesapeake and Meadow View, Sayers Common,
DPSC5: Land at Coombe Farm, Sayers Common,
DPSC6: Land to the West of Kings Business Centre &
DPSC7: Land at LVS Hassocks, Sayers Common

Number of Comments Received

Total: 388

Sound: 4

Unsound: 384

Key Issues Raised

Site Promoter:

DPSC3: Berkeley Latimer (1190757, 1190780, 1190785, 1190812)

- Full site (2,000 dwellings) can be delivered within Plan period.
- Considers that additional education provision (expandable element) is not justified.
- Currently exploring if safeguarded land is suitable for supporting other strategic infrastructure; new 33kV/11kV primary substation. Criterion 8 should reflect land could be used to accommodate additional utility/ infrastructure and will funded pro-rata from all Sayers Common sites.
- Support 20 minute neighbourhood concept which has formed one of the main guiding principles and focus for the masterplan framework - support strategy to reduce reliance on private motor car.
- Wording of policy implies that land and costs of providing the school will be entirely borne by the developer when facility is also meeting needs of wider area.

DPSC4: Antler Homes (1190705)

- Support allocation.
- Clarification/ wording required regarding infrastructure section of policy; should include 'where appropriate'.
- Site is capable of being brought forward independently.
- Clarification sought for criterion 1; currently considered ambiguous and require further clarity on how to address this requirement.

DPSC5: Welbeck Strategic Land II (1190890)

- Support coordinated approach but site is not reliant on other sites to be delivered.
- Requirement 2 needs amending to refer to DPSC3 not DPSC2.
- Confirm that policy requirements can be met.

DPSC6: Reside Development (1189855)

- Confirms that site suitable, available and achievable within the plan period - commencement within first 5 years of the plan.
- Suggests that wording regarding the provision of wastewater treatment upgrades needs clarifying/ reviewing as is not currently consistently applied across the sites.

DPSC7: Wates Development (1191818)

- Confirms that happy to work with MSDC and other Sayers Common site promoters to ensure a coordinated approach to development and delivery of a sustainable community.
- Confirms that site can be delivered early in the Plan period, with an upgraded SEN facility as soon as practically possible.
- Suggest criterion 9 is deleted as is superfluous.

Transport

- Concern over cross-boundary impacts on road network and securing effective mitigation. (DPSC3) [**Horsham District Council (1190711)**].
- Lack of detail regarding public transport strategy and active travel routes/ links; without which do not consider that sustainable transport measures can be achieved. Also questions the achievability of access points and how the sever impacts on A23/ B2118 will be mitigated. (DPSC3)
- Independent Sustainable Access Review concludes that Sayers Common is divorced from main settlements and in reality, too distant and disconnected to reduce car reliance. (DPSC3)
- Local roads unsuitable for traffic from proposed retail/ industrial uses. (DPSC3)
- Welcome opportunity to work with MSDC to reduce trips on the A23 and to understand the extent of financial contributions towards sustainable transport and highway improvements. Cumulative impacts on SRN and SRN junctions. Works to the SRN must be deliverable within highway land or land within the control of the developer. Collaboration required to establish 'monitor and manage' approach, with suitable funded mitigation packages [**National Highways (1191183)**].
- Proposed shared route; needs improvements to wayfinding and existing bridleways to achieve realistic modal shift. [**Hurstpierpoint and Sayers Common Parish Council (1191158)**].
- Impacts on local roads and junctions; B2116/ B2117, traffic through Hurstpierpoint and access on to the A23 southbound from Brighton Road. Mitigation for these issues is unclear [**Hurstpierpoint and Sayers Common Parish Council (1191158)**].
- Development will have a severe impact on the highway network and highway safety [**Shermanbury Parish Council (1186996)**].
- Risks to the community posed by increased traffic – plans should include improvement to sustainable transport infrastructure to reduce car dependency. Road safety issues at Muddleswood Crossroads and the Ginger Fox junction. Increased noise/ disturbance, air and light pollution to community [**Newtimber Parish Meeting (1190804)**].
- Support is given to inclusion of requirement to provide financial contributions towards improvements at Hassocks station and sustainable transport and layout which provides sustainable travel connections. [**Network Rail (1190753)**].

- Strategic transport modelling is inadequate to understand the likely impacts on the transport network in terms of capacity and safety.
- Transport evidence is flawed and overly reliant on home working assumptions.
- Development will exacerbate existing issues and residents/ users of the school(s) would all be dependent on car travel.
- School will exacerbate traffic issues. Poor access to Hassocks station.
- No evidence provided in relation to the likely impacts on road network.

Landscape

- Requirement for 'significant open space and landscaping at southern boundary to ensure gap' has been removed. (DPSC3)
- SA identifies residual major negative effect from loss of BMV, amended wording suggested against DPN1 seeks to address contradiction (DPSC3) [**Natural England** (1196374)].
- Harm to landscape character [**Shermanbury Parish Council** (1186996)].
- The sites are within the setting of SDNP and are visible from Wolstonbury Hill and Newtimber Hill in the national park. Risk of harm to special qualities of the NP. Impact of cumulative urbanisation of the landscape. Mitigation measures will be required, and a landscape-led approach to masterplanning. [**National Trust** (1189774)].
- Concern that development of this scale cannot comply with the principles set out in the SDNP View Characterisation and Analysis Study. As viewed from SDNP, Hurstpierpoint and Sayers Common will appear as one, increasing negative effects on views, sky glow and tranquillity. [**South Downs National Park Authority** (1190831)].
- Irreparable damage to landscape character.
- Does not comply with a significant number of Development Plan policies and should not therefore be allocated – suitable mitigation will not be feasible.
- Coalescence with Albourne and Sayers Common and harmful urbanisation. Harmful impact potential on South Downs National Park Dark Skies
- Development would cause disproportionate harm compared with the benefits associated with housing delivery.

Biodiversity

- Survey information unavailable; unable to comment on ecological value. Site contains; drains and hedges which will act as corridors and important for connectivity; should be retained, significantly buffered and enhanced. (DPSC3) [**Sussex Wildlife Trust** (1190866)].
- Additional criterion needed in relation to adjacent ancient woodland and deciduous woodland priority habitat. (DPSC3) [**Natural England** (1196374)].
- Concern raised over impact on ancient woodland. (DPSC5) [**Hurstpierpoint and Sayers Common Parish Council** (1190706)].
- Irreplaceable habitats will be lost – impossible to mitigate impacts of such large-scale loss of greenfield land [**Shermanbury Parish Council** (1186996)].
- Contrary to NPPF and council policy, harming and fragmenting habitats and biodiversity [**CPRE (Sussex)** (1189028)].
- Ecological information provided by site promoters has not been used to inform policy requirements (DPSC4-7) [**Sussex Wildlife Trust** (1190866)].
- Site lies within Low Weald countryside which contains rich flora, ancient woodland and indicator species where significant work has been undertaken since 2004 through the wildlife enhancement programme to identify biodiversity and identify areas of extreme value and measures to enhance and protect it.
- Loss of biodiversity/ green infrastructure, wildlife and habitats.

- Impact on barn owls

Infrastructure

- Questions viability of proposed infrastructure given only 2,000 dwellings. (DPSC3)
- Unclear if location for secondary school is supported by WSCC. (DPSC3)
- Considers that proposed 'leisure' and 'retail' uses are unviable. (DPSC3)
- Need to understand potential impacts on school catchment areas which may be affected and how community health services will be met [**Horsham District Council** (1190711)].
- Recommend early engagement with EA's permitting team with regards to proposed off site wastewater treatment works to ensure infrastructure can be delivered prior to occupation. (DPSC3) [**Environment Agency** (1189771)].
- Risk of smaller allocations coming forward quicker than DPSC3; delivery risks of infrastructure (insufficient costs). Policy to require collaboration and timely delivery of infrastructure; i.e. masterplanned as a whole/ joint outline application. Policies should include reference to coordinated approach regarding infrastructure to reduce risks and impacts of smaller sites coming forward before significant site. [**Hurstpierpoint and Sayers Common Parish Council** (1191158)].
- Support the inclusion of the requirement for financial contribution towards improvements to Hassocks Station, sustainable transport and provision of layout to provide sustainable travel connections [**Network Rail** (1190753)].
- Location of proposed school is detached from existing village [**Hurstpierpoint and Sayers Common Parish Council** (1191158)].
- Scale of growth requires joint masterplanning and joint strategy. Infrastructure delivery and improvements should be detailed and planned for in the Plan. [**Hurstpierpoint and Sayers Common Parish Council** (1191158)].
- Insufficient jobs, residents will commute to surrounding areas. No evidence for sustainable transport measures [**CPRE (Sussex)** (1189028)].
- Existing infrastructure is deficient; lack of sewerage treatment infrastructure and water supply issues; additional pressure on healthcare infrastructure; no provision for new/expanded schools.
- The allocations are reliant on delivering significant infrastructure for which there is no guarantee it will be delivered. No evidence that appropriate infrastructure to support the proposed growth has been planned for and is deliverable.
- Active travel route unsuitable for most potential users.
- Lack of parking at Hassocks Station.
- Wastewater facility not sufficient. Lack of water supply.

Flooding

- Significant problem with surface water flooding in this area. Flood attenuation schemes are rarely maintained properly. [**Shermanbury Parish Council** (1186996)]
- Taking account of climate change and existing situation, proposals will exacerbate flooding/ flood risk.
- Will exacerbate flooding (Albourne Parish Council)

General

- Additional land adjacent to DPSC3 is available to be considered as an extension; could deliver approximately 300 dwellings. (DPSC3)
- DPSC3 assumes 40dph; 35dph is more realistic given site constraints, rurality of site and BNG requirements which all reduce developable area. (DPSC3)
- Land is in multiple ownership; Berkeley Latimer do not own whole site. (DPSC3)

- Concern over impact of retail provision on Henfield. Suggest DPE4 amended to include neighbouring authorities where a Retail Impact Assessment is required. [**Horsham District Council** (1190711)].
- Disproportionate growth at Sayers Common. [**Hurstpierpoint and Sayers Common Parish Council** (1191154)].
- Over reliance of large sites; risks under supply of housing in the short to medium term.
- Sayers Common sites should be considered collectively.
- Consider that there might be opportunity for neighbouring unmet Gypsy and Traveller pitches to be provided. [**Horsham District Council** (1190711)].
- Support. Site lies on edge of Coastal Sussex HMA and FEMA; potential to assist in reducing identified shortfalls in Brighton & Hove. [**Brighton & Hove CC** (1186995)].
- Smaller sites will be reliant on DPSC3 for infrastructure without which they will not be sustainable.
- Risk to development; if one site fails then 20-minute case falls away [**CPRE (Sussex)** (1189028)]
- Sites combined represent a strategic policy and should therefore look ahead at least to 30 years to take account for full delivery, particularly given site complexities. Contrary to local and national policy.
- DPSC3 should be removed from the plan as it is not sustainable, is in conflict with the council's strategy, national policy and will damage the surrounding landscape and is undeliverable and not positively prepared.
- Allocations DPSC4 - 7 are not justified and together would damage the integrity of the village, individually they are undeliverable due to increased flood risk.
- 20-minute neighbourhood principle is an urban concept as described by TCPA guidance – not appropriate for a rural setting, development cannot meet these principles, council have failed to follow the guidance.
- Car reliant development.
- Does not pass the test of soundness.
- Development should be focused on urban areas not greenfield sites.
- Site selection process is flawed – sites are unsustainable.

Other comments:

- Water supplies are already stressed in this area.
- Proposal not integrated with existing communities.
- Likely light and noise pollution, including on the SDNP tranquillity.
- Air pollution from increased traffic.
- Loss of green gap between settlement – coalescence
- Impact on landscape, biodiversity, habitat including ancient woodland, and wildlife.
- Proposal not suited to the rural nature of Sayers Common or to an aging population that needs public services in close proximity.
- Lack of local community engagement or buy-in. Vision for Sayers Common is being determined by developers and planners, not local residents.
- Development will not deliver more local jobs or genuinely affordable housing options for local residents.
- Overdevelopment; provision of 1,000 homes is excessive.
- Other options to meet identified housing need.
- Specific concern for the area of land known as the 'Hamlet'; isolated.
- SA assessment of DPSC3 is flawed, not objective, transparent or robust in its assessment of reasonable alternatives.
- Development is disproportionately distributed across the district.
- Smaller sites will be delivered independently.

Officer summary response

- The Strategic Transport Study, which includes a safety study, in combination with the site promoter's transport evidence demonstrate residual severe impacts and safety implications on the network can be satisfactorily mitigated.
- Modifications to policy wording proposed in respect of the wording for education provision.
- No objection from Network Rail in respect of parking provision at Hassocks station; welcome financial contributions sought for improvements.
- No objection raised by South East Water or NHS in relation to water supply or healthcare; any improvements needed to support growth are identified in IDP.
- Infrastructure required to meet growth from sites is set out in policy and Infrastructure Delivery Plan.
- Statements of Common Ground between the Council, Site Promoters and infrastructure providers (where appropriate) have been prepared to outline delivery and phasing of housing and infrastructure. Further detail to be produced with required Masterplan, Phasing Plan and Infrastructure Delivery Strategy through planning application process.
- Each application will be considered on its own merits based on the most up to date information, liaising with relevant infrastructure providers and consultees at the time of the application to ensure necessary infrastructure is secured appropriately and in line with CIL Regulations. (DPSC4)
- The council are working with promoters in Sayers Common to develop a joint Statement of Common Ground to agree how the parties will work together to address the policy requirements. (DPSC4)
- Correction regarding DPSC3 is noted and modification recommended. (DPSC5)
- Policy requirements for phased occupation to align with delivery of sewerage infrastructure have been specifically requested for this site and proposed allocations at DPSC5: Land at Coombe Farm and DPSC7: Land at LVS Hassocks by Southern Water at the Regulation 18 stage of the plan – modifications are proposed to remove the sites specific requirement and to modify Policy DPI7 to address this requirement for all relevant development. (DPSC6)
- Modification recommended to delete criterion 9. (DPSC7)

District Plan		
Chapter 16: Site Allocations		
Number of Comments Received		
Total: 9	Sound: 0	Unsound: 9
Key Issues Raised		
<p>Statutory stakeholders: West Sussex County Council (1190880)</p> <ul style="list-style-type: none"> There is a need for site-specific monitoring to inform decision-making on spending of developer contributions for sustainable transport and key highway infrastructure identified through the transport study 		
<p>Town/Parish Councils: Lindfield Parish Council (1190730)</p> <ul style="list-style-type: none"> Concerns that nearby development to Lindfield will continue to put pressure on the limited infrastructure 		
<p>Other consultee bodies: CPRE (Sussex) (1189028)</p> <ul style="list-style-type: none"> The Council should maximise the proportion of affordable housing required on those sites allocated from the purpose within and close to the High Weald AONB where the need is greatest. <p>Sussex Wildlife Trust (1190866)</p> <ul style="list-style-type: none"> Points raised at regulation 18 on the fact that site allocations policies were not informed by ecological surveys continue to be relevant. Sites should not lead to the deterioration or direct loss of biodiversity. 		
<p>Other comments:</p> <ul style="list-style-type: none"> The proposed allocations would cause harm to the coherence of the ecological network in an area where wildlife is already under pressure. Measures are inadequate with no evidence that they will be enforced Too many proposals to build on farmland Lack of evidence of the deliverability of the infrastructure requirements identified for each site allocation policy. 		
<p>Officer summary response</p> <ul style="list-style-type: none"> Allocations outline the infrastructure required to support the growth from the development. The IDP schedules contain further details on infrastructure projects and their delivery. Evidence, including the Strategic Housing Market Assessment (2021) and Viability Study support the affordable housing requirements within relevant policies. 		

District Plan		
Chapter 16: Site Allocations		DPA1: Batchelors Farm, Keymer Road, Burgess Hill
Number of Comments Received		
Total: 10	Sound: 2	Unsound: 8
Key Issues Raised		

Site Promoter: Fairfax Acquisition Limited (1190886)

- Support the allocation

Transport

- Ensure that the cumulative impact of the Plan traffic can be adequately mitigated. Transport Assessment for development in proximity of SRN junctions will need to be developed in consultation with NH and demonstrate impacts on the SRN and its junctions, merges and diverges mitigated [**National Highways (1191183)**]
- Impact on traffic and additional congestion

Landscape

- No enhancement of the countryside
- Impacts on the views from the adjacent open space and the surrounding countryside, including the South Down National Park
- Urbanisation of countryside setting
- Loss of strategic gap and coalescence between Burgess Hill and Hassocks
- Note the inclusion of criteria ensuring the scale, sitting and design of the development avoids harm to the character of the setting and to views from the South Downs National Park [**South Downs National Park Authority (1190831)**]

Biodiversity

- Loss of historic hedgerow
- Development effectively within nature reserve
- Impacts on ecology, biodiversity and wildlife

Infrastructure

- Lack of water available to sustain additional development.
- Loss of well used green infrastructure.
- Support the inclusion of the requirement for financial contribution towards improvements to Burgess Hill Station [**Network Rail (1190753)**]

Heritage

- Proposal out of character with surrounding area
- Impacts on the views from listed assets

Flood Risk

- Flooding issues

Accessibility

- Lack of pedestrian access to the site and site likely to be reliant on the use of private car

Other

- In conflict with the adopted Mid Sussex District Plan policies DP12 and DP15
- Impacts from light and noise pollution
- Cumulative impact with SA13 [*Allocation from Site Allocation DPD*]
- Lack of information on carbon sequestration
- Allocation inconsistent with historical planning permission refusal at this location

Officer summary response

- The (Systra) Strategic Transport Study has been developed in consultation with and validated by WSCC Highway Authority and National Highways and is fit for

purpose. The Study demonstrates that the cumulative impact of the Development Plan traffic can be adequately mitigated.

- Policy DPS4 sets out the requirements in relation to flood risk and sustainable drainage. The Plan should be read as a whole and other policies in the Plan cover requirements Plan that will be applied to relevant proposals.
- The policy requires that landscape impacts and views from the SDNP are minimised. The introduction of those requirements is supported by the SDNPA.
- The development will not result in coalescence of settlements.

District Plan

Chapter 16: Site Allocations

DPA2: Land at South of Appletree Close, Janes Lane, Burgess Hill

Number of Comments Received

Total: 9

Sound: 0

Unsound: 9

Key Issues Raised

Site Promoter: DMH Stallard (1189539)

- Support the plan although additional work is likely to be needed in relation to access to minimise impacts on trees

Transport

- Ensure that the cumulative impact of the Plan traffic can be adequately mitigated. Transport Assessment for development in proximity of SRN junctions will need to be developed in consultation with NH and demonstrate impacts on the SRN and its junctions, merges and diverges mitigated [**National Highways** (1191183)].

Landscape

- Impact on views from surrounding areas
- Green belt development
- Loss of strategic gap between Burgess Hill and Ditchling Common
- Change of character of the entrance to Burgess Hill
- Impact on landscape sensitivity must be considered [**Lewes District Council** (118525)].

Biodiversity

- Ongoing loss of trees
- Impacts on the natural environment
- Loss of trees, woodland and hedgerows
- Inconsistent with national policy: impact on existing environment, development of greenfield site, impact on local wildlife rich habitats

Infrastructure

- Lack of capacity on road network
- Limited water pressure and internet connectivity at this location
- Issues with existing infrastructure (road, electricity, wifi)
- Insufficient amenities and lack of provision for new residents

Heritage

- Out of character with surrounding, in particular proposed density
- Impact on character

Developability

- Dangerous access to the site

Other

- Extension to/Outside of the BUA
- Conflict with proposed policies DPH2, DPH3, DPNs
- Increased light pollution.
- Lack of engagement with local community

Officer summary response

- The (Systra) Strategic Transport Study has been developed in consultation with and validated by WSCC Highway Authority and National Highways and is fit for purpose. The Study demonstrates that the cumulative impact of the Development Plan traffic can be adequately mitigated.
- Policy DPC1 sets out the requirements to ensure that impacts on landscape are appropriately considered and to ensure landscape-led development is delivered across the district. The Plan should be read as a whole and other policies in the Plan cover requirements Plan that will be applied to relevant proposals.
- WSCC as highway authority have informed SHELAA process which fed into site selection. It is considered possible to provide safe access.
- The site is on the edge of a settlement with existing infrastructure capacity as advised by relevant infrastructure providers, while the development is required to provide highways works and sustainable transport measures, alongside financial contributions towards offsite infrastructure to support growth.
- The development will not result in the coalescence of settlements.

District Plan**Chapter 16: Site Allocations**

DPA3: Burgess Hill Station, Burgess Hill & DPA3a: Allotment Site – Nightingale Lane, Burgess Hill

Number of Comments Received**Total: 18****Sound: 3****Unsound: 15****Key Issues Raised****Transport**

- National Highways need to be satisfied that the cumulative impact of Local Plan traffic can be adequately mitigated [**National Highways** (1191183)]
- Impact of additional traffic on highway network, safety, and car parking, exacerbating existing problems.

Biodiversity

- Policy is silent regarding area of ancient woodland [**The Woodland Trust** (1189959)].
- Impact on adjoining ancient woodland, loss of habitats and biodiversity.
- Impact on biodiversity and animal habitats [**Mims Davis MP** (1190736)]

Infrastructure

- To ensure rights over the allotments in perpetuity by the Town Council and to make DPA3a more robust (sound) the term 'or long-lease' shall be deleted so a single, definitive, outcome is attained. The revised wording shall be thus:
'As a result of this allocation, these allotments will be Statutory upon completion

with the freehold or long-lease provided to Burgess Hill Town Council for their ongoing management and maintenance' [**Burgess Hill Town Council** (1189577)].

- Loss of allotment space/ green space - Insufficient infrastructure - Water constraints - Area prone to flooding [**Mims Davis MP** (1190736)]
- Concern that any funding for infrastructure will not materialise or be directed elsewhere and not ring-fenced for Burgess Hill.
- Additional strain on infrastructure such as schools that are already at capacity. Increased carbon emissions from development not consistent with net-zero and climate change ambitions.

Heritage:

- The proposed allotment site is on a Roman Road – pre-determination evaluation for potential archaeological features has been carried out to determine whether the asset could be conserved [**Historic England** (1190689)]

General

- Plan fails to allocate sufficient housing on brownfield sites [**Hurstpierpoint Parish Council** (1191149)]
- DPA3 – Burges Hill Station: Support - opportunity to secure improvements to Burgess Hill Station which will encourage usage of the rail network. Further improvements for pedestrians and cyclists within Burgess Hill to the station should also be pursued to improve accessibility for all users. DPA3a - Allotment Site, Nightingale Lane, Burgess Hill Supports the identification of an alternative site for new allotments which provides significant benefits for residents and other users. [**Network Rail** (1190753)]
- Need for assurance that assistance will be provided to allotment holders during the relocation process.
- Proposed replacement allotments will not adequately compensate due to net loss of greenfield and allotment land.
- Existing allotments are highly valued in their current location.
- Noise and air pollution.
- Overdevelopment in view of Northern Arc development already being built on greenfield.
- Incompatible with the Neighbourhood Plan, which protects existing allotment sites.

Officer summary response

- The (Systra) Strategic Transport Study has been developed in consultation with and validated by WSCC Highway Authority and National Highways and is fit for purpose. The Study demonstrates that the cumulative impact of the Development Plan traffic can be adequately mitigated.
- Modifications recommended to refer to ancient woodland.
- The specifics of the tenure agreement are a private legal matter and is not a material planning consideration – current wording provides flexibility and is sound.
- The requirement for a pre-determination evaluation for potential archaeological features will be secured through application of policy DPB2 Listed Buildings and Other Heritage Assets and a modification is recommended to refer to the Roman Road.

District Plan

Chapter 16: Site Allocations

DPA4: Land off West Hoathly Road, East Grinstead

Number of Comments Received		
Total: 6	Sound: 1	Unsound: 5
Key Issues Raised		
<p>Site Promoter Devine Homes (1189426)</p> <ul style="list-style-type: none"> • Support the proposed allocation. • The site is available, deliverable and achievable. • Supporting evidence has been undertaken for the proposed allocation and is available on the Council's website. • Any landscape and visual effects would be localised and as such it is considered there would be little impact on the High Weald National Landscape. • An appropriate buffer for the ancient woodland has been included in the indicative site layout. • The hedgerow fronting West Hoathly Road will be retained. • A pedestrian link to Sunnyside Recreation Ground has been incorporated. • Suitable access can be achieved, and a pedestrian crossing can be incorporated. 		
<p>Transport</p> <ul style="list-style-type: none"> • Ensure that the cumulative impact of the Plan traffic can be adequately mitigated. Transport Assessment for development in proximity of SRN junctions will need to be developed in consultation with NH and demonstrate impacts on the SRN and its junctions, merges and diverges mitigated [National Highways (1191183)] • Concerns over the impacts on the B2110/B2028 junction (additional traffic, congestion, pollution, road deterioration) which is in the top 3 of the most critical junctions in MSDC, within a conservation area, in the countryside [Turners Hill Parish Council (1189358)]. 		
<p>Landscape</p> <ul style="list-style-type: none"> • Pleased to note reference to conserving and enhancing the AONB. Concerned that the quantum of dwellings will be difficult to achieve in an appropriate landscape-led design bearing in mind the presence of ancient woodland, trees and hedgerows, all of which are characteristic of the High Weald AONB and will need to be retained. Recommend revisiting number of dwellings to reflect an appropriate density for the character of the location to ensure it provides clear, realistic and achievable targets to inform subsequent planning application. Expand criterion 1 to include reference to landscape-led design, layout and capacity [High Weald National Landscape Partnership (1194408)]. • Recommend that the Council reviews the major development assessment conclusions for this site. Expand criterion 1 to include reference to development being landscape-led. Include a requirement for a LVIA [Natural England (1196374)]. 		
<p>Biodiversity</p> <ul style="list-style-type: none"> • Welcome point 2 for provision of an appropriate buffer for the ancient woodland and priority habitat. The policy would not be sound without this requirement [Woodland Trust (1189985)]. 		
<p>Officer summary response</p> <ul style="list-style-type: none"> • The (Systra) Strategic Transport Study has been developed in consultation with and validated by WSCC Highway Authority and National Highways and is fit for purpose. The Study demonstrates that the cumulative impact of the Development Plan traffic can be adequately mitigated. 		

- This policy DPA4 and policies DPC1 and DPC4 highlight the need for landscape-led development and particular requirements for development within the High Weald AONB including for LVIA.

District Plan

Chapter 16: Site Allocations

DPA5: Land at Hurstwood Lane, Haywards Heath

Number of Comments Received

Total: 8

Sound: 1

Unsound: 7

Key Issues Raised

Site Promoter:

Taylor Wimpey Strategic Land (1190898)

- Support the allocation - but the site has been planned on the basis of 200 homes on a larger site that is within both Mid Sussex District and Lewes District.
- Access is proposed via Hurstwood Lane and, as such, an amendment to requirement 4 regarding tree retention is sought. Additional planting should be either along the site boundary and/or within the site.
- Good potential for the site to integrate with the Hurst Farm development.
- The transport impact will be minor and within daily variations.

Transport

- Ensure that the cumulative impact of the Plan traffic can be adequately mitigated. Transport Assessment for development in proximity of SRN junctions will need to be developed in consultation with NH and demonstrate impacts on the SRN and its junctions, merges and diverges mitigated [**National Highways** (1191183)]
- Concerned by allocations DPA5 and DPA6. Combined with the Hurst Farm site, it is considered there will be a detrimental impact on the road network particularly at the Hurstwood Lane/ Fox Hill junction [**Haywards Heath Town Council** (1187719)].
- Potential for highway access conflict with the Hurst Farm allocation [**Homes England** (1191327)].
- Hurstwood Lane/Fox Hill junction capacity modelling for the Hurst Farm site did not include DPA5 and DPA6 [**Homes England** (1191327)].

Landscape

- The impacts of edge of settlement development needs to be undertaken with regard to landscape sensitivities [**Lewes District Council** (1187065)].

Biodiversity

- The trees along Hurstwood Lane contribute to biodiversity and provide a noise buffer and natural privacy screen to the proposed primary school on the Hurst Farm site - Homes England is supportive of the policy wording to retain and enhance the trees [**Homes England** (1191327)].

Infrastructure

- Support the inclusion of a requirement to provide financial contributions towards improvements at Haywards Heath railway station [**Network Rail** (1190753)].
- Would welcome inclusion of a requirement for infrastructure delivery of the sites to be integrated, with particular regard to any cross-border implications, notably on the highways network and education provision [**Lewes District Council** (1187065)].

- Need to consider capacity of utilities to accommodate DPA5 and DPA6 on top of Hurst Farm development [**Homes England** (1191327)].

Other comments

- Note that DPA5 goes beyond the existing Haywards Heath Neighbourhood Plan allocation at Hurst Farm. The policy wording for the allocations notes the need to integrate development of the allocations [**Lewes District Council** (1187065)].
- Generally supportive of DPA5 but note specific comments [**Homes England** (1191327)].
- Allocation appears to be development on potential BMV agricultural land [**Natural England** (1196374)].
- Omission site – the site scores poorly in the site selection assessment and does not outperform the land at Colwell Farm. The site does not accord with the 20-minute neighbourhood principles [**Miller Homes** (1191296)].

Officer summary response

- No proposed modification in relation to the retention of trees – criterion 4 already provides flexibility.
- The (Systra) Strategic Transport Study has been developed in consultation with and validated by WSCC Highway Authority and National Highways and is fit for purpose. The Study demonstrates that the cumulative impact of the Development Plan traffic can be adequately mitigated.
- Policy DPI1: Infrastructure Provision includes reference to cross-boundary infrastructure.
- Further engagement with relevant stakeholders will consider the comments made by Homes England.
- Further engagement with relevant stakeholders will consider the points raised by Homes England.

District Plan

Chapter 16: Site Allocations

DPA6: Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath

Number of Comments Received

Total: 8

Sound: 1

Unsound: 7

Key Issues Raised

Site Promoter: Elivia Homes (1189694)

- Support the allocation.
- 30 dwellings can be accommodated on the site.
- Access from Hurstwood Lane rather than Colwell Lane.
- Character of Hurstwood Lane can be retained through a sensitively designed layout.
- Any trees removed for access can be mitigated with replacement planting.
- Trees on site boundary can be retained.

Transport

- Ensure that the cumulative impact of the Plan traffic can be adequately mitigated. Transport Assessment for development in proximity of SRN junctions will need to be developed in consultation with NH and demonstrate impacts on the SRN and its junctions, merges and diverges mitigated [**National Highways** (1191183)].

<ul style="list-style-type: none"> • Concerned by allocations DPA5 and DPA6. Combined with the Hurst Farm site, it is considered there will be a detrimental impact on the road network particularly at the Hurstwood Lane/ Fox Hill junction [Haywards Heath Town Council (1187719)]. • Potential for highway access conflict with the Hurst Farm allocation [Homes England (1191327)]. • Hurstwood Lane/Fox Hill junction capacity modelling for the Hurst Farm site did not include DPA5 and DPA6 [Homes England (1191327)].
<p>Landscape</p> <ul style="list-style-type: none"> • The impacts of edge of settlement development needs to be undertaken with regard to landscape sensitivities [Lewes District Council (1187065)].
<p>Biodiversity</p> <ul style="list-style-type: none"> • The trees along Hurstwood Lane contribute to biodiversity and provide a noise buffer and natural privacy screen to the proposed primary school on the Hurst Farm site - Homes England is supportive of the policy wording to retain and enhance the trees [Homes England (1191327)].
<p>Infrastructure</p> <ul style="list-style-type: none"> • Support the inclusion of a requirement to provide financial contributions towards improvements at Haywards Heath railway station [Network Rail (1190753)]. • Would welcome inclusion of a requirement for infrastructure delivery of the sites to be integrated, with particular regard to any cross-border implications, notably on the highways network and education provision [Lewes District Council (1187065)]. • Need to consider capacity of utilities to accommodate DPA5 and DPA6 on top of Hurst Farm development [Homes England (1191327)].
<p>Flood Risk</p> <ul style="list-style-type: none"> • Representations to the Hurst Farm planning application demonstrated that surface water flooding is an issue along Colwell Lane [Homes England (1191327)].
<p>Other comments</p> <ul style="list-style-type: none"> • Note that DPA6 goes beyond the existing Haywards Heath Neighbourhood Plan allocation at Hurst Farm. The policy wording for the allocations notes the need to integrate development of the allocations [Lewes District Council (1187065)]. • Generally supportive of DPA6 but note specific comments [Homes England (1191327)]. • Allocation appears to be development on potential BMV agricultural land [Natural England (1196374)]. • Omission site – the site scores poorly in the site selection assessment and does not outperform the land at Colwell Farm. The site does not accord with the 20-minute neighbourhood principles [Miller Homes (1191296)].
<p>Officer summary response</p> <ul style="list-style-type: none"> • The (Systra) Strategic Transport Study has been developed in consultation with and validated by WSCC Highway Authority and National Highways and is fit for purpose. The Study demonstrates that the cumulative impact of the Development Plan traffic can be adequately mitigated. • Policy DPI1: Infrastructure Provision includes reference to cross-boundary infrastructure.

- Further engagement with relevant stakeholders will consider the points raised by Homes England.

District Plan

Chapter 16: Site Allocations

DPA7: Land east of Borde Hill Lane, Haywards Heath

Number of Comments Received

Total: 117

Sound: 0

Unsound: 117

Key Issues Raised

Site Promoter: **Fairfax Acquisition Limited** (119099)

- Support the allocation although object to the proposed yield, the site can accommodate approximately 100 dwellings.

Transport

- Ensure that the cumulative impact of the Plan traffic can be adequately mitigated. Transport Assessment for development in proximity of SRN junctions will need to be developed in consultation with NH and demonstrate impacts on the SRN and its junctions, merges and diverges mitigated [**National Highways** (1191183)].
- Likely increase in traffic
- Frequent accidents on Borde Hill Lane
- Access to town is congested due to pinch point under the railway bridge
- Cumulative impact of increased traffic on AONB villages
- Traffic impact of proposed development on Copyhold Lane

Landscape

- Impact on landscape
- Sensitivity of landscape character
- The report provided by Fabrik Consultants contradict the finding of other landscape reports (LVIAs) and should be removed.
- Only some parts of the site have landscape suitability for development. These areas have a lack of defensible boundaries which are likely to result in pressure to develop the whole site.
- Loss of greenfield site
- Continuation of suburbanisation and urban sprawl
- Coalescence with Ansy and Staplefield
- Erosion of green barriers between Haywards Heath, Cuckfield, Lindfield and the High Weald AONB
- The Plan fails to preserve green barriers between the villages and towns.
- Adjacent to AONB
- Negative visual impact on the AONB and entrance to Haywards Heath
- Concerns that the policy may not meet requirement of para 182 of the NPPF which states that development within the settings of a designated landscape should be 'sensitively located and designed to avoid or minimise adverse impacts on the designated areas'. No reference to the importance of design aspects in preserving character particularly as the allocation abuts the High Weald AONB. No reference to the development being 'landscape-led'. No reference to policy DPN3 or DPC4. [**Natural England** (1196374)]
- Loss of enjoyment of views including from public viewpoints
- Contradiction between the landscape requirement and the flooding requirement to appropriately locate development within the site.

Biodiversity

- Impact on wildlife and biodiversity
- Loss of mature trees
- Proximity with ancient woodland
- Impact on ancient woodland
- Site within the woodland inventory for Mid Sussex District
- Grade 3 agricultural land

Infrastructure

- Additional strains on local infrastructure
- Lack of infrastructure and significant strain on local services in Haywards Heath
- Cumulative impacts of small development have not been accounted for across the years and has resulted in a lack of investment towards infrastructure.
- Increase parking from train commuters due to lack of public parking and limited public transport.
- Unsuitable utility infrastructure (power, water supply and drainage)
- Lack of leisure and entertainment within the town to sustain more residents and create a healthy community.
- Detrimental cumulative impact of development on services and amenities
- Developer contributions from this development should be directed to Haywards Heath [**Haywards Heath Town Council** (1187719)].
- Support the inclusion of the requirement to provide financial contributions towards the improvement of the HH Station. [**Network Rail** (1190753)].

Heritage

- Impact on historic environment
- Impact on roman road
- Included in the description of Borde Hill's Grade II* Parkland listing / Proximity with parkland surrounding the listed building at Borde Hill
- Adverse impact on character of the neighbourhood
- A roman road cross the site and therefore archaeological assessment would be required as per the requirement of policy DPB2 [**Historic England** (1190689)].

Flood Risk

- Site is subject to flooding issues.
- Active river valley on site
- Site within Flood Zone 3
- High probability of/ likely increased of surface water flooding.
- Support the inclusion of comments provided at the regulation 18 stage [**Environment Agency** (1189771)].

Developability

- Unsuitability of road system to accommodate safe route for pedestrian and cyclist [**Haywards Heath Town Council** (1187719)]
- Not accessible, isolated from services and lack of connectivity.
- No road access should be provided via Orchard Way and Fairfield Way
- Developer should engage with Network Rail's Asset Protection Team to ensure suitable fencing, drainage and other protections are in place to prevent impacts on the railway. [**Network Rail** (1190753)]
- The PROW along the southern boundary utilises an underpass [**Network Rail** (1190753)].

Accessibility

- Unsustainable location for development, alternative sites within the SHELAA would deliver more sustainable development [**Haywards Heath Town Council** (1187719)]
- Does not meet the 20-minute neighbourhood ambitions.
- Volume and speed of traffic on Balcombe Road presents risks for pedestrians
- Increase reliance on the use of private car.
- Lack of accessibility to PROW due to volume of traffic on Balcombe Road and Hanlye Lane
- Loss of access to the countryside

Other

- Not efficient use of land as this is a greenfield site.
- Proposed density does not meet the requirement for effective use of land.
- Lack of explanation for choosing green space rather than brownfield
- Development of brownfield land would be a better investment.
- The Plan is proposing an oversupply over the plan period and therefore this site is not needed.
- This allocation contradicts the overarching principle of the strategy established for the plan.
- Contrary to proposed DPN policies.
- Contrary to the objectives of the sustainability appraisals
- Lack of justification for the allocation
- Planning application at this location was previously refused.
- Previous inspector found that under provision at Haywards Heath did not pause soundness issues.
- Contrary to / not allocated within Haywards Heath Neighbourhood Plan
- Upon the grant of permission at Penland Farm, land was not supposed to be built on for 15 years.
- Increase noise and disturbance.
- Within a soil mineral safeguarding area
- Number of other development ongoing within the vicinity of the site and around Haywards Heath
- Clarification should be provided in relation to the extent the wider implications of the site will be considered.
- Outside of Haywards Heath built-up area
- Concerns over prioritising of house building
- Development unpopular with residents
- Lack of consideration on the impacts on existing residents
- Residents would like MSDC to register this land as an Area of Great Landscape Value
- Loss of privacy and amenity
- Detrimental to provide affordable homes for local people.
- The proposed allocation is in breach of government guidelines.
- Inappropriate development at a location already subject to significant new housing
- A long-term vision for the town is needed to consider its future with the addition of new housing.
- Financial management of Borde Hill should not influence planning decisions.

Officer summary response

- The (Systra) Strategic Transport Study has been developed in consultation with and validated by WSCC Highway Authority and National Highways and is fit for purpose. The Study demonstrates that the cumulative impact of the Development Plan traffic can be adequately mitigated.
- Cross referencing with other policies within the Plan is not considered necessary. The Plan should be read as a whole and other policies in the Plan cover requirements Plan that will be applied to relevant proposals.
- The District Plan recognises that the proposed development will form part of the Haywards Heath settlement. This was reflected within the Infrastructure Delivery Plan and associated schedules which directs all planning obligations from the proposed development towards infrastructure in Haywards Heath.
- Policy wording ensure that development is directed away from areas at risk of flooding.
- The development must provide highway works and sustainable transport measures, as well as financial contributions towards a broad range of infrastructure to support growth at this location.
- The Site is not within the High Weald AONB although adjacent to it. The policy requirements for the site require mitigation to reduce any potential impact on the AONB and heritage assets. The High Weald National Landscape was consulted at regulation 19 and raise no objection.
- The plan should be read as a whole. Other policies in the plan provide additional detail and requirements for protecting the natural environment and green infrastructure. This includes to provide biodiversity net gain as well as avoid and mitigate impacts on woodland and other habitats, provide sustainable drainage and incorporate water efficiency measures as part of sustainable design.
- Services and facilities are accessible within 20 minutes via active travel modes. All site allocations policies have been assessed against a rigorous site selection methodology and subject to sustainability appraisal.

District Plan

Chapter 16: Site Allocations

DPA8: Orchards Shopping Centre,
Haywards Heath

Number of Comments Received

Total: 2

Sound: 1

Unsound: 1

Key Issues Raised

Transport

- Ensure that the cumulative impact of the Plan traffic can be adequately mitigated. Transport Assessment for development in proximity of SRN junctions will need to be developed in consultation with NH and demonstrate impacts on the SRN and its junctions, merges and diverges mitigated. How will the identified transport infrastructure requirements be funded and delivered [**National Highways** (1191183)].
- Supports inclusion of financial contributions for improvements to Haywards Heath station.

Officer summary response

- Welcome support for Policy.
- The (Systra) Strategic Transport Study has been developed in consultation with and validated by WSCC Highway Authority and National Highways and is fit for purpose. The Study demonstrates that the cumulative impact of the Development Plan traffic can be adequately mitigated.

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District Plan		
Chapter 16: Site Allocations	DPA9: Land west of Turners Hill Road	
Number of Comments Received		
Total: 54	Sound: 0	Unsound: 55
Key Issues Raised		
<p>Site Promoter: Wates Developments (1191774)</p> <ul style="list-style-type: none"> • Amend wording (from country park to countryside open space) to ensure effectiveness of criterion. • Increase dwelling yield to 450. • Confirm that onsite and offsite infrastructure requirements can be met. • Confirm site can be delivered early in Plan period and happy to work with DPA10 as criterion 8 sets out. • Criteria 1, 3, and 12 not needed – repeating other policy. 		
<p>Transport</p> <ul style="list-style-type: none"> • Ensure that the cumulative impact of the Plan traffic can be adequately mitigated. Transport Assessment for development in proximity of SRN junctions will need to be developed in consultation with NH and demonstrate impacts on the SRN and its junctions, merges and diverges mitigated [National Highways (1191183)]. • Additional traffic will put pressure on already congested roads, junctions, speeding and rat-runs on rural lanes. • Lack of viable solution to congestion issues on A264 corridor and A264/ A22 junction • Impacts on Wallage Lane • Concerned about impacts on B2110/ B2028 junction [Turners Hill Parish Council (1189358)]. 		
<p>Landscape</p> <ul style="list-style-type: none"> • Ancient woodland should be removed from allocation area. More detail needed on how impacts on ancient woodland will be addressed. • Further loss of green gap between Crawley Down and M23. 		
<p>Biodiversity</p> <ul style="list-style-type: none"> • Site is a wildlife corridor. • Deer management – road hazard • Streets should have fruit trees; blossom and fruit could benefit wildlife and people. 		
<p>Infrastructure</p> <ul style="list-style-type: none"> • Local wastewater network has limited capacity to accommodate proposed growth; however, not a constraint provided planning policy and subsequent conditions ensure occupation is phased to align with the delivery of wastewater infrastructure. Required reinforcement of wastewater network will be provided through the New Infrastructure charge. Existing SW infrastructure crosses the site; requires minimum 6m easement. Additional criteria suggested to ensure phasing of development and easement [Southern Water (1188647)]. • Additional growth will increase pressure on local doctors' surgery. Outdoors sports provision should be provided off-site at the Haven Centre [Worth Parish Council (1190873)]. 		

- Lack of services in village. Should not allocate sites if it cannot guarantee that the necessary infrastructure will be delivered or is already available. School already at capacity, healthcare in special measures, national grid already struggles to support energy needs of existing residents.
- Impact on Worth Way bridleway
- Lack of public transport in rural areas. Additional development in Crawley Down is unsustainable and inevitably results in more cars, more traffic, with additional need for EV charging facilities and parking space.
- A coordinated strategic approach to development and infrastructure needed in the north of the district .
- New 4G pitch should be provided at Haven Centre. Preference would be to development P1 which is better located and has some facilities already, rather than P2. Also still a local need for 9x9 (under 11/12) and 11x11 (under 13/14) pitch which could be incorporated at the Haven Centre on P2 & P3. Changing rooms at Haven Centre need complete refurbishment or new facility added.
- Low water pressure already experienced adjacent to site.

Flood risk

- Catchment is subject to high infiltration flows during certain groundwater conditions. Appropriate SuDs should be agreed with LLFA. Scale of proposed developments doesn't materially affect sewer network, but care needed when designing new networks to ensure they don't surcharge and cause flooding. Upgrades to wastewater network likely to be needed; early liaison needed to agree phasing plan [**Thames Water** (1191163)]
- Surface water flooding. Stream in lower part of site already breaches banks in times of prolonged rainfall. Wallage Lane floods. Damage already seen to Huntsland Lane bridge.
- Drainage challenges

Developability

- Freeholders of adjacent Cross development will not permit access to site.
- Construction access will be an issue as access is already tight in Wychwood Place.

Other comments:

- Proposed development of agricultural land; suggested wording to Policy DPN1 provided to address inconsistency [**Natural England** (1196374)].
- Concerns with strategy which proposes settlements such as Crawley Down, which met its housing requirement against 2018 District Plan, to take more growth. Proportionate growth needs defining and evidence for the level of growth considered proportionate for each settlement. Strategy is currently inconsistent; housing requirements differ for similar sized settlements. Quantum of development is not proportionate for Crawley Down.
- New houses unsold.
- MSDC should explain why the significant site at Ansty has not been taken forward.
- DPA9 and DPA10 should be brought forward together.
- Agricultural land should be for food production.
- Departure from neighbourhood plan and Parish Council views not considered.
- Lack of engagement with local community, no support from the local community for the scheme
- Overdevelopment; site will appear physically and visually separate from existing village.
- Lack of coordination with adjoining site allocation, DPA10, and significant site at Crabbet Park – DPSC2.

- Air and noise pollution from additional traffic.
- Light and noise pollution from the proposed football pitch.

Officer Summary Response

- The (Systra) Strategic Transport Study has been developed in consultation with and validated by WSCC Highway Authority and National Highways and is fit for purpose. The Study demonstrates that the cumulative impact of the Development Plan traffic can be adequately mitigated.
- Proposed modifications to address site promoters' reference to countryside open space.
- No objection from water and wastewater providers.
- Requirements suggested by Southern Water and Thames Water are covered by other policies in the Plan; Plan should be read as a whole.
- All suggestions from Town and Parish Councils for the future spending of planning obligations have been compiled and included within appendix 1 of the Infrastructure Delivery Plan. Projects will inform the preparation of relevant section 106 agreement at the planning application stage.

District Plan

Chapter 16: Site Allocations

DPA10: Hurst Farm, Turners Hill Road, Crawley Down

Number of Comments Received

Total: 19

Sound: 0

Unsound: 19

Key Issues Raised

Site Promoter: Reside Developments Limited (1189772)

- Clarification required in relation to the requirement protect adjacent sensitive landscape areas
- Clarification in relation to the Ashdown Forest contributions as the site is beyond the 7km ZOI.
- Support the allocation. Site is suitable, available and achievable within the plan period. Development within the first five years of adoption. Provision of policy compliant affordable housing and self/build plots. No technical issues in relation to viability.

Transport

- Ensure that the cumulative impact of the Plan traffic can be adequately mitigated. Transport Assessment for development in proximity of SRN junctions will need to be developed in consultation with NH and demonstrate impacts on the SRN and its junctions, merges and diverges mitigated [**National Highways** (1191183)]
- Concerns over the impacts on the B2110/B2028 junction (additional traffic, congestion, pollution, road deterioration) which is in the top 3 of the most critical junctions in MSDC, within a conservation area, in the countryside [**Turners Hill Parish Council** (1189358)].
- Road network at Crawley Down are at capacity and additional development will increase traffic.
- Additional traffic in Crawley Down and associated pollution, noise and loss of tranquillity

Biodiversity

- Clarification should be provided how the impacts on the ancient woodland must be addressed to comply with para 186c NPPF [**The Woodland Trust** (1189996)].
- Impact on environment and wildlife
- Growth at this location will continue to increase the strain on ecosystems.
- Loss of habitat

Infrastructure

- The Council has failed to respond to the Parish Council's views on the local infrastructure requirements.
- Proposed football pitch on the neighbouring site should be located closer to the Hurst Farm entrance to avoid impact on neighbouring properties.
- Limited resident facilities and local services
- Doctors are at capacity.
- Lack of capacity within local school to accommodate increased population.
- Unsuitability of road network
- Added burden on water supply.
- Access issues for emergency vehicles
- Outdoor sport provision would need careful planning (parking, floodlighting, noise)
- Increase usage of Worth Way will have negative impacts on the area and its users.
- No suitable electric infrastructure to cope with additional population.
- No concerns regarding wastewater networks in relation to this development. Liaison with the provider will be essential. Include reference to capacity and phasing. [**Thames Water** (1191163)].

Flood Risk

- Major drainage issue around the junction of Wallage Lane and a private lane
- Areas surrounding Hunstlands are prone to flooding and additional development will worsen the situation.
- Increased surface water drainage issue
- This catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network; however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer-term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. [**Thames Water** (1191163)].

Developability

- Proposed access is unclear, and likely to pass existing properties.
- Concerns about the suitability of access via Wychwood Place
- Lack of visibility to access Turners Hill Road. Safety concerns

Other

- Site should be considered as one with DPA9 in particular in relation to transport and access [**Worth Parish Council** (1190873)].
- Lack of strategic approach to proposed development in Crawley Down
- Negative impacts on adjoining properties
- Departure from Neighbourhood Plan
- Loss of countryside with impacts on the unique characteristics of Crawley Down and loss of identity for communities

- The allocation of the site contradicts policy DPN1 in allocating development on potential BMV Grade 2 & 3 agricultural land [**Natural England** (1196374)]
- Overdevelopment when taking commitments into account [**Nexus Planning** (1189677)].
- Site will appear visually and physically separate from existing village [**Nexus Planning** (1189677)].

Officer summary response

- The (Systra) Strategic Transport Study has been developed in consultation with and validated by WSCC Highway Authority and National Highways and is fit for purpose. The Study demonstrates that the cumulative impact of the Development Plan traffic can be adequately mitigated.
- Further details on the relationship between the proposed development and the adjacent ancient woodland are considered unnecessary. The Plan should be read as a whole and the criteria is covered under other policies contained within the Plan that will be applied to the proposal.
- Reference to phasing development to align with water infrastructure is considered unnecessary. The Plan should be read as a whole; requested insertion is covered under other policies contained within the Plan.
- All infrastructure suggestions from Town and Parish Councils for the future spending of planning obligations have been compiled and included within appendix 1 of the Infrastructure Delivery Plan. Suggested projects together with additional engagement with relevant town and parish councils will inform the preparation of relevant section 106 agreement at the planning application stage.
- The site promoter has indicated that access is achievable and no objection was raised by the highway authority.
- Financial contributions are required for offsite infrastructure, including education, health and sustainable transport, to mitigate the impacts of the proposed development.

District Plan

Chapter 16: Site Allocations

DPA11: Land rear of 2 Hurst Road, Hassocks

Number of Comments Received

Total: 6

Sound: 1

Unsound: 5

Key Issues Raised

Site Promoter: **Globe Homes** (1189988)

- Support the allocation.
- Concerns over the inclusion of the infrastructure requirements within the policy wording. Planning obligations should be determined at the application stage in accordance with adopted policies and guidance.

Transport

- Ensure that the cumulative impact of the Plan traffic can be adequately mitigated. Transport Assessment for development in proximity of SRN junctions will need to be developed in consultation with NH and demonstrate impacts on the SRN and its junctions, merges and diverges mitigated [**National Highways** (1191183)].

Biodiversity

- Further development will have a negative impact on the local wildlife.

Infrastructure

- Unsuitable infrastructure (education, health, transport)
- Disproportionate development proposed in village with lack of infrastructure to support growth.
- Support the inclusion of requirements for financial contributions towards the improvement of Hassocks Station [**Network Rail** (1190753)].

Heritage

- Archaeological potential on site due to crossing point of two Roman Roads - this would be addressed via DPB2 [**Historic England** (1190689)].

Other

- Further development will have a negative impact on existing residents and the local wildlife.

Officer summary response

- The (Systra) Strategic Transport Study has been developed in consultation with and validated by WSCC Highway Authority and National Highways and is fit for purpose. The Study demonstrates that the cumulative impact of the Development Plan traffic can be adequately mitigated.
- Financial contributions are required for offsite infrastructure, including education, health and sustainable transport to mitigate the impacts of the proposed development.

District Plan**Chapter 16: Site Allocations****DPA12: Land west of Kemps, Hurstpierpoint****Number of Comments Received****Total:** 143**Sound:** 1**Unsound:** 142**Key Issues Raised****Site Promoter: Thakeham Homes Limited (1191000)]**

- Support the inclusion of the site alongside on-site provision of play space and informal outdoor space.
- Flexibility should be introduced for the quantum of delivery to maximise the potential of the site.
- The requirements to upgrade the footpath should be limited within the site.

Transport

- Ensure that the cumulative impact of the Plan traffic can be adequately mitigated. Transport Assessment for development in proximity of SRN junctions will need to be developed in consultation with NH and demonstrate impacts on the SRN and its junctions, merges and diverges mitigated [**National Highways** (1191183)]
- Lack of transport capacity
- Congestion issues in Hurstpierpoint
- Transport issues from the A2300 down Cuckfield Road into Hurstpierpoint and along the B2116 from Sayers Common to Hassocks, excessive movement on High Street in Hurstpierpoint and extreme pressure at the Stonepound Crossroads
- Additional traffic pressure on Western Road and the High Street
- Contravenes with para 111 of the NPPF re. road safety

- Inability of the village to accommodate further traffic in particular to access Hassocks Station

Landscape

- Iterative growth of the settlements with erosion of gaps undermining the distinctive character and identity of individual settlements [**Hurstpierpoint and Sayers Common Parish Council** (1191154)]
- The proposed allocation is located on land open to the public and well used.
- Loss of gap between Hurstpierpoint and Sayers Common
- Plan fails to include a robust strategic gap policy.
- Countryside location and within a local green gap
- Local gaps identified in the neighbourhood plan are being ignored.
- The proposal would blur the existing green crescent strategic gap.
- Erosion of the countryside between Burgess Hill and Hurstpierpoint
- Concerns that Hurstpierpoint will become a neighbourhood of Burgess Hill
- Urbanisation of land immediately adjacent to and visible from the SDNP
- Impact on the South Downs National Park
- The proposal would not enhance the countryside.
- Further evidence is required on the impacts on the landscape for the policy to be sound.

Biodiversity

- Loss of biodiversity that could not be compensated via BNG.
- Lack of evidence in relation to the provision of BNG (the assertion that enhancing open space quality and connectivity supports biodiversity is unfounded and lacks proofs of net gain, no control over private garden use, general guides does not demonstrate tangible net gain for wildlife, hedgehog highways is only a compensation mechanism, the absence of ponds and the removal of hedgerows contradicts claims of creating valuable habitats, promised educational programmes on ecology and sustainability are vague and unsubstantiated)
- Trees on site are protected.
- Agricultural land with native hedgerows and trees providing biodiverse habitat for species.
- Impact of development on the root systems of trees separating the allocated sites to the back of the properties along Kemps
- Risk of losing verge along Orchard Way to widen the access road to the site. This may also have impacts on the trees and biodiversity at this location.
- Contrary to the protection of greenfield sites
- Streams and waterways on site host biodiversity
- Negative impact on biodiversity
- Impacts on wildlife
- Impact of proposed development on wildlife initiative carried out by groups such as the Woodland, Flora and Fauna Group
- Impact of the fragmentation of local countryside on the wildlife
- Violation of the Green Claims Code
- Object due to impact on biodiversity.

Infrastructure

- Further evidence is required on the impacts on the local infrastructure for the policy to be sound.
- Insufficient plans to improve the infrastructure.
- Inadequate evidence that the necessary infrastructure will be delivered.

- Inadequate infrastructure in place to accommodate growth (lack of school spaces, no capacity within GP surgery, congestion, sewage issue in Nursery Close, sewage contamination).
- Health and education infrastructure are at capacity.
- Water discharge onto the site from surrounding land [**Hurstpierpoint and Sayers Common Parish Council** (1191160)]
- Impacts on the PRoW
- Loss of Prow at the end of Orchard Way
- Works likely to be a health and safety issue for users of the PRoW crossing the site.
- Land has been subject to sewage contamination and due to inadequate infrastructure, this will continue to occur and result in additional health hazards.
- Improvement works would be needed to accommodate additional sewage.
- Unreliable public transport
- Lack of link to jobs, services and leisure via public transport
- Lack of cycling infrastructure
- Lack of investment on cycle route and infrastructure
- Services are shallow in Orchard Way
- Condition of roads
- Lack of parking spaces at the village car park to accommodate further growth.
- Loss of communal recreational area
- Shortage of sport provision will be exacerbated.
- Unsafe traffic

Heritage

- Further evidence is required on the impacts on the heritage site for the policy to be sound.
- No heritage statement was submitted to the LPA showing that policy requirements are achievable and therefore at this point the allocation has the potential to have a detrimental impact on designated heritage assets in the vicinity of the site. At this stage the allocation of the site is justified by the harm on the development outweighed by public benefits. The main benefit of the development is the provision of new homes, which could be achieved at other locations without such impact on protected build environment [**Hurstpierpoint and Sayers Common Parish Council** (1191160)].
- Proposal within a conservation area
- Proposal would encroach on the Langton Lane Conservation area.
- Impact on the Langton Land Conservation Area in conflict with para199 of the NPPF
- High density compared to neighbouring estates.
- Change to the sense of place and feel of historic areas.
- Harmful impact on built environment
- Risk of erosion of the settlement's character and loss of identity by further development that encroaches upon and beyond the built-up edge of settlements within the parish and those in neighbouring parishes [**Hurstpierpoint and Sayers Common Parish Council** (1191154)]

Flood Risk

- Lack of confidence that the proposed policies will be sufficient to alleviate current and future problem caused by development in particular in relation to flooding.

- Concerns that the flood risk to the site and/or offsite from development has not been adequately considered within the allocation [**Hurstpierpoint and Sayers Common Parish Council** (1191160)].
- Proposal is on flood plain.
- Drainage issues on the site extends to the electricity supply behind nursery close.
- The drainage stream had been omitted from the vision document and therefore SUDS will be inadequate.
- Drainage issues likely to be exacerbated

Developability

- Unsuitable proposed access via residential road with poor visibility onto Albourne Road
- Orchard way was not built to accommodate this level of traffic.
- Unsuitable access
- Street parking on Orchard Way is essential to accommodate residents' cars.
- Alternative access should be found both for the construction and occupation stage.
- Concerns with the Orchard Way/Albourne Road junction safety
- Land not available for development as rights of way, use and access already exist for the public.

Accessibility

- Poor vehicular connectivity to the settlement which would add a significant volume of traffic on Orchard Way [**Hurstpierpoint and Sayers Common Parish Council** (1191160)].
- Development will be reliant on private car usage.

Other

- Adverse impact on the residential amenity of existing neighbouring occupiers (to the south at Orchard Way and to the East at Kemps) [**Hurstpierpoint and Sayers Common Parish Council** (1191160)].
- Impact on residents' quality of life
- Impact on the community feel.
- Adverse effect on quality of life (increased traffic congestion, noise pollution, loss of green space)
- Preserving the tranquillity and charm of neighbourhood should be prioritised over extensive urbanisation.
- Lack of relation with existing communities with single way in and out
- Contrary to the adopted neighbourhood plan
- Contradiction between the plan period and the proposed timing for the development to be delivered.
- Light pollution
- Increased pollution from vehicles will impact on health and standard of living.
- Air pollution in Hurstpierpoint High Street and Stonepound Crossroads
- Proposal was previously rejected due to access and distance from services.
- Exacerbate pollution levels.
- Development at this location will create precedent for development west of the village.
- The village has accommodated a lot of growth in the last 5 years.
- Disproportionate level of development for the village
- Site had been considered in the absence of strategy.
- Allocations should be proposed primarily near existing major urbanisation with associated infrastructure.

- Development should be identified within the High Weald AONB where development of 50 dwellings is less are acceptable.
- The area for the proposed development is rural.
- Support
- Lack of information on the proposed housing mix or density
- Need for smaller properties.
- Object to the removal of the affordable housing requirement.
- Level of affordable houses required is too low.
- Lack of affordability
- Insufficient due diligence in relation to viability and deliverability of site
- Lack of independent assessment - current assessment carried out by site proponent.

Officer summary response

- The (Systra) Strategic Transport Study has been developed in consultation with and validated by WSCC Highway Authority and National Highways and is fit for purpose. The Study demonstrates that the cumulative impact of the Development Plan traffic can be adequately mitigated.
- Mitigations of the impacts of the proposed development may be beyond the boundary of the site. This will need to be considered at the application stage with advice from the relevant infrastructure provider, mitigation measures appropriately secured and subsequently addressed to make development acceptable in planning terms.
- The policy requirement require appropriate mitigation, including requirement for a mitigation strategy informed by a Heritage Impact Assessment. The draft masterplan prepared by the site promoter intends to limit development to the eastern parcel only as per the policy requirement. This has been strengthened by including only those areas where development is considered acceptable within the proposed revised built-up area.
- The considered is not considered to cause coalescence. The policy required a landscape-led approach, with upgrades to PROWs, environmental enhancement and public open space.
- The policy required protection and enhancement of streams on the site and ecological corridors between the site and the countryside. Other policies in the plan address the needs for green infrastructure, protection of habitats and biodiversity net gain.
- The policy requires sewerage network upgrades, sustainable transport measures, and highway works, in addition to financial contributions towards a broad range of offsite infrastructure. Other policies in the plan ensure a sequential approach that directs development away from land at risk of flooding, while avoiding water pollution.

District Plan

Chapter 16: Site Allocations

DPA13: The Paddocks, Lewes Road

Number of Comments Received

Total: 2

Sound: 0

Unsound: 2

Key Issues Raised

Transport

- Ensure that the cumulative impact of the Plan traffic can be adequately mitigated. Transport Assessment for development in proximity of SRN junctions will need to

be developed in consultation with NH and demonstrate impacts on the SRN and its junctions, merges and diverges mitigated [**National Highways** (1191183)].

Other comments

- Allocation appears to be development on potential BMV agricultural land [**Natural England** (1196374)].

Officer summary response

- The (Systra) Strategic Transport Study has been developed in consultation with and validated by WSCC Highway Authority and National Highways and is fit for purpose. The Study demonstrates that the cumulative impact of the Development Plan traffic can be adequately mitigated.
- The site includes an existing residential use. Other policies in the Plan seek to protect BMV land.

District Plan

Chapter 16: Site Allocations

DPA14: Land at Foxhole Farm, Bolney

Number of Comments Received

Total: 341

Sound: 1

Unsound: 340

Key Issues Raised:

Site Promoter: Wates Developments (1191785)

- Confirms that site can be delivered early in the Plan period.
- Criterion 1; suggested wording amendments to ensure compliance with NPPF.
- Criterion 6; amend reference of country park to countryside open space to ensure wording is effective.
- Criterion 7; 'exploring opportunities' too broad brush. Suggest that wording is amended to make more effective; either include if education land justified by WSCC at planning application stage or community facility within use class E(e) or E(f) or F(1)(a)).
- Criterion 10 is superfluous - delete.

Transport

- Ensure that the cumulative impact of the Plan traffic can be adequately mitigated. Transport Assessment for development in proximity of SRN junctions will need to be developed in consultation with NH and demonstrate impacts on the SRN and its junctions, merges and diverges mitigated [**National Highways** (1191183)].
- Access Strategy fails to consider how heavy goods vehicles or refuelling tankers will access fuel station with new refuge [**Bolney Parish Council** (1189073)].
- Local rural roads and narrow cannot cope with additional traffic. The Street has shared surface with virtual pavements and pinch points; unsafe for pedestrians, cyclists and those using mobility scooters.

Landscape

- Will be significant change in character from footpath 44Bo [**Bolney Parish Council** (1189073)].
- New houses will be out of character with properties in village setting [**Mims Davies MP** (1190736)].
- Site is within setting of AONB.
- Site can be seen from SDNP.

Biodiversity

- Impact on wildlife. Fields are habitats for existing wildlife [**Mims Davies MP** (1190736)].

Infrastructure

- No evidence of understanding what existing provision there is in village or what is needed for local community (existing or new). Clarity needed in the status between the infrastructure listed in the policy and what is included in 'policy requirements'. Details and evidence needed on the purpose and form of proposed infrastructure (café, country park, orchard, working hub, community facility) (who will use it, how will it be sustained). Lack of sustainable modes of transport to surrounding villages and towns [**Bolney Parish Council** (1189073)].
- Insufficient infrastructure to support development [**Mims Davies MP** (1190736)].
- Lack of public transport, insufficient capacity in health services, pressure on schools, poor reliability of electricity and digital infrastructure; loss of water supply
- Already problems with South East Water infrastructure
- Proposed café/ working hub/ allotment/ orchard and country park not needed in village and will not improve sustainability of village.
- Inclusion of 'land for education provision' is vague and confusing.
- School is at capacity.
- Site could provide mobile health service to help alleviate pressure on infrastructure.
- Village needs an east-west off-road cycleway.
- Existing houses have no mains gas supply, new homes will need to be heated by LGP or oil; not sustainable.
- Unclear how site delivers sustainable development.

Heritage

- Historic Sussex village; linear and ancient layout.
- Impact on heritage assets including Grade I Listed Church.

Flood Risk

- Area prone to surface water flooding [**Mims Davies MP** (1190736)].
- Reduced housing numbers and include physical interventions (water features) needed to address flood risk.

Developability

- Access onto A272 is unsuitable and unsafe. Already accidents, speeding cars. Additional movements will add to already congested roads. Technical audits yet to be tested by Highway Authority.
- Two proposed pedestrian access points unsafe.
- Roundabout should be provided at access instead of T-junction.

Accessibility

- Does not adhere to 20-minute travel times.
- Masterplan is not well designed, poor accessibility and connectivity to site and beyond.

Other comments:

- Disagree that Bolney is a settlement with potential for proportionate growth.
- Lack of engagement with local community from District Council or site promoter [**Bolney Parish Council** (1189073)].
- Overdevelopment on a greenfield site [**Mims Davies MP** (1190736)].

- Would appear as a large cul-de-sac and highly urban.
- Disproportionate level of growth for village. There are other better sites in village of a smaller scale that can integrate better.
- Amended wording suggested to address inconsistency with allocation and draft Policy DPN1; loss of Best and Most Versatile agricultural land [**Natural England** (1196374)].
- Village is remote location; not suitable for affordable housing due to reliance on private car.
- Brownfield sites should be prioritised.
- Increase light pollution from development.
- Not consistent with Neighbourhood Plan policies
- Vision Document contain inaccuracies.
- Site is designated Green Belt
- Contrary to Policy DP6
- Should be used as arable farming land.
- Houses not needed; recent new homes not selling.
- Little or no information about how issues raised from developing the site will be addressed (reliability of statutory services, flooding, drainage, visual impact, access achievability)

Officers Summary Response:

- The (Systra) Strategic Transport Study has been developed in consultation with and validated by WSCC Highway Authority and National Highways and is fit for purpose. The Study demonstrates that the cumulative impact of the Development Plan traffic can be adequately mitigated.

District Plan

Chapter 16: Site Allocations

DPA15: Ham Lane Farm House, Ham Lane, Scaynes Hill

Number of Comments Received

Total: 27

Sound: 1

Unsound: 26

Key Issues Raised

Site Promoter: Antler Homes Plc (1190724)

- The word 'appropriate' should be added for developer contributions given that all sites are determined on their own merits taking a balanced planning view.

Transport

- Ensure that the cumulative impact of the Plan traffic can be adequately mitigated. Transport Assessment for development in proximity of SRN junctions will need to be developed in consultation with NH and demonstrate impacts on the SRN and its junctions, merges and diverges mitigated [**National Highways** (1191183)].
- Impact on the A272 traffic
- Impacts on road safety with junction with the A272

Landscape

- Loss of countryside
- Loss of gap with Haywards Heath and Lindfield - expansion of the built-up area will lead to coalescence with neighbouring communities.

Biodiversity

- Impact on wildlife
- Note added wording since regulation 18 consultation [**The Woodland Trust** (1190007)]
- Site surrounding by trees.
- Importance of protecting existing mature trees and hedgerows
- The land should remain agricultural land.
- Loss of good agricultural land

Infrastructure

- A contribution to the Scaynes Hill to Lindfield Active Travel path would be expected [**Lindfield Parish Council** (1190732)]
- Limited services at Scaynes Hill
- Development will require update to existing utilities.
- Lack of consideration of access and infrastructure
- Limited public transport and no footpath leading to the village.
- Only a small shop in the village
- No health facilities
- Small primary school
- Unsuitable sewerage infrastructure
- Existing housing growth at Scaynes Hill without infrastructure improvements
- Support the inclusion of the requirement to provide financial contributions towards improvements at Haywards Heath Station [**Network Rail** (1190753)].

Flood Risk

- Concerns in relation to flooding.
- Drainage and sewerage issues in particular at Sunnycroft Close.

Developability

- Question the site assessment and whether the site is deliverable [**Lindfield Parish Council** (1190732)]
- Proposed access via Ham Lane. It is a private road which does not meet any current highway, safety or accessibility standards. Upgrade of Ham Lane would be required to meet policy requirement 2 and 3, including to the bus stop on the A272. Ham Lane should also change to public highway with 20mph speed limit [**Lindfield Parish Council** (1190732)]
- Inadequate proposed access
- Access is proposed via Halm Lane a private unadopted single track within limited passing points maintained by residents and used as a public footpath.
- Ham Lane is unsuitable and unsafe for the increased traffic of this development.
- Lack of viable access from the public highway
- The allocation does not recognise the issues in delivering the site (lack of practical access, narrow lane)
- Safety of Ham Lane
- Lane is unlit and so is the junction with the A272.

Accessibility

- Reliance on private car

Other

- Ham Lane is the dividing line between Haywards Heath and Scaynes Hill
- No consideration of the comment submitted at regulation 18

Officer summary response

- The (Systra) Strategic Transport Study has been developed in consultation with and validated by WSCC Highway Authority and National Highways and is fit for purpose. The Study demonstrates that the cumulative impact of the Development Plan traffic can be adequately mitigated.
- Infrastructure requirements including via financial contributions will be considered in more detail at the planning application stage for each proposed site allocation. They will be subject to the Regulation 122 (CIL Regulations (as amended)) test.
- This site allocation is relatively small and is not considered overdevelopment for Scaynes Hill, or to cause coalescence between settlements.
- Policy requires highway works and sustainable transport measures, as well as financial contributions towards a broad range of offsite infrastructure including sustainable transport. Policy requires new pedestrian links to existing PROW network.
- Financial contributions are required for offsite infrastructure, including education, health and sustainable transport to mitigate the impacts of the proposed development.
- Utilities company has not raised issues with wastewater and sewerage.
- Other policies in the plan ensure a sequential approach that directs development away from land at risk of flooding.

District Plan

Chapter 16: Site Allocations

DPA16: Land west of North Cottages and Challoners, Cuckfield Road, Ansty &
DPA17: Land to the west of Marwick Close, Bolney Road, Ansty

Number of Comments Received

Total: 34

Sound: 4

Unsound: 30

Key Issues Raised

Site Promoter **DPA16: Greenplan Designer Homes** (1189685) – for part of DPA16

- Support allocation.
- Suitable access can be provided from Cuckfield Road.
- All policy requirements can be met, and some evidence has already been prepared, such as an arboricultural assessment.

Site Promoter **DPA17: Devine Homes** (1189446)

- Support allocation.
- Vision document shows the site can deliver 32 units – would prefer the policy wording to be for ‘up to 40 dwellings’.
- Background technical evidence has been provided to the Council.
- Site is in a sustainable location.
- All policy requirements can be met.
- Noise Assessment shows that the site is suitable for residential use but owing to the proximity of the site to the A272, noise mitigation (in the form of acoustic glazing and mechanical ventilation) has been recommended in order to achieve recommended internal noise levels.

Transport

- Transport Assessment required to demonstrate how cumulative impacts on the SRN and SRN junctions will be mitigated. Trip reduction on the A23 is welcomed,

<p>and need to understand how mitigation measures would be applied and funded for the A23 Bolney junction [National Highways (1191183)]</p> <ul style="list-style-type: none"> • The local highway network would not cope with the additional traffic. • Marwick Close is narrow with no footpath leading to the site. Additional traffic would be dangerous for pedestrians. • Impact of proposed development on Ansty roundabout. • Additional traffic will cause queuing on Upton Drive at peak times when it is difficult to join the A272.
<p>Biodiversity</p> <ul style="list-style-type: none"> • The development would destroy wildlife habitats. • Impacts on trees which may need to be protected.
<p>Infrastructure</p> <ul style="list-style-type: none"> • Supports policy requirement for financial contributions towards improvements at Haywards Heath railway station [Network Rail (1190753)]. • Local infrastructure is already overstretched.
<p>Heritage</p> <ul style="list-style-type: none"> • Potential impacts on nearby listed buildings.
<p>Developability</p> <ul style="list-style-type: none"> • The promotor does not have right of access over Upton Drive or Marwick Close, and access from Marwick Close will not be granted by the residents, making this development undeliverable. • Access from Marwick Close is unsuitable.
<p>Accessibility</p> <ul style="list-style-type: none"> • Limited services and infrastructure. • Ansty is not suitable to deliver the 20-minute neighbourhood approach.
<p>Other comments:</p> <ul style="list-style-type: none"> • Ansty has been classified as a small village with low growth potential, but the plan allocates more housing in Ansty than in larger settlements with greater growth potential, which is contrary to the plan's strategy. Constraints and impacts of development have not been adequately assessed during the preparation of the plan [Ansty & Staplefield Parish Council (1190660)]. • Omission site – Ansty has been wrongly categorised as a small village, considering the level of growth that has already been allocated and is proposed in the District Plan Review. There is no evidence that this site is more appropriate than alternative sites [Ansty Land (1191175)]. • Impacts on natural environment and in particular air quality.
<p>Officer summary response</p> <ul style="list-style-type: none"> • The (Systra) Strategic Transport Study has been developed in consultation with and validated by WSCC Highway Authority and National Highways and is fit for purpose. The Study demonstrates that the cumulative impact of the Development Plan traffic can be adequately mitigated. • The Transport Study is being finalised in consultation with National Highways and local highways authorities, to include highway mitigation packages. A SoCG has been prepared to demonstrate co-operation on transport impacts.

- The limited level of growth proposed at Ansty is considered acceptable. Site allocations have followed sustainability appraisal and application of the site selection methodology, further supported by evidence such as a Transport Study to understand the impacts of development on the local and strategic road network.
- The site promoter for DPA17 has provided evidence that demonstrates the suitability of access from Upton Drive/ Marwick Close including the necessary road widths.
- The site promoter for DPA17 has confirmed that site access is available and there is a legal right to access the site from Upton Drive/ Marwick Close.
- The site yield for DPA17 has been amended to 40 dwellings.

District Plan

Chapter 16: Site Allocations

DPA18: Land at Byanda, Hassocks

Number of Comments Received

Total: 1

Sound: 0

Unsound: 1

Key Issues Raised

Other comments:

- Question whether reference to the specific planning permission should be removed to allow flexibility if the permission lapses.

Officer summary response

- The (Systra) Strategic Transport Study has been developed in consultation with and validated by WSCC Highway Authority and National Highways and is fit for purpose. The Study demonstrates that the cumulative impact of the Development Plan traffic can be adequately mitigated.
- The supporting text merely reflects the situation at the time of the District Plan being prepared and set out the position should the planning permission expire.

District Plan

Chapter 16: Site Allocations

DPA19: Land at Hyde Lodge, Handcross

Number of Comments Received

Total: 5

Sound: 2

Unsound: 3

Key Issues Raised

Site Promoter: Welbeck Strategic Land (1189522)

- Helpful that the precise yield and accommodation type will be determined following further work.
- The policy should include flexibility to allow conventional housing to be delivered on the site if a suitable marketing exercise shows no interest from specialist housing providers.

Infrastructure

- There is insufficient information to determine what upgrades to sewerage infrastructure may be required. Provide additional detail of the type, scale and phasing of development [Thames Water (1191163)].

Other comments

- Support provision of a nursing home in this location, allowing older people to downsize while remaining in their local community. Conventional housing is already planned at St Martin Close, Handcross [**Slaugham Parish Council** (1190838)].
- Omission site – specialist housing for older people such as a care home or extra care facility will have a greater visual impact on the AONB than conventional housing, due to the height, mass and bulk of this model of housing. If this form of development is considered suitable in the AONB, it is not reasonable to exclude other housing development in the AONB. Site assessment has not been objective [**Hallam Land Management** (1191123)].

Officer summary response

- Specialist housing for older people is market-driven, with specialist providers delivering according to local demand. Therefore, the policy is not prescriptive about the type and form of housing, but Policy DPI7 will be applied to any planning application on this site, requiring appropriate engagement with water companies.
- Conventional housing in this location would be materially different from older person's accommodation, with different impacts on the highway network and other infrastructure such as education. The plan's strategy directs housing development towards more sustainable locations. The site would need to be assessed again in terms of potential impact on the High Weald National Landscape (AONB).

District Plan		
Chapter 17: Infrastructure		Policy: DPI1: Infrastructure Provision
Number of Comments Received		
Total: 9	Sound: 3	Unsound: 9
Key Issues Raised		
<p>Regulation 19 Proposed Site Promoter: Berkeley Latimer (1190760)</p> <ul style="list-style-type: none"> • Support the need to provide Infrastructure Delivery Strategies • The supporting text should make reference to Infrastructure Delivery Strategies to address on and off-site infrastructure when applications are made. • It should be recognised that significant sites will be phased both in relation to housing and infrastructure delivery. <p>Peacock 5 Limited (1190878)</p> <ul style="list-style-type: none"> • Support 		
<p>Statutory stakeholders: National Highways (1191183)</p> <ul style="list-style-type: none"> • Support the phasing of development to align with infrastructure delivery. <p>West Sussex County Council (1190880)</p> <ul style="list-style-type: none"> • Reference to 'monitor and manage' process to deliver vision-led approach and to setting Infrastructure Management Groups should be included. <p>Network Rail (1190753)</p> <ul style="list-style-type: none"> • Support the policy in seeking to promote active and sustainable modes of transport. • Support the use of planning condition. • Continue to work with the Council and update the IDP and specific strategic site plans in relation to infrastructure provision. 		
<p>Other comments:</p> <ul style="list-style-type: none"> • The establishment of essential infrastructure can give rise to difficulties, and this should be taken into account. • Experience from previous development has shown failure to deliver infrastructure alongside new development. • Infrastructure improvements should be delivered prior to commencement of development. • It should be acknowledged that even with masterplanning, project can fail without funding being secured from the offset. Stronger policy wording should be introduced in those areas where infrastructure deficiencies exist. 		

District Plan		
Chapter 17: Infrastructure		Policy: DPI2: Planning Obligations
Number of Comments Received		
Total: 8	Sound: 2	Unsound: 6
Key Issues Raised		
<p>Regulation 19 Proposed Site Promoter: Berkley Latimer (1190760)</p>		

- Further information is needed as to what developers are expected to contribute towards, and the amount required (or the mean of calculating them)

Fairfax Acquisitions Ltd (1191201)

- Concerns were previously raised that this policy needed to refer to the “reasonable” costs of the council and county council being covered by the Applicant.

Statutory stakeholders:

National Highways (1191183)

- Welcome the opportunity to provide monitoring recommendations from other regions and Councils that National Highways are working within.

NHS Property Services Limited (1190817)

- Welcome the specific reference to the provision of health facilities.
- Concerns over the prioritisation of contribution on a case-by-case basis for development with limited viability. The provision of healthcare is critical to the delivery of sustainable development. They should be given significant weight in decision making and identified as high priority within the supporting text.
- Support the approach set out in appendix 5 and the flexibility in determining the most appropriate means of meeting healthcare needs arising from new development.

Network Rail (1190753)

- Support

Town/Parish Councils:

Balcombe Parish Council (1190447)

- There is a lack of overall spending strategy, including a lack of communication with beneficiaries of funds secured and collected.
- Maintenance contributions should be included within planning obligations.

Other consultee bodies:

Sport England (1189880)

- Reference should be included to sport pitches and other sport facilities required.

Officer summary response

- Infrastructure requirements have been specified against each individual allocation policy. Details on the level are provided within appendix 5 which is sign posted within the supporting text. Indicative amounts have been included within the Infrastructure Delivery Plan.
- This policy solely clarifies the intention of the Council's to secure planning obligations monitoring cost. The matter is regulated under Regulation 122 (2A) of the CIL Regulations (as amended) and does not need to be repeated in policy.

District Plan

Chapter 17: Infrastructure

Policy: DPI3: Major Infrastructure Projects

Number of Comments Received

Total: 1

Sound: 0

Unsound: 1

Key Issues Raised

Other consultee bodies:**Gatwick Airport Limited**

- Changes introduced following reg18 consultation are supported.
- Lack of clarity with the term 'reasonably foreseeable development proposals'
- Support the removal of the reference to 'Delivery Plans'.

Officer summary response

- Noted

District Plan**Chapter 17: Infrastructure****Policy: DPI4: Communications Infrastructure****Number of Comments Received****Total: 0****Sound: 0****Unsound: 0****Key Issues Raised**

No comments received

Officer summary response

- n/a

District Plan**Chapter 17: Infrastructure****Policy: DPI5: Open Space, Sport and Recreational Facilities****Number of Comments Received****Total: 3****Sound: 1****Unsound: 2****Key Issues Raised****Statutory stakeholders:****Sport England (1189883)**

- The reference to existing facilities being retained 'where possible' in the supporting text is inconsistent with national policy and should be omitted.
- The playing pitch study is not reference and currently out of date and should be updated.
- The loss of facilities should not be justified by marketing (contrary to para 103 of the NPPF)
- Para 3 of the policy is not in accordance with para 103 of the NPPF.

Other consultee bodies:**Royal Botanic Gardens Kew (1191172)**

- Support

Other comments:

- The provision of recreational facilities must be balanced with the need to protect the countryside. Unformal green space also constitutes recreational facilities.

Officer summary response:

- The policy builds on the NPPF by providing clarity as to how the loss of open space, sport and recreational facilities will be assessed in line with the requirement of the NPPF.

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District Plan		
Chapter 17: Infrastructure	Policy: DPI6: Community and Cultural Facilities and Local Services	
Number of Comments Received		
Total: 4	Sound: 1	Unsound: 3
Key Issues Raised		
Statutory stakeholders: NHS Property Services Limited (1190817) <ul style="list-style-type: none"> Criteria 7 of the policy lack flexibility which can have harmful impact on the NHS ability to ensure the delivery of essential facilities and services for the community. The disposal of redundant or no longer suitable sites and properties is critical to fund new or improved services within a local area. Requiring a marketing period will add unjustified delays to vital reinvestment in facilities and services for the community. 		
Other consultee bodies: Theatres Trust (1189529) <ul style="list-style-type: none"> Support 		
Other comments: <ul style="list-style-type: none"> Community facilities should be included within strategic site . This will help minimise car journeys to other areas for recreational purposes. Conflicts with the loss of Imberhorne Lane Public Car Park 		
Officer summary response: <ul style="list-style-type: none"> Criteria under the 'Existing Provision' are not cumulative and therefore it is considered that the policy is designed to accommodate situation described by NHS Services Limited. Community facilities requirements have been identified for all significant sites and are set out within each policy. 		

District Plan		
Chapter 17: Infrastructure	Policy: DPI7: Water and Wastewater Infrastructure	
Number of Comments Received		
Total: 7	Sound: 1	Unsound: 6
Key Issues Raised		
Regulation 19 Proposed Site Promoter: Fairfax Acquisitions Limited (1191201) <ul style="list-style-type: none"> This is not strictly a planning matter. Providers have a statutory duty to ensure water and waste provisions and connections for development. It is not the applicant's responsibility to ensure this is available. The water companies alongside the Environment Agency need to plan to accommodate future demand. Where this cannot be met, the Council needs to reconsider the proposal on capacity grounds. Therefore a policy is not needed. 		
Reside Development Limited (1189857)		

- It is not developers' responsibility to demonstrate adequate capacity within the planning process. This is not a planning matter and is addressed by other legislations. Where any deficiencies are highlighted, it is incumbent on the water authorities to plan for these to be improved and updated as necessary.

Statutory stakeholders:

Environment Agency (1189771)

- May wish to include a cross reference to Policy DPS5: Water Neutrality.

Thames Water (1191167)

- Support the policy.

Town/ Parish Councils:

Worth Parish Council (1190873)

- Robust empirical evidence from the water companies is required to show that capacity is in place to meet future demand on all sites. In addition, developers should be asked to provide evidence of how their sites will be water efficient. More emphasis should be placed on provision of measures such as greywater recycling and rainwater harvesting to be fitted as standard on new builds.

Other consultee bodies:

CPRE (Sussex) (1189028)

- Consider the use of Grampian conditions to ensure that water and/or wastewater infrastructure is sufficiently upgraded to meet demand in new development.
- Suggested policy modifications to delivery of infrastructure and storm overflows.

Home Builders Federation (1190702)

- Concerns over the failure of water companies to fulfil their statutory duties.
- It is the responsibility of water companies to plan for future demand for water services relating to the development requirements proposed in local plans. Where water services cannot be guaranteed, then the development requirements in the plan cannot be delivered making the plan unsound.
- The plan cannot be made sound in relation to matters of water through policies in that plan stipulating actions that applicants must take as they cannot provide the water services.

Officer summary response

- Welcome support for policy.
- With regards to cross-referencing to other policies in the Plan, it is considered that on this occasion it is unnecessary and the Plan should be read as a whole.
- The need for Grampian conditions will be considered on a case-by-case basis and in line with national policy and guidance.
- The supporting text makes reference to the need to protect the environment from untreated sewage discharges.
- Policy DPS4: Flood Risk and Sustainable Drainage also makes reference to sewer flooding.
- Mid Sussex District is located in an area of serious water stress. Development must be positively planned to minimise its impact on water resources. Water companies prepare a water resource management plan to ensure adequate provision to meet the demand from development, however, the Council will also seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments and applicants for development will need to demonstrate this.

District Plan		
Chapter 17: Infrastructure		Policy: DPI8: Viability
Number of Comments Received		
Total: 17	Sound: 1	Unsound: 16
Key Issues Raised		
<p>Other consultee bodies: CPRE (Sussex) (1189028)</p> <ul style="list-style-type: none"> • Viability note suggests viability has improved so scope for affordable housing percentage to be increased. • Viability review does not test alternative levels of affordable housing. <p>Home Builders Federation (1190702):</p> <ul style="list-style-type: none"> • Lack of evidence to justify need for 20% BNG which demonstrates it will not impact on delivery and viability – whole plan viability not sufficiently detailed/ site specific. • Concern over cost and deliverability of sustainable homes policy – not fully costed. • Viability evidence relying on average values is questioned in terms of movement in the market in real terms – it is not based on house type and cannot be relied upon against far higher costs faced by development industry. • The new part iii added to DPI8 merely repeats PPG and as such is unnecessary. 		
<p>Other comments: Policy wording:</p> <ul style="list-style-type: none"> • Exclude viability review for single phased schemes. • Second stage review could hinder or prevent sites being delivered. • Requirement for open book viability assessments is supported. <p>Viability implications of policies:</p> <ul style="list-style-type: none"> • DPH8 Affordable Housing - in light of para 58 of the NPPF, evidence underpinning this policy and developer contributions are of concern in the context of older persons' housing. • Concerned that the viability assessment has overplayed the viability of older persons' housing. • Viability note (December 2023) is too high level and does not consider evidence submitted or the cumulative impact of DPS2 and M4(3) requirements on older persons' housing. • DPS2 goes beyond Building Regulations in energy and water – not robustly evidenced or justified as being feasible or viable. <p>Viability Study evidence base:</p> <ul style="list-style-type: none"> • Viability report - out of date (May 2022). Chapter 4 - House prices - Significant material changes since 2022. EUV out of date - too low. • Development costs - out of date - major events - Ukraine war and Lis Truss budget - major impact on construction costs - 20% more now. • BNG - in correct statement re costs (para 8.78) does not account for maintenance cost 30 years. Gross to net deliverable area should be 60% not 70% as stated. • Delivery in year 1 is unrealistic. • Viability note (Dec 2023) does not address issues raised around BNG - evidence should be revisited in collaboration with the development industry. • DPS2 goes beyond Building Regulations in energy and water – not robustly evidenced or justified as being feasible or viable. • Viability evidence of implications of DPS2 not clear or sufficiently robust. 		

Officer summary response

- Strategic Viability Study and subsequent Viability Notes in combination with the Ricardo Net Zero evidence demonstrate the policy requirements for policy DPS2 are justified feasible and viable. A Main Modification is provided should the Inspector find the current wording unsound.
- Modifications have been recommended to remove specific reference to paragraph numbers in the PPG.

District Plan

Chapter 19: Saved Policies

Number of Comments Received

Total: 4

Sound: 1

Unsound: 3

Key Issues Raised

Regulation 19 Proposed Site Promoter:

Elivia Homes (1188308)

- Support

Town/ Parish Councils:

Balcombe Parish Council (1190447)

- Chapter should reference saved policies from neighbourhood plans.

Other comments:

- Objection to planning application 23/810 on site allocated under Site Allocations DPD, Policy SA19 (land south of Crawley Down Road, East Grinstead), to be saved on adoption of the District Plan.

Officer Summary Response

- Welcome support

District Plan

Appendix 1: Marketing Guidance and additional information required to support planning applications

Number of Comments Received

Total: 1	Sound: 1	Unsound: 0
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Key Issues Raised

Town/ Parish Councils:

Balcombe Parish Council (1190447)

- Supports appendix which provides more robust marketing requirements.

Officer summary response

- Welcome support

District Plan

Appendix 2: Town Centres and Primary Shopping Area Boundaries

Number of Comments Received

Total: 1	Sound: 0	Unsound: 1
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Key Issues Raised

Town/ Parish Councils:

Balcombe Parish Council (1190447)

- New boundary excludes car parks in the town centre - former boundary better reflected the centre.

Officer Summary Response

- The proposed amended town centre boundaries are informed by advice from Nexus Planning retail specialist consultants to the council, in accordance with Annex 2 of the NPPF definition of town centres and excludes existing car parks which have been identified for brownfield redevelopment sites in the Haywards Heath Masterplan (Mid Sussex Retail Study).

Duty to cooperate

Number of Comments Received

Total: 140

Sound: 7

Unsound: 133

Key Issues Raised

Regulation 19 Proposed Site Promoter:

Antler Homes (1190705)

- Duty to cooperate evidence has not been published as part of the consultation

Elivia Homes (1188295)

- The Council fails to demonstrate how agreements have been reached in relation to the unmet housing need as part of the duty to cooperate.

Peacock 5 Ltd (1190878)

- We are aware of the recent Local Plan examination on Crawley Borough Council Local Plan which clearly states the need for the wider Northern West Sussex Area to address additional housing shortfall for Crawley, given its significant land constraints. Page 23 of the MSDC Plan recognises this and states that further Statement of Common Ground will be submitted at Submission or as part of the examination process for the MSDC District Plan. Given the location of the significant site at Crabbet Park, in close proximity to the Borough Boundary, we support the cross boundary working that is ongoing between both Local Authorities.

Town/ Parish Councils:

Ansty and Staplefield Parish Council (1190652) and **Cuckfield Parish Council** (1190656)

- The Council has engaged constructively with neighbouring authorities as required by the duty to cooperate

Local Authorities:

Brighton and Hove City Council (1186995)

- Support the District Council's approach to identifying development potential and notes the principles underpinning the proposed District Plan strategy.

Crawley Borough Council (1189681)

- CBC and MSDC have a long history of positive joint working across the administrative boundaries of the two authority areas including during the preparation of the District Plan. The Crawley Borough Local Plan Inspectors confirmed that they are satisfied that the preparation of the submitted Plan has met the legal requirements of the Duty to Cooperate.

Horsham District Council (1190711)

- Legal and procedural requirements have been met. Together with Crawley Borough, both Mid Sussex and Horsham District form part of the Northern West Sussex Housing Market Area. The adjoining authorities have a long history of close working with regards strategic planning matters and have been effective at achieving mutually supportive outcomes. The legal Duty to Cooperate is therefore met, as evidenced by various statements of common ground and joint evidence prepared in recent months and over time.

South Downs National Park Authority (1190831)

- Support continuing liaison with neighbouring authorities carried out by the Council

Tandridge District Council (1190867)

- Whilst Tandridge District Council understands that Mid Sussex's primary Housing Market Area is with Crawley and Horsham, and that the three new strategic allocations are to provide for Crawley's unmet need, our Strategic Housing Market Assessment shows that Tandridge and Mid Sussex have close links. Therefore, Tandridge District Council would welcome opportunities where Mid Sussex may be able to assist in cross boundary housing issues in the future.

Wealden District Council (1189586)

- The two parties have also substantially progressed a SoCG relating to the Council's respective emerging Local Plans that confirms that effective cooperation is taking place between the parties in relation to relevant strategic matters. This includes development close to the adjoining administrative boundaries between the two local planning authorities, housing provision, economic development, cross boundary infrastructure issues and matters relating to the natural environment, including the Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA). Although this SoCG has yet to be signed, WDC will support an SoCG in relation to the Mid Sussex District Plan Submission Draft (2021 - 2039) (Regulation 19) and will work with Mid Sussex District Council to ensure that a new SoCG can be finalised prior to the submission of the Local Plan to the Secretary of State.

Other consultee bodies:

Home Builders Federation (1190702)

- The Council has failed to meet the duty to cooperate. No evidence as to how the Council has complied with it.
- Concerns that the approach taken have not looked to maximise the effectiveness of plan making, in particular no progress has been made to address the unmet need within the Northern West Sussex HMA or elsewhere in other bordering authorities.

Other comments:

- The authority has failed to comply with guidance which states that any agreement with other authorities should be practical and consistent with sustainable development.
- Fail to work with neighbouring authorities to meet its duty to cooperate
- By exceeding the housing numbers by 1,000 the planning authority has failed to comply with the guidance which states that any agreement with other authorities should be practical and consistent with sustainable development.
- A duty to cooperate topic paper remains to be published. It is acknowledged that the duty is an ongoing process, although it is concerning that no strategy has been set out to accommodate unmet need from nearby authorities.
- Supporting documents fails to demonstrate how the unmet need from neighbouring authority has been considered or have influenced the plan.
- Insufficient dedicated provisions have been made for the Council to fulfil its Duty to Cooperate with other Authorities within the Northern West Sussex Housing Market Area and the West Sussex and Greater Brighton Strategic Planning Board Area, to assist in meeting their significant and well-established unmet housing need.
- The Council fails to demonstrate how agreements have been reached in relation to the unmet housing need as part of the duty to cooperate.

- The Council fails to demonstrate how agreements have been reached in relation to the unmet housing need as part of the duty to cooperate.
- No evidence on Duty to Cooperate on the consultation portal - it should be at a very advanced stage at reg 19.
- Fail to identify solution to address unmet housing need.
- No draft statement of common ground has been published.
- No published evidence of meaningful engagement with neighbouring authority Lewes District Council.
- Whilst it is acknowledged within the District Plan Review that the Duty to Cooperate is an ongoing process, it is extremely concerning that still no strategy has been set out to accommodate unmet need from nearby authorities which is a core requirement to the production of positively prepared and justified strategies. In addition to unmet need, it is also established that the Duty serves a clear purpose in facilitating the delivery of cross-boundary sites.
- the Council has failed to offer any proper consideration of addressing known unmet needs, when it could have done so.
- The Council's Duty to Cooperate is situated within the Statement of Community Involvement (SCI). It states that continued cooperation with local authorities will be key to meet local challenges through mechanisms such as the Gatwick Diamond Initiative and the Coastal West Sussex and Greater Brighton Strategic Planning Board. The SCI then draws attention to the Duty to Cooperate Framework which establishes the process to enable cooperation with the relevant local authorities and organisations. The Duty to Cooperate Statement has not been published as part of the plan's evidence base and therefore we are uncertain as to how exactly the Council have cooperated with the relevant authorities and bodies to ensure that the plan addresses strategic and cross boundary issues. Without this evidence, it cannot be concluded that 'The Council should have worked collaboratively with neighbouring authorities and prescribed bodies on strategic and cross boundary matters' and therefore at this time the legal tests have not been met.

Officer Summary Response

- The Duty to Cooperate compliance statement and associated Statement of Common Grounds will be published upon submission of the Plan to the Secretary of State.

Site Selection

Number of Comments Received

Total: 28

Sound: 3

Unsound: 25

Key Issues Raised

Regulation 19 Proposed Site Promoter:

Antler Homes (1190705)

- Site 1026 (DPSC4: Chesapeake and Meadowview) - Inconsistent distance stated between assessment and Sustainability Appraisal for primary school.

Thakeham Homes Ltd (1191000)

- Disagree with the statement that the site could be visible from the surrounding countryside and potentially from the South Downs National Park; views from the SDNP would be restricted by intervening development and existing mature vegetation. Development would sit in the backdrop of the existing settlement.

Town/ Parish Councils:

Ansty and Staplefield Parish Council (1190652)

- Sound

Cuckfield Parish Council (1190656)

- Sound

Other comments:

- Fails to account for surface water run-off from proposed development.
- Lack of review of assessments in light of new sites or updated evidence.
- Loss of agricultural land should form part of assessment criteria.
- Selected sites cannot meet other policy requirements or support the principles of 20-minute neighbourhoods.
- 20-minute distances in assessment work inconsistent with 20-minute principles; latter measured as return journey.

Officer Summary Response

- SHELAA and Site Selection work updated in between Regulation 18 and Regulation 19.
- The TCPA 20-minute neighbourhood guide sets out the potential of two approaches to rural settlements; the approach will be adapted to best suit the specific location.
- Discrepancy between distances from primary school in site 1026 assessment and Sustainability Appraisal work noted. TravelTime mapping confirms distance as over 20mins.

Strategic Housing Market Assessment

Number of Comments Received

Total: 3

Sound: 0

Unsound: 3

Key Issues Raised

Town/ Parish Councils:

Albourne Parish Council (1190652)

- Housing number too high; SHMA uses more up to date demographic data showing a reduction in population growth than those used in the Standard Method calculation resulting in a substantial discrepancy.

Other comments:

- Disagrees that there aren't any circumstances which warrant increasing the housing need figure; Plan should ensure that the anticipated growth in workforce from Gatwick expansion is included in housing need.
- Affordability is worsening in district; Plan should be increasing housing need figure to address matter.

Officer Summary Response

- Potential circumstances for deviating from standard method housing need figure, including Gatwick expansion proposals, population projections and affordability, were considered through the Strategic Housing Market Assessment work, concluding no change to standard method housing numbers.

Habitats Regulations Assessment**Number of Comments Received**

Total: 7	Sound: 2	Unsound: 6
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Key Issues Raised**Regulation 19 Proposed Site Promoter:****Peacock 5 Ltd (1196374)**

- Support the HRA.

Statutory stakeholders:**Natural England (1196374)**

- Agree that Castle Hill SAC can be screened out from further assessment.
- Update to include reference to all the Arun Valley sites (SAC, SPA and Ramsar).
- Water neutrality: Agree with the HRA conclusion of no adverse effect on the integrity of the Arun Valley sites on the basis of Policy DPS5: Water Neutrality.
- Recreational pressure: Agree with the HRA conclusion of no adverse effect on the integrity of the Ashdown Forest SPA and SAC on the basis of Policy DPC6: Ashdown Forest SPA and SAC and that the strategic solution continues to be implemented (SANG and SAMM).
- Air quality: Agree with a HRA conclusion of no adverse effect for the plan alone but currently unable to concur with a conclusion of no adverse effect in combination with other plans or projects.
- [Post-Regulation 19 consultation update] Air quality: Having considered the updated assessment Natural England advises that it concurs with the assessment conclusions that an adverse effect on the integrity of Ashdown Forest SAC and SPA can be ruled out both alone and in-combination with other plans and projects.

Local Authorities:**Wealden District Council (1189586)**

- Ashdown Forest is a strategic matter and both local authorities are working in partnership on air quality and SAMM.

Other comments:

- The HRA only considers impacts on SPA and SAC not general biodiversity decline.
- No clear plan for water neutrality.

Officer Summary Response

- Welcome support for HRA.
- The Council looks forward to continuing to work in partnership with other local authorities on Ashdown Forest matters.
- The purpose of the HRA is to examine the effects of the District Plan on internationally important wildlife sites (i.e. SPA, SAC and Ramsar sites).
- Policy DPS5: Water Neutrality sets out the approach to water neutrality.
- An updated HRA has been produced to address Natural England's comments and Natural England is now satisfied that the Plan will not lead to adverse effects on the integrity of the Arun Valley sites and the Ashdown Forest SPA and SAC.

Sustainability Appraisal

Number of Comments Received

Total: 174

Sound: 7

Unsound: 167

Key Issues Raised

Regulation 19 Proposed Site Promoter:

Elivia Homes (1188298)

- The Sustainability Appraisal of the draft Local Plan considers two possible spatial options. The appraisal of options is based on the existing settlement hierarchy which is proposed to be carried forward from the adopted Local Plan. This was based on the Council's Settlement Sustainability Review (SSR) undertaken in 2015. It is important the Council recognise the importance of allowing development to support the provision of existing services, alongside the potential for development to contribute to the delivery of improved services provision.

Elivia Homes (1189694)

- Overall support for the Sustainability Appraisal although adjustment of the assessment for DPA6 would be more reflective of the likely impact of the development.

Antler Homes (1190705), Peacock 5 Limited (1190878)

- Support

Option Two Development Limited (1191030)

- The scoring of DPSC2 on listed buildings has been downgraded although no specific measures have been identified within the proposed policy.

Fairfax Acquisitions Limited (1191201)

- The Sustainability Appraisal (SA) is an important evidence base document. It is the most sustainable option that MSDC should be taking forward. It is rather alarming therefore that the SA was commissioned in early October 2023, and published as a final version in November 2023; this timeframe is not sufficient to allow a thorough assessment of the Draft Plan.

However, whilst reasonable alternative sites have been considered, only new sites have been included in this SA. There are some minor changes to others, but not all have been reassessed. It is not clear why, or what methodology MSDC used to determine which were worthy of reassessment.

The statement that no substantive comments were received on the framework is inaccurate.

MSDC failed to make changes to the assessment of site 736.

Miller Homes (1191313)

- Several inconsistencies have been identified in the SA scoring in relation to land controlled by Miller Homes (ref. 844) and two other sites subject to draft allocations in the Local Plan Review (refs. 508 and 858).

Danworth Farm Limited (1191235)

- Disagree with the scoring presented for the site 1075.

Thakeham Homes (1191735)

- Scoring for DPSC1 should be more positive.

Airport Parking and Hotels Limited (1191135), Crawley Down Garage Pension Scheme (1191187)

- Support the choice of pursuing option 2 for the spatial strategy.

Whitehall Homes (1191024)

- Findings of the Sustainability Appraisal show that development at Swallows Yard (789 and 1063) would be more sustainable than some proposed allocations.

Whitehall Homes (1191133)

- Site 1139 should be considered as a reasonable alternative.

Antler Homes Plc (1190724)

- Contest appraisal scoring for DPA15.

Greenplan Designer Homes (1189685)

- Support although some of the scoring for DPA16 is not considered accurate.

Berkeley Latimer (1190760)

- The sustainability appraisal assessment underplays the findings of the transport study supporting the plan.

Catesby Strategic Land (1191601)

- The District Plan Review and SA highlight an apparent scarcity of land adjoining the Tier 1 settlements of East Grinstead and Haywards Heath available and suitable for development.

Statutory stakeholders:

Natural England (1196374)

- No general comments

Town/ Parish Councils:

Ansty and Staplefield Parish Council (1190652) and Cuckfield Parish Council (1190656)

- To the best of our knowledge the plan has been prepared in accordance with relevant legislation and regulations. It is supported by a Sustainability Assessment which confirms that the plan would meet the requirements of national policy and the various duties placed upon the local planning authority.
- The Sustainability Appraisal and the Site Allocations Conclusions Paper submitted with the plan demonstrate that alternatives were considered and rejected for appropriate planning reasons. There can be no reasonable argument that any additional sites (and certainly no larger sites) need to be added to the plan, or that the sites selected are not the most suitable of those available.

Other consultee bodies:**Gatwick Airport Limited (1190687)**

- Comments raised that regulation 18 have been addressed.

Other comments:

- The selected spatial option is among the least favourable and scores negatively.
- Option 2 is preferable with a mix of large and smaller sites.
- The Council has not undertaken an adequate sustainability appraisal. It appears that the only important factor in the summary appraisal table is housing, because only the preferred option, which makes the case for DPSC3, scores a 'double positive'. There is no explanation of what standard has been used to achieve this score, or why other options fail to score equally highly. National guidance now makes it clear that meeting a housing number is not the only important criterion. The Council has failed to assess Option 1 properly, although it admits it has the potential to meet the housing number.
- The council has not adequately identified or assessed alternatives that meet sustainability criteria better than DPSC3. Option 1, for instance, offers a more sustainable solution, yet it has not been properly evaluated.
- It is not completely clear what exactly an option or site has had to do to achieve its rating in the Appraisal, or why similar sites have been given a different rating.
- MSDC Sustainability Appraisal has not properly assessed option DPSC3 against other reasonable alternative sites.
- The Council has not undertaken a proper sustainability appraisal. The methodology is unsound, opaque and unfair. The Council has failed to assess Option 1 properly, although it admits this option has the potential to meet the housing number, and scores better on the full range of sustainability criteria.
- The authority has refused to identify and assess properly a realistic and reasonable alternative which is likely to meet the positively prepared test and score better in terms of sustainability.
- The Council's own commissioned Sustainability Appraisal has been poorly interpreted.
- Question the scoring of DPA7.
- DPA7 fails to meet 12 of the 14 Sustainability Appraisal Framework objectives.
- There appears to be no evidence that the authority has identified and assessed properly reasonable alternatives to DPSC1, DPSC3,4 and 5 which are likely to meet the positively prepared test and score better in terms of sustainability.
- A proper appraisal should ensure that potential environmental effects are given full consideration alongside social and economic issues.
- The Sustainability Assessment seems to brush over the flooding issues at DPSC3.
- The Sustainability Appraisal proposes that the bulk of the required housing will be achieved principally by the development of a number of large greenfield sites.
- Issues with the assessment of allocations at Sayers Common
- The Spatial Options such as brownfield sites and urban regeneration and more sympathetic smaller development closer to existing communities should have been considered. There is a presumption that the two areas selected were the easy option, put forward by developers as being the most profitable.
- It is concerning that no detailed ecological surveys were done for the Plan's Sustainability Appraisal which admits to being a "desk-based exercise not verified in the field."
- The MSDC's own Sustainability Appraisal contradicts the current proposal, emphasising the need to reduce road congestion and pollution by fostering sustainable travel and access to services.

- The neglect of alternative development strategies, such as urban densification or responsible development within AONBs, suggests a lack of due diligence in the proposal's preparation.
- The Sustainable-Accessibility document mis-represents the availability of public transport for normal day to day life.
- The Sustainability Appraisal only shows 2 options as positively sustainable (development of existing towns and brownfield sites). The district plan does not assess properly the options for development in these areas. The sustainability appraisal shows significant negative impact on all the Sayers Common developments particularly in relation to Natural Resources, Landscape and Energy & Waste. The sustainability appraisal assessments are based on the assumption that the 20 minute neighbourhood is achievable and that people use public transport/do not travel. This assumption is flawed for a rural site that has no easy connectivity. Without this assumption the selection of sites is flawed.
- The MSDC's Sustainability Appraisal, which calls for reduced congestion and pollution through sustainable travel, starkly contrasts with the current proposal, highlighting grave inconsistencies with environmental policy objectives. The proposed development presents serious sustainability and flood risk issues, threatening road user safety and local infrastructure.
- The Sustainability Appraisal desktop study by JBA Consulting acknowledges that there may be mistakes - this isn't acceptable for such a sensitive site [DPA7].
- The Mid Sussex local plan includes a sustainability appraisal which claims to be transparent, robust and thorough (P.xxi). Our analysis, however, shows that an important feature of the local plan - a commitment to embrace the principles of the 20-minute neighbourhood - has not been carried through into the appraisal; no strategic option embodying them has been properly considered; the scoring definitions are unworkable; the assessments themselves are inconsistent and partial; and three of the four alternatives chosen are not reasonable. A rigorous appraisal has not been undertaken, and so the authority has not met this aspect of the 'Justified' test. (1191800 – Watchdog for Intrusive Local Development (WILD))
- The Sustainability Appraisal of the Mid Sussex Development Plan underplays the negative impacts on the site and the mitigations will not have the intended impact

Officer Summary Response

- The settlement hierarchy constituted the basis of the adopted District Plan spatial strategy which was based on proportionate growth across the hierarchy of settlements. The Sustainability Appraisal sets out the limits of this strategy due to the lack of available sites within a number of settlements. As a consequence, alternative strategies had to be considered. The proposed strategy was built on the potential for further growth of each of the settlement. The findings of the settlement hierarchy helped support the assessment of each settlement. It is recognised within the Plan that the position of settlements within the hierarchy will be kept under review.
- The SA has been prepared on a consistent basis across all sites, using the same data sources and benchmarking. The methodology including in relation to scoring is set out within the report.
- The Sustainability Appraisal is an iterative process. The Regulation 19 version of the report build on the previous version of the report providing clarifications and corrections where necessary. It has been prepared in line with regulations and guidance and meets all relevant requirements.
- Only reasonable alternatives are assessed within the Sustainability Appraisal. The process to identify them is set out within the report (from section 6) and within the Site selection methodology. The rationale for assessment review is set out in para 6.2 of the report.

Community Involvement Plan

Number of Comments Received

Total: 49

Sound: 0

Unsound: 49

Key Issues Raised

Other comments:

- No real effort to communicate with the community during the creation of the plan. Communities' views regarding settlement plans, infrastructure requirements, environmental considerations, sustainability issues, vision and needs of the villages were not considered or requested. The first engagement with our communities was at Regulation 18 stage, where significant decisions had been made.
- The Plan is unsound because there was limited attempt to engage with the community.
- The Crawley Down exhibition was not communicated to whole village.
- Local communities and residents are not classed as stakeholders.
- There has not been 'clear consultation with the local community' regarding proposed developments.
- Poorly communicated to communities who will be significantly affected
- Principles of community engagement have not been followed.
- Concerns raised by the public have been ignored.
- Majority of residents are not aware of the consultation and the future impacts of the plan to the community
- Comment to regulation 18 consultation have not been given proper consideration and are hard to locate
- Lack of consultation
- Limited engagement with the community. Lack of awareness of the proposed developments, relying on councillors to communicate. Exhibition at CD was not properly advertised. System is designed to make it difficult for residents to be aware or involved in the plan process.
- The e-form is long-winded and cumbersome. Disbelief that comments from the community will be taken on board.
- Notification for reg 19 consultation was not received and the e-form is difficult to navigate.
- The response form is a barrier to people responding.
- The form & consultation is not aimed at residents. Asking for revised wording & evidence with supporting information to support representation, is unjustified. The form and questions are not appropriate.
- Difficult and time consuming for residents to go through the DP and supporting documents to provide comments
- The Council is deliberately avoiding consultation.
- Inovem is difficult to understand, unable to get a paper copy of the plan. consultation is flawed and disproportionately skewed towards those with an advanced technical mind-set.
- Minimal information and updates from the council regarding the plan.
- Questions at what time and in what manner has there been, or will there be, effective consultation with the residents most directly affected?
- Residents are discouraged to respond due to their voices not being heard in the past
- Lack of representation of residents views, concerns and wishes in regard to strategic policymaking

- No clear response to individual and collective concerns that gives assurance that views have been fully and fairly considered and reflected. The Council's approach to consultation and criticism fundamentally undermines and removes local democratic accountability, removing trust and willingness of the people to take part
- Plan is developer led, not community/strategically led.

Officer Summary Response

- The Council is confident that consultation legal requirements have been met, with some measures above and beyond regulations.
- Explanation of how the Council sought to consult with local communities in/ out of district is set out in the Community Involvement Plan and Consultation Statement (Regulation 22).

Infrastructure Delivery Plan

Number of Comments Received

Total: 19	Sound: 0	Unsound: 19
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Key Issues Raised

Regulation 19 Proposed Site Promoter:

Berkley Latimer (1190855) & (1190760)

- More details in relation to the apportionment of cost need to be included within the IDP.
- Lack of details within the IDP in particular in relation to off-site and beyond the district boundary requirements
- Statement should be included to explain how the Infrastructure Delivery Strategy for each Significant Site should be prepared and its scope - in particular in relation to apportionment where multiple sites are contributing to the same piece of infrastructure.

Thakeham Homes (1189800)

- The requirement for a MUGA at DPSC1 should be removed as sport facilities provision are to be provided at Brookleigh.
- Policy requires SEND financial contribution alongside on-site provision of Special Support Centre provision within the one-site school.
- Question the impact of the proposed development on the train station and therefore whether a financial contribution is needed.
- Lack of clarity as to what extent parts of the route will require upgrade and to what extent these are attributed to each allocation.

Statutory stakeholders:

National Highways (1191183)

- Further information on the level of contributions likely to be collected for each site, the measures likely to be funded and the funding gap would be useful.
- An approach to appropriately manage the risk of unacceptable road safety impact on the SNR from new housing should be developed.
- Lack of information on when and how the sustainable transport mitigation provision will arise.

Network Rail (1190753)

- There are opportunities to improve cycling and bus connectivity to the stations especially from the larger strategic sites that sit outside the main towns in Mid Sussex. Developments should support these connections and enhance them were

possible to maximise active and sustainable modes of travel. Funding for improved cycle storage and access to the stations as a result is also required.

- Burgess Hill station would benefit from improvements to accessibility. Network Rail would encourage the Council to assist in securing funding from other nearby developments to ensure delivery of the improvements.
- The proposed developments close to Haywards Heath could lead to station capacity issues with projected increasing demand from both current and future growth. Network Rail will continue to monitor and identify if additional mitigations are required and provide updates to the IDP to reflect this.
- East Grinstead and Wivelsfield station are both seeing planned improvements to access to enhance this for all users.

South East Water (1190851)

- Confident that the Water Resources Management Plans accommodate a level of growth for the area to ensure that sufficient water is available within the local areas to meet a supply-demand balance.
- To meet this demand a mix of new water supplies and demand management initiatives will be implemented.

Southern Water (1188647)

- Add reinforcement of the wastewater network for DPA9

West Sussex County Council (1190880)

- Insufficient details in relation to transport interventions that will be needed to deliver the local plan, their affordability, deliverability and the apportionment of costs.
- Cycle routes between Sayers Common and Burgess Hill are aspirational and not currently identified as priorities. No feasibility work has been carried out and there are significant challenges to overcome, therefore the deliverable of the scheme remains to be determined.
- NCN20 has been largely undesignated in Mid Sussex due to a lack of off-road cycle infrastructure.
- Make reference to the need to be flexible and updated as a result of changes to the local authority duties around early years and childcare. These changes will considerably increase the demand for funded places.

Town/ Parish Councils:

Hurstpierpoint and Sayers Common Parish Council (1191152)

- Fail to provide robust evidence that infrastructure for sustainable urban extensions has been adequately planned for and demonstrably shown to be deliverable in a timely manner in conjunction with the urban extension of less sustainable settlements
- Lack of planned programmes for the timely delivery of improvements of non-car modes of transport, linked to urban extensions.
- No final confirmation of the proposed arrangements for education provision on the significant sites.

Worth Parish Council (1190873)

- A list of infrastructure projects to support future growth of settlement in Worth parish has been provided- similar information was provided at the regulation 18 consultation stage and was not included within the plan.

Local Authorities:

Tandridge District Council (1190867)

- Detailed mitigation plans on the implications for the A22/A264 corridors should be included within the Plan, as well as traffic impact on neighbouring communities and pressures on neighbouring infrastructures . Specifically, Tandridge would like to see the inclusion of a trigger point for junction improvements at the A22 / A264

Other comments:

- Lack of consideration for infrastructure
- Challenges in managing water supply cut off in Bolney. Bolney is on the edge of the Sussex supply network and is heavily reliant on the largest supply site, Balcombe Water Treatment Works. South East Water advised that this limits their ability to provide additional connections into this area from their network.
- Question the ability of South East Water to meet demand
- A Southern Water Engineer's report on flooding and sewage issues in Sayers Common has been deleted.
- Lack of clear strategy to deal with infrastructure improvements required in the north of the district.
- Further clarity required in relation to infrastructure planning to accommodate growth.
- Lacks any real commitment or detail to improve the poor cycling infrastructure within Haywards Heath and surrounding area

Officer Summary Response

- The Infrastructure Delivery Plan identifies, where possible, infrastructure needs and sets out an estimate of likely costs associated with each project. As the District Plan progresses, and starts being delivered, infrastructure providers will be able to provide greater clarity on specific needs to the proposed sites allocations. As such, the Infrastructure Delivery Plan Is a living document that will be incrementally updated.

Strategic Transport Study

Number of Comments Received

Total: 12

Sound: 0

Unsound: 12

Comments Received

Statutory stakeholders:

National Highways (11911183)

- Much of the A23 and sections of the M23 will have their design standards exceeded by 2039 either due to background growth and/or the effects of Plan development. Additionally, three approach arms or circulatory sections on the M23 are forecast to operate close to or above capacity.
 - The Plan is generally consistent with Government policy (NPPF and Circular 01/2022).
 - For the Plan to be acceptable (to National Highways) Council will need to consider:
 - a different pattern of growth, or
 - committing to significant highway investment in improvements to the M23 and A23,
 - or
 - committing to a more ambitious package of sustainable transport, travel demand management and behaviour change measures and interventions accompanied by a robust 'Monitor and Manage' strategy/approach.
 - 8 matters highlighted as needing to be resolved.

Town/ Parish Councils:**Worth Parish Council (1190873)**

- Concerns remain in relation to the capacity of the A264, the major east/west route through our parish.

Local Authorities:**East Sussex County Council (1190666)**

- Further evidence requested to understand potential cumulative cross-boundary impacts.

West Sussex County Council (1190880)

- Holding objection - Technical work on the transport evidence base for the District Plan is currently incomplete.
- Residual impacts remain - WSCC are working with the council to resolve forecast impacts - there is a reasonable prospect of a solution emerging through ongoing further work.
- No evidence has been provided on highway safety grounds - methodology agreed and work understood to have commenced.

Surrey County Council (1191201)

- SCC has concerns regarding the cumulative cross-boundary impacts in Surrey, particularly on the A22/A264 corridor. Joint working will be essential to fully understanding the impact of proposals on the Surrey local road network and how these might be mitigated and funded and to encourage cross-boundary active and sustainable travel. Potential for supplementary comments following receipt of further data from MSDC.

Tandridge (1190867)

- Tandridge's concern remains the A22/A264 corridors - the allocation of major housing growth at Copthorne (2,000 homes) will have a significant cross boundary impact on traffic for our district – no mention on the impact or mitigation proposed.

Other comments:

- Modelling is flawed.

Officer summary response

-

Overarching comments**Number of Comments Received****Total: 8****Sound: 4****Unsound: 4****Key Issues Raised****Other comments:**

- Support the Plan
- The Plan is sounds
- Building in the countryside should be minimised
- Don't build

Officer Summary Response

- Noted

