

Statement from Mrs Jacqueline Simmons.

Regulation 19 Submission references 1189185, 1191239, 1191333, 1191339 & 1191343

Matter 3: Vision, Objectives and Spatial Strategy Issue 1: Whether the Spatial Vision and Objectives for Mid Sussex Council are justified, effective, consistent with national policy and positively prepared?

Question 33.

There is not an overall District Plan Spatial Strategy.

- a) It appears to fluctuate depending on what type of speculative site development offers are received.
- b) If the development location is favourable to the Council's ideas and views it appears to sub consciously look to interpret policies to justify it. If it is not favourable to them then the opposite will happen.
- c) There is no evidence that potential developers are given a clear view or guidance of what MSDC's strategy policy or precedence is. No copy of the call out letter to developers appears to be saved in the evidence file so there is no visible evidence to show what Spital Strategy they were advised of.
- d) Examples of random approach are given in my Reg 19 submission ref 1189185 Section 2 pages 2-17.

This means that the approach of MSDC is not justified, positively prepared or effective. It does not make the DP sound. A clear spatial vision is required to make the DP sound, effective and achievable.

Question 34.

It does not make effective use of land.

- a) It does not fully consider the existing land use nor justifies its change.
- b) Many proposed allocated sites and sustainable communities are on existing agricultural land. Some of that agricultural land is potentially Agricultural Land Classification grade 3a or above, the best and most versatile land (BMV).
- c) Footnote 62 on page 52 of the NPPF states "*Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development.*"
- d) DP policy DPC1 on page 90 of the Plan also endorses this "*The best and most versatile agricultural land (Grades 1, 2 and 3a) and Grade 3b in the High Weald AONB will be protected from non-agricultural development proposals and will be protected from being covered by artificial surfaces or woodland that will prevent future use of the soils. Where significant* development of any grade of agricultural land is demonstrated to be necessary, detailed field surveys will need to be undertaken and proposals will be expected to use areas of poorer quality land in preference to that of higher quality.*"
- e) The Sustainability Appraisal on page 43 paragraph 7 states "*in the absence of site-specific surveys to identify Grades 3a and 3b, and in line with the precautionary principle, ALC Grade 3 is considered as BMV land*".
- f) On the objective of maintaining BMV It also states on page 44 paragraph 1 "*Development proposals which would result in the loss of 20ha or more of greenfield land, of which is classed as ALC Grades 1, 2 and/or 3, would be expected to have a major negative impact on this objective*".
- g) However agricultural land is not included in MSDC Site Selection Methodology so the existence of BMV land has not been considered in the site selection process.
- h) MSDC reason is that most agricultural land in Mid Sussex is grade 3 and so would not be possible to tell the difference between grade 3a and 3b by just using mapping technology.
- i) Only a small amount of the grade 3 land in the MSD is potentially Grade 3a. Any loss of it would be significant to food production & security.

- j) MSDC are aware and admit that there is potentially grade 3a land in site DPSC3. In the Sustainability Appraisal Page B-74 paragraph 6 it states “a major negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the large-scale loss of undeveloped land (including over 20ha of potential BMV land) because of the development”.
- k) I raised this at both Reg 18 and Reg19 stages and more details can be found in my Reg 19 submission 1189185 Section 3g Agriculture pages 33-36.
- l) MSDC are aware but chose not to do anything about it at this stage. They advise that it can be taken into consideration at the planning stage. In DPC1 on page 90 of the plan they advise that *proposals will be expected to use areas of poorer quality land in preference to that of higher quality.*
- m) However, in the site promoter’s plan of DPSC3 all of this potential grade 3a land is earmarked for development including a school and the community facilities. To obtain the number of houses and infrastructure requested all of it must be built over and developed. Mitigation would not be possible unless the number of houses was at least halved.
- n) That would result in less infrastructure and non sustainability of the site. Therefore, the site would knowingly be at substantial risk of not being able to meet the principles of policy DPC1, but this has not been taken into consideration when the site was selected.

By not fully considering current land usage MSDC cannot therefore make best use of the land and actively looks to subvert its own and NPPF policies.

Question 36

The scale and level of growth is not justified with regards to site DPSC3 in Sayers Common.

- a) It has a 7 day open shop, village hall, pub, church & hall, preschool, industrial and employments areas etc. Many young families have made it their home. It is not the declining type of village as depicted on page 39 of the DP paragraph 3.
- b) The Hurstpierpoint & Sayers Common Neighbourhood Plan made in 2015 it allowed for 30 to 40 new houses being required in the village in the period to 2031. Since then, at least 180 have been built or planning permission granted showing that the village has taken on its share of new housing and growth.
- c) It is an existing sustainable village. However, add another 2543 houses to it and merge it with the existing village of Albourne and it will no longer be that. An extension usually smaller than then existing body it is attached to not eight times bigger. The existing village would lose its identity and become instead just an annex to an unsustainable dormitory town.
- d) The infrastructure that MSDC advise would be needed to make the new town sustainable is not under their control and in the hands of others to finance and deliver. The size and amount of it would cost too much so has a very low chance of being delivered. Without delivery there is no sustainability.

The scale and level of growth of the village that MSDC is requesting cannot be delivered sustainably. The DP which requires it to be so is therefore not sound. A major change therefore needs to be applied to the way MSDC Spatial policy is dealt with in the DP if it is to be considered sound.

Question 39

The constraints within the District appear to have influenced a policy that development should be avoided in the HWAONB.

- a) This is regardless of what type of land is being proposed for or demonstrating that harm would be caused to the High Weald Area Of Natural Beauty.
- b) It has resulted with most development focused in the Low Weald areas.
- c) This has led to the destruction of the Low Weald area Character type in the district. It also leads to the building of an urban barrier in the south of the district from its eastern to western boundaries. This removes any unbroken rural link between the HWAONB and the South Down National Park in the district. See my reg 19 submission 1189185 section 2a pages 2-7.

The constraints have therefore been negatively used, with regards to distribution of houses and growth, and to the landscape of Mid Sussex as a whole.

Question 42

Please refer to my Reg 19 submission ref 1189185 section 2d Site Allocations 13-17 which discussed this matter.