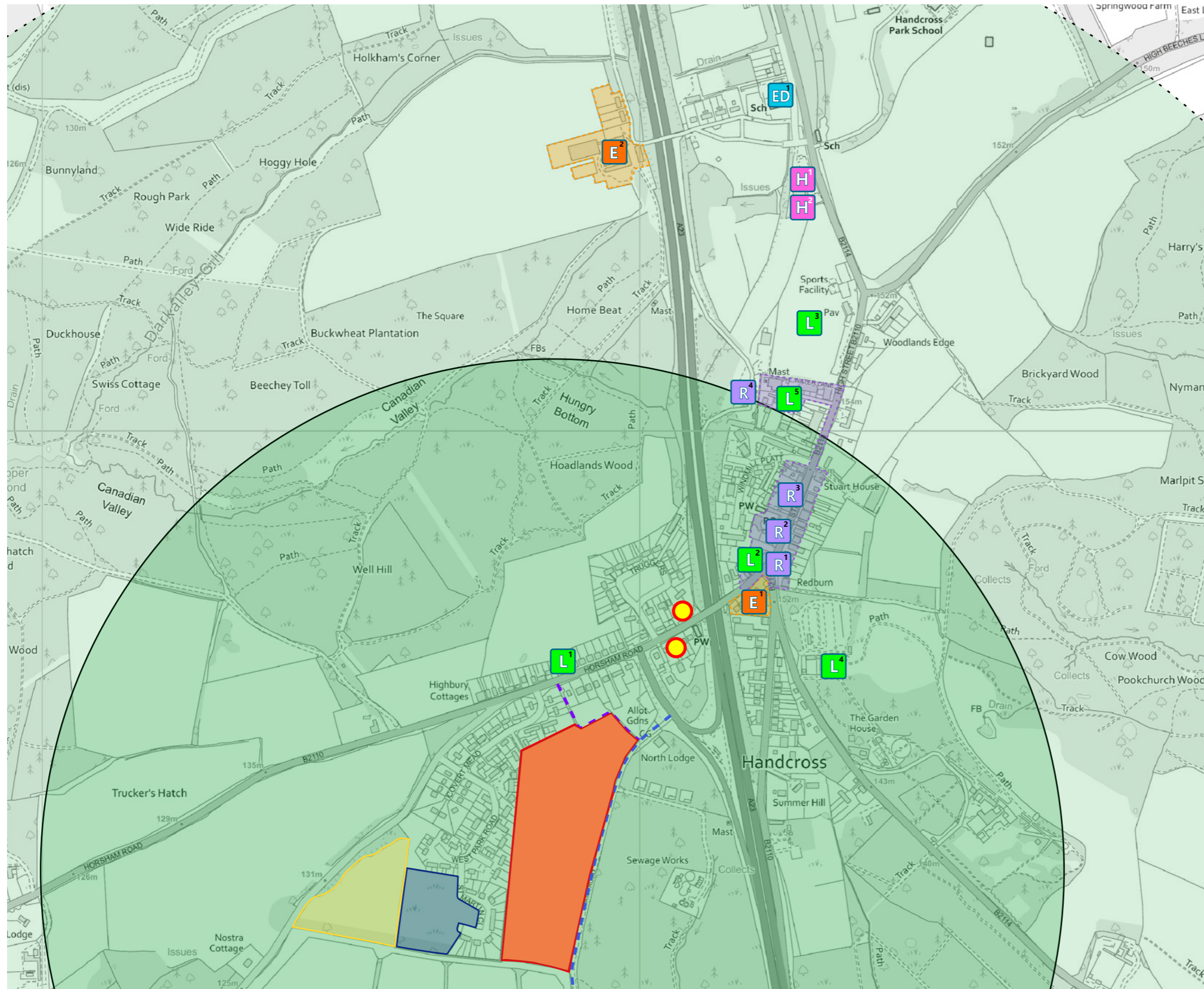


Land west of Park Road  
Handcross



- KEY**
- SITE BOUNDARY
  - TOWN CENTRE
  - EMPLOYMENT AREA
  - PROPOSED DPD ALLOCATION SA27
  - SLAUGHAM NP ALLOCATION AT ST. MARTIN'S EAST
  - BUS STOP
  - PUBLIC BRIDLEWAY 75
  - PUBLIC FOOTPATH 35
  - CATCHMENT WALKING DISTANCES
  - 800M CATCHMENT
  - 1600M CATCHMENT
  - LEISURE
  - THE ROYAL OAK INN
  - THE RED LION PUBLIC HOUSE
  - HANDCROSS RECREATION GROUND AND PAVILION
  - NYMANS - NATIONAL TRUST
  - HANDCROSS VILLAGE HALL
  - EMPLOYMENT
  - BRIGHTON ROAD INDUSTRIAL ESTATE
  - ANGLETON LTD
  - RETAIL
  - HANDCROSS BUTCHERS
  - SPAR (WITH POST OFFICE)
  - HANDCROSS NEWSAGENTS
  - BP FUELING STATION
  - EDUCATION
  - HANDCROSS PRIMARY SCHOOL
  - HANDCROSS PARK SCHOOL
  - HEALTHCARE
  - OUSE VALLEY MEDICAL PRACTICE
  - DUMBLEDORE DENTAL CENTRE
  - HEALTHCARE
  - OUSE VALLEY MEDICAL PRACTICE
  - DUMBLEDORE DENTAL CENTRE

Local Facilities Plan

Land west of Park Road  
Handcross





## 3.0 Design

This section presents the design development of the illustrative masterplan, taking into account the key considerations from the site assessment.

## 3.1 Concept Layout

The concept layout seeks to acknowledge its setting by retaining the existing tree line boundaries and incorporating existing trees and green spaces to create attractive interconnected green spaces throughout.

To the north of the Site, public open space is being offered to provide a useable space accessed from the Village via Covert Mead, the existing allotments and Park Road all which abut the site via existing footpaths therefore enhancing the Sites sustainability.

This space will also work to replace the loss of public open space at St.Martin's Close as a result of the proposed housing allocations.









### KEY

- 1 Tree lined landscape buffer with woodland walk
  - 2 Pedestrian / cycle ways between development
  - 3 Indicative housing zone
- Public footpath connection  
— Public bridleway connection  
— Site boundary 5.12Ha  
— Access road alterations  
— Existing housing allocation in SNP  
— Proposed Housing allocation SA27

Proposed access drawing

Key:

-  Tree lined landscape buffer with woodland walk
-  Pedestrian / cycle ways between development
-  Indicative housing zone
-  Public footpath connection
-  Public Bridleway connection
-  Site boundary 5.99 Ha

Accommodation - between 65-80 dwellings (13-16 dph)



Concept proposal plan

## 3.3 Aerial View

This image shows the contextual relationship the site has with the nearby allocations at St.Martin's Close (east and West) and Handcross village.

It also highlights the Site as a logical extension which would define the limits of the village through natural defensible boundaries which would be enhanced as a result of the proposals.

The verdant green setting will be maintained through retention of large numbers of trees and connected formal and informal green spaces.

Land west of Park Road

Handcross



Aerial view of proposals:

Wates House  
Station Approach  
Leatherhead  
Surrey KT22 7SW

Tel: 01372 861000  
[www.wates.co.uk](http://www.wates.co.uk)



Land west of Park Road  
Handcross

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





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**Key:**

-  Tree lined landscape buffer with woodland walk
-  Pedestrian / cycle ways between development
-  Indicative housing zone
-  Public footpath connection
-  Public Bridleway connection
-  Site boundary 5.99 Ha

Accommodation - between 65-80 dwellings (13-16 dph)

Pedestrian access from public footpath off Horsham Road

Public open space and retained woodland

Pedestrian access from public footpath off Covert Mead

Covert Mead

Horsham Road

Pedestrian access from public bridleway off Park Road

Community building

Access road enhanced to suit proposals

A23

Proposed allocation SA27

Existing allocation



Revisions

- P01 / 11.01.19 / Initial issue
- P02 / 14.01.19 / Public ROW added
- P03 / 14.01.19 / Scale changed to show context
- P04 / 06.12.19 / Community Hall shown / Access road layout updated.
- P05 / 09.12.19 / Scale increased to 1:2500
- P06 / 13.02.20 / Additional parcel added
- P07 / 28.09.20 / Siteplan adjusted to suit tree constraints

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Drawn by	Date	Project Title	Status	Stage
RM	11.01.19	Land to Park Road, Handcross	Preliminary	Feasibility
Scale at A3	1:2500	Document Title	Drawing Number	Revision
		Concept layout	19013(AF)00.01	P07

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APPENDIX 2

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# **Slaugham Neighbourhood Development Plan 2014-2031**

**A report to Mid Sussex District Council on the  
Slaugham Neighbourhood Development Plan**

**Andrew Ashcroft  
Independent Examiner  
BA (Hons) M.A. DMS M.R.T.P.I.**

**Director – Andrew Ashcroft Planning Limited**

## **Executive Summary**

- 1 I was appointed by Mid Sussex District Council in November 2018 to carry out the independent examination of the Slaugham Neighbourhood Development Plan.
- 2 The examination was undertaken by written representations. I visited the neighbourhood plan area on 17 January 2019.
- 3 The Plan includes a range of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. There is a very clear focus on safeguarding local character and community facilities. It identifies allocations for new residential development.
- 4 The Plan has been underpinned by community support and engagement. It is clear that all sections of the community have been actively engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report I have concluded that the Slaugham Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum should be held within the neighbourhood area.

**Andrew Ashcroft**  
**Independent Examiner**  
**7 May 2019**

## **1 Introduction**

- 1.1 This report sets out the findings of the independent examination of the Slaugham Neighbourhood Development Plan 2014-2031 (the 'Plan').
- 1.2 The Plan has been submitted to Mid Sussex District Council (MSDC) by Slaugham Parish Council in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012 and 2018 and in the latest revision in February 2019. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether or not the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises as a result of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope. Any plan can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted plan has been designed to be distinctive in general terms, and to be complementary to the development plan in particular. It addresses a range of environmental and community issues and proposes the allocation of two residential developments.
- 1.6 Within the context set out above this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then be used to determine planning applications within the plan area and will sit as part of the wider development plan.

## 2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by MSDC, with the consent of the Parish Council, to conduct the examination of the Plan and to prepare this report. I am independent of both MSDC and the Parish Council. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have over 35 years' experience in various local authorities at either Head of Planning or Service Director level. I am a chartered town planner and have significant experience of undertaking other neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral Service.

### *Examination Outcomes*

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan is submitted to a referendum; or
  - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
  - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.

### *The Basic Conditions*

- 2.5 As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State; and
  - contribute to the achievement of sustainable development; and
  - be in general conformity with the strategic policies of the development plan in the area;
  - be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations; and
  - not be likely to have a significant effect on a European site or a European offshore marine site, either alone or in combination with other plans or projects.

I have examined the submitted Plan against each of these basic conditions, and my conclusions are set out in Sections 6 and 7 of this report. I have made specific comments on the fourth and fifth bullet points above in paragraphs 2.6 to 2.12 of this report.

- 2.6 The Neighbourhood Plan General Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 2.7 In order to comply with this requirement, the Parish Council commissioned the preparation of a Sustainability Appraisal incorporating Strategic Environmental Assessment (SEA). The report is thorough and well-constructed. It appraises the policy options against the sustainability framework.
- 2.8 The Appraisal has two detailed appendices. Appendix 1 appraises different policy options. Appendix 2 is a Housing Sites Options Appraisal. Where appropriate I comment on the technical details in the Sustainability Appraisal in the policy specific section of this report (Section 7).
- 2.9 MSDC also prepared its own Habitats Regulations Assessment (HRA) of the Plan in November 2018. It assessed the policies in the Plan against the Ashdown Forest SPA and SAC. It concludes that the Plan is not likely to have significant environmental effects on this important European nature conservation site or undermine their conservation objectives alone or in combination taking account of the precautionary principle. As such Appropriate Assessment is not required.
- 2.10 Having reviewed the information provided to me as part of the examination, including the most recent HRA assessment, I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. None of the statutory consultees have raised any concerns with regard to either neighbourhood plan or to European obligations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of European obligations.
- 2.11 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

*Other examination matters*

- 2.12 In examining the Plan I am also required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
  - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and

- the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

2.13 Having addressed the matters identified in paragraph 2.12 of this report I am satisfied that all of the points have been met subject to the contents of this report.



### 3 Procedural Matters

- 3.1 In undertaking this examination I have considered the following documents:
- the submitted Plan;
  - the Basic Conditions Statement;
  - the Consultation Statement;
  - the Sustainability Appraisal and the associated Non-Technical Summary;
  - the MSDC HRA report;
  - the Parish Council's responses to my Clarification Note;
  - the District Council's responses to my Clarification Note
  - the representations made to the Plan;
  - the adopted Mid Sussex District Plan 2014-2031;
  - the National Planning Policy Framework (March 2012, July 2018 and February 2019);
  - Planning Practice Guidance (March 2014 and subsequent updates); and
  - relevant Ministerial Statements.
- 3.2 I carried out an unaccompanied visit to the Plan area on 17 January 2019. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. My site inspection is covered in more detail in paragraphs 5.9 to 5.16 of this report.
- 3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted plan, I was satisfied that the Plan could be examined without the need for a public hearing. I advised MSDC of this decision early in the examination process.
- 3.4 On 24 July 2018 a revised version of the NPPF was published. Paragraph 214 of the 2018 NPPF identifies transitional arrangement to address these circumstances. It comments that plans submitted before 24 January 2019 will be examined on the basis of the 2012 version of the NPPF. The further updates to the NPPF in 2019 did not affect these transitional arrangements. I have proceeded with the examination on this basis. All references to paragraph numbers within the NPPF in this report are to those in the 2012 version.

## 4 Consultation

### *Consultation Process*

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012 the Parish Council has commissioned the preparation of a Consultation Statement. This Statement is proportionate to the Plan and its policies. It includes an assessment of the consultation undertaken during the various stages of Plan production. It also provides specific details about the consultation process that took place on the pre-submission version of the Plan (November 2017 to January 2018).
- 4.3 The Statement sets out details of the range of consultation events that were carried out in relation to the initial stages of the Plan. It provides details about:
- the organisation of dedicated meetings and discussions with key statutory local organisations, local residents and organised groups;
  - the distribution of leaflets and updates;
  - the use of banners and adverts to publicise key events; and
  - the public event on the proposed site allocations in April 2017.
- 4.4 The Statement itself is very comprehensive. It is supported by a series of technical appendices. Some of the appendices reproduce the consultation material used. This gives a degree of depth and interest to the Statement.
- 4.5 The Statement also provides specific details on the comments received as part of the consultation process that took place on the pre-submission version of the Plan (Table 1). It identifies the principal changes that worked their way through into the submission version (Table 2). They help to describe the evolution of the Plan.
- 4.6 It is clear that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. I note that several of the local residents who have made representations to the Plan consider that their earlier views have not been taken into account. I address the specific issues around the proposed housing sites later in this report. Nevertheless, for the purposes of this part of the report I am satisfied that proper engagement has been undertaken.
- 4.7 From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process.

### *Representations Received*

4.8 Consultation on the submitted plan was undertaken by the District Council for a six-week period that ended on 14 January 2019. This exercise generated comments from a range of organisations as follows:

- Thames Water
- Sport England
- Trustees of Ashfold Estate
- Environment Agency
- Thakenham Homes
- Welbeck Land
- Millwood Designer Homes
- West Sussex County Council
- Historic England
- Gladman Developments Limited
- High Weald AONB
- Highways England
- A2 Dominion
- Natural England
- Hallam Land
- Wates Homes
- Freechase and Lyndhurst Estates

4.9 In addition 33 representations were made to the Plan by local residents. The overwhelming majority of these comments expressed overlapping objections to the housing allocation and the reserve site proposed in the Plan.

4.10 In examining the Plan I have taken account of all the representations made. Where appropriate I make specific reference to the representation concerned on a policy-by-policy basis.

## 5 The Neighbourhood Area and the Development Plan Context

### *The Neighbourhood Area*

- 5.1 The neighbourhood area consists of the parish of Slaugham. Its population in 2011 was 2769 persons living in 1131 houses. It was designated as a neighbourhood area in July 2012. It is of an irregular shape bisected by the A23 as it runs in a north-south direction from Crawley to Brighton. It has four principal settlements – Pease Pottage in the north, Handcross and Slaugham and Warninglid to the south. The majority of the neighbourhood area falls within the High Weald Area of Outstanding Natural Beauty.
- 5.2 The villages of Handcross and Pease Pottage are the two major concentrations of residential and business activity in the neighbourhood area. Handcross is located at the junction of the B2110 and the B2114. It has a vibrant village centre. The National Trust property of Nymans Gardens is located to the immediate south of the village. Pease Pottage is located to the immediate west of the A23 and to the south of Crawley. A service centre is located to the immediate east of the A23.
- 5.3 The majority of the neighbourhood area falls within the High Weald Area of Outstanding Natural Beauty. The High Weald is a historic countryside of rolling hills with small irregular fields, woodlands and hedges. Its attractiveness is immediately apparent. In many cases the settlements in the neighbourhood area have taken account of their natural landscape setting. Slaugham itself is particularly attractive and is located on a ridge (Park Road) between two watercourses. Warninglid has a similarly attractive setting and makes good use of vernacular materials. The villages of Warninglid, Slaugham and Handcross each contain a designated conservation area.

### *Development Plan Context*

- 5.4 The development plan covering the neighbourhood plan area is the Mid Sussex District Plan 2014-2031. It was adopted in March 2018. The Plan sets out a vision, objectives, a spatial strategy and overarching planning policies that guide new development in the Plan period. It is this development plan context against which I am required to examine the submitted Neighbourhood Plan
- 5.5 Policy DP1 Sustainable Economic Development, DP4 Housing and DP6 Settlement Hierarchy of the District Plan provide key elements of the strategic approach of the District Plan. New growth is largely based around the settlement hierarchy. In District terms Burgess Hill, East Grinstead and Haywards Heath are category 1 settlements. Within the neighbourhood area Handcross and Pease Pottage are identified as category 3 settlements (medium size villages), and Slaugham and Warninglid are identified as category 4 settlements (small villages).

- 5.6 The principal new development proposed within the neighbourhood area is that of a strategic allocation to the east of Pease Pottage (Policy DP10). It incorporates 600 new dwellings and a range of associated community facilities.
- 5.7 In addition to this strategic approach the following policies in the District Plan are particularly relevant to the Slaugham Neighbourhood Plan:

DP12 Protection and Enhancement of the Countryside  
 DP13 Preventing Coalescence  
 DP14 Sustainable Rural Development and the Rural Economy  
 DP15 New Homes in the Countryside  
 DP16 High Weald Area of Outstanding Natural Beauty  
 DP25 Community Facilities and Local Services  
 DP31 Affordable Housing  
 DP35 Conservation Areas

In this context the Basic Conditions Statement usefully highlights key policies in the development plan and how they relate to policies in the submitted Plan. This is good practice. It provides confidence to all concerned that the submitted Plan sits within its local planning policy context.

- 5.8 The submitted Plan has been prepared within its wider adopted development plan context. In doing so it has relied on up-to-date information and research that has underpinned existing planning policy documents in the District. This is good practice and reflects key elements in Planning Practice Guidance on this matter. It is clear that the submitted Plan seeks to add value to the District Plan and to give a local dimension to the delivery of its policies. This is captured in the Basic Conditions Statement.

#### *Unaccompanied Visit*

- 5.9 I carried out an unaccompanied visit to the neighbourhood area on 17 January 2019. The day was cold but sunny. It showed off the neighbourhood area at its Winter best.
- 5.10 I drove into the area from the M23/A23 to the north. I stopped initially at the Pease Pottage service station. This gave me an initial impression of the setting and the character of the neighbourhood area and its relationship with the A23. I saw the emerging development of the strategic housing allocation in Pease Pottage as identified in the District Plan.
- 5.11 I looked at the settlement of Pease Pottage to the west of the A23. I saw the new houses off Horsham Road and off Old Brighton Road (Haynes Way). I also looked at the two housing sites promoted by representors.
- 5.12 I then drove to Handcross. I saw the School to the north of the village. I then walked around the village centre. I saw its range of shop and commercial uses and its wider importance to the sustainability of the neighbourhood area. I saw some of the parking and congestion issues that are addressed in the Aims of the Plan. In most cases they

related to delivery vehicles. Plainly things have moved on since their predecessors filled up with petrol at the iconic Esso petrol pump outside The Old Garage.

- 5.13 I then looked at the two proposed housing sites in St Martin Close. I looked particularly at the way in which they would occupy land currently used as open grassland and as woodland. I saw that they were located at the end of a series of roads which created a long cul-de-sac. Whilst I was in Handcross I also took the opportunity to look at the three proposed housing sites promoted by developers in their representations to the Plan.
- 5.14 I took the opportunity to view the access and parking arrangements associated with Nymans Gardens (National Trust) to the immediate south of the village centre. This helped me to understand better the relationship between the village and the Gardens and one of the Aims in the Plan relating to car parking.
- 5.15 I drove to Slaugham via Staplefield. In Slaugham I saw the idyllic relationship between the church to the south of Staplefield Road and the main village to the north in Park Road. I saw several very fine vernacular houses and the pathway up to Slaugham Park. I also saw its iconic white telephone box.
- 5.16 I then drove to Warninglid. I saw the many pleasant cottages off The Street. I drove back to Handcross along Coos lane. In doing so I saw Furnace Pond.

## 6 The Neighbourhood Plan as a whole

6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped considerably in the preparation of this section of the report. It is an informative and professional document.

6.2 The Plan needs to meet all the basic conditions to proceed to referendum. This section provides an overview of the extent to which the Plan meets three of the five basic conditions. Paragraphs 2.6 to 2.11 of this report have already addressed the issue of conformity with European Union legislation.

### *National Planning Policies and Guidance*

6.3 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework (NPPF) issued in March 2012. Paragraph 3.4 of this report has addressed the transitional arrangements which the government has put in place as part of the publication of the 2018 version of the NPPF.

6.4 The NPPF sets out a range of core land-use planning principles to underpin both plan-making and decision-taking. The following are of particular relevance to the Slaugham Neighbourhood Plan:

- a plan led system– in this case the relationship between the neighbourhood plan, the adopted Mid Sussex District Plan 2014-2031;
- recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
- taking account of the different roles and characters of different areas;
- always seeking to secure high quality design and good standards of amenity for all future occupants of land and buildings; and
- conserving heritage assets in a manner appropriate to their significance.

6.5 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development, which is identified as a golden thread running through the planning system. Paragraph 16 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

6.6 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and ministerial statements.

- 6.7 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms. It sets out a positive vision for the future of the plan area within the context of its position in the settlement hierarchy. In particular it positively allocates a site for residential development and proposes another as a reserve site. It includes a series of policies that seek to safeguard the quality and nature of its natural environment and the High Weald AONB in particular. The Basic Conditions Statement maps the policies in the Plan against the appropriate sections of the NPPF.
- 6.8 At a more practical level the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraphs 17 and 154). This was reinforced with the publication of Planning Practice Guidance in March 2014. Its paragraph 41 (41-041-20140306) indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise and supported by appropriate evidence.
- 6.9 As submitted the Plan does not fully accord with this range of practical issues. The majority of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

*Contributing to sustainable development*

- 6.10 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social and environmental. It is clear that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension the Plan includes policies for housing and employment development (Policies 11/12 and 14-16 respectively). In the social role, it includes policies on open space (Policy 7), community facilities (Policy 8), and on utility infrastructure (Policy 10). In the environmental dimension the Plan positively seeks to protect its natural, built and historic environment. It has specific policies on the AONB (Policy 1) and on conservation areas (Policy 6). The Parish Council has undertaken its own assessment of this matter in the submitted Basic Conditions Statement.

*General conformity with the strategic policies in the development plan*

- 6.11 I have already commented in detail on the development plan context in the wider District in paragraphs 5.4 to 5.8 of this report.
- 6.12 I consider that the submitted Plan delivers a local dimension to this strategic context. The Basic Conditions Statement helpfully relates the Plan's policies to policies in the development plan. Subject to the recommended modification in this report I am satisfied that the submitted Plan is in general conformity with the strategic policies in



the development plan. Indeed, it positively seeks to deliver the ambitions of the District Plan in the neighbourhood area.

## 7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. In particular, it makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 My recommendations focus on the policies themselves given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the Plan area. The wider community and the Parish Council have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (41-004-20170728) which indicates that neighbourhood plans must address the development and use of land. It includes a series of Aims which the Plan recognises cannot be delivered directly through the planning process. These Aims are identified in a different colour to the land use policies. They sit within the appropriate topic-based parts of the Plan.
- 7.5 I have addressed the policies in the order that they appear in the submitted plan. Where necessary I have identified the inter-relationships between the policies. The Aims are addressed after the policies.
- 7.6 For clarity this section of the report comments on all the policies and the Aims whether or not I have recommended modifications in order to ensure that the Plan meets the basic conditions.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

### *The initial sections of the Plan (Sections 1-3)*

- 7.8 These introductory sections of the Plan set the scene for the range of policies. They do so in a concise and proportionate way. The Plan is presented in a professional way. It is colourful and makes a very effective use of tables and maps. A very clear distinction is made between its policies and the supporting text. It also draws a very clear connection between the Plan's objectives and its resultant policies.
- 7.9 The initial elements of the Plan set the scene for the policies. They are commendable to the extent that they are proportionate to the Plan area and the subsequent policies.

- 7.10 Section 1 provides a very clear context to the neighbourhood area and when it was designated. It identifies how the Plan was prepared, how it will fit into the wider planning system in the event that it is 'made' and what the Plan sets out to achieve.
- 7.11 It also sets out how the community was engaged in the plan-making process. Whilst this overlaps with the Consultation Statement it provides a useful context to this matter in the main body of the Plan.
- 7.12 Section 2 provides commentary on the neighbourhood area. It sets out useful information on the social and economic context of the neighbourhood area. This information feeds into some of the policies in the Plan.
- 7.13 Section 3 provides a Vision for the neighbourhood area together with a series of Strategic Objectives. The objectives are both thorough and comprehensive.
- 7.14 The remaining parts of the Plan incorporate policies on a topic basis. They include related supporting text and background information. The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

#### Policy 1: Protecting the Area of Outstanding Natural Beauty

- 7.15 The majority of the neighbourhood area falls within the High Weald AONB. This policy provides a context within which development proposals can be assessed and determined. I sought clarity from the Parish Council on the actual extent of the AONB and whether it should be included on a map base within the Plan. The Parish Council has provided the relevant information. I recommend accordingly.
- 7.16 The form and structure of the policy is very similar to that of Policy DP16 of the MSDP. National policy is clear that there is no need for a neighbourhood plan to repeat policies that are already contained within a local plan. However, in circumstances where the AONB extends largely throughout the neighbourhood area and has had a significant influence on other elements on the plan-making process, I am satisfied that the policy should remain in the Plan. I recommend two modifications to ensure that the policy has the clarity required by the NPPF. The first signposts the extent of the AONB within the neighbourhood area within the policy itself. The second inserts the relevant details from MSDP Policy DP16 into the first part of the policy. As submitted Policy 1 has excluded important parts of the corresponding MSDP policy. I also recommend a modification to the third part of the policy to correct a grammatical error.

#### **At the beginning of the policy add:**

**'The extent of the High Weald Area of Outstanding Natural Beauty is shown on [insert details]'**

**In the first part of the policy insert 'only' between 'will' and 'be'.**

#### **At the end of the first part of the policy add:**

**‘in particular;**

- **the identified landscape features or components of landscape beauty and to their setting;**
- **the traditional interaction of people with nature and appropriate landscape management;**
- **character and local distinctiveness, settlement pattern, sense of place and setting of the AONB; and**
- **the conservation of wildlife and cultural heritage.’**

**In the third part of the policy replace ‘it’s’ with ‘its’.**

Policy 2: Protection of the Landscape

- 7.17 This policy refers specifically to the part of the neighbourhood area which is outside the AONB. In specific terms it is the built-up area of Pease Pottage and two adjoining modern developments.
- 7.18 The policy indicates that development which has an unacceptable detrimental effect on the landscape in this area will not be supported other than in exceptional circumstances where the use relates to essential infrastructure. The policy has attracted several representations.
- 7.19 I have considered the purpose of this policy very carefully. I can see that the Parish Council wishes to apply a policy approach to the landscape in that part of the neighbourhood area outside the AONB. However, the evidence for the policy is not well-developed. Paragraph 4.6 comments that its principal purpose is to protect this part of the neighbourhood area from unacceptable development based on public feedback about its local importance. Plainly this is an important part of the neighbourhood planning process. However, in this case the resultant policy is not dissimilar to Policy 1 which addresses the AONB. In particular Policy 2 would only support development in ‘exceptional circumstances’. Such an approach is reserved only for designated landscapes in paragraphs 115 and 116 of the NPPF. Plainly in the case of the AONB that part of the neighbourhood area is such a designated landscape.
- 7.20 In addition the matter of fact approach taken in the policy is not in general conformity with Policies DP12 (Protection and Enhancement of the Countryside), DP14 (Sustainable Rural Development) and DP15 (New Homes in the Countryside) of the adopted District Plan. In their different ways these policies offer a degree of flexibility for appropriate development to come forward. On this basis I recommend the deletion of this policy from the Plan. It does not have regard to national policy and is not in general conformity with strategic policies of the development plan.

**Delete the policy.**

*Delete paragraph 4.6*

### Policy 3: Protection of the Open Countryside

- 7.21 This policy raises similar issues to those addressed above in respect of Policy 2. In this case there is a specific issue of the consistency between the submitted policy and Policy DP12 (Protection and Enhancement of the Countryside) in the adopted District Plan.
- 7.22 The submitted policy takes a negative approach to development proposals in the countryside except for the purposes of agriculture or other uses which have to be located in the countryside. In contrast Policy DP12 of the District Plan takes a positive approach to new development in the countryside. The policy initially comments that the countryside will be protected in recognition of its intrinsic character and beauty. It then continues to comment that development will be permitted where it maintains or possibly enhances the quality of the rural and landscape character of the District.
- 7.23 Considering all of the issues I conclude that the submitted policy is not in general conformity with Policy DP12 of the District Plan. Indeed, in many respects the two policies run in different directions. In any event the submitted policy fails to add any local value or distinctiveness to the strategic context for development in the District. In these circumstances I recommend the deletion of the policy and the supporting text. I am satisfied that the general policy objective that is sought by the policy will be satisfactorily achieved by the implementation of District Plan Policy DP12 through the development management process.

#### **Delete the policy.**

*Delete paragraph 4.12*

### Policy 4: Sustainable Development Measures

- 7.24 The policy supports sustainable development measures and associated proposals. It specifically highlights photovoltaic panels, solar thermal insulation and biomass and heat pumps.
- 7.25 The policy meets the basic conditions.

### Policy 5: Green Infrastructure

- 7.26 The policy addresses green infrastructure. It has three related parts. The first supports proposals which would conserve, maintain and enhance existing green infrastructure. The second part supports proposals that would improve access for pedestrians and cyclists into the parcels of green infrastructure in the neighbourhood area. The third resists proposals that would involve the loss of green infrastructure unless mitigation or compensation measures are associated with the proposal.

- 7.27 The supporting text provides a context to the existing green infrastructure in the neighbourhood area (paragraph 4.17). It also identifies the social and community benefits of well-managed green infrastructure (paragraph 4.16).
- 7.28 I recommend a series of detailed modifications to the wording of the policy as follows:
- in the first part of the policy replace ‘and’ with ‘or’. As submitted the policy would require proposals to ‘conserve, maintain and enhance the existing green infrastructure network’. In some case this may well be possible. In most cases to achieve all three ambitions in the policy would be unrealistic or impracticable;
  - in the second part of the policy insert the missing words at the end; and
  - in the third part of the policy replace ‘be resisted’ with ‘not be supported’
- 7.29 Otherwise the policy meets the basic conditions.

**In the first part of the policy replace ‘and’ with ‘or’**

**In the second part of the policy add at the end ‘will be particularly supported’**

**In the third part of the policy replace ‘be resisted’ with ‘not be supported’**

#### Policy 6: Conservation Areas

- 7.30 This policy celebrates the rich historic built environment of the neighbourhood area. It contains three conservation areas – Slaugham, Warninglid and Handcross.
- 7.31 I recommend that the supporting text and map information shows the extent of the conservation areas. This would be best achieved by including an A4 plan for each of the three conservation areas in an appendix of the Plan. In the absence of this information the reader of the Plan has to go elsewhere to find the relevant information.
- 7.32 The policy itself has two related parts. The first provides general policy guidance on the need for new development to conserve or enhance the three conservation areas. The second part of the policy identifies five specific locations within the three conservation areas. I sought clarity from the Parish Council on the role and purpose of this part of the policy. I was advised that the intention of this part of the policy was to identify particularly sensitive locations within the conservation areas. The Parish Council also considers that they are of local significance and should be conserved in an appropriate fashion. I recommend modifications to this part of the policy, and to the supporting text, to bring clarity to the policy and to achieve the ambitions which the Parish Council had in mind in formulating its approach in the Plan.
- 7.33 The initial part of the policy is more general in its approach. The corresponding policy in the adopted District Plan is Policy DP35. Plainly its coverage is District-wide. Nevertheless, it is commendably detailed in the way in which it requires development in conservation areas to conserve or enhance the character or appearance of the District’s conservation areas. In comparison Policy 6 in the submitted Plan does not include the same level of general detail and guidance. As such it is not in general

conformity with the District Plan policy. In addition, it does not provide any refined or granular details which would apply to the three conservation areas in the neighbourhood area.

- 7.34 In these circumstances I recommend that the policy is modified so that it consolidates and reinforces the strategic District Plan policy in a more local context. In recommending this modification I have also considered the need for the retention or otherwise of the supporting text associated with the policy (paragraphs 4.18-4.23). Given the importance of the conservation areas within the neighbourhood area and the quality and robustness of the supporting text I am satisfied that it should remain in the Plan. I recommend modifications to the existing text so that it makes a direct reference to District Plan Policy DP35 and its role in determining development proposals in the three conservation areas.

**Replace the opening part of the policy with the following:**

**‘Development proposals within the Handcross, Slaugham and Warninglid conservation areas will be supported where they conserve or enhance the character or appearance of the conservation area concerned and comply with the requirements in Policy DP35 (Conservation Areas) of the District Local Plan.**

**In the second part of the policy add the following after ‘will be supported’:**

**‘where such proposals would conserve or enhance the specific part of the conservation area and its immediate setting’**

*At the end of paragraph 4.18 add:*

*‘The three conservation areas are shown on [insert details]’*

*At the end of paragraph 4.22 add:*

*‘Development proposals within the three conservation areas will be assessed and determined against national policy and Policy DP35 of the Mid Sussex District Plan 2014-2013. Policy 6 of this Plan has been designed to be complementary to this national and local policy context and to provide specific detail relevant to the neighbourhood area.’*

*At the end of paragraph 4.23 add:*

*‘Policy 6 has two related parts. The first has a general effect. It makes a reference to the key principles contained in Policy DP35 of the adopted District Plan. The second makes a specific reference to five identified locations within the three conservation areas. They are particularly sensitive locations which have been identified as part of the plan-making process. The Parish Council also considers that they are of local significance and should be conserved in an appropriate fashion.’*

Policy 7: Open Space

- 7.35 The policy seeks to recognise the importance of good well-planned open spaces in the neighbourhood area. It has four related parts. The first offers support to

development proposals which provide a mix of formal and informal open space. The second requires open spaces to be high quality and to serve a local need. The third resists proposals that would result in the loss of open spaces. The fourth part supports proposals for the replacement of open space where two criteria are met.

- 7.36 I recommend that the first and second parts of the policy are combined. This will bring the clarity required by the NPPF. I also recommend that the initial part of the policy should be realigned so that it requires the provision of open space to standards set out in the Mid Sussex Development Infrastructure and Contributions Supplementary Planning Document in developments promoted within the neighbourhood area in either the neighbourhood plan or the District Plan. Whilst policies in a neighbourhood plan need to be considered in the round the language used in the first part of the policy could be interpreted as offering support to a proposed development which conflicted with the wider development plan but which provided open space to meet local need.
- 7.37 Otherwise the policy meets the basic conditions. Its implementation through the development management process will make a significant contribution towards the achievement of the social and the environmental dimensions of sustainable development in the neighbourhood area.

**Replace the first and second parts of the policy with:**

**‘Development proposals which are otherwise in accordance with the development plan should provide a mix of formal and informal open space to standards set out in the Mid Sussex Development Infrastructure and Contributions Supplementary Planning Document to meet local need as appropriate to the site concerned. The resulting open space should be designed and arranged within the site in a high-quality fashion’**

Policy 8: Community Facilities

- 7.38 This policy celebrates the extensive range of community facilities to be found in the neighbourhood area. They are primarily focused in the four main settlements. Paragraph 5.6 provides an indication of their scope. During my visit to the neighbourhood area I saw their importance to the local community.
- 7.39 The policy has two related parts. The first resists proposals that would result in the net loss of community facilities. The second offers support for the alteration and/or replacement of community facilities where a series of factors are met.
- 7.40 The policy has attracted two representations. One suggests that the policy would be improved if it provided a context for the provision of new community facilities. The other suggests that the policy has not fully explored the scenario where alternative sites would unlock the potential to provide new facilities to meet the immediate needs of residents of Handcross. Plainly both of these potential dimensions to a policy of this nature would improve its role and applicability. However, my role is to examine the policy against the basic conditions. It is not within my remit to improve a policy.

As such I am satisfied that the policy has regard to national policy and is in general conformity with strategic policies in the development plan. It meets the basic conditions.

#### Policy 9: Superfast Broadband

- 7.41 The policy has a sharp focus on supporting proposals that would improve access to high speed broadband services. It has regard to national policy in the NPPF.
- 7.42 The policy has two related elements. The first offers support to proposals which would provide access to super-fast broadband. The second offers support to schemes which sympathetically locate and design the associated above-ground network installations. I recommend modifications to both elements of the policy. They will bring clarity and simplicity to the intentions of the policy. They will also ensure that the two parts of the policy follow a similar format to other policies in the submitted Plan.

#### **Replace the first part of the policy with:**

**‘Proposals which would provide access to a super-fast broadband network will be supported’.**

#### **Replace the second part of the policy with:**

**‘Proposals for above ground network installations which would provide access to a super-fast broadband network will be supported where their location is sympathetically chosen and designed to reflect the character of the local area’.**

#### Policy 10: Utility Infrastructure

- 7.43 The policy offers support to new and/or improved community infrastructures where it meets the identified needs of the community.
- 7.44 The principle of the approach taken meets the basic conditions. Nonetheless I recommend the deletion of ‘encouraged’ in the policy wording. It is both unclear and unnecessary. I also recommend other detailed modifications to the wording of the policy so that it has the clarity required by the NPPF.

#### **Delete ‘encouraged and’.**

**Replace ‘in order to meet’ with ‘where it meets’.**

#### Housing Allocations

- 7.45 Policies 11 and 12 are at the very heart of the Plan. They propose a housing allocation and a reserve housing allocation respectively. They are located on adjacent parcels of land off St Martin Close in Handcross. I comment on each in turn later in this report. However, in the interests of consistency and to avoid repetition I



address a series of general issues at this point. Whilst they overlap one with another the following points have a particular bearing on the two housing sites:

- the strategic need or otherwise for the two proposed housing sites (paragraphs 7.46 to 7.54);
- the location of the two proposed sites with the High Weald AONB (paragraphs 7.55 to 7.69);
- the concentration of the proposed new housing development in the Plan in Handcross (paragraphs 7.70 to 7.71); and
- the site-selection process (paragraphs 7.72 to 7.82).

*The strategic need or otherwise for the two proposed housing sites*

- 7.46 The supporting text in Section 6 of the Plan provides a context against which it has proposed the two housing allocations. It outlines the strategic housing targets contained in the MSDP and the way in which they step from 876 dwellings per annum up to 2023/24 to 1090 dwellings from 2024/25. It also explains the context within which MSDC has commenced work on its own Site Allocations Development Plan Document.
- 7.47 The most significant residential development in the neighbourhood area during the Plan period will be that of the strategic site to the east of Pease Pottage. It is allocated in Policy DP10 of the MSDP. I saw that development had already commenced on this important site started when I visited the neighbourhood area.
- 7.48 Policy DP6 Settlement Hierarchy of the MSDP identifies the extent of the unidentified additional housing provision that remains to be provided within the District. It emphasises the role that will be played by neighbourhood plans as part of this process. The table at the end of the policy identifies the minimum residual housing delivery figure from 2017 onwards for the various settlements in the District. Footnote 6 to the table is particularly informative for the Slaugham Plan. It identifies that ‘the required minimum provision at Pease Pottage (Slaugham Parish) is significantly greater than other settlements within Category 3 due to the allocation and subsequent permission granted for 600 homes within this settlement. Due to this, the other settlements within Slaugham Parish (Handcross, Slaugham and Warninglid) will not be required to identify further growth through the Plan process on top of windfall growth although may wish to do so to boost supply’.
- 7.49 The Parish Council undertook a Housing Needs Consideration in late 2016 as the MSDP was in preparation. The results of that study indicate that the housing need in the neighbourhood area over the Plan period could be accommodated by the completions and commitments and that the housing need would be met without the need for allocations in the emerging neighbourhood plan.
- 7.50 Nevertheless the Parish Council resolved to consider whether further modest growth should be facilitated through the preparation of the emerging neighbourhood plan. As paragraphs 6.12 and 6.13 of the Plan comment this decision took account of the pro-

growth national growth agenda, the pressure for new dwellings in the District and MSDC's decision to proceed with work on a Site Allocations DPD.

- 7.51 The decision of the Parish Council to promote additional residential development in the submitted Plan beyond that already committed at Pease Pottage strategic allocation features in many of the local residents' representations made to the Plan (see paragraph 4.8 of this report). The representations contend that the proposed new housing in St Martin Close Handcross is simply not required.
- 7.52 Such comments from local residents are understandable. Indeed, they take account of footnote 6 of Policy DP6 of the MSDP. Nevertheless, I am satisfied that the principle of the approach taken by the Parish Council is both appropriate and meets the basic conditions. I have come to this conclusion for the following reasons:
- footnote 6 to Policy DP6 of the MSDP is clear that through the neighbourhood plan process the Parish Council may wish to identify further growth to boost supply;
  - it recognises the emerging work being carried out by MSDC on the preparation of a Sites Allocations DPD;
  - paragraph 47 of the NPPF highlights the importance and the role of the plan-making process in boosting significantly the supply of housing;
  - PPG (41-044-20160519) advises that neighbourhood plans can allocate additional sites to those in a Local Plan where this is supported by evidence to demonstrate need above that identified in the Local Plan; and
  - in any event the purpose of neighbourhood planning is to give communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of the local area (PPG 41-001-20140306).
- 7.53 Whilst local residents have contended that the two sites in St Martin Close are not needed the development industry has made a different set of representations on the Plan. Some suggest that the level of development should be higher both in general terms and to future-proof the Plan. Others promote potential development sites either in addition to or as alternatives to the St Martin Close package. Clearly different proposals would bring forward different levels of additional housing. In some case they would include community benefits. However, based on the evidence available to me I am satisfied that the proposals in the plan for a modest allocated site and a modest reserve site are appropriate to the circumstances that exist in the neighbourhood area on strategic housing allocation and delivery.
- 7.54 I address the site selection process shortly. Nevertheless, at this point in the report I highlight a later recommended modification which refers to the potential need for a review of any made neighbourhood plan based on the monitoring of the delivery of new housing development within the Plan period. The current situation may change within the Plan period.

*The location of the two proposed sites within the High Weald AONB*

- 7.55 Both of the proposed sites fall within the High Weald AONB. On this basis their proposed allocations have attracted objections from the High Weald AONB Unit and

Natural England. The comments from the AONB Unit draw my attention to paragraphs 115 and 116 of the NPPF. The former indicates that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty. The latter indicates that planning permission should be refused for major development in these designated areas except in exceptional circumstances and where it can be demonstrated that they are in the public interest. Three factors are identified for the consideration of any such applications.

- 7.56 Plainly the issue of the appropriate location of additional housing allocations is heavily influenced by the extensive nature of the AONB within the neighbourhood area. This matter was addressed in detail within the examination and the eventual adoption of the MSDP. In paragraph 49 of his report on the MSDP the Planning Inspector comments:

*'Meeting the housing needs of an area is a core planning principle in the NPPF, and in Mid Sussex this will entail development on greenfield land. Mid Sussex District is endowed with sites and areas of natural and historic interest; it has part of the South Downs National Park, the High Weald Area of Outstanding Natural Beauty (AONB) and various heritage designations. Moreover, many of the undesignated rural areas of the District are attractive countryside. Together, these assets are a central part of the character of the District.'*

- 7.57 It is within this context that the two housing sites in the submitted Plan have been promoted. They are a proposed housing allocation and a proposed reserve site in an emerging neighbourhood plan which has had to grapple with the inherent tensions of promoting new housing growth on the one hand and safeguarding a high-quality landscape on the other hand. The Planning Inspector's report on the Local Plan anticipates the challenges which the Parish Council has addressed. Paragraph 53 of his report comments that:

*'Further allocations are likely to be needed in the future Site Allocations DPD to meet the housing requirement. There are locations within the District of lesser landscape value, in relatively sustainable locations near to settlements and close to main transport routes. Some settlements lie within the AONB and may be appropriate for modest housing schemes, but there is no evidence that meeting the housing requirement will necessitate major development in the AONB other than that already permitted by the Council at Pease Pottage, or that it would harm the National Park.'*

- 7.58 I sought comments from both MSDC and the Parish Council on this important matter as part of the clarification note process. I summarise the responses below.

- 7.59 MSDC helpfully commented on the process which it is following with regards to its work on the emerging Site Allocations Development Plan Document (DPD). The site selection criteria are based around three key factors: planning constraints, development considerations and sustainability/access to services. The work is drawing on the distribution requirements identified in Policy DP6 of the adopted District Plan.

- 7.60 I was also advised that approximately half of the wider District is within the High Weald AONB. On this basis the High Weald AONB Unit is providing an assessment of the potential impact of the development of sites within the AONB. Plainly this is good practice. As an outcome of this process sites with a medium or low impact will be taken forward for further assessment taking into account any necessary mitigation. Sites with a high impact are not being considered further.
- 7.61 The site assessment process was ongoing at the time that the responses to the clarification note were received. The package of sites in St Martin Close is one of eight sites in the wider parish, and one of four in Handcross that are being considered as part of this process
- 7.62 The Parish Council raises similar and overlapping commentary in its response to this issue to those raised by MSDC. In a local context it advises that 99% of the neighbourhood areas lies within the AONB. It goes on to comment that in this context there is little practical alternative to identifying land for new residential development in sustainable locations outside the built-up areas that would not be within the AONB. It then comments that not all land within the neighbourhood area is of equal landscape character, quality or sensitivity and that its site selection process has taken these matters and inevitable variations into account.
- 7.63 The Parish Council concludes that its detailed assessment of the various site options (as set out in the SA) indicates that the two sites promoted in the Plan are of a lesser landscape importance and sensitivity to other sites considered both in both absolute and relative terms. It also comments that the two sites are visually well-contained and relate well to the existing built up area of Handcross.
- 7.64 I have considered the extent to which the development of either the proposed allocated site or the combination of the allocated site and the reserve site would constitute major development in the AONB. In doing so I have considered national policy in paragraphs 115 and 116 of the NPPF.
- 7.65 Within its general approach paragraph 116 of the NPPF specifically advises that any applications for major development in an AONB should include an assessment of three factors as follows:
- the need for the development;
  - the cost of and scope for developing elsewhere outside the designated area or meeting the need in some other way; and
  - any detrimental effect on the environment, the landscape and recreational opportunities and the extent to which that could be moderated
- 7.66 In this context the High Weald AONB Unit has raised an objection to the identification of the allocated and the reserve site in the Plan. In particular the Unit comments that the proposals represent unwarranted major development in the AONB and that insufficient information has been included in the submitted documents to support such development.

- 7.67 I have also considered the allocation of the two sites that are located within the AONB very carefully. Plainly the submitted Plan needs to have regard to national policy to meet the basic conditions. Having considered all the evidence and information I am satisfied that the Plan has regards to national policy on AONBs. Firstly, the language used in paragraph 116 of the NPPF has a clear focus on how local planning authorities should consider planning applications for major development in AONBs. Plainly this may well arise in the event that the Plan is made. However, the neighbourhood plan is being promoted as part of the development plan process. In addition, the two sites, in their different ways are being promoted by a qualifying body for inclusion within a development plan document. In this capacity the process involved is very different from that which would properly arise if, in this case, MSDC was to receive an application for major development in the AONB.
- 7.68 Secondly the Plan itself, and the responses to the clarification note, comment on the way in which the identification of an allocated site and a reserve site would address a similar set of issues to the three criteria identified in paragraph 116 of the NPPF. In particular the Parish Council has come to a reasonable judgement that it wishes to promote additional housing development over and above the strategic development site at Pease Pottage and that there is no realistic prospect of accommodating that need in a sustainable location outside the AONB.
- 7.69 Thirdly I am satisfied that the development of either the proposed allocated site or the allocated site and the reserve site would not constitute major development in the AONB. Given that the NPPF does not define major development any assessment of this matter is inevitably subjective in nature. However, I have concluded that the development of the allocated site would be modest in scale and well-related to the existing built up area of the village. I have also separately recommended modifications to the proposed reserve site so that the policy reflects this approach and that clear release mechanisms are identified in the Plan. Nevertheless, if it came forward, I am also satisfied that the in-combination effect would not represent major development given the proximity of the two sites and the similarities of their effects on the natural beauty of the overall AONB.

*The concentration of the proposed new housing development in the Plan in Handcross*

- 7.70 The Plan provides commentary about the neighbourhood area and the relative sustainability of its various settlements. On the basis of this information and my own observations when I visited the neighbourhood area, it is unsurprising that several of the sites assessed for future development are around the edges of Handcross village. It is the most sustainable settlement within the neighbourhood area. In particular it has a critical mass of community services and an attractive and vibrant village centre.
- 7.71 As such I am satisfied that the Plan has sought to concentrate additional housing development in Handcross. Whilst some developers have argued that their sites are in more sustainable locations within or on the edge of the village than those included in the Plan off St Martin Close there is general agreement that Handcross is an appropriate location for new residential development in principle.

*The site-selection process*

- 7.72 The site-selection process has generated a considerable degree of commentary both from the development industry and from local residents. This reflects the importance of the relationship between the delivery of new housing and safeguarding the environment in the District in general and within the neighbourhood area in particular.
- 7.73 The site selection process is addressed both within the submitted Plan (paragraphs 6.2 to 6.15) and within the submitted Sustainability Appraisal (SA). The former sets out the way in which the process considered wider housing needs and has sought to take into account that a Site Allocations DPD is being prepared. The latter assesses a range of potential housing sites considered against a series of environmental and other factors. In combination these parallel sets of information inform the site-selection process captured in the Plan.
- 7.74 The Parish Council commissioned the preparation of the Sustainability Appraisal. The resulting document is both thorough and detailed. The Appraisal has been prepared in accordance with the CLG Plan Making Manual and the SEA guidance from the Office of the Deputy Prime Minister 'A Practical Guidance to the Strategic Environmental Assessment Directive' 2005.
- 7.75 The Appraisal identifies a range of sustainability issues and options to be considered in formulating the proposals for the emerging Plan. It has ensured that a range of potential social, economic and environmental effects have been properly considered. Its ambition has been to enable the most sustainable policy options to be identified for inclusion with the submitted Plan.
- 7.76 The SA assesses seventeen sites for their ability to provide additional housing within the neighbourhood area. Three of the sites had received planning permission at the time that the plan was submitted (SL04/05/14). SL05 is the strategic site at Pease Pottage as allocated in the MSDP. All of the other fourteen sites are within the AONB. In addition, the five sites promoted as alternative/additional sites through the representation process were also within the AONB. There are overlaps between the two sets of sites.
- 7.77 The details of the sites assessed are captured in Appendix 2 of the SA. Each site was assessed against a common set of criteria. They include the effect of the sites on rural character, highways safety, the delivery of affordable housing and their ability to maintain or enhance community infrastructure. The assessment highlighted that all sites will positively contribute to the delivery of housing. The majority would be likely to include some provision of affordable housing. The assessment process also highlighted that sites which are close to existing services and facilities score more favourably against the objectives which seek to enhance non-car modes of travel. The assessment also indicates that the majority of sites would have a negative impact on the environmental objectives of the Plan. Plainly the extent of the impact is dependent on the location of the site, and in particular with reference to the High Weald AONB. The results confirm that the neighbourhood area is relatively constrained in environmental terms.

7.78 The SA draws the following conclusions on this important matter:

*'In order to seek to facilitate the delivery of housing need in the parish, it is considered inevitable there will be some harm, particularly against environmental objectives. Undertaking the requisite balancing exercise, it is considered sites off St. Martins Close score more favourably and the potential to limit and mitigate the adverse impacts are greater.*

*Having assessed all reasonable alternative sites, the Parish Council elected to allocate St. Martins Close (east), and St. Martins Close (west) which the Assessment has demonstrated will overall, and on balance, positively meet the Sustainability Objectives of the Plan. It is considered the proposed allocation of the identified sites presents the most sustainable option for the Parish as the sites with the least environmental effects have been allocated.'*

7.79 Several representations have been made by the development industry on both the SA process followed and its conclusions. In most cases the developer concerned suggests either an alternative site to the St Martin Close package or its own site in addition to those proposed in the submitted Plan. In summary they raise the following matters:

- the Plan does not go far enough in contributing towards national and local housing needs;
- it fails to future-proof the Plan; and
- the comparison between the various sites assessed is insufficiently-detailed.

7.80 In several cases the various representations raise the following concerns about the appropriateness of the selection of the sites in St Martin Close and/or their sustainability as follows:

- the sites are rural and tranquil;
- they have relatively poor access to local services;
- their development would impact negatively on the informal recreational use of the open area in St Martin Close;
- the access to the sites and the capacity of the highways network; and
- the impact on the AONB from their development.

7.81 Plainly there will be a range of views about the scale of new development that should be delivered within the Plan and the best sites that would achieve the required amount. However, my role is to examine the Plan as submitted rather than a potential alternative to the submitted Plan. In this capacity I am satisfied that the site-selection has been robust and that it has been carried out to an appropriate standard. The SA takes a professional approach to the matter which is proportionate to the task concerned. In particular its conclusion is understandable and derived from its evidence base. In addition, the site selection has been undertaken within the wider context of the SA process which has addressed a series of environmental objectives and their relationship to the policies within the Plan itself.

- 7.82 I address site specific considerations for the St Martin Close sites in my commentary on the two sites concerned (Policies 11 and 12). However, in a broader sense I am satisfied that their development can be satisfactorily accommodated within the landscape/AONB context. I am also satisfied that the sites can be satisfactorily accommodated within the local highway network. In reaching this view I have taken account of the lack of any representation on this issue either from West Sussex County Council (in its capacity as the highways authority) or from MSDC (in its capacity as the local planning authority).

*Summary of the section on housing allocations*

- 7.83 I have given very careful consideration to these various matters and the overlaps between them. I have concluded that the Parish Council has taken a responsible and a thorough approach to this important aspect of the plan-making process. In particular it has addressed the matter of future housing development in a positive fashion and has responded to the opportunity provided by the Local Plan Inspector to consider further residential development in the Parish beyond the strategic allocation at Pease Pottage. In doing so it has sought to dovetail the preparation of the neighbourhood plan into the emerging Site Allocations DPD work.
- 7.84 I am also satisfied that the identification of a housing allocation and a reserve site in the AONB is both distinctive to the neighbourhood area and meets the basic conditions. In simple terms there is no practical option other than to allocate sites for any new residential development within the AONB. However, within this context I am satisfied that the Parish Council have chosen the correct package of sites and that it has done so on the basis of an appropriate evidence base within the SA. In my judgement either the separate development of the allocated site or the development of both sites would have a limited impact on the wider integrity and attractiveness of the High Weald AONB. In particular the sites concerned would be seen within the wider landscape as a logical and natural rounding off the existing village. This approach is in contrast with some of the other sites considered both within the neighbourhood area and around Handcross where the impact would be much greater.
- 7.85 The following sections of this report comment in detail on the two St Martin Close sites. Where necessary I recommended specific modifications to the policies.

Policy 11: St Martin Close (East)

- 7.86 This policy proposes the allocation of land adjacent to St Martin Close Handcross for residential development. The policy and the supporting text indicate that the site would yield 30 houses in the early part of the Plan period (2017-2022). As the Plan comments the character of the site is influenced by the adjacent modern residential development in St Martin Close which lies to the north of the site.
- 7.87 The proposed housing allocation is located at the southern end of West Park Road. In effect Covert Mead and West Park Road have been developed over the years to the south and have created a discrete group of houses to the south of Handcross. There are two separate vehicular access points into the wider area. The first via



Covert Mead is off Horsham Road. The second via West Park Road is off Coos Lane. I looked at the traffic conditions and the capacity of the network when I visited the neighbourhood area. I saw several cars parked on street in the area in general, and on Covert Mead in particular. This restricted vehicular speeds. Both of the junctions with Coos Lane and Horsham Road were functioning safely and effectively. Plainly the development of additional dwellings at the southern end of St Martin Close will add further traffic onto the local network. Nevertheless, there is no evidence to the effect that the additional traffic and vehicle movements will impact on highway safety. In this respect I note that West Sussex County Council has raised no objection to the potential development of the site in its representation.

- 7.88 The Plan comments that the site is a greenfield site. My observations when I visited the neighbourhood area were that the site was a combination of informal open space (to the immediate west of St Martin Close) and a wooded area (to the south of the western part of West Park Road). I sought clarity from MSDC on this matter. I was advised that the planning history indicates that the planning application that granted consent for the construction of 20 low cost dwellings at St Martin Close, identified land at St Martin Close East as open space associated with the development (planning application SV/038/96). The land was transferred to the Parish Council via a Section 106 Agreement. Clause 5 of that agreement refers to the open space. I was also advised that the open space has neither been formally identified as open space on the Policies Map in the adopted District Plan nor on the Council's mapping system. In addition, it is not included in any of the published District Council open space surveys.
- 7.89 The Parish Council has also advised that the S106 agreement comments that the open space shall not be used for any purpose other than as public open space and no buildings or other structures or erections shall be constructed or placed thereon without the Council's prior written approval.
- 7.90 The Parish Council has advised further about how it has sought to address this restriction. It has engaged with the transferor, whose retained land benefits from this covenant, to keep them abreast of the preparation of the Plan and the Parish Council's aspiration to develop the site for residential uses. The transferor has been invited to attend public consultation events and to make representations at the pre-submission consultation stage. I was also advised about an informal understanding between the Parish Council and the transferor, that where the site is allocated for residential development as part of the emerging Plan, the transferor will agree to have the covenant removed from the land.
- 7.91 Since the grant of planning permission, the land has been left as grassland/scrubland. As a gesture of good will, for the benefit of existing residents, the Parish Council currently informally manage the area immediately fronting St. Martin Close (East).
- 7.92 Plainly the circumstances around the future development of the site are not straightforward. Nevertheless, this scenario is not unusual. On the basis of the information available to me I am satisfied that the site is capable of being developed

within the Plan period in general terms, and within its earlier part as anticipated in the Plan in particular. Plainly it cannot be guaranteed. It is for this and other reasons that I have separately recommended that the Plan is monitored, and, if necessary, reviewed.

- 7.93 The issue of the potential development of the 'open space' within the existing Martin Close development raises several related issues. The issues overlap with the representations made by several local residents. The first is its status. The planning history indicates that it was transferred to the Parish Council as part of the Section 106 agreement. Evidence from the Parish Council identifies that the land has been left as grassland/scrubland and that the area is informally managed.
- 7.94 The second is the use of the area. Its informal management and layout arrangements are unlikely to generate any formal use of the space. Evidence submitted by the development industry indicates that there are informal but established footpaths within the 'open space'. I saw these footpaths when I visited the neighbourhood area. Local residents have also advised about their use of the 'open space'.
- 7.95 The third is the opportunity for local residents, including children, to secure safe and convenient outdoor recreation in the event that the St Martin Close East site is developed for housing. The Parish Council draws my attention to the existing open recreational area at the western end of West Park Road. It is located approximately 75 metres away from the existing houses in St Martin Close.
- 7.96 In its response to the clarification note the Parish Council has also addressed the general issue of the provision of open space in the wider locality of St Martin Close/West Park Road in the event that the development of the proposed allocation proceeds. It considers that the proposed allocation can positively accommodate open space which would benefit future users of the site. It is envisaged that new open space could be provided which connects with existing open space(s) in the surrounding area. It is considered such connected provision could provide health and recreation benefits for existing and future users of the site. In addition, the Parish Council considers open space could provide community-focused and social benefits. It considers that the provision of such high-quality open space would be an important element in achieving sustainable development. In this context the wider issue of the provision of open space on new housing developments in the District is addressed in the Mid Sussex Development Infrastructure and Contributions Supplementary Planning Document (SPD). It was adopted in July 2018. It operates within the context of the adopted District Plan. Paragraph 3.53 of the SPD comments that the District Council requires that the leisure and recreation needs generated by residential development are provided for by the developer as an integral part of the development. These needs will include outdoor playing space, a contribution towards sporting infrastructure, and, in the case of larger developments may include indoor facilities. If this is not feasible, the District Council will require developers to make financial contributions which will be used to provide appropriate facilities in the District. In terms of the details of doing so paragraph A2.9 of the SPD comments that it is not always practicable or appropriate to provide all the categories of outdoor playing space, sport and recreation within every development. In particular it

comments that it is only appropriate on larger developments to provide playing pitches on site and that the provision of children’s playing space on site for developments of 50 homes or more.

- 7.97 I have considered these various matters very carefully. On the one hand the proposed development of the site will involve the loss of the existing informal open space off St Martin Close. Plainly the existing space adds to the openness of this part of Handcross in general terms, and the West Park Road/St Martin Close part of the village in particular. On the other hand, the existing ‘open space’ appears to be used only on an informal basis. At the same time the development of the site offers an opportunity to incorporate a re-worked open space.
- 7.99 Taking all the various factors into account I am satisfied that the approach which has been taken in the plan-making process takes account of the evidence on this matter. Nevertheless, I recommend that the development of St Martin Close East provides for its own open space which would be provided and maintained to the standards set out in the Mid Sussex Development Infrastructure and Contributions Supplementary Planning Document. Given the circumstances of the site as described in paragraph 7.88 to 7.91 of this report I recommend that the open space is provided as an integral part of its development. I also recommend modifications both to the policy and to the supporting text on this matter.
- 7.100 Finally the policy requires access into the site from St Martin Close. It also requires that the development of this site provides access into the proposed site to the west – St Martin Close (west) and as detailed in Policy 12. I am satisfied that these matters are appropriate to the policy and the circumstances of the proposed development of the site. I comment on Policy 12 (St Martin Close West) in the next part of this report. I have already commented on the wider capacity of the highways network earlier in this report (paragraph 7.82).

**Insert an additional criterion in the policy (between 3 and 4) to read: ‘the development provides open space at least to the standards set out in the Mid Sussex Development Infrastructure and Contributions Supplementary Planning Document’**

*In paragraph 6.16 replace ‘a greenfield site bound’ with ‘informal open space associated with the original development of St Martin Close and is bounded’*

*At the end of paragraph 6.16 add: ‘Criterion 4 of Policy 11 requires the provision of open space as part of the development of the site. This should be to the standards in the Mid Sussex Development Infrastructure and Contributions Supplementary Planning Document as a minimum. The development of the site brings an opportunity to provide community and social benefits through the provision of revised open spaces facilities in this part of Handcross. The provision of high-quality well-designed open space would be an important element in securing the sustainable development of the site.’*

Policy 12: St Martin Close (West)

- 7.101 The policy refers to a parcel of land which is located to the immediate west of the St Martin Close (east) site as addressed in Policy 11. My observations when I visited the neighbourhood area were that the site was open grassland and shrubland.
- 7.102 The policy comments that the site could deliver 35 houses. It also comments that access should be achieved through the development of the adjacent allocated site (as set out in Policy 11).
- 7.103 Paragraph 6.24 comments that the site is allocated as a reserve site. This reflects advice in national policy to the extent that such allocations can help to ensure that emerging evidence of housing need is addressed in the plan-making process. This is summarised in paragraph 6.22 of the Plan. However, the concept of a reserve site is not translated into the policy itself. It simply comments that development of the St Martin Close West site will be supported following the commencement of the St Martin Close East site. In these circumstances the reserve mechanism (effectively holding the development of such a site until a strategic need was identified) would not apply. Instead the development of the site would simply be linked to that of St Martin Close East. In its response to the clarification note the Parish Council acknowledges this inconsistency and confirms its view that the site should function as a reserve site. In this respect the commentary in paragraph 6.24 that the site could come forward in the second part of the plan period...if required to ensure the longer-term housing need of the Parish is fully met.
- 7.104 The site has developer interest (Millwood Designer Homes). In its representation to the Plan Millwood Designer Homes suggests that the site is immediately available and could come forward in the earlier part of the Plan. It also comments about the restrictions on its development in relation to the development of the St Martin Close east site. Finally, it draws my attention to the point above about the tension between the supporting text and the policy on when and in what circumstances its potential development could proceed.
- 7.105 I have considered the tension between the policy and the supporting text. In doing so I have taken careful consideration of the representation made by Millwood Designer Homes and by the Parish Council in its response to my clarification note. I am satisfied that the St Martin Close West site should be considered as a reserve site. There is no compelling evidence to suggest that there is a strategic need at this stage for the development of both the St Martin Close East and West sites. Nevertheless, the potential for this site to be developed in conjunction with that of St Martin Close East is appropriate in general terms in the event that the evidence justifies the need for its release for housing purposes.
- 7.106 The concept of a reserve site within a neighbourhood plan has regard to national policy (PPG 41-009-20160211). It also takes account of the potential uncertainty about future housing delivery needs within the neighbourhood area during the Plan period. Given the inconsistency between the policy and the supporting text on this site in the Plan I recommend modifications to the policy so that properly achieves the ambitions as captured in the text. In doing so I have considered the following matters:

- the likely commencement of development on the St Martin Close East site;
- the likely build out of that site;
- the timetable for the eventual adoption of the emerging Mid Sussex Site Allocations DPD;
- the recommended modification in this report that the neighbourhood plan is monitored and reviewed as appropriate in the event that it is 'made';
- the need for a stepped trajectory in the delivery of housing in the District as a whole (from 876 dwellings per annum from 2015/15-2023/24 to 1090 per annum from 2024/5); and
- the planned trajectory for the Pease Pottage strategic site.

7.107 Taking account of these matters I recommend that the supporting text identifies a series of key trigger points at which the potential release of the reserve site would be considered by the Parish Council. In the circumstances I recommend that this consideration involves MSDC given its broader access to information on the delivery of housing in the wider District. At this stage it is impractical to identify the way in which various process will unfold over the next few years. As such I recommend that the trigger point for the consideration of the release of the site should be whichever of the following four events occurs first:

- The review of neighbourhood plan itself – this review process is already recommended elsewhere in this report;
- The adoption of the emerging Mid Sussex Allocations DPD – this process will determine whether or not the site is required to meet the residual District housing requirement;
- The adoption of any review of the District Plan – this process would have a similar effect to that of the adoption of the DPD;
- A material delay in delivery of the Pease Pottage strategic delivery site in the adopted District Plan – the allocation of this site and its development trajectory has been an important factor in underpinning the development of the adopted District Plan and the emerging neighbourhood plan.

7.108 As submitted both the policy and the supporting text are based on the principle that the development of the St Martin Close West site follows the development of the St Martin Close East site. Within the context of the former site operating as a reserve site I am satisfied that it would be appropriate for it to be developed following the development of the St Martin Close East site. In particular this takes account of the access arrangements proposed in both policies.

7.109 In the event that the development of the St Martins Close East site does not proceed for whatever reason and evidence supports the need to release the development of the St Martin Close West site the issue could be addressed in a review of the neighbourhood plan at that time.

7.110 I have commented in paragraph 7.99 of this report about the need for an appropriate amount of open space to be provided as part of the residential development of the St Slaugham Neighbourhood Plan – Examiner's Report

Martin Close East site. The same principles should also apply to the development of this reserve site. I recommend accordingly. I also recommend consequential additional supporting text. In particular the additional text highlights the opportunity that would exist for the open spaces on the St Martin Close East and West sites to be provided on adjacent sites and to a complementary design and layout in the event that they were provided either in full or in part on the site concerned. This would enhance the usability of the spaces and may assist with maintenance costs and liabilities.

**Replace the first part of the policy with:**

**‘Land at St Martin Close West Handcross is identified as a housing reserve site. Where the need for its release is identified at the relevant trigger point in paragraph 6.27 of this Plan development proposals for up to 35 houses will be supported subject to the following criteria:’**

**Insert an additional criterion in the policy (between 2 and 3) to read: ‘the development provides open space at least to the standards set out in the Mid Sussex Development Infrastructure and Contributions Supplementary Planning Document’**

*In paragraph 6.24 replace ‘in the second part of’ with ‘later within’*

*Replace paragraph 6.27 with:*

*‘The potential trigger point at which the need or otherwise for the release of this reserve site will be considered will be an important matter for the Parish Council. At this stage it is impractical to identify the way in which various process will unfold over the next few years. These include progress on the Mid Sussex Allocations DPD, the development of the St Martin Close East site and wider housing delivery in both the District and the neighbourhood area. As such the trigger point for the consideration of the release of the site should be whichever of the following events occurs first -the review of neighbourhood plan itself; the adoption of the emerging Mid Sussex Allocations DPD; the adoption of any review of the District Plan and a material delay in delivery of the Pease Pottage strategic delivery site in the adopted District Plan. The Parish Council will involve the District Council in this exercise given the overlaps with strategic housing delivery.’*

*At the end of paragraph 6.28 add:*

*‘Criterion 3 of Policy 12 requires the provision of open space as part of the development of the site. This should be to the standards in the Mid Sussex Development Infrastructure and Contributions Supplementary Planning Document as a minimum. The development of the site brings an opportunity to provide community and social benefits through the provision of enhanced open spaces facilities in this part of Handcross. The provision of high-quality well-designed open space would be an important element in securing the sustainable development of the site. In the event that both St Martin Close East and West sites are developed for housing purposes and that some or all of that open space is provided on site there would be an opportunity for the open spaces on the two sites to be provided on adjacent*

*parcels of land and to a complementary design and layout. There may also be the opportunity to consolidate the provision of open space on St Martin Close West with the existing open space off West Park Road. These options would enhance the usability of the spaces and may assist with maintenance costs and liabilities.'*

Policy 13: Residential Development within and adjoining the settlement boundaries

- 7.111 This policy offers support for residential development within the built-up areas of Handcross, Pease Pottage and Warninglid subject to the proposals concerned meeting five environmental and design criteria. Its second part identifies the circumstances in which proposals for residential development outside the defined built up areas will be supported.
- 7.112 The policy takes on a similar format to that in Policy DP6 of the District Plan. In addition, the Parish Council advised me through the clarification note process that the definition of the built-up areas has adopted the boundaries as included in the Policies Maps of the District Plan.
- 7.113 On the one hand the submitted policy seeks to add local value to the District Plan policy by defining five specific environmental and design matters that are distinctive to the neighbourhood area. The policy in the District Plan is more general in its reference to its Policy DP26. This matter would in general terms add weight to the ability of the policy to meet the basic conditions and its retention of the policy in the Plan.
- 7.114 On the other hand the submitted policy either repeats key elements of District Plan Policy DP6, or in other places omits key elements of that policy. In particular the final part of Policy DP6 is excluded.
- 7.115 In all the circumstances I am not satisfied that the policy meets the basic conditions. In the first instance it does not have regard to national policy to the extent that it largely repeats a local plan policy without adding any local value. In the second instance the submitted policy is not in general conformity with Policy DP6 of the District Plan. In the event that I was to recommend modifications to ensure that it was in general conformity the policy would then replicate Policy DP6.
- 7.116 In recommending this modification I have also considered the need for the retention or otherwise of the supporting text associated with the policy (paragraphs 6.29-6.32). Given the importance of the built-up areas within the neighbourhood area and the quality and robustness of the supporting text I am satisfied that it should remain in the Plan. In any event the supporting text comments that the Parish has had a strong record of windfall development. There is no reason to suppose that this will not continue throughout the Plan period. I recommend modifications to the existing text so that it makes a direct reference to the role of District Plan Policy DP6 in determining residential development proposals in the three built up areas and their definition in the District Plan policies maps.

**Delete the policy.**

*At the end of paragraph 6.31 add:*

*'The three built up areas are shown on the Mid Sussex District Plan Policies Map Pease Pottage (18a), Handcross (18b) and Warninglid (18d)'*

*At the end of paragraph 6.32 add:*

*'Development proposals within the three built-up areas will be assessed and determined against national policy and Policy DP6 of the Mid Sussex District Plan 2014-2031'*

Policy 14: Local Employment

- 7.117 This policy is the first of two policies which addresses economy and employment matters. Its focus is on restricting the loss of land in business or other employment use unless the business use is no longer viable.
- 7.118 The policy refers to the need for the marketing of the premises for business purposes for a period of six months and the levels of interest shown. Plainly this is an important factor. However, it is a process matter rather than a policy requirement. I recommend accordingly. The issue can be satisfactorily captured in the supporting text.

**Delete 'and the site.....being shown'**

*At the end of paragraph 7.5 add:*

*'Policy 14 provides an opportunity for land owners to demonstrate that the site or premises concerned is no longer viable for business purposes. In these circumstances any resulting planning application should demonstrate that the site has been professionally marketed for business use at a realistic market price for at least six months and with no interest being shown.'*

Policy 15: Economic Development

- 7.119 This is the second policy on the matter of economic development in the neighbourhood area. It offers support to proposals which would enable the development of business uses subject to four locational and environmental issues.
- 7.120 I sought advice from the Parish Council on its definition of 'a sustainable location' as set out in the first of the four criteria. I was advised that as part of its consideration of this matter it had concluded that a sustainable location would be either one within Handcross or Pease Pottage or within 800 metres of the settlement boundaries of those settlements and/or readily accessible to non-car forms of transport. It also commented that it recognised that other locations may have the ability to meet this test.
- 7.121 These comments are both helpful and highlight the inherent tension in attempting to define a matter which may vary from site to site. Nonetheless I consider that on



balance the retention of this matter within the policy meets the basic conditions and serves a useful purpose within the wider context of the policy. I recommend a modification to the supporting text to clarify this matter for the decision-maker. Otherwise the policy meets the basic conditions.

*At the end of paragraph 7.6 add:*

*'Policy 15 provides a supporting context within which such proposals would be considered in the development management process. Plainly the definition of a sustainable location will be a matter of local judgement. However, the Parish Council considers that a sustainable location would be either one within Handcross or Pease Pottage or within 800 metres of the settlement boundaries of those settlements and/or readily accessible to non-car forms of transport.'*

Policy 16: Protection of Handcross High Street

- 7.122 The policy seeks to protect the vitality of Handcross High Street. The approach taken has been underpinned by community consultation feedback. I saw its various retail and commercial facilities first-hand when I visited the neighbourhood area. It sits at the heart of the neighbourhood area and contributes significantly to its sustainability.
- 7.123 The focus of the policy is safeguarding A1(shops) and A4 (drinking establishments) uses. Proposals for the change of use of existing A1/A4 uses to other uses will not be supported. Within this context however the policy recognises the potential implications of permitted development rights and commercial viability issues.
- 7.124 The thrust of the policy meets the basic conditions. However, I recommend a series of modifications to ensure that it has the clarity required by the NPPF. In particular I recommend modifications to transfer text currently included in the policy into the supporting text and to clarify the wording of the principal element of the policy itself. The first paragraph of the policy is more of a statement of intent rather than a policy and is already addressed in the supporting text

**Delete the first and third paragraphs**

**In the second paragraph of the policy replace 'Where planning permission is required for' with 'Insofar as planning permission is required'**

*At the end of paragraph 7.10 add:*

*In these circumstances [then include the deleted third paragraph]*

Plan Aims

Aim 1: Preventing Coalescence: Pease Pottage Gap

- 7.125 This Aim indicates that development will not be supported within the Pease Pottage Gap unless the proposal concerned meets three criteria. They are primarily focused

on agricultural development or where they would otherwise make a valuable contribution to the landscape and amenity of the Gap.

- 7.126 Like other neighbourhood plans the submitted Plan has sought to include a suite of non-land use aims which do not meet the tests to be included as a land-use policy. The submitted Plan has properly followed this approach in the majority of the Aims in the submitted Plan.
- 7.127 However this approach does not extend to this specific Aim. By simple definition it is worded as a land use policy. In addition, the Gap is clearly defined on the Proposals Map. I sought clarity from the Parish Council on this point. The response is very thorough. It identifies the way in which the approach in the submitted Plan evolved during the Plan-making process. In summary the Aim was originally a planning policy in the pre-submission version of the Plan. The need for such an approach has now been overtaken by the adoption of the District Plan. Unlike the previous Local Plan, the District Local Plan does not include a Gap policy. Following detailed discussions with MSDC the Parish Council decided to proceed with an Aim in the submitted Plan recognising that it was not supported by a background paper as suggested by MSDC.
- 7.128 Plainly this matter has presented several challenges for the Parish Council. Whatever the background to this matter the Aim is worded as a planning policy. This is inherently contrary to the expected approach for a non-land use policy. I recommend modifications to the Aim so that it adopts an appropriate approach. In this case I recommend that the Aim indicates that the Parish Council will work with affected landowners to safeguard the existing gap between Crawley and Pease Pottage.
- 7.129 The Aim in the submitted Plan defines the Gap on the Proposals Map. Whilst I understand the intended clarity of that approach, I recommend that the Gap is removed from the Proposals Map. By definition an Aim in a neighbourhood plan is not a land use policy and cannot be shown on the Proposals Map.
- 7.130 Within this context I also recommend consequential modifications to the supporting text.

*Replace the Aim with:*

*'The Parish Council considers the area to the north of Pease Pottage should be kept free from development. In this context it will work with landowners and other agencies to secure appropriate management regimes to safeguard the openness of the parcels of land between Pease Pottage and Crawley.'*

*Remove the Pease Pottage Gap from the Proposals Map*

*Replace paragraphs 4.7-4.9 as follows:*

*4.7*

*'This Aim refers to the existing open land between Pease Pottage and Crawley. The southern part of this wider area falls within the neighbourhood area.'*

## 4.8

*'The adopted District Plan includes a policy to prevent coalescence between settlements (DP13). This approach replaces the inclusion of specific Strategic Gaps in the former Local Plan.'*

## 4.9

*Retain the first sentence in the submitted Plan.*

*Replace the second sentence with:*

*'Aim 1 sets out the Plan's approach to this matter. It identifies the way in which the Parish Council will work with landowners and other agencies to secure appropriate management regimes to safeguard the openness of the parcels of land between Pease Pottage and Crawley.'*

#### Aim 2: Preserving Settlement Identity

- 7.131 This Aim raises similar issues to those raised with regard to Aim 1. In this case it effectively produces a planning policy which would not support development proposals which would individually or cumulatively result in the loss of the separate identity of the four villages in the neighbourhood area.
- 7.132 The Aim largely repeats the approach taken in Policy DP13 of the adopted District Plan. Indeed, the supporting text in paragraph 4.10 largely repeats the first part of Policy DP13. The approach in that policy is to ensure that new development does not result in the coalescence of existing settlements.
- 7.133 I have considered all the information available to me on this element of the Plan, including the Parish Council's response to my clarification note. I recommend that the Aim is deleted. I have come to this view for two principal reasons. The first is that it adds no distinctive local value to Policy DP13 of the District Plan. The second is that the geography of the neighbourhood area is such that the coalescence of any two of the four villages would be a remote possibility given the distances between them and their location within the AONB.

*Delete the Aim*

*Delete the supporting text (paragraph 4.10 and 4.11)*

#### Aim 3: Pease Pottage Community Facilities

- 7.134 The Aim has two related parts. The first supports development that would bring community benefits in Pease Pottage. The second supports the creation of new community facilities in Pease Pottage.
- 7.135 I am satisfied that it is both appropriate and distinctive to the neighbourhood area.

#### Aim 4: Community Infrastructure Levy (CIL)

- 7.136 The Aim sets out the Parish Council's priorities for the local use of CIL funding.

- 7.137 MSDC has yet to decide to operate a CIL charging levy. Nonetheless the Aim seeks to establish priorities if this work is adopted. In this context I am satisfied that it is both appropriate and distinctive to the neighbourhood area.

#### Aim 5: Handcross Village Centre

- 7.138 The Aim reflects the importance of Handcross village centre in the neighbourhood area. In effect the Aim identifies the Parish Council's approach towards co-ordinating the retail approach and marketing of the existing operators.

- 7.139 I am satisfied that it is both appropriate and distinctive to the neighbourhood area. I saw the vibrancy of the village centre first-hand. The Aim has the ability to contribute significantly to the delivery of the economic dimension of sustainable development in the neighbourhood area.

#### Aim 6: Quiet Lanes and Public Rights of Way

- 7.140 The Aim reflects the importance of the use and the recreational opportunities offered by quiet lanes and footpaths. The Aim supports three related matters - the Quiet Lane initiative in the wider county, the upgrading of existing rights of way and supporting proposals for new footpaths. Six are specifically highlighted.

- 7.141 I am satisfied that the Aim is both appropriate and distinctive to the neighbourhood area. In particular I can see that the package of measures set out to develop a footpath between Warninglid and the primary school. I saw the isolated nature of the school when I visited the neighbourhood area.

#### Aim 7: Handcross Parking and Improvements to the Pedestrian Environment

- 7.142 The Aim reflects the importance of the use and vitality of the village centre of Handcross and the pressures placed on its parking facilities by visitors to the adjacent Nymans Gardens National Trust facility. The Aim supports three related matters - the identification of a site for off-street parking; the facilitation of additional parking for visitors to Nymans and the High Street and the improvement of the wider pedestrian environment.

- 7.143 I am satisfied that the Aim is both appropriate and distinctive to the neighbourhood area. In particular I can see that the package of measures set out to address a particular area of concentrated activity in the neighbourhood area.

#### Aim 8: Traffic Management and Access

- 7.144 This Aim supports proposals for traffic management and proposals that would improve access to community facilities. Plainly the two may overlap.

7.145 I am satisfied that it is both appropriate and distinctive to the neighbourhood area.

Aim 9: Parking

7.146 This Aim supports development which provides parking facilities at or beyond County Council parking standards

7.147 I am satisfied that it is both appropriate and distinctive to the neighbourhood area.

Other Matters – Monitoring the Plan

7.148 In paragraph 7.54 I recommended that measures be taken to monitor the effectiveness of the Plan and, as appropriate, to undertake a review of certain elements of the Plan. This is important both in its right and to take account of any potential implications which may arise from the adoption of the emerging Allocations Plan DPD or the review of the adopted District Plan.

7.149 In this context I recommend the inclusion of an additional section within the Plan on this important matter.

*Include the following at the end of the Plan.*

*'Section 9*

*Monitoring and Review*

*9.1. The preparation of this Plan has taken place within the strategic context provided by the Mid Sussex District Plan which was adopted in March 2018. It has also sought to take account of the emerging Mid Sussex Allocations Plan DPD.*

*9.2. The Parish Council recognises that the plan-making process is dynamic and that development does not always proceed at the pace that was originally intended. In other cases, development may come forward which was not predicted at the time that development plans were adopted or made as appropriate. In this context the Parish Council will monitor the effectiveness or otherwise of the implementation of the policies in the neighbourhood plan on an annual basis.*

*9.3. Where monitoring of the Plan indicates that development is not proceeding as anticipated the Parish Council will consider undertaking a review of the wider neighbourhood plan or specific parts of the plan as appropriate.*

*9.4. Within the context of the monitoring and review process the Parish Council will specifically take account of the potential implications of the adoption of the Mid Sussex Allocations Plan DPD. At the end of the year in which the DPD is adopted the Parish Council will assess the need or otherwise for a review of the neighbourhood plan with regard to the delivery of new housing in the neighbourhood area.*

*9.5. The Parish Council will monitor the delivery of the allocated housing site at St Martin Close East (Policy 11). It will also monitor the strategic circumstances with regard to the delivery of housing in the neighbourhood area so that it can work collaboratively with the District Council to reach a decision on the extent to which the trigger mechanisms have been met in order to release the reserve site identified in the Plan (Policy 12 St Martin's Close West).'*

### Other Matters - General

- 7.150 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly as a result of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan as a result of the recommended modifications to the policies. It will be appropriate for MSDC and the Parish Council to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

*Modification of general text (where necessary) to achieve consistency with the modified policies.*

### Other Matters – Factual Errors

- 7.151 Paragraph 1.2 of the Plan comments that the neighbourhood area was designated in September 2012. However, the designation took place in July 2012. I recommend that the supporting text is modified accordingly.

*In paragraph 1.2 replace ‘September’ with ‘July’*

## 8 Summary and Conclusions

### *Summary*

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2031. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community.
- 8.2 Following my independent examination of the Plan I have concluded that the Slaugham Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

### *Conclusion*

- 8.3 On the basis of the findings in this report I recommend to Mid Sussex District Council that subject to the incorporation of the modifications set out in this report that the Slaugham Neighbourhood Development Plan should proceed to referendum.

### *Referendum Area*

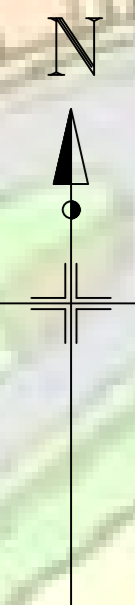
- 8.4 I am required to consider whether the referendum area should be extended beyond the Plan area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved by the District Council in July 2012.
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth and efficient manner. The responses to my Clarification Note were very thorough. They helped significantly in the preparation of this report.

**Andrew Ashcroft**  
**Independent Examiner**  
**7 May 2019**

APPENDIX 3

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Covert Mead

Allotment Garden

North Lodge

Sewage Works

Existing trees within the Blind Veterans Trust (BVT) land and group G3 have not yet been surveyed but appear to not be particularly large or mature, with the more established individuals located in the south-west corner being Norway spruce which may be remnants of a crop planting. The full arboricultural constraints imposed by the BVT parcel and the access along Park Road will be subject to a further detailed survey to inform the arboricultural constraints in this area.

SJA No development or disturbance of any kind on tree side of red line.

SJA Trees proposed for retention

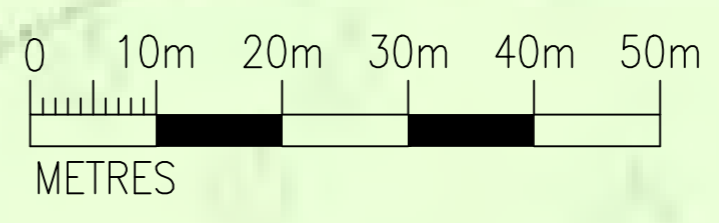
SJA Approximate 20m wide green buffer with adjacent residential development to west.

SJA Trees proposed for retention

SJA Off-site trees

SJA Recommended 5m planting buffer from boundary fence for proposed 'green' boundary screening with adjacent off-site residential dwellings to west.

SJA Off-site trees



1 : 600 @A1

Arboricultural Constraints	
The bold red line represents the closest to trees to be retained that proposed development can be located without encroaching into root protection areas ('RPAs').	
<b>SJA</b> trees ARBORICULTURAL PLANNING CONSULTANTS	
Project:	Park Road, Handcross
Client:	
Drawing:	TREE RETENTION PLAN - Preliminary
Drawing no:	SJA TRP 20124-051
Revision no:	
Based on:	Topographical survey
Drawn by:	NHK
Date of issue:	Sept 2020
Scale:	1:600 @A1
Checked by:	Tel: (01737) 813058 sja@sjatrees.co.uk
Tree nos.:	● 58 Category 'U' trees: ● [8] Canopies of trees to be retained:
Category 'A' RPA:	Category 'B' RPA:  Category 'C' RPA:
Dev. area:	

FOR DESIGN GUIDANCE ONLY - NOT FOR SUBMISSION TO THE LPA!  
For further information refer to the SJA Tree Survey Schedule  
Do not scale from this drawing; please check all dimensions on site, and notify us of any discrepancies. SJA trees (the trading name of Simon Jones Associates Ltd) cannot be held responsible for inaccuracies in the topographical plan on which this drawing is based.  
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This drawing is copyright and may not be used or changed without the written consent of SJA trees.



ARBORICULTURAL PLANNING CONSULTANTS

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Directors: Simon R. M. Jones Dip. Arb. (RFS), FArborA.,  
RCArborA. (Managing)  
Frank P. S. Spooner BSc (Hons), MArborA, TechCert (ArborA)

## **Preliminary Tree Survey Schedule**

### **Park Road, Handcross**

**August 2020**

# Tree Survey Schedule: Explanatory Notes

## Park Road, Handcross

This schedule is based on a tree inspection undertaken by Nigel Kirby of SJAtrees (the trading name of Simon Jones Associates Ltd.), on Wednesday 26th August 2020. Weather conditions at the time were clear, dry and bright. Deciduous trees were in full leaf.

The information contained in this schedule covers only those trees that were examined, and reflects the condition of these specimens at the time of inspection. We did not have access to the trees from any adjacent properties; observations are thus confined to what was visible from within the site and from surrounding public areas.

The trees were inspected from the ground only and were not climbed, and no samples of wood, roots or fungi were taken. A full hazard or risk assessment of the trees was not undertaken, and therefore no guarantee, either expressed or implied, of their safety or stability can be given.

Trees are dynamic organisms and are subject to continual growth and change; therefore the dimensions and assessments presented in this schedule should not be relied upon in relation to any development of the site for more than twelve months from the survey date.

### 1. Tree no.

Given in sequential order, commencing at "1".

### 2. Species.

'Common names' are given, taken from MITCHELL, A. (1978) A Field Guide to the Trees of Britain and Northern Europe.

### 3. Height.

Estimated with the aid of a hypsometer, given in metres.

### 4. Trunk diameter.

Trunk diameter measured at approx. 1.5m above ground level; or where the trunk forks into separate stems between ground level and 1.5m, measured at the narrowest point beneath the fork. Given in millimetres.

### 5. Radial crown spread.

The linear extent of branches from the base of the trunk to the main cardinal points, rounded up to the closest half metre, unless shown otherwise. For small trees with reasonably symmetrical crowns, a single averaged figure is quoted.

### 6. Crown break.

Height above ground and direction of growth of first significant live branch.

### 7. Crown clearance.

Distance from adjacent ground level to lowest part of lowest branch, in metres.

### 8. Age class.

Young: Seedling, sapling or recently planted tree; not yet producing flowers or seeds; strong apical dominance.

Semi-mature: Trunk often still smooth-barked; producing flowers and/or seeds; strong apical dominance, not yet achieved ultimate height.

Mature: Apical dominance lost, tree close to ultimate height.

Over-mature: Mature, but in decline, no crown retrenchment

Veteran: Mature, with a large trunk diameter for species; but showing signs of veteranisation, irrespective of actual age, with decay or hollowing, and a crown showing retrenchment and a structure characteristic of the latter stages of life.

Ancient: Beyond the typical age range and with a very large trunk diameter for species; with extensive decay or hollowing; and a crown that has undergone retrenchment and has a structure characteristic of the latter stages of life.

### 9. Physiology.

Health, condition and function of the tree, in comparison to a normal specimen of its species and age.

### 10. Structure.

Structural condition of the tree – based on both the structure of its roots, trunk and major stems and branches, and on the presence of any structural defects or decay.

Good: No significant morphological or structural defects, and an upright and reasonably symmetrical structure.

Moderate: No significant pathological defects, but a slightly impaired morphological structure; however, not to the extent that the tree is at immediate or early risk of collapse.

Indifferent: Significant morphological or pathological defects; but these are either remediable or do not put the tree at immediate or early risk of collapse.

Poor: Significant and irreparable morphological or pathological defects, such that there may be a risk of failure or collapse.

Hazardous: Significant and irreparable morphological or pathological defects, with a risk of imminent collapse.

### 11. Comments.

Where appropriate comments have been made relating to:

- Health and condition
- Safety, particularly close to areas of public access
- Structure and form
- Estimated life expectancy or potential
- Visibility and impact in the local landscape

### 12. Category.

Based on the British Standard "Trees in relation to design, demolition and construction - Recommendations", BS 5837: 2012, Table 1, adjusted to give a greater weighting to trees that contribute to the character and appearance of the local landscape, to amenity, or to biodiversity.

**Category U:** Trees in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years.

(1) Trees that have a serious, irreparable, structural defect, such that their early loss is expected due to collapse, including those that will become unviable after removal of other category 'U' trees (e.g. where, for whatever reason, the loss of companion shelter cannot be mitigated by pruning).

(2) Trees that are dead or are showing signs of significant, immediate, and irreversible overall decline.

(3) Trees infected with pathogens of significance to the health and/or safety of other trees nearby, or very low quality trees suppressing adjacent trees of better quality.

**Category A:** Trees of high quality with an estimated remaining life expectancy of at least 40 years.

(1) Trees that are particularly good examples of their species, especially if rare or unusual.

(2) Trees, groups or woodlands of particular visual importance as arboricultural and/or landscape features.

(3) Trees, groups or woodlands of significant conservation, historical, commemorative or other value.

**Category B:** Trees of moderate quality with an estimated remaining life expectancy of at least 20 years.

(1) Trees that might be included in category 'A', but are downgraded because of impaired condition (e.g. presence of significant though remediable defects including unsympathetic past management and minor storm damage) such that they are unlikely to be suitable for retention for beyond 40 years; or trees lacking the special quality necessary to merit the category 'A' designation.

(2) Trees present in numbers, usually growing as groups or woodlands, such that they form distinct landscape features, thereby attracting a higher collective rating than they might as individuals; or trees present in numbers but situated so as to make little visual contribution to the wider locality.

(3) Trees with material conservation or other cultural value.

**Category C:** Trees of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150mm.

(1) Unremarkable trees of very limited merit or of such impaired condition that they do not qualify in higher categories.

(2) Trees present in groups or woodlands, but without this conferring on them significantly greater collective landscape value, and/or trees offering low or only temporary landscape benefits.

# TREE SURVEY SCHEDULE

## Park Road, Handcross

No.	Species	Height	Trunk diameter	Radial crown spread	Crown break	Crown clearance	Age class	Physio - logy	Structure	Comments	Category
1	Norway maple	19.5m	635mm	N 5.5m E 5.25m S 6.5m W 7.5m	3.5m	1.5m	Mature	Average	Indifferent	Prominent buttress roots; single trunk; forks into multiple codominant stems at 5m; large dia. approx. 250mm - 300mm lateral scaffold limbs emanating from trunk at 5m and 7m; asymmetrical crown to W as suppressed by adjacent specimens; upper canopy glimpsed above roof lines and between dwellings of St Martin Close; hidden in all other long direct public views; contributes to boundary screening; significant component of group in which it stands.	B (1)
2	English oak	17m	570mm	N 6.75m NE 6.5m E 6.25m S 6.75m W 6.5m	3m	S 3m	Mature	Average	Indifferent	Off-site tree; prominent buttress roots; mechanical wounding on trunk; internal heartwood exposed; contributes to boundary screening.	B (1)
3	Western red cedar	12m	2 stems @ 240mm 210mm	N 4.25m E 3.5m S 3m W 4m	2m	E 0.5m	Semi-mature	Average	Poor	Off-site tree; multi-stemmed from base; tight compression forks with evidence of included bark.	C (12)
4	English oak	20m	400mme st.	N 5.25m NE 5m E 5.25m SE 5.5m S 6m W 7m	4m	NE 3m	Mature	Average	Indifferent	Off-site tree; prominent buttress roots; twin-stemmed from 1m; tight compression fork with evidence of included bark from 1m to 2m above ground; union obscured by child's tree house; union appears 'fused' and tensile; asymmetrical crown to W as suppressed by adjacent specimens; upper canopy readily visible from rear amenity gardens to N, upper canopy glimpsed above roof line from West Park Road; hidden in all other long direct public views.	B (12)
5	Norway maple	17m	2 stems @ 230mm	N 4m E 1m S 0m W 3.5m	2m	4m	Semi-mature	Average	Poor	Off-site tree; prominent, shallow buttress roots; twin-stemmed from base; acute branch unions; one-sided crown as suppressed by adjacent specimens; unremarkable tree of very limited merit.	C (12)
6	Sweet chestnut	20m	500mm 2 stems @ 535mme st.	N 8m NE 7m E 5.5m S 4m W 4.25m NW 8m	4m	S 5m	Mature	Average	Poor	Prominent buttress roots, with mechanical wounding; internal heartwood exposed; multi-stemmed from base; tight compression forks with evidence of included bark; asymmetrical crown to N as suppressed by adjacent specimens; readily visible from allotments to N; contributes to boundary screening.	C (12)

No.	Species	Height	Trunk diameter	Radial crown spread	Crown break	Crown clearance	Age class	Physio - logy	Structure	Comments	Category
7	Hornbeam	14m	400mm 3 stems @ 250mm	N 3m E 6m S 6m SW 6m W 4.75m	2m	1.5m	Mature	Average	Poor	Off-site tree; evidence of historic root plate movement; mechanical wounding at base; internal heartwood exposed; asymmetrical crown as suppressed by adjacent specimens; readily visible from bridleway.	C (12)
8	Beech	22m	795mm	N 8m E 9m S 8m SW 7m W 9.5m NW 7.25m	5.5m	W 6m	Mature	Average	Hazardous	Off-site tree; prominent buttress roots; large mechanical wounding on E side of trunk from ground level up to 8m; significant differences in tone when eastern buttress roots and lower trunk, from ground level up to 3m, around entire trunk tapped with acoustic hammer suggest internal defects; notable reaction wood and 'Gate Posts' on either side of wound; contractor warning: evidence of 'Hornets' nest within cavity beginning at 8m at apical extent of wound; evidence of decay extending further up into trunk above this; single trunk; asymmetrical weighted crown to W as suppressed by adjacent specimens; storm damage in crown; significant component of group in which it stands; in keeping with the character of the local area; readily visible from bridleway; hidden in all other long direct public views.	U
9	English oak	21m	650mm	N 7.25m NE 5m E 8m S 8.5m W 8.75m NW 8.25m	4m	N 2m	Mature	Average	Good	Off-site tree; prominent buttress roots; single trunk; field boundary indicator; good example of species; large boundary tree; individual at northern extent of row of trees lining the east boundary of the adjacent southern field; forming an external feature of the site; readily visible from bridleway and Park Road.	A (12)
10	English oak	19m	475mm	N 2m E 7.25m S 4m W 4m	2m	E 1m	Semi-mature	Average	Indifferent	Many surface roots, damaged on upper sides, probably by cattle; prominent buttress roots; evidence of historic root plate movement; swept stem to E for approx. 2m before correction to vertical; asymmetrical crown to E as suppressed by adjacent specimens; fastigate crown demonstrating acute unions; however no evidence of tight compression forks with included bark; aerodynamic group with meshing crowns providing companion shelter; readily visible from bridleway; hidden in all other long direct public views from NE anti-clockwise to SE.	B (2)
11	English oak	21m	510mm	N 5.5m NE 5m E 7m SE 4m S 4m SW 5m W 3m NW 6m	4m	E 1.5m	Mature	Average	Moderate	Many surface roots, damaged on upper sides, probably by cattle; prominent, shallow buttress roots; single trunk; drawn-up and suppressed on S side; dominant individual within aerodynamic group with meshing crowns providing companion shelter; readily visible from bridleway; hidden in all other long direct public views from NE clockwise to SE.	B (12)

No.	Species	Height	Trunk diameter	Radial crown spread	Crown break	Crown clearance	Age class	Physio -logy	Structure	Comments	Category
12	Red oak	18m	350mm	N 2.5m E 3m S 5.75m SW 6m W 3.5m	2m	2m	Semi-mature	Average	Moderate	Prominent, shallow buttress roots; single trunk; twin-stemmed from 9m with tensile union; asymmetrical crown as suppressed by adjacent specimens; significant component of group in which it stands.	B (1)
13	Beech	15m	340mm	N 3.25m E 3.25m S 6.75m SW 7m W 5.5m	2m	S 0.5m	Semi-mature	Average	Poor	Prominent, shallow buttress roots; tight compression forks with evidence of included bark; asymmetrical crown as suppressed by adjacent specimens; woodland copse boundary tree; inessential component of group in which it stands; hidden in all long direct public views.	C (1)
14	Beech	18m	475mm	N 5.5m E 4.5m S 8.25m W 1.75m	1.5m	S 0.75m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; buttress roots, with mechanical wounding; internal heartwood exposed; twin-stemmed from 1.5m with acute union; tight compression forks with evidence of included bark; woodland copse boundary tree.	C (1)
15	Silver birch	20m	2 stems @ 220mm 280mm	N 2m E 2.5m S 3m W 2.75m	4m	4m	Semi-mature	Average	Poor	Prominent, shallow buttress roots; multi-stemmed from base; woodland copse boundary tree; hidden from all external views; inessential component of group in which it stands.	C (12)
16	Silver birch	19m	370mm	N 3m E 2m S 1.75m W 2.25m	4m	4m	Semi-mature	Average	Indifferent	Twin-stemmed from base; subdominant stem felled and removed; internal heartwood exposed; woodland copse boundary tree; hidden from all external views.	C (1)
17	English oak	15.5m	365mm	N 4m E 3.75m S 3m W 5m	3.5m	2m	Semi-mature	Average	Indifferent	Evidence of historic root plate movement; prominent, shallow buttress roots; tight compression fork with evidence of included bark in upper canopy; hidden from all external views.	C (12)
18	Red oak	13.5m	290mm	N 2.5m E 2.25m SE 5.5m S 5.25m SW 5.75m W 3m	2m	1.5m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; single trunk; asymmetrical crown as suppressed by adjacent specimens; woodland copse boundary tree; hidden from all external views.	C (1)
19	Silver birch	20m	2 stems @ 340mm	N 5m E 5m S 5m W 5m	3m	3.5m	Semi-mature	Average	Poor	Prominent, shallow buttress roots; multi-stemmed from base; tight compression forks with evidence of included bark; significant component of the group in which it stands; hidden from all external views; unremarkable tree of very limited merit.	C (1)

No.	Species	Height	Trunk diameter	Radial crown spread	Crown break	Crown clearance	Age class	Physiology	Structure	Comments	Category
20	Red oak	20m	325mm	N 0m E 3m SE 5.5m S 7.75m SW 6.25m W 1m	2m	S 2m	Semi-mature	Average	Poor	Prominent, shallow buttress roots; tight compression fork with evidence of included bark; one-sided crown as suppressed by adjacent specimens; inessential component of group in which it stands.	C (1)
21	Sweet chestnut	20m	455mm	N 0.5m E 2.25m S 4.5m SW 5m W 2m	2m	2m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; one-sided crown as suppressed by adjacent specimens; inessential component of group in which it stands; upper canopy glimpsed from recent development to SW.	C (1)
22	Goat willow	19m	300mm 400mm	N 5m E 5.25m S 5.75m W 5.75m	2m	1.5m	Mature	Below average	Poor	Multi-stemmed from base; sparsely foliated; contributes to boundary screening; unremarkable tree of very limited merit.	C (1)
23	Goat willow	19m	400mm	N 3m E 3.75m SE 5m S 3m W 4m	2m	2m	Mature	Average	Poor	Self-seeded specimen; contributes to boundary screening; tight compression fork with evidence of included bark; hidden in all long direct public views from N, clockwise to W.	C (12)
24	Silver birch	19m	380mm	N 4m E 3m S 2m W 5m	4m	4m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; single trunk; asymmetrical crown as suppressed by adjacent specimens; contributes to boundary screening; upper 3m of canopy may be glimpsed above roof line to W; hidden in all other long direct public views.	B (2)
25	Norway maple	18m	425mm st.	N 4m E 4m S 5.5m W 8m NW 7m	1m	1.5m	Semi-mature	Average	Indifferent	Self-seeded specimen; asymmetrical, swept crown as suppressed by adjacent specimens; contributes to boundary screening; inessential component of group in which it stands.	C (12)
26	Sweet chestnut	20m	445mm	N 6.5m E 4.75m S 2m W 3.5m	3m	3m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; single trunk; asymmetrical crown as suppressed by adjacent specimens; upper canopy readily visible from public footpath to N; significant component of group in which it stands; hidden in all other long direct public views.	B (2)

No.	Species	Height	Trunk diameter	Radial crown spread	Crown break	Crown clearance	Age class	Physio - logy	Structure	Comments	Category
27	Sweet chestnut	20m	560mm	N 2.75m NE 4.5m E 5m SE 7.25m S 7.25m SW 1m W 3.75m NW 5.25m	6m	6m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; single trunk; forks into dominant and subdominant stems at 1.75m; dominant stem orientated to S, subdominant to N; tensile union evident; stems are tall, drawn-up and suppressed; canopies of stems begin to separate with S stem making up approx. 65% of canopy; central canopy 'hole' has been filled by self seeded silver birch; aerodynamic canopy with chestnut forming meshing crowns providing companion shelter; if silver birch removed would create an exposed high crown on each stem; upper canopy glimpsed in short views from PROW to N, hidden in all other long direct public views; significant component of group in which it stands.	B (2)
28	Beech	20m	290mm	N 3.75m E 4.5m S 1.75m W 3.5m	2m	1.25m	Semi-mature	Average	Indifferent	Self-seeded specimen; prominent, shallow buttress roots; tight compression fork with evidence of included bark a main bifurcation 5m; O+Asymmetrical, almost one-sided crown as suppressed by adjacent specimens; drawn-up and suppressed; hidden from all external views.	C (1)
29	Sweet chestnut	20m	370mm	N 3m E 2.5m S 2.5m W 3m	3m	5m	Semi-mature	Average	Good	Prominent, shallow buttress roots; single trunk; mechanical wounding on E trunk at 1.5m; internal heartwood exposed; however, notable occlusion wood present; upright trunk and stem growth; significant component of group in which it stands; although currently of low landscape value as hidden by adjacent trees.	B (1)
30	Beech	20m	245mm	N 2.5m E 3.5m S 2.5m W 2m	2.25m	2.25m	Semi-mature	Average	Moderate	Prominent, shallow buttress roots; single trunk; drawn-up and suppressed; possible Height/Diameter ratio greater than 50: increasing at risk of failure if companion shelter removed; hidden from all external views.	B (1)
31	Sweet chestnut	18m	365mm	N 3m E 2.25m S 4m W 3.5m	2m	4m	Semi-mature	Average	Moderate	Prominent buttress roots; single trunk; significant component of the group in which it stands; hidden in all external views.	B (1)
32	Beech	19m	280mm	N 2.5m E 3m S 5m W 4m	2.5m	1.25m	Semi-mature	Average	Poor	Prominent, shallow buttress roots; single trunk; tight compression fork with evidence of included bark at 12m; hidden from all external views.	C (12)
33	Silver birch	18m	2 stems @ 215mm st. 350mm	N 4.5m E 6.5m S 5.5m W 6m	1m	1.5m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; multi-stemmed from base; tight compression fork with evidence of included bark; contributes to boundary screening; hidden in all long direct public views from N clockwise to SW.	C (12)



No.	Species	Height	Trunk diameter	Radial crown spread	Crown break	Crown clearance	Age class	Physio - logy	Structure	Comments	Category
34	English oak	17m	330mm	N 1m E 0m S 1m SW 7.5m W 8m NW 8.5m	2m	1.25m	Semi-mature	Average	Poor	Small self-seeded specimen; prominent, shallow buttress roots; tight compression fork with evidence of included bark; canopy entirely offset from base; contributes to boundary screening; hidden in all other long direct public views from N clockwise to SW.	C (12)
35	Ash	19m	330mm	N 2.75m E 0.75m S 1.75m W 5.25m	2m	1.75m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; one-sided crown as suppressed by adjacent specimens; contributes to boundary screening; hidden in all other long direct public views.	C (12)
36	English oak	19m	310mm	N 2.5m E 0m S 2.75m SW 5.25m W 6m NW 5.5m	2m	1m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; asymmetrical, one-sided crown as suppressed by adjacent specimens; contributes to boundary screening; hidden in all other long direct public views from N clockwise to SW.	C (12)
37	Red oak	17.5m	310mm	N 1m E 1m S 4m SW 5.25m W 5m NW 4.75m	2m	1m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; asymmetrical, one-sided crown as suppressed by adjacent specimens; contributes to boundary screening; hidden in all other long direct public views from N clockwise to SW.	C (12)
38	Ash	19m	300mm	N 2.5m E 2.25m S 1m W 3.75m	2m	1.5m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; asymmetrical, one-sided crown as suppressed by adjacent specimens; contributes to boundary screening; hidden in all other long direct public views from N clockwise to SW.	C (12)
39	English oak	18.5m	245mm	N 3m E 0m S 2m W 5m	2m	1m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; asymmetrical, one-sided crown as suppressed by adjacent specimens; contributes to boundary screening; hidden in all other long direct public views from N clockwise to SW.	C (12)

No.	Species	Height	Trunk diameter	Radial crown spread	Crown break	Crown clearance	Age class	Physio - logy	Structure	Comments	Category
40	English oak	19m	320mm	N 3m E 0m S 3m SW 4m W 5.5m	2m	1m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; asymmetrical, one-sided crown as suppressed by adjacent specimens; contributes to boundary screening; hidden in all other long direct public views from N clockwise to SW.	C (12)
41	Sweet chestnut	15m	225mm	N 1.75m E 0.75m S 3m SW 3m W 2.75m	2m	W 1m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; asymmetrical, one-sided crown as suppressed by adjacent specimens; contributes to boundary screening; hidden in all other long direct public views from N clockwise to SW.	C (12)
42	Ash	19m	455mm	N 3m E 3.75m S 5.5m W 5.25m	3m	W 5m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; asymmetrical, one-sided crown as suppressed by adjacent specimens; contributes to boundary screening; hidden in all other long direct public views from N clockwise to SW; significant component of group in which it stands.	B (2)
43	Ash	19m	375mm	N 4.5m E 3.5m S 4.25m SW 4.75m W 5.75m NW 5.5m	2m	W 4m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; many surface roots; asymmetrical, one-sided crown as suppressed by adjacent specimens; tight compression fork with evidence of included bark; contributes to boundary screening; hidden in all other long direct public views from N clockwise to SW.	C (12)
44	Ash	19.5m	400mm	N 2m E 2.75m S 4.25m SW 6m W 7m NW 6m	2m	1.5m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; asymmetrical, one-sided crown as suppressed by adjacent specimens; contributes to boundary screening; hidden in all other long direct public views from N clockwise to SW; significant component of group in which it stands.	B (2)
45	Ash	18m	390mm	N 4m E 1.75m S 4m W 5.5m	2m	1.5m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; asymmetrical, one-sided crown as suppressed by adjacent specimens; contributes to boundary screening; hidden in all other long direct public views from N clockwise to SW.	B (2)

No.	Species	Height	Trunk diameter	Radial crown spread	Crown break	Crown clearance	Age class	Physio - logy	Structure	Comments	Category
46	English oak	20m	470mm	N 6m E 2m S 2.25m SW 7.5m W 7.75m NW 8.75m	1m	1m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; asymmetrical, one-sided crown as suppressed by adjacent specimens; tight compression fork with evidence of included bark at 8m; contributes to boundary screening; hidden in all other long direct public views from N clockwise to SW.	C (12)
47	Sweet chestnut	19m	320mm st.	N 4m E 3m S 4m W 5m	1m	2m	Semi-mature	Dead	Hazardous	Dead tree.	U
48	Sweet chestnut	19m	315mm	N 4m E 3m S 2.75m W 4m	3.75m	4m	Semi-mature	Average	Moderate	Prominent, shallow buttress roots; asymmetrical, one-sided crown as suppressed by adjacent specimens; contributes to boundary screening; woodland edge tree; upper canopy visible above roof line of residential dwellings to W; hidden in all other long direct public views from N clockwise to SW.	B (2)
49	Sweet chestnut	19m	250mm	N 2.25m E 1m S 3m W 4.75m	2m	1m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; asymmetrical, one-sided crown as suppressed by adjacent specimens; contributes to boundary screening; hidden in all other long direct public views from N clockwise to SW.	C (1)
50	Silver birch	20m	450mm	N 4.5m E 3.25m S 3m W 4.75m	4m	4m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; asymmetrical, one-sided crown as suppressed by adjacent specimens; contributes to boundary screening; hidden in all other long direct public views from N clockwise to SW; significant component of group in which it stands.	B (1)
51	English oak	12m	300mm	N 5.5m E 4m S 5.5m SW 3m W 2m NW 3m	1.75m	1.75m	Semi-mature	Average	Good	Prominent, shallow buttress roots; single trunk; small self-seeded specimen; hidden in all long direct public views; of moderate quality, but currently of low value due to small size.	B (1)
52	Sweet chestnut	19m	340mm	N 3m E 1m S 3.5m SW 5.5m W 5m	2m	4m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; asymmetrical, one-sided crown as suppressed by adjacent specimens; contributes to boundary screening; hidden in all other long direct public views from N clockwise to SW.	C (12)

No.	Species	Height	Trunk diameter	Radial crown spread	Crown break	Crown clearance	Age class	Physio - logy	Structure	Comments	Category
53	Silver birch	19m	280mm	N 3m E 1m S 3m W 5m	2m	1.5m	Semi-mature	Average	Indifferent	Self-seeded specimen; many surface roots; prominent, shallow buttress roots; woodland copse boundary tree; hidden from all external views.	C (1)
54	English oak	12.5m	330mm st.	N 3.75m NE 3.5m E 4.25m SE 4.25m S 3.75m W 4m	1.75m	E 1.5m	Semi-mature	Average	Moderate	Off-site tree; small self-seeded specimen; contributes to boundary screening; hidden from all external views; of moderate quality, but currently of low value due to small size.	B (1)
55	Silver birch	19.5m	200mm 2 stems @ 300mm	N 4.25m E 3m S 3.75m W 5.5m	3m	2m	Semi-mature	Average	Poor	Prominent, shallow buttress and surface roots; tight compression forks with evidence of included bark; hidden from all external views; unremarkable tree of very limited merit.	C (12)
56	Turkey oak	20.5m	430mm	N 4m E 3m S 3m W 6.25m	2m	W 1.5m	Semi-mature	Below average	Indifferent	Prominent buttress roots; single trunk; slightly sparsely foliated; cattle compaction at base; significant component of group in which it stands; hidden from all external views.	C (1)
57	Flowering cherry	17m	445mm	N 4.75m E 2.75m S 3.5m W 7m	2m	W 2m	Mature	Average	Indifferent	Many surface roots; prominent, shallow buttress roots; tight compression fork with evidence of included bark; asymmetrical crown as suppressed by adjacent specimens; significant component of group in which it stands; hidden from all external views.	C (1)
58	Norway maple	14.5m	290mm	N 4.25m E 2m S 4.5m W 6.25m	2m	W 1.5m	Semi-mature	Average	Poor	Many surface roots; prominent, shallow buttress roots; tight compression fork with evidence of included bark; asymmetrical crown as suppressed by adjacent specimens; significant component of the group in which it stands; hidden from all external views.	C (1)
59	Silver birch	18m	2 stems @ 310mm	N 4m E 3.75m S 3m W 3.75m	3.5m	3m	Semi-mature	Average	Indifferent	Many surface roots; prominent, shallow buttress roots; twin-stemmed from 1m; acute union present, no evidence of bark to bark contact; significant component of group in which it stands; upper canopy glimpsed above G6 to W; hidden in all other long direct public views.	C (1)
60	English oak	18.5m	260mm	N 0m E 2m S 3.75m W 5.75m	2m	W 2m	Semi-mature	Average	Poor	Many surface roots; evidence of cattle compaction; asymmetrical one-sided crown as suppressed by adjacent specimens; squirrel damage in crown; hidden from all external views.	C (1)

No.	Species	Height	Trunk diameter	Radial crown spread	Crown break	Crown clearance	Age class	Physio -logy	Structure	Comments	Category
61	Norway maple	19m	775mm	N 8.25m E 10m SE 9.5m S 8.5m W 6.75m	3m	W 2m	Over-mature	Average	Poor	Prominent buttress roots; evidence of cattle movement and ground compaction around base; forks into multiple codominant stems at 3m; many surface roots, damaged on upper sides, probably by cattle; central stem is dead with evidence of internal decay and hollowing, at risk of failure; large historic storm damage and tear-out wounds in upper canopy; sub-dominant laterals limbs taking over apical dominance; significant component of group in which it stands; hidden in all long direct public views.	C (1)
62	Sweet chestnut	20m	400mm	N 5.5m NE 8m E 7.75m SE 6.5m S 2m W 1.75m	2m	E 1m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; single trunk; asymmetrical one-sided crown as suppressed by adjacent specimens; contributes to density of regenerated copse; hidden from all external views.	C (1)
63	Sweet chestnut	20m	385mm	N 8.25m NE 8.75m E 3.25m S 1m W 3.25m NW 8.25m	2m	NW 1m	Semi-mature	Average	Indifferent	Prominent, shallow buttress roots; single trunk; one-sided crown as suppressed by adjacent specimens; significant component of group in which it stands; contributes to boundary screening; glimpsed from Covert Mead.	C (12)
64	Norway maple	20.5m	375mm	N 3.5m NE 7.25m E 6.25m SE 4.75m S 7m SW 5.5m W 5.5m	2m	NW 1.5m	Semi-mature	Average	Moderate	Many surface roots; prominent, shallow buttress roots; single trunk; significant component of group in which it stands; acute unions, due to fastigate form; however, no evidence of tight compression forks with bark to bark contact; contributes to density of regenerated copse.	B (1)
65	Norway maple	7m	180mm	N 3m E 3m S 3m W 2.75m	2m	2m	Semi-mature	Average	Indifferent	Small self-seeded specimen; many surface roots, damaged on upper sides, probably by cattle; hidden in all long direct public views; unremarkable tree of very limited merit.	C (1)

No.	Species	Height	Trunk diameter	Radial crown spread	Crown break	Crown clearance	Age class	Physio - logy	Structure	Comments	Category
66	Norway maple	10m	250mm	N 4.5m E 4.5m S 3.75m W 4m	2m	W 1.25m	Semi-mature	Average	Poor	Small self-seeded specimen; many surface roots, damaged on upper sides, probably by cattle; tight compression fork with evidence of included bark; hidden in all long direct public views; unremarkable tree of very limited merit.	C (1)
67	Field maple	9.5m	160mm 140mm est.	2.75m	4m	E 5m	Semi-mature	Average	Poor	Off-site tree; twin-stemmed from base; small self-seeded specimen; contributes to boundary screening.	C (1)
68	Field maple	5.5m	120mm est. 190mm est.	N 1m NE 2.5m E 3.25m SE 3m S 1m W 0m	2m	E 2m	Semi-mature	Average	Indifferent	Small self-seeded specimen; crown has been heavily reduced or "topped" in past; unremarkable tree of very limited merit.	C (1)
69	English oak	5.5m	235mm est.	N 1m NE 3m E 3.5m SE 3.25m S 1.25m W 0.5m	1.5m	E 1m	Semi-mature	Average	Indifferent	Small self-seeded specimen; crown has been heavily reduced or "topped" in past; unremarkable tree of very limited merit.	C (1)
70	Silver birch	10.5m	140mm	N 2m E 1m S 1.75m W 2m	1.5m	0.5m	Semi-mature	Average	Indifferent	Small self-seeded specimen; many surface roots, damaged on upper sides, probably by cattle; unremarkable tree of very limited merit.	C (12)
71	English oak	8m	220mm	N 3m E 3m S 3.5m W 2m	2m	SE 1m	Semi-mature	Average	Indifferent	Small self-seeded specimen; many surface roots, damaged on upper sides, probably by cattle; unremarkable tree of very limited merit.	C (1)
72	Turkey oak	9m	185mm	N 1.75m E 3m S 2.75m W 1m	1m	S 1m	Semi-mature	Average	Indifferent	Small self-seeded specimen; unremarkable tree of very limited merit; hidden in all long direct public views.	C (1)
73	Holly	7m	4 stems @ 120mm est.	N 2.5m E 3m S 3m W 3m	1m	N 1m	Semi-mature	Below average	Poor	Multi-stemmed from base; slightly sparsely foliated; of only low-level screening value; unremarkable tree of very limited merit.	C (1)

No.	Species	Height	Trunk diameter	Radial crown spread	Crown break	Crown clearance	Age class	Physio - logy	Structure	Comments	Category
74	English oak	8m	210mm	N 2m E 4m SE 4.5m S 4m W 1.5m	2.25m	SE 1.5m	Semi-mature	Average	Indifferent	Small self-seeded specimen; nearly one-sided crown as suppressed by adjacent specimens; unremarkable tree of very limited merit.	C (1)
75	Holly	6m	4 stems @ 110mm est.	N 2.5m E 3.25m S 3m W 3.25m	0.5m	0m	Semi-mature	Average	Poor	Multi-stemmed from base; small self-seeded specimen; unremarkable tree of very limited merit.	C (1)
76	English oak	23m	1200mm est.	N 9.5m E 9m S 12m W 10m NW 9m	3m	W 4m	Over-mature	Average	Moderate	Off-site tree; prominent buttress roots; single trunk; mechanical wounding on trunk; internal heartwood exposed; occlusion wood present; exudations on trunk at approx. 4m W side; large boundary tree, likely historical planting adjacent to Park Road; essential component of group in which it stands; woodland boundary tree; readily visible from Park Road.	A (23)
77	Silver birch	21m	490mm	N 5m E 3m S 5.5m W 6.25m	4m	W 4m	Mature	Average	Indifferent	Off-site tree; prominent buttress roots, with mechanical wounding; mechanical wounding on trunk; notable occlusion wood seen; woodland boundary tree.	B (2)
78	English oak	8m	245mm	N 2m E 4.25m S 2.5m W 0.5m	1m	E 1m	Semi-mature	Average	Indifferent	Small self-seeded specimen; canopy entirely offset from base; unremarkable tree of very limited merit.	C (1)
79	Silver birch	20m	320mm	N 2.5m E 5m S 2m W 2m	3m	E 4m	Semi-mature	Average	Poor	Evidence of historic root plate movement; many surface roots, damaged on upper sides; multi-stemmed from base; tight compression forks with evidence of included bark.	C (1)

No.	Species	Height	Trunk diameter	Radial crown spread	Crown break	Crown clearance	Age class	Physio -logy	Structure	Comments	Category
80-84	Silver birch	#T80 20m #T81 20m #T82 20m #T83 21m #T84 20m	#T80 2 stems @ 230mm #T81 290mm #T82 310mm #T83 2 stems @ 210mm #T84 2 stems @ 250mm	4m	3m	4m	Semi-mature	Average	Poor	Row of closely planted specimens, designed to form a hedge or screen; group of drawn-up, mutually suppressed specimens; at risk of failure if companion shelter removed; multi-stemmed from base; tight compression forks with evidence of included bark.	C (12)
85-86	Silver birch	#T85 21m #T86 21m	#T85 2 stems @ 260mm #T86 300mm	N 5.5m NE 5m E 6.25m S 4m W 4.25m	3m	2m	Semi-mature	Average	Poor	Row of closely planted specimens, designed to form a hedge or screen; drawn-up and mutually suppressed; tight compression fork with evidence of included bark; at risk of failure if companion shelter removed; readily visible from bridleway to E; hidden in all other long direct public views.	C (12)
87	English oak	22m	1000mm ivyest.	N 7.75m E 11m S 9m SW 8.5m W 6.75m	3m	SW 4m	Mature	Average	Moderate	Off-site tree; prominent buttress roots; heavily ivy-covered impeding inspection of branch unions; field boundary tree; readily visible from bridleway and internal views from the site; significant component of group in which it stands; hidden in all other long direct public views.	A (23)
88	English oak	21m	820mm	N 6.5m E 8m S 10m SW 10m W 6m	4m	SW 6m	Mature	Average	Moderate	Off-site tree; prominent, shallow buttress roots; forks into two codominant stems at 4m; N stems remains apically dominant, while S stem phototropically grows to S; significant component of group in which it stands; woodland boundary tree; readily visible from bridleway and internal views from site; in keeping with the character of the local area; hidden in all other long direct public views.	A (23)



No.	Species	Height	Trunk diameter	Radial crown spread	Crown break	Crown clearance	Age class	Physio - logy	Structure	Comments	Category
89-91	Sycamore	#T89 20m #T90 20m #T91 20m	#T89 490mm ivy #T90 440mm ivy #T91 470mm ivy	N 5m E 4.5m S 6m W 5.5m	3.5m	4m	Mature	Average	Indifferent	#89 off-site trees; row of closely growing specimens, forming a hedge or screen; aerodynamic group with meshing crowns providing companion shelter; drawn-up and mutually suppressed; contributes to boundary screening; hidden in all long direct public views; unremarkable trees of very limited merit.	C (12)
92	English oak	12m	215mm	3.75m	2m	1.5m	Semi-mature	Average	Indifferent	Small self-seeded specimen; prominent, shallow buttress roots; of moderate quality, but currently of low value due to small size; hidden in all long direct public views; unremarkable tree of very limited merit.	C (1)
93	Silver birch	20.5m	390mm 330mm	N 6m E 4.25m S 7m W 6m	2m	E 1.5m	Semi-mature	Average	Indifferent	Self-seeded specimen; twin-stemmed from base; drawn-up and mutually suppressed stems; glimpsed from bridleway; unremarkable tree of very limited merit.	C (1)
94	Silver birch	17.5m	240mm	N 3.5m E 0.75m S 2m W 4.5m	2m	W 1m	Semi-mature	Average	Indifferent	same comments as tree no. 36; glimpsed from W; contributes to boundary screening.	C (12)
95	Silver birch	17.5m	240mm	N 3.5m E 0.75m S 2m W 4.5m	2m	W 1m	Semi-mature	Average	Indifferent	Small self-seeded specimen; asymmetrical canopy with meshing crown; unremarkable tree of very limited merit.	C (12)
96	Norway maple	19m	430mm	N 4.5m E 2.5m S 3.5m W 5.5m	4m	E 4m	Semi-mature	Average	Indifferent	Off-site tree; prominent, shallow buttress roots; drawn-up and suppressed; asymmetrical crown as suppressed by adjacent specimens; upper canopy glimpsed above roofline to W.	B (2)
97-98	Sweet chestnut	#T97 19.5m #T98 19.5m	#T97 420mm #T98 395mm	N 4m E 1m S 3m W 6.5m	4m	E 5m	Semi-mature	Average	Indifferent	Self-seeded specimens; one-sided crown as suppressed by adjacent specimens; contributes to boundary screening; upper canopy glimpsed above roofline to W; hidden in all other long direct public views.	C (12)
99	Sweet chestnut	19.5m	450mm	N 4.5m E 2.75m S 3m W 6m	4m	E 4m	Semi-mature	Average	Poor	Off-site tree; contributes to boundary screening; tight compression fork with evidence of included bark at 4m; hidden in all other long direct public views.	C (12)
100	Flowering cherry	19m	320mm	N 3m E 2m S 2m W 4m	3m	2.5m	Semi-mature	Average	Indifferent	Self-seeded specimen; readily visible from allotments; hidden in all other long direct public views; contributes to boundary screening; unremarkable tree of very limited merit.	C (12)

No.	Species	Height	Trunk diameter	Radial crown spread	Crown break	Crown clearance	Age class	Physio -logy	Structure	Comments	Category
G2	Various	Min 16m Max 20m	Min 75mm Max 295mm	3m	2m	3m	Semi-mature	Average	Poor	Small area of recent secondary woodland; prominent, shallow buttress roots; drawn-up and mutually suppressed; many specimens with Height/Diameter ratio greater than 50: at risk of failure if companion shelter removed; trees displaying morphological and physiological features consistent with size, age, species and location; tight compression forks with evidence of included bark; contributes to boundary screening; readily visible from public footpath; many windthrown individuals within group, hung-up demonstrating shallow structural root plates.	C (12)
G3	Various	Min 6m Max 15m	Min 5 stems @ 180mm Max 375mm est.	4m	1m	1m	Semi-mature	Average	Indifferent	Off-site group of trees; species include cherry laurel, Norway spruce, goat willow, silver birch, holly, Norway maple, hornbeam and rowan; row of multistemmed cherry laurel located adjacent to boundary; off-set to NE by approx. 7m, more establish coniferous trees located; many individuals show prominent, shallow buttress roots consistent with other trees in local vicinity; single trunks; tall, drawn-up and mutually suppressed; aerodynamic group with meshing crowns providing companion shelter; contributes to boundary screening; in keeping with character of local area; readily visible from public footpath and bridleway.	B (12)
G4	Various	Min 15m Max 20m	Min 100mm Max 275mm	3m	2m	2m	Semi-mature	Average	Poor	Small area of recent secondary woodland; self-seeded specimens; group of drawn-up, mutually suppressed specimens; drawn-up specimens with Height/Diameter ratio greater than 50: at risk of failure if companion shelter removed; hidden from all external views; unremarkable trees of very limited merit.	C (1)
G5	Various	Min 12m Max 19.5m	Min 120mm Max 300mm	3.5m	2m	1m	Semi-mature	Average	Poor	Species include English oak, Norway maple, rowan, silver birch, holly and sweet chestnut; small area of recent secondary woodland; many surface roots, damaged on upper sides, probably by cattle; prominent buttress roots, with mechanical wounding; trees displaying morphological and physiological features consistent with size, age, species and location; including tight compression forks with evidence of included bark; NW extent contributes to boundary screening; hidden in all other long direct public views.	C (1)
G6	Western red cedar	12m	Min 100mm Max 240mm	3m	0.25m	0.25m	Semi-mature	Average	Indifferent	Off-site group of trees; row of closely planted specimens, designed to form a hedge or screen; trees displaying morphological and physiological features consistent with size, age, species and location; tight compression forks with evidence of included bark; aerodynamic group with meshing crowns providing companion shelter; group of drawn-up, mutually suppressed specimens; contributes to boundary screening; hidden in all other long direct public views from N anti-clockwise to S.	C (12)
G7	Western red cedar	1.5m	Avg 25mm	0.5m	0.25m	0.5m	Young	Average	Good	Off-site group of trees; row of closely planted specimens, designed to form a hedge or screen; of only low-level screening value; inessential component of wider landscape.	C (1)
G8	Sweet chestnut	8m	Avg 6 stems @ 110mm est.	4m	0.5m	0.5m	Semi-mature	Average	Poor	Recently coppiced timber crop; unremarkable trees of very limited merit.	C (1)

No.	Species	Height	Trunk diameter	Radial crown spread	Crown break	Crown clearance	Age class	Physio - logy	Structure	Comments	Category
G9	Various	Min 16m Max 18m	Min 140mm Max 320mm	3.75m	2m	1.5m	Semi-mature	Average	Poor	Row of closely growing specimens, forming an aerodynamic group; group of drawn-up, mutually suppressed specimens; east edge of group readily visible from bridle way; many with Height/Diameter ratio greater than 50: at risk of failure if companion shelter removed; inessential component of the wider landscape; hidden in all other long direct public views.	C (12)
G10	Beech	Min 4m Max 9m	Min 175mm Max 210mm	3m	1m	1m	Young	Average	Moderate	Small planted specimens; hidden in all long direct public views; unremarkable trees of very limited merit.	C (1)
H1	Various	1m	Max 25mm	1m	0m	0m	Semi-mature	Average	Indifferent	Of only low-level screening value; species include hornbeam, hazel, bracken and bramble; evidence of regular management.	C (1)

## Root Protection Areas (RPAs)

Root Protection Areas have been calculated in accordance with paragraph 4.6.1 of the British Standard 'Trees in relation to design, demolition and construction – Recommendations', BS 5837:2012. This is the minimum area which should be left undisturbed around each retained tree. RPAs are portrayed initially as a circle of a fixed radius from the centre of the trunk; but where there appear to be restrictions to root growth the circle is modified to reflect more accurately the likely distribution of roots.

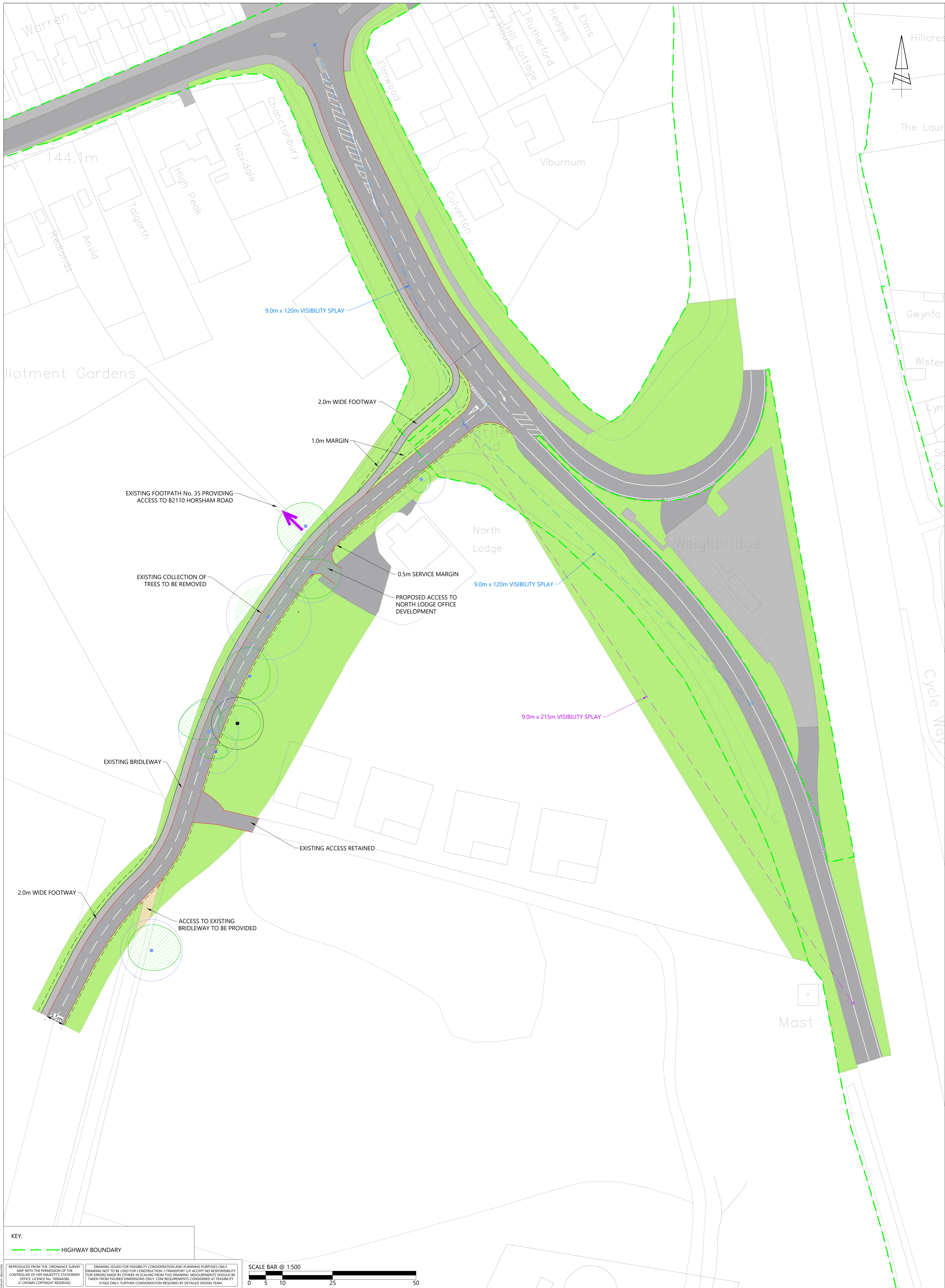
<b>Tree No.</b>	<b>Species</b>	<b>RPA</b>	<b>RPA Radius</b>
1	Norway maple	182.4m <sup>2</sup>	7.6m
2	English oak	147.0m <sup>2</sup>	6.8m
3	Western red cedar	72.1m <sup>2</sup>	4.8m
4	English oak	72.4m <sup>2</sup>	4.8m
5	Norway maple	47.9m <sup>2</sup>	3.9m
6	Sweet chestnut	372.1m <sup>2</sup>	10.9m
7	Hornbeam	157.2m <sup>2</sup>	7.1m
8	Beech	285.9m <sup>2</sup>	9.5m
9	English oak	191.1m <sup>2</sup>	7.8m
10	English oak	102.1m <sup>2</sup>	5.7m
11	English oak	117.7m <sup>2</sup>	6.1m
12	Red oak	55.4m <sup>2</sup>	4.2m
13	Beech	52.3m <sup>2</sup>	4.1m
14	Beech	102.1m <sup>2</sup>	5.7m
15	Silver birch	79.3m <sup>2</sup>	5.0m
16	Silver birch	61.9m <sup>2</sup>	4.4m
17	English oak	60.3m <sup>2</sup>	4.4m
18	Red oak	38.0m <sup>2</sup>	3.5m
19	Silver birch	104.6m <sup>2</sup>	5.8m
20	Red oak	47.8m <sup>2</sup>	3.9m
21	Sweet chestnut	93.7m <sup>2</sup>	5.5m
22	Goat willow	113.1m <sup>2</sup>	6.0m
23	Goat willow	72.4m <sup>2</sup>	4.8m
24	Silver birch	65.3m <sup>2</sup>	4.6m
25	Norway maple	81.7m <sup>2</sup>	5.1m
26	Sweet chestnut	89.6m <sup>2</sup>	5.3m
27	Sweet chestnut	141.9m <sup>2</sup>	6.7m
28	Beech	38.0m <sup>2</sup>	3.5m
29	Sweet chestnut	61.9m <sup>2</sup>	4.4m
30	Beech	27.2m <sup>2</sup>	2.9m
31	Sweet chestnut	60.3m <sup>2</sup>	4.4m
32	Beech	35.5m <sup>2</sup>	3.4m
33	Silver birch	97.2m <sup>2</sup>	5.6m
34	English oak	49.3m <sup>2</sup>	4.0m
35	Ash	49.3m <sup>2</sup>	4.0m
36	English oak	43.5m <sup>2</sup>	3.7m
37	Red oak	43.5m <sup>2</sup>	3.7m
38	Ash	40.7m <sup>2</sup>	3.6m
39	English oak	27.2m <sup>2</sup>	2.9m
40	English oak	46.3m <sup>2</sup>	3.8m
41	Sweet chestnut	22.9m <sup>2</sup>	2.7m
42	Ash	93.7m <sup>2</sup>	5.5m
43	Ash	63.6m <sup>2</sup>	4.5m
44	Ash	72.4m <sup>2</sup>	4.8m

45	Ash	68.8m <sup>2</sup>	4.7m
46	English oak	99.9m <sup>2</sup>	5.6m
47	Sweet chestnut	46.3m <sup>2</sup>	3.8m
48	Sweet chestnut	44.9m <sup>2</sup>	3.8m
49	Sweet chestnut	28.3m <sup>2</sup>	3.0m
50	Silver birch	91.6m <sup>2</sup>	5.4m
51	English oak	40.7m <sup>2</sup>	3.6m
52	Sweet chestnut	52.3m <sup>2</sup>	4.1m
53	Silver birch	35.5m <sup>2</sup>	3.4m
54	English oak	49.3m <sup>2</sup>	4.0m
55	Silver birch	99.5m <sup>2</sup>	5.6m
56	Turkey oak	83.6m <sup>2</sup>	5.2m
57	Flowering cherry	89.6m <sup>2</sup>	5.3m
58	Norway maple	38.0m <sup>2</sup>	3.5m
59	Silver birch	86.9m <sup>2</sup>	5.3m
60	English oak	30.6m <sup>2</sup>	3.1m
61	Norway maple	271.7m <sup>2</sup>	9.3m
62	Sweet chestnut	72.4m <sup>2</sup>	4.8m
63	Sweet chestnut	67.1m <sup>2</sup>	4.6m
64	Norway maple	63.6m <sup>2</sup>	4.5m
65	Norway maple	14.7m <sup>2</sup>	2.2m
66	Norway maple	28.3m <sup>2</sup>	3.0m
67	Field maple	20.4m <sup>2</sup>	2.6m
68	Field maple	22.8m <sup>2</sup>	2.7m
69	English oak	25.0m <sup>2</sup>	2.8m
70	Silver birch	8.9m <sup>2</sup>	1.7m
71	English oak	21.9m <sup>2</sup>	2.6m
72	Turkey oak	15.5m <sup>2</sup>	2.2m
73	Holly	26.1m <sup>2</sup>	2.9m
74	English oak	20.0m <sup>2</sup>	2.5m
75	Holly	21.9m <sup>2</sup>	2.6m
76	English oak	651.4m <sup>2</sup>	14.4m
77	Silver birch	108.6m <sup>2</sup>	5.9m
78	English oak	27.2m <sup>2</sup>	2.9m
79	Silver birch	46.3m <sup>2</sup>	3.8m
80-84	Silver birch	47.9m <sup>2</sup>	3.9m
		38.0m <sup>2</sup>	3.5m
		43.5m <sup>2</sup>	3.7m
		39.9m <sup>2</sup>	3.6m
		56.5m <sup>2</sup>	4.2m
85-86	Silver birch	61.2m <sup>2</sup>	4.4m
		40.7m <sup>2</sup>	3.6m
87	English oak	452.4m <sup>2</sup>	12.0m
88	English oak	304.2m <sup>2</sup>	9.8m
89-91	Sycamore	108.6m <sup>2</sup>	5.9m
		87.6m <sup>2</sup>	5.3m
		99.9m <sup>2</sup>	5.6m
92	English oak	20.9m <sup>2</sup>	2.6m
93	Silver birch	118.1m <sup>2</sup>	6.1m
94	Silver birch	26.1m <sup>2</sup>	2.9m
95	Silver birch	26.1m <sup>2</sup>	2.9m
96	Norway maple	83.6m <sup>2</sup>	5.2m
97-98	Sweet chestnut	79.8m <sup>2</sup>	5.0m
		70.6m <sup>2</sup>	4.7m
99	Sweet chestnut	91.6m <sup>2</sup>	5.4m
100	Flowering cherry	46.3m <sup>2</sup>	3.8m
G2	Various	39.4m <sup>2</sup>	3.5m

G3	Various	63.6m <sup>2</sup>	4.5m
G4	Various	34.2m <sup>2</sup>	3.3m
G5	Various	40.7m <sup>2</sup>	3.6m
G6	Western red cedar	26.1m <sup>2</sup>	2.9m
G7	Western red cedar	2.5m <sup>2</sup>	0.9m
G8	Sweet chestnut	5.5m <sup>2</sup>	1.3m
G9	Various	46.3m <sup>2</sup>	3.8m
G10	Beech	20.0m <sup>2</sup>	2.5m
H1	Various	2.5m <sup>2</sup>	0.9m

APPENDIX 4

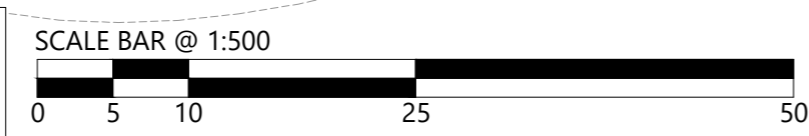
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KEY:  
--- HIGHWAY BOUNDARY

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REV	DATE	BY	DESCRIPTION	CHK	APP	PROJECT	CUSTOMER
A	04.12.19	JD	ACCESS ARRANGEMENT UPDATED	MC	JCB	PARK ROAD, HANDCROSS	WATES DEVELOPMENTS
FOR INFORMATION							

DRAWN:	MC	CHECKED:	MC	APPROVED:	JCB
SCALE @ A1:	1:500	DATE:	20.11.19		
PROJECT No:	ITB14511				
DRAWING No:	ITB14511-GA-003				REV: A



735

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA11

<b>ID:</b>	<b>735</b>
<b>Response Ref:</b>	Reg19/735/1
<b>Respondent:</b>	Ms D Hindle
<b>Organisation:</b>	
<b>On Behalf Of:</b>	
<b>Category:</b>	Resident
<b>Appear at Examination?</b>	x

<b>Name</b>	Debbie Hindle
<b>Address</b>	[REDACTED]
<b>Phone</b>	[REDACTED]
<b>Email</b>	[REDACTED]
<b>Which document are you commenting on?</b>	Site Allocations DPD
<b>Sites DPD Policy Number (e.g. SA1 - SA38)</b>	Site Allocations West of Crawley Down (area688)
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	No
<b>(1) Positively prepared</b>	Unsound
<b>(2) Justified</b>	Unsound
<b>(3) Effective</b>	Unsound
<b>(4) Consistent with national policy</b>	Unsound
<b>Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD</b>	<p>1. NOT Positively prepared in terms of meeting the housing and employment needs of the region.</p> <ul style="list-style-type: none"> <li>• The size and proposed rural location is completely out of proportion to the village of Crawley Down. Taking away 60 acres (25ha) of valuable agricultural land and woodland destined for 300 houses and associated facilities is not desirable or sustainable</li> <li>• Covid has decimated Gatwick as a local employer reducing the need for extra homes.</li> </ul> <p>2. NOT Justified - when considered against the reasonable alternatives</p> <ul style="list-style-type: none"> <li>• The proposal conflicts with the Planning Objective of maintaining a rural break between urban areas of East Grinstead and Crawley-Gatwick</li> <li>• The proposal conflicts with the Planning Objective of maintaining a rural break between urban areas of East Grinstead and Crawley-Gatwick.</li> </ul> <p>3. NOT Effective</p> <ul style="list-style-type: none"> <li>• The site is a steep slope which will cause flooding when covered with impermeable surfaces.</li> <li>• There is no mains drainage below the site. The small stream leading to the lakes at Rowfant House will be flooded.</li> <li>• Our house will be particularly affected by this development. It sits at the bottom of the field below the development and all this water will flood down towards our house. We already have regular problems with floods at the front of our house. Heavy rain already regularly overwhelms the sewerage plants up Wallage Lane (South) causing pollution and unpleasant odour.</li> </ul> <p>4. NOT Consistent with national policy</p> <ul style="list-style-type: none"> <li>• The fields and woods are precious attributes of the SE Region's environment.</li> <li>• Rural urbanization threatens long-established residences, environs, privacy, security, and enjoyment, especially from the County Council's Worth Way.</li> <li>• The proposal conflicts with the Planning Objective of maintaining a rural break between urban areas of East Grinstead and Crawley-Gatwick.</li> </ul>

<b>Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.</b>	Remove the proposed 60 acre site to the West of Crawley Down as an area of development
<b>If you wish to provide further documentation to support your response, you can upload it here</b>	
<b>If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination</b>	No, I do not wish to participate at the oral examination
<b>Please notify me when-The Plan has been submitted for Examination</b>	yes
<b>Please notify me when-The publication of the recommendations from the Examination</b>	yes
<b>Please notify me when-The Site Allocations DPD is adopted</b>	yes
<b>Date</b>	27/09/2020

**737**

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA11

**ID:** 737

**Response Ref:** Reg19/737/3

**Respondent:** Ms K Lamb

**Organisation:** DMH Stallard

**On Behalf Of:** Reside - West Kings Reeds Lane SC

**Category:** Developer

**Appear at Examination?** ✓

**From:** Stevenson, Holly <Holly.Stevenson@dmhstallard.com>  
**Sent:** 28 September 2020 13:09  
**To:** ldfconsultation  
**Cc:** Lamb, Katie  
**Subject:** Representations - Mid Sussex Site Allocations DPD Regulation 19 Consultation (DMH Stallard Ref:315317-8)  
**Attachments:** LTR MSDC SA DPD Reg 19 Site 830\_22649712\_1.pdf; WesternLandMasterplan-SayersCommon - 1-1000.pdf; 17-T135\_07.pdf; 7284\_Sayers Common\_LVA\_FINAL - (2660598).pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** TBC

Dear Sirs,

**Mid Sussex Site Allocations DPD – Regulation 19 Consultation  
Land west of Kings Business Centre, Reeds Lane, Sayers Common (#830)  
On behalf of Reside Developments Limited**

Please find herewith, our representations in relation to the Mid Sussex Site Allocations DPD Regulation 19 consultation.

Regards

---

Holly Stevenson | Paralegal | Tel: +44 1293 663521  
For and on behalf of DMH Stallard LLP  
3rd Floor, Origin One, 108 High Street, Crawley, West Sussex, RH10 1BD



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Our people are now working from home and you can email us and call us with all our usual contact details and we will continue to deliver our client service standards. Remote working and flexibility are very much at the core of DMH Stallard's culture and the way we work. Our offices are currently closed however, so please do not send us any documents by post or try to visit us. Your usual DMH Stallard contact will be able to advise you how best to deal with your specific needs and situation.

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

**Date** 28 September 2020  
**Your ref** Site Ref #830  
**Our ref** 0704/315317-8

Dear Sirs

**Mid Sussex Site Allocations DPD – Regulation 19 Consultation  
Land west of Kings Business Centre, Reeds Lane, Sayers Common (#830)  
On behalf of Reside Developments Limited**

DMH Stallard act on behalf of Reside Developments Limited (“Reside”) in relation to the land west of King Business Centre, Reeds Lane, Sayers Common (Site Ref. #830) and the Site Allocations DPD (“SA DPD”).

Reside also have an interest in the land to the east of King Business Centre, known as land to the north of Lyndon, Reeds Land, as allocated at Policy SA 30; separate representations have been made in support of Policy SA 30, which we consider to be sound.

Reside are generally supportive of the SA DPD and the evidence base that the Council have produced to inform the site selection process. Reside support the Council’s commitment to the allocation of a sufficient supply of land to meet the residual housing requirements as set out in the District Plan and to providing an overprovision of sites to ensure flexibility and a rolling 5 year housing land supply. However, it is submitted that the land west of King Business Centre should also be allocated, in association with land north of Lyndon (Policy SA 30), to provide a comprehensive scheme for both sites, and to meet the residual housing requirements for Category 3 settlements on a single, well considered, site. At present, on the basis of the representations contained herewith, we submit that the approach to the site selection process is unsound.

Policy SA10 of the SA DPD sets out how the Council will meet the residual housing need necessary to meet the identified housing target, set out in the adopted District Plan. It states that the residual housing requirement, reflecting Neighbourhood Plans and windfall development is 1,280 dwellings. The policy, at Table 2.4, also demonstrates how the residual housing figure will be distributed throughout the district, in accordance with the settlement hierarchy. We acknowledge that the Council have sought to distribute the houses

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**Offices in London, Gatwick, Guildford, Brighton and Horsham. Website** [www.dmhstallard.com](http://www.dmhstallard.com)

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towards higher tier settlements, but some of these are considered to have greater environmental impacts, than land west of Kings Business Centre, which could be delivered in accordance with the allocation of land north of Lyndon, Reeds Lane (SA30).

Policy DP6 of the District Plan identifies Sayers Common as a Category 3 Settlement, noting that these are *“Medium sized villages providing essential services for the needs of their own residents and immediate surrounding communities. Whilst more limited, these can include key services such as primary schools, shops, recreation and community facilities, often shared with neighbouring settlements.”* They are therefore considered sustainable settlements, which could accommodate future development, this is reflected in the Council’s identification of land at Lyndon, Reeds Lane, Sayers Common (SA30).

Table 2.4 of the SA DPD states that the residual housing requirement for category 3 settlements is 371, however, through the SA DPD, they only deliver 238 new homes. The under provision is met by development in the Category 1 settlements, Burgess Hill for example has accommodated significant growth within the District Plan and disproportionately through the SA DPD; East Grinstead is the only Category 1 settlement with further residual housing need.

Table 13 of the SA sets out the number of units deliverable from the final ‘sifted’ pool of deliverable sites, against the residual housing requirements for each settlement. It also notes that all but two settlements in category 1 (East Grinstead – 706 dwellings) and category 2 (Cuckfield – 198 dwellings) settlements have met their residual housing requirement. The residual requirement therefore for category 1 and category 2 settlements is only 904 dwellings, yet they are accommodating 1,409 within the SA DPD. Of these sites, some are considered to have known constraints to development, including impacts on nationally import landscapes, such as the South Downs National Park, or have currently unknown access arrangements. Conversely, the residual housing requirement for category 3 settlements, such as Sayers Common, is 371 dwellings, and the SA DPD only allocates land in these settlements for 238 dwellings. The Council have a pool of sites, including land west of Kings Business Centre, which are suitable, achievable and deliverable, and could be identified in order to meet the residual housing need of category 3 settlements, particularly when they could form the expansion of an existing site allocation (SA 30 – land north of Lyndon), rather than an entirely new allocation. This would also reduce pressure on other settlements categories which are meeting more than their residual requirement and on less suitable sites.

Of the allocations within the SA DPD, approximately 548 dwellings are considered to be in locations which are visible from the South Downs National Park or the High Weald AONB, or are within the High Wealden AONB (153 dwellings). At paragraph 171 of the NPPF, it requires that LPA’s allocate land with the least environmental or amenity value, further noting at paragraph 172 that great weight should be given to conserving and enhancing landscape and scenic beauty of Areas of Outstanding Natural Beauty and National Parks,

they are given the highest status of protection. These are landscapes which should clearly afford the greatest level of protection, yet they have been allocated for housing in place of more suitable sites, and on the edges of settlements which have already met their residual housing requirement. The SA DPD, through the SA, should consider a pallet of non-AONB sites first, to ensure the protection of designations of a national importance, and only when the most appropriate sites have been considered, move towards the identification of AONB sites. Similarly, the Council have dismissed sites on minimal landscape grounds, but then seek to allocate significant parcels of land close to the South Downs National Park. We submit that sites, such as that west of King Business Centre, where there would be minimal landscape harm, should be considered above those which would have a detrimental affect on either the AONB or National Park.

Additionally, the SA DPD allocates 250 dwellings on land where access is currently unknown (according to the policies, which state that access needs to be explored) - land at Burleigh Lane, Crawley Down (SA 22) and land south of Crawley Down Road, Felbridge (SA 19). In comparison, land west of Kings Business Park, Sayers Common, could be delivered via an access already considered acceptable for site allocation SA 30 – land north of Lyndon, or a separate / new access directly from Reeds Lane, with no need to purchase additional land, and is therefore deliverable immediately.

#### Land at Kings Business Centre (Site Ref #830)

The land at Kings Business Centre (Site Ref. #830) is assessed in the SHELAA for approximately 100 units on 3.3ha of land to the west of Kings Business Centre. The assessment of the site is generally very positive; it is noted that the site is remote from the AONB, not at risk of flooding, not affected by Ancient Woodland, ecological designations or heritage assets and that a satisfactory access can be achieved in its own right or alongside SA 30.

The assessment notes that the site could be of archaeological merit, but that this could be assessed through the planning application process, and mitigation implemented if necessary, we would agree that this does not represent a constraint to development.

We note that the site is considered to have some landscape impacts, notwithstanding the strongly defined tree boundaries, which contain the site from wider views. Additionally, the site is characterised to the east by King Business Centre and Avtrade Global Head Quarters to the west, both of which urbanise the immediate vicinity of the site. Furthermore, the Council argue in the SHLEAA assessment, that the development of the site would have an impact on the setting of Sayers Common when arriving from the west, but this is already eroded by Avtrade and Kings Business Centre.

A Landscape and Visual Appraisal (LVA) has been prepared by LDA and is submitted as part of these representations, demonstrating that sensitive development of the site for up to 100



units, would not have a significant effect on the landscape character of the locality. In summary, the LVA states that:

*“...the site falls within an area of ‘medium’ landscape capacity (as defined by the Capacity of Mid Sussex District to Accommodate Development 2014 study) where there is considered to be some potential for development.*

*According to the Mid Sussex Landscape Character Assessment, the Site falls into the ‘Hickstead Low Weald’ LCA. However, the Site is weakly representative of the wider LCA and rural landscape due to its proximity to the settlement edge, and adjacent residential and commercial development. Visually, the Site is very well-contained and benefits from good levels of screening due to its enclosure by mature boundary and peripheral vegetation.*

*It is anticipated that the Site could deliver up to approximately 100 new dwellings with associated green space. While development would inevitably alter the character of the Site itself due to the change from agricultural to residential use, any effects on wider landscape character would be very localised. The main visual effect would be on a short section of PRow crossing the Site and there would no discernible change to the character / view from of Reeds Lane when approaching Sayers Common from the west.*

*The proposed development – when considered in conjunction with the proposed allocation (‘Land to the North of Lyndon’) and permitted development (‘Kingland Laines’) – is considered to relate well to the existing pattern of development which is strung out along the B2118 and Reeds Lane.*

*Overall it is concluded that development within the Site could be accommodated without resulting in undue adverse effects on landscape character, views and the settlement form of Sayers Common.”*

There appears to be no valid justification or evidence base to support the Council’s assessment of the site’s landscape capacity. The *Mid Sussex Landscape Capacity Study 2007* assesses a large swath of land at Hickstead and Sayers Common, which is too large to make any site specific assessment of landscape capacity, particularly the land west of King Business Centre, which is defined by employment land to the east and west. Furthermore, as detailed in the LDA LVA, the site is uncharacteristic of the wider Landscape Character Area and as such, it would not be sound to dismiss the site on the basis of the Mid Sussex Landscape Capacity Study 2007.

The *Capacity of Mid Sussex District to Accommodate Development 2014*, provides an updated assessment of the Landscape Character Area, which identifies the parcel as having **Medium Capacity** to accommodate development (there are a number of sites allocated within the District Plan and draft SA DPD, within areas identified as having a lower landscape capacity for development). Paragraph 3.24 of the Capacity of Mid Sussex District to Accommodate Development 2014 notes that these areas are “*now judged as having*

*medium capacity (shown in yellow on Figure 3.2), and there is the potential for limited development to be located in some parts of these character areas, so long as there is regard for existing features and sensitivities within the landscape.”*

In summary, there does not appear to be any evidence that supports the Council’s assessment of the site as having limited landscape capacity, quite the opposite, the evidence base would suggest that the site has capacity for development.

Overall, Reside welcomes the positive summary provided within the SHELAA assessment, however, we cannot support the Council’s final assessment of the site on the basis of landscape impact, which is not supported by any evidence base and is contrary to the expert opinion of LDA in the enclosed LVA.

### The Sustainability Appraisal

The SA assesses the remaining 51 sites, sifted through the SHELAA process, the land west of King Business Centre is included within this pool of sites. The SA then distributes the sites into three categories based on the individual site appraisals, these are:

- Sites that perform well
- Sites that perform poorly (*these sites are discounted from the SA DPD process*)
- Marginal

There are 4 sites in Sayers Common that are assessed within the final palette of sites, Land north of Lyndon, Reeds Lane is assessed as a site that performs well and is identified for site allocation (Policy SA 30). Reside control the land north of Lyndon which is immediately adjacent to the land west of King Business Centre. Two small sites are rejected from further assessment.

Land west of King Business Centre is identified as a ‘marginal’ site, this is described as a site which *‘perform well individually (positives outweigh the negatives); however, they are not necessarily the most sustainable site within the settlement’*. This would suggest that sites are then discounted from the ‘sites that perform well category’ or from further consideration, simply because they are not the best site within that settlement. We submit that this pallet of remaining sites should have been considered in comparison with those in other settlements, which would have demonstrated, that the land west of Kings Business Centre, offers a more suitable development, connected with an existing site allocation, than those with access issues or on sensitive land such as that adjoining the South Downs National Park on within the High Weald AONB.

Furthermore, we have submitted that the Council have not properly considered the landscape impacts of development in this location, which is significantly less than other identified sites. Reside have submitted evidence demonstrating that the site can be

development sensitively with limited harm, particularly in light of the commercial uses nearby. If the Council updated their assessment to reflect this, it would have fallen within the 'sites that perform well' category and would have been allocated for housing. This would also have assisted in meeting the residual housing requirement for Category 3 settlements without pressure to release additional land on the edges of category 1 and category 2 settlements which are less suitable.

Notwithstanding the above, it is acknowledged that the sites that perform well would not provide a sufficient buffer against the residual housing requirement (paragraph 6.45) and as such, the SA suggests that additional supply should be taken from the 10 remaining 'marginal' sites, of which land west of Kings Business Centre is one.

Table 17 of the SA provides further analysis of the marginal sites, it should be noted that land to the west of King Business Centre, is the only site in a Category 3 settlement and could have been allocated to meet the residual housing need identified. Table 17 dismisses the remaining sites within category 2 settlements, but identifies 4 further 'marginal' sites on the edges of category 1 settlements, of these, 3 are allocated for development, however, these sites are on land close to, or adjoining, the boundary of the South Downs National Park and are visible from viewpoints within. Whilst we acknowledge that the Council have sought to direct any shortfall to higher order settlements, the Council should place significant weight on the protection of nationally designated sites, this would then have directed the Council towards other more suitable sites, such as the land west of Kings Business Park.

### Summary

Once the individual assessment of the land west of King Business Centre is revised to reflect the Council's own evidence base (ie. that there is medium capacity for development) and that of LDA (as enclosed) the site would move into the 'performs well' category, and would address most of the residual housing requirement identified for Category 3 Settlements and should therefore be allocated based on the Council's own methodology. However, even without revision to the categorisation of the site, there is a residual housing requirement for Category 3 settlements, and land at west of King Business Centre can come forwards, in conjunction with Policy SA 30 (land north of Lyndon), to deliver a cohesive and well masterplanned, extension to Sayers Common, with limited constraints to development. This would also relieve pressure on other more sensitive locations close to, or within, the South Downs National Park and High Weald AONB.

A site masterplan is enclosed, demonstrating how the site can deliver approximately 80-100 dwellings, providing a good range of small and medium dwelling sizes and associated open space. The site can also be masterplanned in accordance with the land north of Lyndon (Policy SA 30) to deliver a total of approximately 115-135 dwellings and associated formal and informal open space. Furthermore, Reside are committed to early delivery of the land

north of Lyndon (Policy SA30) and intend to bring forwards development at an early stage, the land west of Kings Business Centre could be brought forwards as part of that proposal, resulting in delivery of both proposals cumulatively within the first five year period.

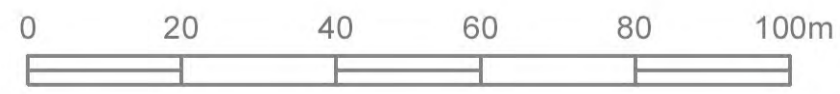
The Council's own evidence base, supplemented by the attached LVA, demonstrates that the site is unconstrained and capable of coming forward for development in the short term. Reside have control over both the land north of Lyndon, and land west of King Business Centre, and the delivery of both sites now, through the SA DPD, would enable a cohesive and properly masterplanned approach to development at Sayers Common, we therefore submit that the wider site should be identified, through Policy SA 30 for residential development of around 120-130 dwellings.

Yours faithfully



DMH Stallard LLP

- Enclosures    Site masterplan
- Site access plan
- LDA Landscape and Visual Appraisal



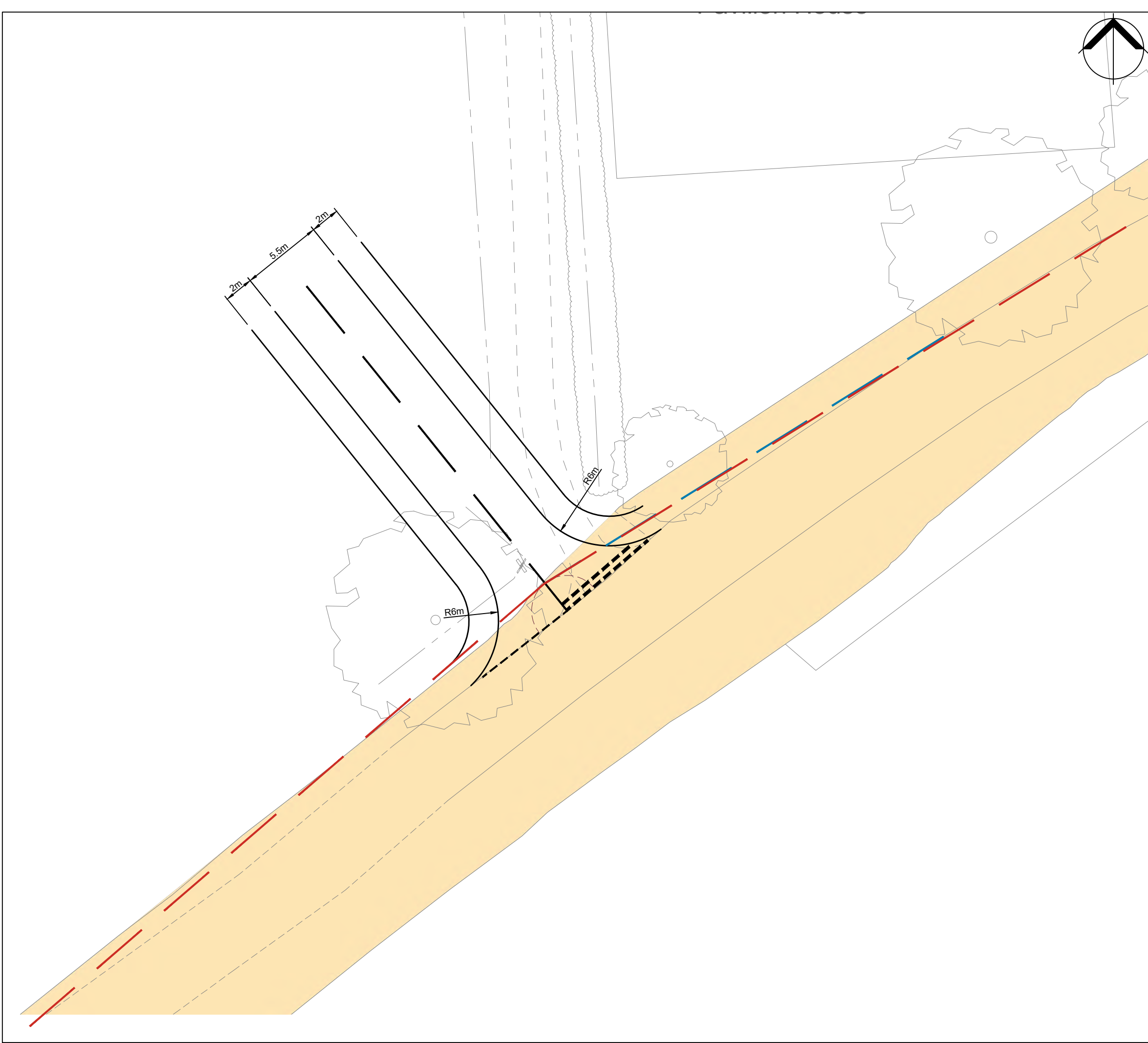
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 Job No: 1636 / W / 02  
 Date: November 2019

## Illustrative Masterplan - Residential Development: Western Land - Sayers Common

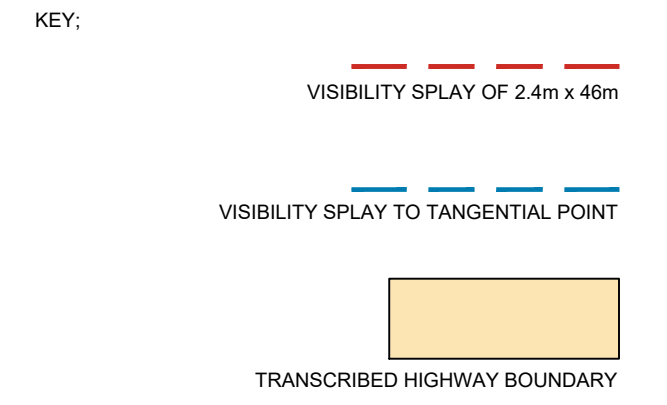
reside.



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 LAND AT REEDS LANE, SAYERS COMMON,  
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TITLE  
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# **Land to the West of Kings Business Centre Reeds Lane, Sayers Common**

Landscape and Visual Appraisal  
November 2019

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 Comment FINAL

*This document has been prepared and checked in accordance with ISO 9001:2015.*



## 1.0 Introduction

### 1.1 Scope of the Report

- 1.1.1. LDA Design was commissioned to carry out a landscape and visual appraisal (LVA) of the proposed residential development at the Land to the West of King Business Centre, Sayers Common on behalf of Reside Developments Ltd. The work has been completed by a small team of Chartered Landscape Architects.
- 1.1.2. This LVA forms part of the written representations submitted to Mid Sussex District Council in relation to the Regulation 18 consultation on the Draft Site Allocations Development Plan Document (DPD).

### 1.2 The Site

- 1.2.1. The Site is located to the west of Sayers Common, a village situated to the south-west of the district of Mid Sussex.
- 1.2.2. **Figure 1** places the Site in its immediate context, labelling key features within the vicinity of the Site, while **Figure 2** identifies the key policy and environmental context, including proposed and permitted sites for new housing, Public Rights of Way (PRoW) and other recreational routes.
- 1.2.3. The Site encompasses approximately 3.3ha of land that presently comprises a grazed field with scattered individual trees. The topography of the Site is relatively flat, falling marginally from east to west, and it is well-enclosed by mature vegetation.
- 1.2.4. The boundaries of the Site are predominantly delineated by a combination of woodland, trees and hedgerows, as follows:
- To the north, the Site boundary abuts Furze Field woodland, an area of mature woodland with some scrub.
  - To the east, the Site adjoins the western edge of Sayers Common. The Site directly abuts commercial units within the King Business Centre and lies adjacent to an overgrown parcel of land to the north of the Business Centre, which is proposed for a housing allocation of around 35 houses ('Land to the North of Lyndon, Reeds Lane').
  - To the south, the Site boundary runs alongside Reeds Lane and comprises a mature hedgerow with individual trees.
  - To the west, the Site boundary is marked by a tall hedgerow with mature trees that extends between Furze Field woodland and Reeds Lane.
- 1.2.5. Further to the west of the Site lies the existing commercial development of Valley Farm Business Park and Avtrade Global Headquarters. These are separated from the Site by an intervening rough grassland field and two field boundaries with dense hedgerows.
- 1.2.6. The village of Sayers Common itself centres around the two local roads – the B2118 and Reeds Lane. Sayers Common's older dwellings are generally strung out along these routes, with more recent cul-de-sac developments branching off the main routes.

- 1.2.7. An area of open land to the north-east of the Site – beyond the Land of the North of Lydon’ proposed housing allocation – has planning consent for a new residential development (Ref. DM/15/1467 and DM/19/1148), referred hereafter as ‘Kingland Laines’.

### 1.3. Approach to the Appraisal

- 1.3.1. The methodology used for this report is informed by best practice guidance including Natural England’s ‘*An Approach to Landscape Character Assessment*’ (2014), and ‘*Guidelines for Landscape and Visual Assessment*’ (GLVIA) (3rd Edition) (2013) produced by the Landscape Institute and Institute of Environmental Management and Assessment.
- 1.3.2. This report has been informed by desk-study, which has considered relevant planning policy and supplementary planning guidance (including landscape character assessments and capacity studies) pertinent to the Site.
- 1.3.3. This desk-study has been supported by fieldwork that has been undertaken to understand the landscape and visual environment of the Site and its surrounding context.
- 1.3.4. Photographs from key views within and around the Site are presented in the **Figure 3**, which is appended to this report.
- 1.3.5. For the purposes of the LVA, the term ‘landscape’ also encompasses ‘townscape’, and applies equally to the built-up area of Sayers Common and the surrounding countryside.
- 1.3.6. Desk and fieldwork have determined that the Site is visually well contained by surrounding vegetation and built development. As such, this LVA focuses primarily on an area of up approximately 500m from the Site boundary, which is judged to be sufficient to cover all potentially material landscape and visual impacts resulting from the proposed development.

### 1.4. The Structure

- 1.4.1. **Section 1** introduces the appraisal and outlines its scope.
- 1.4.2. **Section 2** presents extracts from adopted and relevant planning policy pertinent to this appraisal; considers local guidance documents and studies; and summarises field observations that has considered the visual environment of the Site and its context.
- 1.4.3. **Section 3** describes proposals and considers the potential landscape and visual effects of the proposed development.
- 1.4.4. **Section 4** sets out the conclusions of the appraisal.
- 1.4.5. The Figures referred to within this appraisal are provided at end of the report.

## 2.0 Baseline Conditions

### 2.1. Landscape Policy and Designations

- 2.1.1. The Site is situated within the administrative area of Mid Sussex District Council, with relevant policies contained within the ‘Mid Sussex District Plan 2014 – 2031’ (Adopted March 2018) and the ‘Hurstpierpoint and Sayers Common Neighbourhood Plan’ (Adopted March 2015).
- 2.1.2. A review of the District and Neighbourhood plan policies shows that there are a number of policies relevant to the landscape and visual context of the Site, which are summarised below.
- 2.1.3. No national or local landscape designations cover the Site or its immediate surroundings.
- 2.1.4. As shown on **Figure 2**, a ‘local gap’ (as defined by the Neighbourhood Plan) is located to the south-east of the Sayers Common, but does not encompass or adjoin the Site. There are various tracts of Ancient Woodland around Sayers Common, but these are typically to the south-east and are remote from the Site. The Site is crossed by a PRoW, which runs broadly east-west across the southern portion of the Site.

#### Mid Sussex District Plan 2014 – 2031

- **DP12: Protection and Enhancement of Countryside.**

*This policy states that, “...the countryside will be protected in recognition of its intrinsic character and beauty. Development will be permitted in the countryside, defined as the area outside of built-up area boundaries on the Policies Map, provided it maintains or where possible enhances the quality of the rural and landscape character of the District, and [...] it is supported by a specific policy reference either elsewhere in the Plan, a Development Plan Document or relevant Neighbourhood Plan.”*

- **DP13: Preventing Coalescence**

*This policy states that “...the individual towns and villages in the District each have their own unique characteristics. It is important that their separate identity is maintained. When travelling between settlements people should have a sense that they have left one before arriving at the next.”*

- **DP22: Rights of Way and other Recreational Routes**

*This policy states that “...rights of way, Sustrans national cycle routes and recreational routes will be protected by ensuring development does not result in the loss of or does not adversely affect a right of way or other recreational routes unless a new route is provided which is of at least an equivalent value and which does not sever important routes.*

- **DP26: Character and Design**

*This policy states that “...all development and surrounding spaces, including alterations and extensions to existing buildings and replacement dwellings, will be well designed and reflect the distinctive character of the towns and villages while being sensitive to the countryside.”*

- **DP37: Trees, Woodland and Hedgerows**

This policy states that “...the District Council will support the protection and enhancement of trees, woodland and hedgerows, and encourage new planting. In particular, ancient woodland and aged or veteran trees will be protected.”

### **Hurstpierpoint and Sayers Common Neighbourhood Plan**

- **Countryside Hurst Policy C1 – Conserving and enhancing character**

This policy states that “...development, including formal sports and recreation areas, will be permitted in the countryside, where:

- It comprises an appropriate countryside use;
- It maintains or where possible enhances the quality of the rural and landscape character of the Parish area;
- In the South Downs National Park, Policy Hurst C2 will take precedent.”

- **Countryside Hurst Policy C3 – Local Gaps and Preventing Coalescence**

This policy states that “...development will be permitted in the countryside provided that it does not individually or cumulatively result in coalescence and loss of separate identity of neighbouring settlements, and provided that it does not conflict with other Countryside policies in this Plan. Local Gaps between the following settlements define those areas covered by this policy:

- Hurstpierpoint and Hassocks;
- Sayers Common and Albourne;
- Hurstpierpoint and Albourne;
- Hurstpierpoint and Burgess Hill.”

## **2.2. Local Guidance Document and Studies**

- 2.2.1. The ‘**Mid Sussex District Landscape Capacity Study**’ (2007) examines the landscape capacity of the District to accommodate proposed development in areas identified by the draft ‘*Core Strategy 2006 – 2026*’ (subsequently replaced by the District Plan).
- 2.2.2. Landscape capacity was determined by considering the value and sensitivity of those LCAs – as defined by the ‘*Landscape Character Assessment for Mid Sussex*’ (2005) – which were most likely to be a focus for growth. This included ‘*LCA 62: Hickstead – Sayers Common Low Weald*’ within which Sayers Common falls. The study found that this area had ‘Low – Medium’ landscape capacity. There appears to be no definition for ‘Low – Medium’ but this implies there is potentially some potential for growth.
- 2.2.3. As this study was undertaken specifically in relation to development locations that were being considered in the draft Core Strategy, it did not cover all areas within the District. Therefore, the ‘**Capacity of Mid Sussex District to Accommodate Development**’ study

was completed in 2014, covering the entire District. This also reviewed the previously assessed areas against a slightly revised scale for landscape capacity.

- 2.2.4. The overall findings conclude that two-thirds of the District is covered by areas that are given the highest protection under national policy, such as the National Park and Area of Outstanding Natural Beauty, and only a small proportion of the District is not covered by any designated landscapes.
- 2.2.5. Landscape capacity is one factor used to inform judgements within this study, and it is identified that the Site falls within an area of 'Medium' capacity. This is defined as an area with *"potential for limited smaller-scale development to be located in some parts of the character area, so long as there is regard for existing features and sensitivities within the landscape"*.
- 2.2.6. The study goes on to geographically 'overlay' a variety of environmental constraints to identify which parts of the District are most constrained. Much of Sayers Common and the Site itself falls outside any identified area of constraints.
- 2.2.7. In both of these studies (2007 and 2014) it is noted that very broad areas are defined / assessed, and it seems likely that more detailed assessment of smaller parcels will be required to more accurately determine landscape capacity. It is also noted that relatively few areas are considered to have high / medium-high capacity to accommodate growth – this would suggest that it may be necessary to consider sites in areas of medium to low capacity.
- 2.2.8. The '**Settlement Sustainability Review**' (2015) seeks to understand the ability of existing settlements to support sustainable growth, and includes reference to environmental constraints. The study does not refer to any particular environmental constraints affecting Sayers Common, with the exception of pockets of Ancient Woodland to the south-east of the village, away from the Site.
- 2.2.9. The '**Site Allocation DPD**' (Regulation 18 Consultation Draft - 2019) presents the Council's draft housing allocation. 'Land to the North of Lyndon, Reeds Lane' (SA30) is a proposed allocation for up to 35 dwellings at Sayers Common.
- 2.2.10. A review of the analysis for 'Land to the North of Lyndon' (SA30) does not identify any particular landscape or other environmental constraints. The 'landscape considerations' section recommends the retention and enhancement of existing mature trees and hedgerows around the site; and the creation of new green space to help integrate the development into the landscape.
- 2.2.11. The '**Site Allocation DPD Sustainability Appraisal**' (2019) includes a review of all potential allocations at Sayers Common, including the Site itself (identified as 'Site D: Land to the West of King Business Park, Reeds Lane'). 'Site A: Furzeland' and 'Site B: Whitehorse' are discounted due to their small size and other constraints. 'Site C: Land to the North of Lyndon' and 'Site D: Land to the West of King Business Park' both perform similarly, with comparable opportunities or constraints.
- 2.2.12. The only difference between the performance of Sites C and D are the larger scale of Site D which is considered to result in a *"more negative impact on land use"*. As a result, Site C is put forward as a proposed allocation within the Site Allocations DPD and Site D is considered

to be 'marginal'. This is despite the fact that both sites are in 'Medium' areas of landscape capacity and with no known constraints (as identified by the 'Capacity of Mid Sussex District to Accommodate Development' study).

## 2.3. Existing Landscape Character

- 2.3.1. An assessment of Mid Sussex's landscape character is set out in the Supplementary Planning Document (SPD) 'A Landscape Character Assessment for Mid Sussex' (2005) (LCAMS), which maps areas of distinctive and relatively homogenous character within the district, identifying 7 Landscape Character Types (LCT).
- 2.3.2. From these areas, the LCAMS identifies 10 Landscape Character Areas (LCA), which are unique geographical areas containing a combination of intimately related LCTs. These LCAs have their own individual character and identity, even though it shares the same generic characteristics with LCTs in other areas.<sup>1</sup>
- 2.3.3. The Site therefore lies within the extent of the LCA 'Hickstead Low Weald', which is described as a "Lowland mixed arable and pastoral landscape with a strong hedgerow pattern. It lies over low ridges and clay vales drained by the upper Adur streams. In the east, the area has experienced high levels of development centred on Burgess Hill."
- 2.3.4. Its key characteristics are as follows [inter alia]:
- "Alternating west-east trending low ridges with sandstone beds and clay vales carrying long, sinuous upper Adur streams.
  - Views dominated by the steep downland scarp to the south and the High Weald fringes to the north. Arable and pastoral rural landscape, a mosaic of small and larger fields, scattered woodlands, shaws and hedgerows with hedgerow trees.
  - Quieter and more secluded, confined rural landscape to the west, much more development to the east, centred on Burgess Hill.
  - Biodiversity in woodland, meadowland, ponds and wetland.
  - Mix of farmsteads and hamlets favouring ridgeline locations, strung out along lanes.
  - Crossed by north-south roads including the A23 Trunk Road, with a rectilinear network of narrow rural lanes.
  - Varied traditional rural buildings built with diverse materials including timberframing, weatherboarding, Horsham Stone roofing and varieties of local brick and tile-hanging".
- 2.3.5. Fieldwork undertaken by LDA Design indicate that the Site and immediate surrounding landscape are not strongly reflective of the LCA's key characteristics.
- 2.3.6. Sayers Common occupies land that slopes up very gradually from the River Adur to the north. The relatively flat topography and pattern of field boundaries with mature

<sup>1</sup> The SPD states that this approach was adopted for the following reason: "1.18. The unpublished Landscape Character Assessment of West Sussex (2003) contained an analysis of landscape character types. Because of the complexity and fine grain of the West Sussex landscape, other than in the river valleys and the Low Weald, there was relatively little difference between the numbers of types and the numbers of areas. It was therefore considered unnecessary to carry out a further analysis of landscape character types in Mid Sussex District, relying instead on the typology created at County level."

vegetation provides a strong sense of enclosure, and the visual influence of the higher ground (South Downs National Park to the south and the High Weald Area of Outstanding Natural Beauty to the north) are not readily apparent.

- 2.3.7. Whilst the wider landscape to the west of Sayers Common (circa 1.5km to west, typically beyond High Cross) displays a mixture of farmsteads and hamlets with a strongly rural character, the landscape to the immediate west of Sayers Common is influenced by proximity to the urban area and north-south transport routes, comprising the A23 and B1128. This is also evident in the conversion of previous farmsteads (such as Valley Farm and Reed's Farm to the west of the site) into commercial development units.
- 2.3.8. However, the settlement form of Sayers Common is typical of the LCA, with built development 'strung out' along the B2118 and Reeds Lane. Reeds Lane itself is a typically rural lane, albeit its character has been influenced by the employment sites on the western edge of Sayers Common.

## 2.4. Existing Visual Amenity

- 2.4.1. Photopanel from key view within and around the Site are presented in the **Figure 3**.
- 2.4.2. Due to the relatively flat nature of the topography, presence of adjacent built development and enclosure by mature tall field boundary vegetation, views of the site are restricted.
- 2.4.3. The sizeable belt of mature woodland around Furze Field adjacent to the northern Site boundary strongly screens views of the Site from the north.
- 2.4.4. To the east, views of the Site are screened from within Sayers Common by intervening vegetation within and around the settlement edge, and existing built form, including the King Business Centre.
- 2.4.5. To the south, the dense hedgerow belt with mature trees that runs adjacent to the southern Site boundary along Reeds Lane strongly filters views from the road and helps enclose the Site. Glimpsed views into the Site are only available adjacent to the current access in the south-east corner of the site (**Viewpoint 1**), and from a gap in the vegetation in the south-west corner of the Site.
- 2.4.6. Views from the PRoW to the south of Reeds Lane / residential edge of Sayers Common are also heavily filtered by the vegetation along the south boundary (**Viewpoint 6**).
- 2.4.7. A PRoW passes through the Site, extending from Reeds Lane to Cobbs Barn north of Valley Farm Business Park. As illustrated by **Viewpoint 2**, there are currently open views from the footpath of the whole of the field.
- 2.4.8. To the west, views of the Site from along the PRoW in the adjacent field to the Valley Farm Business Park are strongly filtered by the dense hedgerow and belt of mature trees that runs along the western Site boundary (**Viewpoint 3**). From here, the Site appears against the backdrop of commercial buildings within the King Business Centre and residential houses on the edge of Sayers Common.

- 2.4.9. As illustrated by **Viewpoint 4**, taken near the entrance to Avtrade Global Headquarters, there are no open views into the Site from Reeds Lane to the west and only the southern boundary tree / hedgerow is visible.



### 3.0 Potential Landscape and Visual Effects

#### 3.1 Development Proposals

- 3.1.1. LDA Design has assessed the Site based on the principle of development at this location and without reference to detailed proposals.
- 3.1.2. It is understood that proposed development is for up to around 100 new dwellings and associated green space, and that the existing field access in the south-east corner of the Site would be utilised for access.
- 3.1.3. It is also understood that the opportunity also exists to establish vehicular and / or pedestrian and cycle routes to the proposed allocated site to the north-east ('Land to the North of Lyndon').

#### 3.2 Potential Effects on Landscape Character

- 3.2.1. The Site lies within the '*Hickstead Low Weald*' LCA but is weakly representative of wider landscape character with few shared key characteristics. Due to its location on the western edge of Sayers Common, and close to the Valley Farm Business Park and Avtrade Global Headquarters, it has a character more strongly influenced by the settlement fringe than the wider rural landscape. The relationship between the Site and settlement edge would be further strengthened with the potential development of 'Land to the North of Lyndon', on the adjoining land north of the King Business Centre.
- 3.2.2. In addition, as the Site and surrounding area is not subject to any statutory or non-statutory landscape, cultural heritage or ecological designations, the landscape value and sensitivity of the Site is likely to be relatively low.
- 3.2.3. Inevitably, there would be a wholesale change to the landscape character of the Site itself associated with the change of land use from agricultural to residential development. However, given the relatively small size of the Site and its strong degree of enclosure and containment, any effects on landscape character from the proposed development would be confined to the Site itself with no discernible effect on wider landscape character.
- 3.2.4. The most valuable elements of the Site are the mature boundary vegetation including the adjoining woodland in Furze Field, and mature trees and hedgerows along the western and southern boundaries. This established boundary vegetation would be retained and enhanced as part of the proposed development, and therefore effects on the landscape fabric of the Site would be limited. The proposed development also has the potential for some enhancement of the landscape fabric, with opportunities for new green space and planting.
- 3.2.5. There would no discernible change to the character of Reeds Lane / approach to Sayers Common from the west. The Valley Farm Business Park and Avtrade Global Headquarters has already diminished the rural character of this road and the proposed development would not be readily visible, set behind the retained and enhanced mature tree and hedgerow along the southern Site boundary.

- 3.2.6. The proposed development – when considered in conjunction with the proposed allocation ('Land to the North of Lyndon') and permitted development ('Kingland Laines') – is also considered to relate well to the existing pattern of development which follows the alignment of the B2118 and Reeds Lane. These developments would collectively create a new area of residential development that is contained from the wider landscape by Furze Field woodland and existing water courses to the north; the B2218 to the east; Reeds Lane to the south; and the Valley Farm Business Park and Avtrade Global Headquarters to the west.

### 3.3. Potential Visual Effects

- 3.3.1. The Site has a restricted visibility due to its strong visual enclosure and containment by mature boundary vegetation along its northern, western and southern boundaries, and built form associated with the King Business Centre and settlement edge of Sayers Common to the east.
- 3.3.2. The main visual effect would arise for users of the PRoW crossing the site, with development altering the nature of the view from an open agricultural field to residential development. However, sensitive treatment and / or realignment of the PRoW within the development layout has the potential to reduce the overall effect on the visual amenity of users.
- 3.3.3. The visual effects on users of the PRoW would also be confined to the relatively short stretch of this route within the Site itself; views from sections of PRoW to the west would be heavily filtered by the existing boundary hedgerow and trees (**Viewpoint 3**).
- 3.3.4. The existing roadside vegetation prevents open views into the Site from Reeds Lane (with the exception of glimpsed views from the south-eastern and south-western corners of the Site where there are gaps in the vegetation). At most, there will be filtered views of the proposed development through dense vegetation from along a short and localised stretch of Reeds Lane between the Valley Farm Business Park and Avtrade Global Headquarters Avtrade (west) and King Business Centre (east).
- 3.3.5. The opportunity exists to further reduce potential visual effects of the proposed development by setting back buildings from the southern Site boundary and undertaking additional planting to strengthen the existing hedgerow and tree belt.
- 3.3.6. View of the proposed development may also be visible from along a short section of the PRoW south of Reeds Lane and / or from along the residential edge of Sayers Common (**Viewpoint 5**), however the majority of views would be screened or otherwise heavily filtered by the southern boundary vegetation.
- 3.3.7. Due to its proximity adjacent to the eastern boundary, some views would be possible from within the King Business Centre, although users are not judged as particularly sensitive.
- 3.3.8. Views from the main buildings of Valley Farm Business Park and Avtrade Global Headquarters would be predominantly screened by the presence of a tall intervening warehouse building and boundary vegetation.

3.3.9. Views of proposed development from the wider countryside west of Sayers Common would be limited due to the relatively flat topography and mature field boundary vegetation.

**3.4. Recommendations for Development**

3.4.1. Based on the assessment of likely landscape and visual effects, the following recommendations are made in relation to the design of the proposed development:

- Retention and enhancement of boundary vegetation and providing a sufficient set back from retained trees to ensure the root protection zones are safeguarded.
- Incorporation of appropriate provision of green space, creating an attractive setting for the new development and opportunities for biodiversity, drainage and recreation.
- Ensuring that the development is set back from Reeds Lane in order to maintain the character of this route.
- Integrating the existing PRow that crosses the site into the layout of the development and / or establishing a suitable alternative alignment, and creating new links as part of proposed green space.
- Careful consideration of site levels and building heights to ensure that the proposed development sits well within the site / landscape and does not appear out of context with the existing development along the western edge (such as the Kings Hill Business Park).

**3.5. Policy Compliance**

3.5.1. In relation to the planning policy context, the proposed development responds as follows:

<b>POLICY</b>	<b>RESPONSE</b>
– DP12: Protection and Enhancement of Countryside – Countryside Hurst Policy C1 – Conserving and Enhancing Character	It is accepted that the Site falls outside of the built-up area boundary of Sayers Common and is not currently proposed as a site for development. However, the LVA concludes that the Site relates well to the existing settlement area; any landscape effects would be localised; and there would be no discernible effects on the wider surrounding countryside.
– DP13: Preventing Coalescence – Countryside Hurst Policy C3 – Local Gaps and Preventing Coalescence	The proposed development would not result in any coalescence with surrounding settlements and the site does not fall with a ‘local gap’ as defined by the Neighbourhood Plan.  There is also considered to be no coalescence with the existing employment area to the west of Sayers Common, with an intervening field separately these sites.

	In addition, there would no discernible change to the character of Reeds Lane / approach to Sayers Common from the west.
- DP22: Rights of Way and other Recreational Routes	The proposed development could be designed to incorporate the existing PRoW crossing the site. No other PRoW or recreational routes would be affected. The proposed development also provides an opportunity to create new publicly accessible green space.
- DP26: Character and Design	The proposed development would be designed to form an appropriate extension to Sayers Common. As concluded by the LVA, the Site relates well to the existing settlement area.
- DP37: Trees, Woodland and Hedgerows	The proposed development would be designed to retain and enhance the vast majority of existing trees and hedgerows along the Site boundaries. In addition, new tree and hedgerow planting would be incorporated into the scheme design where appropriate.

## 4.0 Summary

- 4.1.1. The Site is a rectilinear grass field located on the western edge of Sayers Common adjoining King Business Centre and the proposed housing allocation at Land to the north of Lyndon, Reeds Lane (SA30).
- 4.1.2. While the site does fall outside of the built-up area boundary (as defined by 'Mid Sussex District Plan 2014 – 2031'), a review of planning policy and local guidance documents reveals that the site and surrounding area are not covered by any landscape designations or other environmental constraints. In addition, there are no sensitive landscape features within the Site itself that constrain potential development.
- 4.1.3. Specifically, the site falls within an area of 'medium' landscape capacity (as defined by the 'Capacity of Mid Sussex District to Accommodate Development' 2014 study) where there is considered to be some potential for development.
- 4.1.4. According to the 'Mid Sussex Landscape Character Assessment' (2005), the Site falls into the '*Hickstead Low Weald*' LCA. However, the Site is weakly representative of the wider LCA and rural landscape due to its proximity to the settlement edge, and adjacent residential and commercial development. Visually, the Site is well-contained and benefits from good levels of screening due to its enclosure by mature boundary and peripheral vegetation.
- 4.1.5. It is understood that the Site could deliver up to approximately 100 new dwellings with associated green space. While development would inevitably alter the character of the Site itself due to the change from agricultural to residential use, any effects on wider landscape character would be localised. The main visual effect would be on a short section of PRow crossing the Site, and there would no discernible change to the character / views from Reeds Lane when approaching Sayers Common from the west.
- 4.1.6. The proposed development – when considered in conjunction with the proposed allocation ('Land to the North of Lyndon') and permitted development ('Kingland Laines') – is considered to relate well to the existing pattern of development, which follows the linear course of the two main roads through Sayers Common – the B2118 and Reeds Lane.
- 4.1.7. Overall, it is concluded that development within the Site could be accommodated without resulting in undue adverse effects on landscape character, views and the settlement form of Sayers Common.



LEGEND

 Site boundary

# LDĀDESIGN

PROJECT TITLE  
LAND TO THE WEST OF KINGS BUSINESS CENTRE  
REEDS LANE, SAYERS COMMON

DRAWING TITLE  
Figure 1:  
Site Location

ISSUED BY	Oxford	T: 01865 887 050
DATE	Nov 2019	DRAWN NA
SCALE @A3	1:5,000	CHECKED WBr
STATUS	Final	APPROVED PL

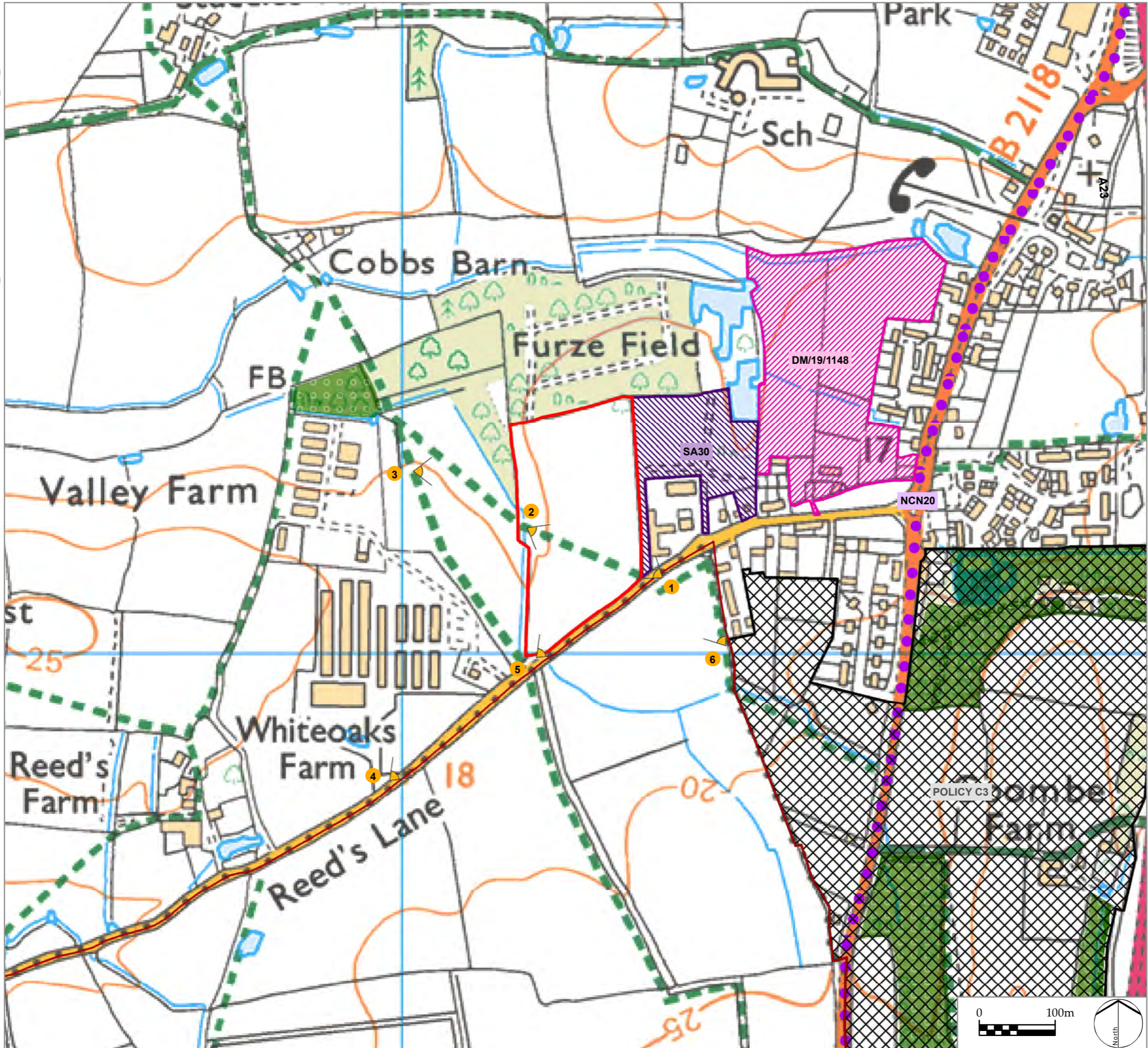
**DWG. NO. 7284\_001**

No dimensions are to be scaled from this drawing.  
All dimensions are to be checked on site.  
Area measurements for indicative purposes only.











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Sources: Ordnance Survey





LEGEND

-  Site boundary
-  Parish boundary
-  Consented Schemes<sup>1</sup>
-  Proposed Housing Sites<sup>2</sup>
-  Local Gap Prevention of Coalescence (Policy C3)<sup>3</sup>
-  National Cycle Network Route
-  Ancient Semi Natural Woodland
-  Footpath
-  Bridleway
-  Viewpoint location

NOTES

<sup>1</sup>Digitised by LDA Design (November 2019) from information available online on Mid Sussex District Council's 'Online Planning Register' - Planning Reference DM/19/1148  
<sup>2</sup>Digitised by LDA Design (November 2019) from information available online on Mid Sussex District Council's 'Development Planning Document Map'  
<sup>3</sup>Digitised by LDA Design (November 2019) from information contained in Hurstpierpoint and Sayers Common Neighbourhood Plan 'Parish 2031 - Neighbourhood Plan - Parish Proposals Map

# LDA DESIGN

PROJECT TITLE  
 LAND TO THE WEST OF KINGS BUSINESS CENTRE  
 REEDS LANE, SAYERS COMMON

DRAWING TITLE  
 Figure 2:  
 Local Policy and Environmental Context

ISSUED BY	Oxford	T: 01865 887 050
DATE	Nov 2019	DRAWN NA
SCALE @A3	1:5,000	CHECKED WBr
STATUS	Final	APPROVED PL

**DWG. NO. 7284\_002**

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X:\JOBS\7284\_Sayers Common\6docs\Report + Figures\7284\_003\_PP



Viewpoint 1: View northwest from Reeds Lane opposite Kings Business Park



Viewpoint 2: View southeast from public footpath (Ref. 1A1) along western site boundary

NB. Viewpoint Locations are shown on Figure 2

ISSUED BY	Oxford	t: 01865 887050	
DATE	November 2019	DRAWN	NA
SCALE@A3	NTS	CHECKED	WBr
STATUS	Final	APPROVED	PL

DWG. NO. 7284\_003.1

PROJECT TITLE  
 LAND TO THE WEST OF KINGS BUSINESS CENTRE  
 REEDS LANE, SAYERS COMMON

DRAWING TITLE  
 Figure 3.1:  
 Photograph Panels



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Viewpoint 3: View southeast from public footpath (Ref. 3AI) between the Site and Valley Farm to the west

v2018.0



Viewpoint 4: View east from Reeds Lane by entrance to Avtrade

NB. Viewpoint Locations are shown on Figure 2

ISSUED BY Oxford t: 01865 887050  
 DATE November 2019 DRAWN NA  
 SCALE@A3 NTS CHECKED WBr  
 STATUS Final APPROVED PL

DWG. NO. 7284\_003.2

PROJECT TITLE  
 LAND TO THE WEST OF KINGS BUSINESS CENTRE  
 REEDS LANE, SAYERS COMMON

DRAWING TITLE  
 Figure 3.2:  
 Photograph Panels

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Viewpoint 5: View east from Reeds Lane near southwest Site boundary

v2018.0



Viewpoint 6: View northwest from public footpath (Ref. 1\_1A1) south of Reeds Lane, on the western edge of Sayers Common

NB. Viewpoint Locations are shown on Figure 2

ISSUED BY	Oxford	t: 01865 887050	
DATE	November 2019	DRAWN	NA
SCALE@A3	NTS	CHECKED	WBr
STATUS	Final	APPROVED	PL

DWG. NO. 7284\_003.3

PROJECT TITLE  
 LAND TO THE WEST OF KINGS BUSINESS CENTRE  
 REEDS LANE, SAYERS COMMON

DRAWING TITLE  
 Figure 3.3:  
 Photograph Panels

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA11

**ID:** 743

**Response Ref:** Reg19/743/8

**Respondent:** Mr T Rodway

**Organisation:** Rodway Planning

**On Behalf Of:** Fairfax - various

**Category:** Developer

**Appear at Examination?** ✓

**From:** Tim Rodway | Rodway Planning <tim@rodwayplanning.co.uk>  
**Sent:** 28 September 2020 16:57  
**To:** ldfconsultation  
**Subject:** Reg 19 Representations - Site Allocations DPD Consultation  
**Attachments:** Reg 19 reps - Fairfax 280920.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Sir/Madam

On behalf of Fairfax Acquisitions Limited, please find attached our representations in respect of the above.

I would be grateful if these could be acknowledged.

Yours faithfully,

**TIM RODWAY**  
DIRECTOR / M +44 (0)7818 061220



**RODWAY PLANNING CONSULTANCY** / T +44 (0)1273 780 463 / [RODWAYPLANNING.CO.UK](http://RODWAYPLANNING.CO.UK)

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RODWAY PLANNING  
CONSULTANCY LIMITED

Planning Policy  
Mid Sussex District Council  
Oaklands  
Oaklands Road  
Haywards Heath  
West Sussex  
RH16 1SS  
**VIA EMAIL ONLY**

28<sup>th</sup> September 2020

Dear Sir/Madam

**Site Allocations DPD - Regulation 19 Consultation**

Rodway Planning Consultancy are instructed by our clients, Fairfax Acquisitions Limited, to continue to promote sites in their control for residential development purposes.

These representations relate to the following sites:

- **SHELAA Site Reference: 63 – Land north of Riseholme, Broad Street, Cuckfield**
- **SHELAA Site Reference: 207 – Land at Dirty Lane/Hammerwood Road, Ashurst Wood**
- **SHELAA Site Reference: 495 – Butchers Field, south of Street Lane, Ardingly**
- **SHELAA Site Reference: 568 – Middle Lodge, Lindfield Road, Ardingly**
- **SHELAA Site Reference: 573 – Batchelors Farm, Keymer Road, Burgess Hill**
- **SHELAA Site Reference: 634 – Land west of Dirty Lane, Ashurst Wood**
- **SHELAA Site Reference: 781 – Land to the south of Robyns Barn, Birchgrove Road, Horsted Keynes**
- **SHELAA Site Reference: 839 – Land at Hazeldene Farm, north of Orchard Way, Warninglid**

It will be noted that Fairfax are also promoting the sites at **Ansty Cross Garage, Ansty (SHELAA site ref: 644)**; and at **Woodfield House, Isaacs Lane, Burgess Hill (SHELAA site ref: 840)**

Both of these sites are included in the submission DPD as allocated sites (see *Policies SA33 and SA17 respectively*). We support the inclusion of these allocations.





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CONSULTANCY LIMITED

We have recently provided the Local Authority with a separate, and specific representation update in relation to the site at Ansty Cross Garage (our letter [and enclosures] dated 24<sup>th</sup> July 2020 refers), and we wish to make no further remarks at this stage in this respect.

With relation to Woodfield House, the Council will be aware that Outline planning permission has now been granted for a scheme of 30 dwellings on this site (application DM/19/3769 refers), and we will not be providing any further comments in respect of this site either.

---

We have had the opportunity to fully review the updated version of the DPD and the revised Sustainability Appraisal report. Accordingly, we wish to make the following comments in respect of the submission version of the Site Allocations DPD:

In summary, and on behalf of our clients, we continue to **object** to the DPD, and its omission of our client's other sites as allocations for future residential development. The detailed justification for our objection in respect of these sites is set out in our previous submissions, dated November 2019, in relation to the Regulation 18 public consultation. Essentially, we consider that the sites that are in our client's control to be suitable for residential redevelopment, and each merits inclusion within the Allocations DPD.

The submission version of the DPD is considered to be immaterially different from the previous Regulation 18 version of the plan, which was subject to public consultation in late 2019. It is understood that this consultation process elicited in excess of 1,300 responses from interested parties.

The Council will have assessed these responses and are required to have updated the DPD and its evidence base on this basis. It is understood that updated transport evidence accompanies the submission draft Site Allocations DPD to address comments made during the Reg 18 consultation. This includes a revised Strategic Transport Assessment (February 2020), prepared by transport consultants SYSTRA, with input from West Sussex County Council and Highways England.

However, the changes to the DPD appear to be negligible, with the main policies and allocations remaining almost identical to that set out within the Reg 18 version. The Reg 19 version has only minor amendments to policy wording (to add clarity or additional requirements to site policies). No new sites have been added, and all the previous proposed allocations remain. This is disappointing given the evidence we have previously provided relating to the suitability of our clients sites, and the flaws in the analysis work that underpins the allocation of some of the included sites (for example, the sites on land south of Burgess Hill).





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CONSULTANCY LIMITED

We note that the DPD seeks to meet the residual housing needs following adoption of the District Plan in 2018. The District Council advise that the residual figure is currently 1,280 units. The housing proposed to be allocated by the submission draft Site Allocations DPD is 1,764 dwellings, which represents an over-supply of 484 dwellings when compared with the residual requirement. Although any over-supply is welcomed, in order to provide resilience and flexibility, we strongly contend that the DPD does not go far enough in this respect. This therefore represents a missed opportunity to boost the supply of housing in the District over the coming years, thereby strengthening the District's currently marginal 5-year housing land supply position.

In this respect it is essential that the housing need context is considered. We note that the current District Plan requirement is 876 units per annum, rising to 1,090 units per annum after 2023/24 (Policy DP4 refers). However, the current standard method for calculating housing need is that a total of 1,114 dwellings should be provided in Mid Sussex each year, and if the Government's proposed new standard method is applied, this increases further to 1,305 units per year. Importantly, it is understood that the District's average delivery over the past 3 years has been just 760 dwellings per year.

Without taking the presented opportunity to allocate a significant level of housing now (in the DPD), there is a considerable, and tangible risk, that Mid Sussex will find itself with a significant housing shortfall in the coming years, which will bring with it social and economic implications, as well as the Development Plan policies relating to housing becoming out-of-date by virtue of Paragraph 11 of the NPPF. We urge the Inspector to reject the DPD as currently proposed.

When considering individual sites for allocation, we maintain our position that **ALL** of the Fairfax sites are suitable for residential development. We can confirm that these sites all remain available, sustainable and deliverable and should be allocated for residential redevelopment. The District Council's DPD provides the mechanism for acting on this positive recommendation.

As part of our previous submissions, we have demonstrated that development of the Fairfax sites would accord with the requirements of national planning policy, principally in that they would provide sustainable development without compromising the District's overarching development strategy, or adversely impacting on landscape quality and other matters of importance.

As currently submitted, we therefore do not consider that the submission version of the DPD is sound. We submit that the DPD should be revised so as to allocate sites that will deliver a significantly increased housing provision, so as to meet the housing needs of the District, when taking into account market signals, improve affordability, and help meet the unmet affordable housing needs of the District.





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CONSULTANCY LIMITED

This will require the allocation of further sites (including those promoted by our clients) for future residential development. This revised strategy would represent a more robust approach to meeting the District Council's significant need for new housing.

We would be grateful if we could continue to be informed of the DPDs progression, and be given the opportunity to make further written representations if or when possible. We would also like to confirm that we would like the opportunity to be present at any Examination Hearings, with a view to making verbal representations to the Planning Inspector if required.

Yours faithfully,



Tim Rodway  
Director

*c.c. Fairfax Acquisitions Limited*





746

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA11

**ID:** 746

**Response Ref:** Reg19/746/1

**Respondent:** Mr P Davis

**Organisation:** Turley

**On Behalf Of:** Crest

**Category:** Developer

**Appear at Examination?** x

**From:** Peter Davis <peter.davis@turley.co.uk>  
**Sent:** 28 September 2020 16:05  
**To:** Idfconsultation  
**Cc:** Tim Burden  
**Subject:** Mid Sussex Draft Site Allocations Reg 19 consultation - Turley on behalf of Crest Nicholson  
**Attachments:** Final Mid Sussex Reg 19 Site Allocation Reps with Appendix.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed  
**Categories:** TBC

Dear Sir / Madam,

Please find attached representations submitted by Turley on behalf of Crest Nicholson in response to Mid Sussex Draft Site Allocations Reg. 19 consultation regarding site at 'Land north of Old Wickham Lane, Haywards Heath'.

If you have any queries or require any further information, please do not hesitate to get in touch.

I look forward to confirmation that you have received the above.

Kind Regards

Peter

**Peter Davis**  
Assistant Planner

## Turley

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M 07917 461 432  
D 0118 902 2847

All Turley teams are now [remote working](#) wherever possible in line with Government guidance.

Our co-owners are contactable in the usual ways and we suggest using mobile numbers in the first instance. We are doing all we can to maintain client service during this challenging time.

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28 September 2020  
**Delivered by email**

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

Dear Sir / Madam,

## **REPRESENTATIONS TO MID SUSSEX SITE ALLOCATIONS DPD REG. 19 CONSULTATION**

On behalf of our client, Crest Nicholson, I am writing to provide formal representations in response to the current public consultation on the Mid Sussex Site Allocations Development Plan Document. These representations also take account of the associated evidence base. Consultation period on the SAPD closes on the 28<sup>th</sup> September 2020.

Crest Nicholson has an active land interest in land north of Old Wickham Lane, Haywards Heath (hereafter referred to as 'the site'). The site is directly contiguous with the existing built urban fabric of the town of Haywards Heath and represents a logical urban extension to the settlement in complete accordance with the adopted Spatial Strategy for Mid-Sussex.

The proposed site is a rectangular shaped and comprises of three parcels of flat, open grassland that are separated by a single line of trees between parcels. To the north of the site lies Haywards Heath Golf Course, with parcels of ancient woodland to north-west and north-east of the site at Stave's Copse and Birchen Wood respectively. To the south and east and south lies existing residential development of sub-urban density and semi-detached form. Located beyond the south-eastern boundary lies Grade II\* listed Wickham Farmhouse and Sunte House. The western boundary of the site abuts the railway tracks of the Brighton Main Line, with Haywards Heath railway station located in the town centre approximately 1 mile south of the site.

Crest Nicholson are pro-actively working with surrounding landowners and respective parties to assist in the delivery of the land north of Old Wickham Lane.

We strongly consider that our client's site can and should assist the Council to meet its housing land requirements, as well as facilitate the sustainable growth of the District's most sustainable settlements.

These representations respond to the Regulation 19 'submission draft' of the emerging Site Allocations Development Plan Document and the evidence base used to inform its production.

The Pinnacle  
20 Tudor Road  
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RG1 10118 902 2830  
turley.co.uk

## RESPONSE TO THE DRAFT SITE ALLOCATIONS DPD

The minimum housing requirement for the Mid Sussex District, including the agreed quantum of unmet housing need to be addressed within the district, is for at least 16,390 dwellings to be delivered in the plan period between 2014 and 2031. The adopted development plan sets out that delivery will be at an average of 876 dwellings per annum (dpa) until 2023/24. Thereafter an average of 1,090 dpa will be delivered between 2024/25 and 2030/31.

It is proposed that the 22 additional housing sites allocated within the Site Allocations DPD will deliver additional means to meet the outstanding requirement following the spatial distribution set out in the table below:

Settlement Category	Settlements	Minimum Required over Plan Period	Updated Minimum Residual Housing Figure	Site Allocations – Housing Supply
1 – Town	Burgess Hill East Grinstead Hayward’s Heath	10,653	706	1,409
2 – Larger Village (Local Service Centre)	Copthorne Crawley Down Cuckfield Hassocks and Keymer Hurstpierpoint Lindfield	3,005	198	105
3 – Medium Sized Village	Albourne Ardingly Balcombe Bolney Handcross Horsted Keynes Pease Pottage Sayers Common Scaynes Hill Sharpthorne Turners Hill West Hoathly	2,200	371	238
4 – Smaller Village	Ansty Staplefield Slaugham Twineham Warninglid	82	5	12

The proposed Site Allocations DPD continues to make allocations at lower tier settlements than Haywards Heath. Hayward Heath is widely recognised as a suitable and sustainable location to allocate additional growth, without the need to place undue pressures on lower Tier settlements in the District as the Council seeks to address its housing land supply for the remainder of the District Plan period.

From the table above, it appears that the Council continues to propose allocations at other Tier 3 settlements; including at Ardingly and Handcross for both 70 and 65 dwellings respectively. It is clear that neither of these settlements are located in such a strategically significant and important area proximate and accessible to a wide

range of facilities as found in the town of Haywards Heath. Further residential development in this location would allow prospective residents to make best use of the facilities and services available within the settlement without having to travel extensive distances, as would be necessary at other, lower tier settlements in less sustainable locations.

## **SITE ASSESSMENT**

This section of our representations provides an overview of the content and conclusions that have been drawn through the Sustainability Appraisal (SA) (July 2020) and in regard to Land North of Old Wickham's Lane (SHELAA Ref. 988), which ultimately have resulted in its omission as a proposed residential development allocation site.

We would note that even on the Council's own SA Assessment land north of Old Wickham's lane does not perform materially different to other allocations such as land at Rogers Farm and therefore we question why the site has not been included as a proposed allocation.

The recommendation not to allocate the site is provided in the Sustainability Appraisal and Site selection Proforma. The Sustainability appraisal provides a site specific SA scoring table and selected high level topic commentary in addition to identifying the following key issues that are considered to be applicable to the land north of Old Wickhams Lane. The key issues are the reasons given by the Council for not allocating the site and comprise (summarised):

- The site does not relate well to health facilities
- The north east corner intersects with a small area of ancient Woodland
- The site is adjacent to two Grade II\* listed buildings in Wickham Farm And Sunte House

We dispute these findings and consider the SA assessment scoring are not fully representative of the potential benefits of development in this location.

To demonstrate that the land north of Old Wickham's lane constitutes a sustainable location for development we have undertaken our own assessment against the same SA objectives used by the Council and set out or discrepancies below:

### ***Objective 4 – Health***

The Council score the site negatively with respect to "Objective – 4 Health", noting that the site is more than a 20 minute walk from health facilities. Crest would like to take this opportunity to highlight that the site is sustainably located within walking distance of the town centre of Haywards Heath whereby there is Nuffield Health Hospital approximately 0.5miles south of the site, approximately an 8 minute walk. To the east, Lindfield Medical Centre is identified is within a 25 minute walk from the eastern boundary of the site.

As noted in previous representations appended to this submission, Crest have control of the neighbouring site and this will facilitate vehicular and pedestrian movements through Gatesmead. The Council's assertion that the site should score negatively against this objective is impractical and a more pragmatic assessment of the site's accessibility to facilities through sustainable method s including walking and cycling should be considered. Crest therefore suggest that the site score evenly against this criteria.

### ***Objective 8 – Biodiversity***

The Council score the site negatively with regard to Sustainability "Objective 8 – Biodiversity", noting that the "site's north eastern corner intersects with a small area of the Birchen Wood ancient woodland including 15m buffer". As per previous representations, Mid Sussex District Council has previously approved development directly south of this parcel of ancient woodland, of which developments have taken account of this constraint and applied a 15m buffer. It can therefore been established that the future development of this Site can be designed so as to

take account of the ancient woodland and supplemented with a thorough landscape and planting strategy so as to ensure any built development is located outside of 15m in accordance with the adopted development plan. The site assessment should therefore score evenly against this objective.

### Objective 10 – Historic

The Council consider the site to have a severe negative score against “Objective 10 - Historic” due to the presence of two grade II\* listed buildings in Wickham Farm to the south-east and Sunte House to the south.

Crest consider that surrounding developments including on the adjacent site (reference DM/15/3415; DM/17/0839) where the impacts of development on the setting of listed heritage assets in the area have been successfully mitigated are evidence that this alone should not inhibit the allocation of this site for residential development. Furthermore, the site is well screened in all directions and views in to the site are limited by virtue of mature hedgerow and tree vegetation along the site’s boundaries. It is noted that the impact on listed buildings resulting from development is anticipated to have “less than substantial harm” on the listed building to the south of the site, however Crest remain confident that, by working alongside Conservation Officers, the site is capable of being planned in such a way as to fully take account of the proximity to the listed heritage assets into account and preserve and enhance their setting. The previously submitted illustrative site plan how development can be achieved on the site, with a ‘buffer zone’ allocated to the southern half of the site to increase the separation distances from the listed heritage assets to the proposed ‘built-up’ area of the site. It is expected that any future planning application be supported by a Heritage Impact Assessment so as to fully assess the impact of the development on the surrounding heritage assets, with a detailed landscaping and planting strategy so as to effectively screen views of the proposed development and mitigate the impact on the setting of listed heritage assets.

In light of the above, we would also ask the Council to revisit the SA scoring as set out in our Table below. Overall, this shows that Land North of Old Wickham’s Lane is more sustainable than a number of the proposed allocations, and therefore is a clear reasonable alternative which is in accordance with the spatial strategy and should be allocated.

Old Wickham Lane	Housing	Health	Education	Retail	Communities	Flood Risk	Land Use	Biodiversity	Countryside	Historic	Transport	Energy / Waste	Water	Regeneration	Employment	Econ. Growth
<b>Council</b>	+	-	+	+	+	0	-	-	0	--	?	?	?	++	+	+
<b>Turley</b>	+	0	+	+	+	0	-	0	0	-	?	?	?	++	+	+

## **SUMMARY**

Land North of Old Wickham Lane, Hayward Heath is considered to be directly contiguous with the existing built urban fabric of Haywards Heath and is a logical urban extension to the settlement in accordance with the adopted Spatial Strategy for Mid-Sussex.

As demonstrated through this submission, as well as Crest Nicholson's previous representations, the Site is largely unconstrained, with there being no overriding issues that would preclude the Site's allocation and subsequent development within 5 years of the adoption of the Mid Sussex Site Allocations DPD. The Site is located in a sustainable location in a Tier 1 Settlement and it is considered that technical considerations regarding landscape, ecology and heritage can be effectively mitigated following detailed assessment and subsequent design process to deliver a modest but valuable contribution to the vitality of the town by way of additional market and affordable dwellings.

I would be grateful if you would provide acknowledgment of receipt of these representations and would keep us informed of the LPA's progress. In the meantime, should you have any queries with regard to the above, please do not hesitate to contact me.

Yours sincerely

Peter Davis  
**Assistant Planner**

[Peter.Davis@turley.co.uk](mailto:Peter.Davis@turley.co.uk)

## **Appendix 1: Previous representations submitted by Turley on behalf of Crest Nicholson – November 2019**



**Representations to Mid Sussex Site  
Allocations DPD Reg. 19 Consultation**  
Land north of Old Wickham Lane, Haywards  
Heath

November 2019

**Turley**

# Contents

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## Contact

Tim Burden / Peter Davis

[Tim.Burden@turley.co.uk](mailto:Tim.Burden@turley.co.uk) / [peter.davis@turley.co.uk](mailto:peter.davis@turley.co.uk)

November 2019

# 1. Introduction

- 1.1 These representations have been prepared by Turley on behalf of Crest Nicholson, in respect of the Mid-Sussex District Council Site Allocations DPD ('SAPD'). The Consultation period on the SAPD closes on the 20th November 2019.
- 1.2 Crest Nicholson has an active land interest in land north of Old Wickham Lane, Haywards Heath (hereafter referred to as 'the Site'). The site is considered to be directly contiguous with the existing built urban fabric of Haywards Heath and is a logical urban extension to the settlement in accordance with the adopted Spatial Strategy for Mid-Sussex.
- 1.3 The proposed site is a rectangular shaped and currently comprises of three parcels of flat, open grassland that are separated by a line of trees between parcels. To the north of the site lies Haywards Heath Golf Course, beyond which lie parcels of ancient woodland to north-west and north-east of the site at Stave's Copse and Birchen Wood respectively. To the south and east and south lies existing residential development of sub-urban density and semi-detached form. Located beyond the south-eastern boundary lies Grade II\* listed Wickham Farmhouse and Sunte House. The western boundary of the site abuts the railway tracks of the Brighton Main Line.
- 1.4 Crest Nicholson are pro-actively working with surrounding landowners / parties to assist in the delivery of the land north of Old Wickham Lane.
- 1.5 These representations respond to the emerging Mid Sussex Site Allocations Development Plan Document and the evidence base used to inform its production. This will include highlighting issues yet to be addressed and inconsistencies with National and Local Planning Policy. This response focuses on matters pertinent to ensuring the emerging Development Plan Document grasps and facilitates housing opportunities at sustainable locations in the Borough.
- 1.6 We strongly consider that our client's site can and should assist the Council to meet its housing land requirements, as well as facilitate the future strategic expansion of Haywards Heath.

## **About Crest Nicholson**

- 1.7 Crest Nicholson is a leading developer of sustainable communities with an overarching purpose in becoming the market leader in the design and delivery of sustainable housing and mixed-use communities. Crest Nicholson's vision is to improve the quality of life for individuals and communities, both now and in the future, by providing better homes, work places, retail and leisure spaces within which they aspire to love, work and play.
- 1.8 Crest Nicholson have been delivering successfully in Mid Sussex for over 20 years. This breadth of work includes the high quality development at Bolnore Garden Village in Haywards Heath for approximate 1,300 new homes, as well as continued delivery of the mixed-use, sustainable residential neighbourhood at Kilnwood Vale, Faygate.

1.9 Crest Nicholson have also facilitated the delivery of the adjoining site to the east of that promoted through these representations at 'Land Parcel At 533329 125662, Birchen Lane, Haywards Heath'. This site is nearing completion.

## 2. Site and Surrounding Area

### The Site

- 2.1 Land north of Old Wickham Lane (hereafter referred to as 'the Site') is approximately 5.7 hectares in size and is located to the north of the town of Haywards Heath, adjacent to the existing edge of the settlements built development.
- 2.2 The site is a rectangular shaped parcel and currently comprises of flat, open grassland. The site is well-screened by mature tree and hedgerow vegetation that runs across the all of the site boundaries, which help restrict external views of the site.
- 2.3 The Government's flood risk map identifies that the majority of the Site is situated in Flood Zone 1, which is the lowest category of flood risk. It is acknowledged that the Scrase Stream runs in an east-west direction adjacent to the northern boundary, however this does not extend into the developable area of the site.
- 2.4 There are no conservation areas within or immediately surrounding the site. The nearest listed buildings to the site are lies Grade II\* listed Wickham Farmhouse, adjacent to the south eastern corner of the site and Sunte House, located further east of Wickham Farm. The site is capable of being planned in such a way as to fully take the proximity to the listed heritage assets into account and preserve and enhance its setting.
- 2.5 It is understood that the site lies within close proximity to parcels of ancient woodland to north-west and north-east of the site at Stave's Copse and Birchen Wood respectively. However, these are not considered to be a constraint to any future development and there are no other ecological constraints that would preclude the development of this site.
- 2.6 A review of the Natural England 'Agricultural Land Classification map - London and the South East' identifies the site as containing Grade 3 agricultural land (the subdivision between Grade 3a and 3b land is not shown on this plan). It is considered that this is an isolated pocket of Grade 3 land and, notwithstanding this, the neighbouring land uses permitted by Mid Sussex such as the golf course, and the Site's proximity to residential dwellings and the railway line to the west make this land unsuitable for agricultural use.
- 2.7 With regards to the landscape character, the site has no existing or proposed landscape designations. Crest Nicholson find it pertinent to note that the site is not located in the High Weald Area of Outstanding Natural Beauty. The 'Mid Sussex District SHLAA: Review of Landscape and Visual Aspects of Site Suitability' document identifies, at Paragraph 3.8 that *"the Haywards Heath area offers the highest potential yields at the lowest potential landscape 'cost'"*.
- 2.8 The site is located within Haywards Heath North Weald (LCA 45), however it is considered that any future residential development of this site would not have an effect of consequence on the landscape due to the proposed residential land use not being uncharacteristic of that currently present within the receiving landscape.

- 2.9 Any perceived visual or physical coalescence between Hayward Heath and settlements to the north by the development of this site is negated by the presence of extensive woodland cover to the north of the site, as well as the presence of Haywards Heath Golf Club which provides both a physical and visual barrier within the landscape to and from the site.
- 2.10 It is understood that the landscape and visual attributes of the landscape north of Haywards Heath have been examined through the appeal process (appeal reference **APP/D3830/W/15/3137838**) in relation to the land immediately east of that promoted by Crest Nicholson.
- 2.11 The Inspector stated that the *“this area was identified as one of the few sites in the district with a medium to high landscape capacity to accommodate new development without significant detrimental effects”* (Paragraph 49). Furthermore, it was considered that whilst *“there are some landscape views from the Hollow Way, the design anticipates suitable buffer planting which could mitigate against any harm from this direction”*, with the Inspector concluding, at Paragraph 105, that *“there was no evidence to show that the site should be assessed as a valued landscape under NPPF 109<sup>1</sup>”*.
- 2.12 In this context, it is reasonable to conclude that any future development of the promoted site can be accompanied by a detailed landscaping and planting strategy so as to effectively mitigate any landscape impact.
- 2.13 The presence of existing properties to the east of the site approved through planning application **DM/15/3415** and **DM/17/0839** act as urbanising influences on the landscape and should not preclude further development taking place in this location. Crest Nicholson consider this location more appropriate to accommodate development, in the highest order settlement.
- 2.14 New housing has been successfully provided within the area of Haywards Heath without any detriment to the physical and visual identity of the settlement. Furthermore, any perceived harm would be well contained by the existing landscape characteristics of the site and the potential for supplemental planting to be included in as part of any development proposal.
- 2.15 It is considered that any physical and visual association with Haywards Heath would assist in the long-term assimilation of the Site into the settlement, enabling new development to specifically identify with the characteristics and qualities of Haywards Heath. Utilising the existing characteristics, housing can be placed in the landscape without creating visual links and inter-visibility between settlements, thus retaining the separation and distinction and effectively ‘rounding off’ development along the northern perimeter of Haywards Heath. The presence of existing woodland will minimise visual impacts on the site from publicly accessible vantage points and provide substantial physical and visual containment.

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<sup>1</sup> National Planning Policy Framework (published 2012)

## **The Proposed Development**

- 2.16 Crest Nicholson would be willing to engage with the LPA to inform the quantum and nature of development proposed at this site. The nature of the site is such that the final proposals would be capable of accommodating around 60 dwellings at a density of approximately 32dph, whilst including an appropriate mix of house types and tenures as well as a varied network of open spaces and landscaping.
- 2.17 An indicative layout as to how this development can be achieved is shown in **Appendix 1** of these representations.

## **Site Access**

- 2.18 The site promoted by Crest Nicholson can be accessed from the east by the continuation of the access road approved as part of the planning application DM/17/0839 at Land Parcel At 533329 125662, Birchen Lane, Haywards Heath.
- 2.19 The neighbouring site is also under the control of Crest Nicholson. This is pertinent given that there will be no delivery constraints to the Land north of Old Wickham Lane and that suitable and safe access and egress to the site can be obtained. The existing and proposed road network will be situated more than 200m away from the parcel of ancient woodland to the north and thus this is not considered to be a constraint that should preclude the delivery of this site.
- 2.20 The site also benefits from being immediately adjacent to the Public Rights of Way (PRoW) network that runs along the eastern and southern borders of the site. This provides the potential to provide pedestrian and cycle access / egress between this site and the facilities and services available in Haywards Heath, adding to the sustainable nature of this site.

## **Wider Accessibility**

- 2.21 The site is well connected to the public transport network. The nearest railway station at Haywards Heath is a 12 minute walk away from the south of the site (0.6miles due south). Haywards Heath is situated on the Brighton Main Line route, with services to Brighton, Gatwick Airport and London Victoria and London St Pancras. Journeys into London take 40 minutes, with trips to Brighton taking approximately 20 minutes.
- 2.22 The closest bus stop is located along Sunte Avenue, approximately 700m away (7minute walk). The 30, 524 and STP1 bus routes all offer frequent services to the wide range of facilities around Haywards Heath, including but not limited to Warden Park School, Lindfield Common playing fields, Lindfield Primary Academy and a diverse range of shops and restaurants located within the town centre. These bus routes also provide the opportunity to access rail services from the site whilst utilising public transport services.
- 2.23 The site is within 1 mile of the town centre, including Haywards Heath train station. The nearest convenience store is about 800m away and there is a doctors' surgery, local hall, supermarket and leisure centre all located within approximately 1mile. There

also exist a number of community facilities, including schools within walking distance of the site.

- 2.24 The site is well positioned in relation to the existing road network, being located to approximately 5 miles from Burgess Hill (15minute drive) to the south, and approximately 10 miles (20minute drive) from the towns of Crawley and East Grinstead and the plethora of services and facilities available in these locations. The site is located 8miles from the M23, 20 miles from the M25 and approximately 30 miles from London by private car.
- 2.25 Crest Nicholson consider that the relationship of Haywards Heath to the surrounding town centres of Burgess Hill, East Grinstead and Crawley (and the myriad of facilities, employment opportunities and public transport connections these provides) sets it apart from other less sustainable settlements where development is being allocated.

### Surrounding Area

- 2.26 Haywards Heath is identified as a Tier 1 settlement in the recently adopted Mid Sussex District Plan (2014 – 2031) (MSDP), as recognition of its sustainability and capacity to accommodate additional growth. Tier 1 settlements are defined as:

*Settlement with a comprehensive range of employment, retail, health, education leisure services and facilities. These settlements will also benefit from good public transport provision and will act as a main service centre for the smaller settlements.*

- 2.27 The adopted MSDP Policies Map identifies the site as being located outside of, but adjacent to the settlement boundary of Haywards Heath as shown in Figure 1 below:

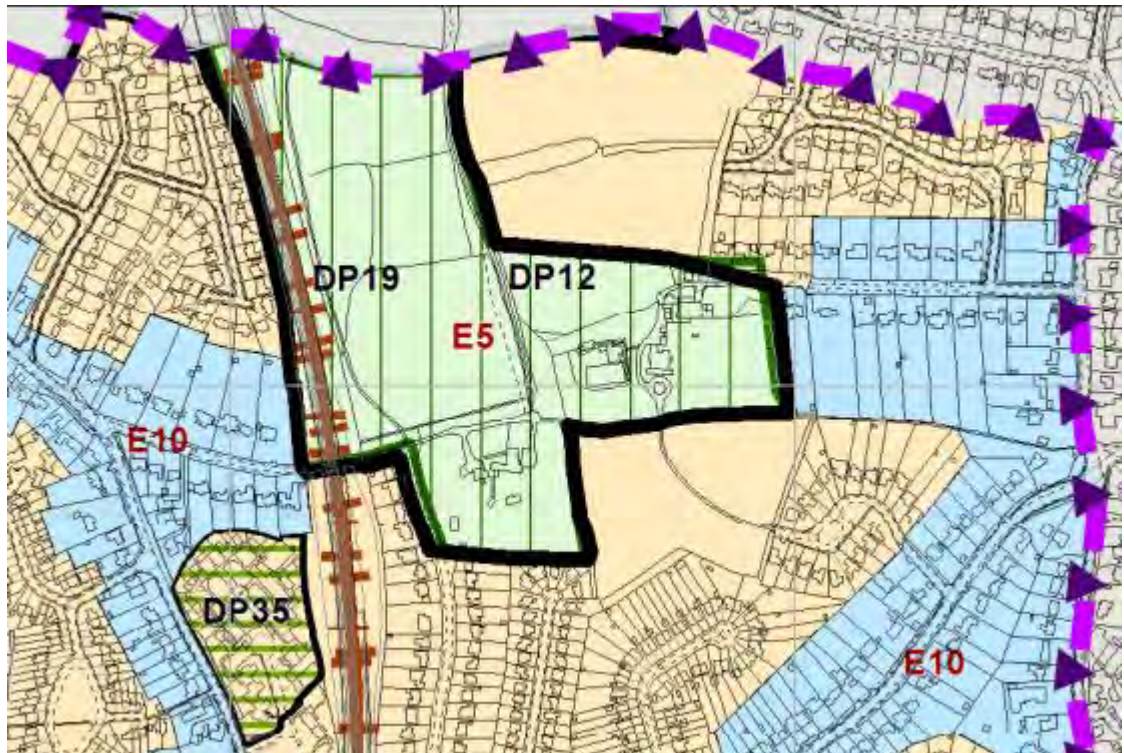


Figure 1 Extract from District Plan Policies Map (March 2018)



- 2.28 It is noted that the adopted Policies Map does not show recent development to the east of the site permitted under ref. DM/15/3415 (outline) and DM/17/0839 (reserved matters), nor the development approved at land south of Sunte House (app. ref DM/15/4862).
- 2.29 In any event, Crest Nicholson considers that the proposed Site adjoins the actual built up area of Haywards Heath and that the Policies Map should be updated to reflect recent developments at the settlement. The importance of this distinction and the perceived distance of the Site from the adopted built up area boundary to Haywards Heath is set out in detail in the following section of these representations.

### Site History

- 2.30 A review of Mid-Sussex online planning portal has identified that the site has the following planning history:
- **DM/19/1648:** Change of use of agricultural land for the keeping of horses, the erection of a stable block with associated hardstanding, fencing and access track. (Amended layout plan 27/06/2019). Under Consideration.
- 2.31 It is understood that this application is yet to be determined by Mid Sussex. Our client considers that this application would not have any future implications on the allocation and subsequent development of this site for future residential uses.

### Surrounding Development at Haywards Heath

- 2.32 A review of Mid-Sussex online planning portal has identified a number of recent applications in the immediate vicinity of the proposed site.
- 2.33 The neighbouring site has the following planning history:
- **14/00209/OUT** - Residential development of up to 48 dwellings with associated garaging, car parking, open space, landscaping and the formation of access roads. Revised information received 10th April 2014 in respect of Great Crested Newts (Revised Masterplan, Parameter Plan and Construction Environment Management Plan). *Withdrawn December 2014.*
  - **14/04475/OUT** - Residential development of up to 48 dwellings with associated garaging, car parking, open space, landscaping and the formation of access roads. *Refused March 2015.*
  - **DM/15/3415** - Outline application for the approval of access details for the residential development of up to 40 dwellings with associated garaging, car parking, open space, landscaping and the formation of access roads. *Refused October 2015 - Allowed on appeal by Secretary of State August 2016.*
  - **DM/17/0839** - Reserved Matters application for the approval of the appearance, landscaping, layout and scale pursuant to outline permission DM/15/3415 for residential development of up to 40 dwellings with associated garaging, car parking, open space, landscaping and the formation of access roads. Revised

plans and documents received 23, 26 and 29 June 2017. *Allowed September 2017.*

- 2.34 During the appeal for application **DM/15/3415** (reference **APP/D3830/W/15/3137838**) it was agreed with Mid Sussex District Council that the *“the site is in an accessible location where occupiers would have the opportunity to walk, cycle and use public transport, reducing their reliance on the private car”* (Paragraph 48 of the Inspectors Report).
- 2.35 There was unchallenged evidence as part of this appeal that the site relates well to the existing urban area and abuts existing housing in Brook Lane. The application also included a Section 106 contribution so as to improve the surrounding footpaths.
- 2.36 The Inspector concluded at paragraph 119, that the site *“is geographically quite well related to the urban area; abuts housing around Birchen Lane, Gatesmead, Roundabout Lane and Brook Lane; would be of a similar density to adjacent housing; and has reasonable access by foot and cycle”*. In addition to this, the Inspector found that *“the character of the landscape and its ecological value would be unharmed”*
- 2.37 In this context, any future development of the proposed site would be of low density so as to remain in-keeping with the character of the neighbouring housing, with sufficient space for landscaping and amenity areas so as to assimilate the development with the existing built fabric of Haywards Heath.
- 2.38 Crest Nicholson note that the site sits within an area designated as a ‘Green Corridor’ within Policy E5 of the Hayward Heath Neighbourhood Plan (2014 – 2031) (adopted December 2016) which identifies certain criteria to which development proposals in these areas will be assessed. Policy E5 states:
- The land outside the proposed built up area is designated as a local gap between Haywards Heath and neighbouring Town/Parishes, to create a landscape buffer that will support and enhance ecological connectivity, maintain the landscape character of the areas and individual settlements. New development outside the built up area will only be permitted if it:*
- *would not unduly erode the landscape character of the area or its ecology;*
  - *would not harm the setting of the town and;*
  - *would retain and enhance the separate identity of communities.*
- 2.39 The evidence base used to inform this policy includes the ‘Capacity of Mid Sussex District to accommodate development’ study prepared by LUC (published 2014). The site is located within Landscape Character Area 45 (Haywards Heath North Weald) with its landscape sensitivity being categorised as *‘slight’*, with *‘moderate’* landscape value.
- 2.40 With regard to the criteria listed in Policy E5 above, the landscape character of this area has been robustly assessed through the appeal process which identified that this area has no existing or proposed landscape designation. Furthermore, as aforementioned in these representations, this area is more suitable for development

than most potential sites in the district (Paragraph 105), with the Inspector concluding “*the character of the landscape and its ecological value would be unharmed*” by development in this location.

- 2.41 Therefore it is evident that further development in this location would not ‘*unduly erode the landscape character of the area or its ecology*’ and accords with this criterion of Policy E5. Any application for development of this site would be accompanied by a detailed landscaping and planting strategy so as to assimilate the development with the surrounding area of Haywards Heath and mitigate any potential impact on the landscape.
- 2.42 The second criterion of neighbourhood planning policy E5 states that new development outside of the built up area will only be permitted if it would not harm the setting of the town. In this context, the site represents a logical urban extension to the existing built up area of Haywards Heath. The site is bound to the west by the Brighton mainline railway and to the north by the presence of Haywards Heath Golf Course and abuts existing residential development to the east and north. Crest Nicholson consider this site to be in a highly sustainable location, in a Tier 1 settlement with good access to employment opportunities and community facilities by sustainable transport methods.
- 2.43 The third criterion of Policy E5 seeks to retain and enhance the separate identity of communities. In this instance, the closest settlements to the northern edge of Haywards Heath are the villages of Balcombe and Ardingly. The built up area of Balcombe is approximately 9km to the north west of the northern boundary of the site whilst the settlement edge of Ardingly is approximately 6.7km to the north east. Between both of these settlements are parcels in agricultural use which are intersected by extensive areas of woodland, most notably that to the north of Haywards Heath Golf Club that effectively screens this area of Haywards Heath. As a result, the proposed allocation and subsequent development of this site would retain and enhance the separate identity of communities, as required by criterion three of Policy E5, whilst effectively ‘rounding off’ development to the north of Haywards Heath as it would not extend the built up area of the town further north than development existing to the west, beyond the railway line, or to the east by the golf club.
- 2.44 It is therefore possible to conclude that the proposed allocation, and any subsequent development, of this site would not undermine the existing policy within the adopted neighbourhood plan. In fact, as demonstrated above, Crest Nicholson find that this site accords with all of the criteria stated within Policy E5.
- 2.45 Of course, the Local Plan will necessarily supersede the Neighbourhood Plan, and has a different role in the development plan and will necessarily supersede it.

### **Strategic Allocations at Haywards Heath**

- 2.46 Crest Nicholson find it pertinent to note that the Mid Sussex District Plan (‘MSDP’) failed to make any strategic allocations at Haywards Heath, despite it being identified as a Tier 1 settlement in the adopted Settlement Hierarchy (Policy DP6: Settlement Hierarchy).

- 2.47 The Settlement Sustainability Review was published in May 2015 and was used as part of a wider evidence base to inform the Mid Sussex District Plan. This document recognised Haywards Heath as one of three main towns in the district *“that benefit from a comprehensive range of employment, retail, health, education and leisure services and facilities and are the most sustainable settlements within Mid Sussex”*.
- 2.48 Furthermore the MSDP expects the delivery of a minimum of 2,511 additional residential dwellings at Haywards Heath across the Plan period. This greatly exceeds the identified requirement for Tier 2 and Tier 3 settlements. Despite this, Mid Sussex made strategic allocations within MSDP at lower tier settlements, such as a large scale allocation at Pease Pottage, a Tier 3 settlement, for 600 new dwellings and community facilities.
- 2.49 The following table is extracted from the MSDP and identifies how each settlement is categorised (Haywards Heath is in Tier 1) the minimum housing requirement expected at each settlement and various other matters including the minimum residual requirement taking commitments and completions into account. Our interpretation of the below table from the MSDP is that Haywards Heath continues to be one of the most sustainable settlements in the District, and should be a focus for additional development.

Cat.	Settlement	Minimum Requirement over Plan Period (Based on stepped trajectory)	Minimum Requirement to 2023/24 (Based on 876dpa)	Commitments / Completions <sup>3</sup> (as at April 1st 2017)	Minimum Residual from 2017 onwards (accounting for commitments and completions)
1	Burgess Hill	5,697	3,351	5,697	N/A
	East Grinstead	2,445	1,020	1,300	1,145
	Haywards Heath	2,511	1,403	2,385	127
2	Cuckfield	320	125	120	200
	Hassocks	882	519	882	N/A
	Hurstpierpoint	359	211	359	N/A
	Lindfield <sup>4</sup>	571	190	31	540
	Copthorne	437	228	388	49
	Crawley Down <sup>5</sup>	437	228	388	49
3	Albourne	57	21	16	41
	Ardingly	73	31	44	29
	Ashurst Wood	102	60	102	N/A
	Balcombe	79	34	49	30
	Bolney	113	48	64	49
	Handcross <sup>5</sup>	0	0	0	N/A
	Horsted Keynes	69	25	16	53
	Pease Pottage <sup>6</sup>	929	546	929	N/A
	Sayers Common	63	27	40	23
	Scaynes Hill <sup>4</sup>	462	272	462	N/A
	Turners Hill	167	71	96	71
	West Hoathly	43	21	36	8
	Sharpthorne	43	21	54	N/A
4	Ansty	54	32	54	N/A
	Staplefield	3	2	3	N/A
	Slaugham <sup>6</sup>	0	0	0	N/A
	Twineham	25	9	6	19
	Warninglid <sup>6</sup>	0	0	0	N/A
		15,940	8,496	13,501	2,439

<sup>3</sup>Commitments here defined as Allocations within the District Plan, Neighbourhood Plans, Small Scale Housing Allocations DPD (2008) and planning permissions.

<sup>4</sup>Note that Lindfield and Scaynes Hill (Lindfield Rural) are currently within the same Neighbourhood Plan area (the Lindfield and Lindfield Rural Neighbourhood Plan). A number of commitments/completions shown above at 'Scaynes Hill' are adjacent to the built-up-area of Lindfield.

<sup>5</sup>Note that Copthorne and Crawley Down form Worth parish, therefore these figures should be read in conjunction with one another.

<sup>6</sup>The required minimum provision at Pease Pottage (Slaugham Parish) is significantly greater than other settlements within Category 3 due to the allocation and subsequent permission granted for 600 homes within this settlement. Due to this, the other settlements within Slaugham Parish (Handcross, Slaugham and Warninglid) will not be required to identify further growth through the Plan process on top of windfall growth although may wish to do so to boost supply.

Figure 2 Extract of the Settlement Hierarchy within the adopted Mid Sussex District Plan

### 3. Representations to Mid-Sussex Site Allocations Development Plan Document

3.1 This section of these representations seeks to provide a critique of the evidence base used to inform the Site Allocations Development Plan Document (SADPD) and to provide specific comments on the SADPD itself.

3.2 The evidence base for the SADPD comprises of the following documents

- *Site Selection Paper 1: Assessment of Housing Sites against District Plan Strategy*
- *Site Selection Paper 2: Methodology for Site Selection*
- *Site Selection Paper 3: Housing*
- *Site Selection Paper 4: Employment*

#### Site Selection Paper 1

3.3 The Site Selection Paper 1 draws upon the results from the SHELAA and the methodology to this document comprises an assessment of whether a site conforms to the spatial strategy based on the following two criteria. If a site fails either one of these, it has been assessed as not being compliant with the District Plan strategy. The criteria are:

- **Connectivity with existing settlements**

*The criteria established to assess the degree of separation is based on a distance of 150m from the built up area boundary (as defined on the Policies Maps). 150m represents a distance that the Council considers differentiates between being connected or remote from existing settlements. This has been based on desktop and site assessments. However, there are a small minority of sites within 150m of the built up area which have been assessed as clearly detached from the settlement due to their access or constraints (such as ancient woodland) separating the site from the settlement.*

- **Size of the site in relation to the existing settlement hierarchy and indicative housing requirements for individual settlements**

*This criteria is set out in the supporting text to DP6. Whilst the Plan sets out a minimum residual requirement, the Site Allocations DPD should broadly follow the levels of growth set out in DP4. Therefore sites that deliver levels of growth, significantly beyond that required by the District Plan strategy, are not considered to be compliant with the strategy. DP4 states that a District Plan review will begin in 2021 with submission to the Secretary of State in 2023. It will be for this review to address any changes to the overall housing requirement (following a review of this figure based on the new Standard Method outlined in the NPPF), including unmet needs from neighbouring*

*authorities. This review will also be an opportunity to re-promote sites that do not conform to the current District Plan 2014- 2031 strategy and policies.*

- 3.4 The following text demonstrates how the site is, in fact, in compliance with the criteria described above and should be considered for residential development within the emerging Site Allocations Development Plan Document.

**Connectivity with existing settlements**

- 3.5 This criterion seeks to differentiate between sites which are connected to or remote from existing settlements. In this instance, the built up area boundary of Haywards Heath, as shown in Figure 1 above, does not take account of major residential development located outside of that boundary which has been approved and subsequently delivered at Haywards Heath (immediately east of the site). Notwithstanding this, Crest Nicholson note that the site promoted at land north of Old Wickham Lane is located within 150m of the existing built up area, as it abuts existing residential development within the settlement area along its southern boundary, and is only separated by the built up area by the presence of the railway line to the west. The adjoining development under construction to the east will result in further connectivity and assimilation with built form.
- 3.6 The Site promoted is located immediately adjacent to the existing settlement edge of Haywards Heath. Therefore it is reasonable to conclude that this site represents a logical urban extension to the existing built form of Haywards Heath when taking account of recent development which unaccounted for on the Council's Policies Map.
- 3.7 Any future development of this site can be complemented by a landscape scheme which provides additional screening from the north and protect existing views of the landscape and assimilates the site within the wider Haywards Heath area and would not affect to identity Haywards Heath and the considered physical and/or visual coalescence between neighbouring settlements.
- 3.8 The latter part of this criterion disqualifies sites that are *"clearly detached from the settlement due to their access or constraints (such as ancient woodland) separating the site from the settlement"*. The site promoted by Crest Nicholson is not 'clearly detached' from the settlement. As these representations demonstrate, the site lies adjacent to the existing urban area and there are various options for access to the site, including by sustainable transport methods.
- 3.9 Crest Nicholson would reiterate that the location of ancient woodland outside of the site boundary should not be considered a constraint that would preclude the site's allocation or its development. Mid Sussex District Council has previously approved development directly south of this parcel of ancient woodland, of which developments have taken account of this constraint and applied a 15m buffer. In fact, the parcel of ancient woodland to the north is located more than 200m away from the northern boundary of the proposed Site, and safe access and egress can be achieved without having detrimental impact on ecological and heritage assets.
- 3.10 Any future development of this Site will be designed so as to take account of the ancient woodland and supplemented with a thorough landscape and planting strategy

so as to ensure any built development is located outside of 15m in accordance with the adopted development plan.

- 3.11 Similarly, with regards to accessibility to the site, Crest Nicholson are confident that a range of access points can be achieved, including vehicular points to east, with cycle and pedestrian access allowing for sustainable routes through the south and potentially to the open space to the east.
- 3.12 Therefore it is reasonable to conclude that whilst not identified within the built up area of Haywards Heath, the proposed site relates well to the existing settlement, including adjoining residential developments.
- 3.13 In light of the above comments, we do not consider that the site promoted by Crest Nicholson can credibly be considered to fail the Council's first criterion regarding 'Connectivity with existing settlements'. In fact the site accords with that criterion.

**Size of the site in relation to the existing settlement hierarchy and indicative housing requirements for individual settlements**

- 3.14 The second criterion in the Stage 1 Assessment of Sites had regard to the *"Size of the site in relation to the existing settlement hierarchy and indicative housing requirements for individual settlements"*.
- 3.15 As previously identified within these representations, the adopted Development Plan identifies Hayward Heath as a Tier 1 settlement. The classification of such settlements as set out in the MSDP is outlined below:  
  
*"Settlement with a comprehensive range of employment, retail, health, education leisure services and facilities. These settlements will also benefit from good public transport provision and will act as a main service centre for the smaller settlements."*
- 3.16 In this context, Hayward Heath should be considered as a suitable and sustainable location to allocate additional growth, without the need to place undue pressures on lower Tier settlements in the District as the Council seeks to address its housing land supply for the remainder of the District Plan period.
- 3.17 Approximately 50% of the Mid Sussex District is located within the AONB, including the whole of the area adjacent to Crawley and much of the boundary with East Grinstead. Since Crawley is likely to have ongoing issues in terms of accommodating its own need, there is likely to be an ongoing expectation that part of Crawley's need should be accommodated in Mid Sussex District. It is therefore necessary to consider sites in or adjacent to the most sustainable settlements so as to protect the more 'open countryside' areas so as to best protect more 'valued landscapes' in the District.
- 3.18 Crest Nicholson highlight the inability of Mid Sussex to allocate additional land within, or adjacent to Haywards Heath as a continued flaw in recognising the important and strategic role that this area plays in accommodating development in a sustainable location. It has been demonstrated through these representations that the site being promoted at land north of Old Wickham Lane can further assist Mid Sussex District Council in providing residential development in a sustainable and accessible location.



Settlement Category	Settlement	Minimum Requirement over Plan Period (based on stepped trajectory)	Commitments and Completions (as at April 1st 2017)	Minimum Residual from 2017 onwards (accounting for commitments and completions)	Commitments and Completions (as at April 1st 2019)	Minimum Residual from 2019 onwards (accounting for commitments and completions)
		As set out in the District Plan 2014 - 2031			As updated in the Draft Sites DPD Consultation October 2019	
<b>1 - Town</b>	Burgess Hill	5,697	5,697	N/A	5,166	0
	East Grinstead	2,445	1,300	1,145	1,704	830
	Haywards Heath	2,511	2,385	127	2,592	10
<b>2 - Larger Village (Local Service Centre)</b>	Cuckfield	320	120	200	115	222
	Hassocks	882	882	N/A	958	0
	Hurstpierpoint	359	359	N/A	469	0
	Lindfield	571	31	540	622	0
	Copthorne	437	388	49	454	0
	Crawley Down	437	388	49	454	0
<b>3 - Medium Sized Village</b>	Albourne	57	16	41	21	39
	Ardingly	73	44	29	53	22
	Ashurst Wood	102	102	N/A	110	0
	Balcombe	79	49	30	60	23
	Bolney	113	64	49	74	43
	Handcross	0	0	N/A	0	0
	Horsted Keynes	69	16	53	20	53
	Pease Pottage	929	929	N/A	971	0
	Sayers Common	63	40	23	47	18
	Scaynes Hill	462	462	N/A	102	134
	Turners Hill	167	96	71	107	67
	West Hoathly	43	36	8	26	20
	Sharpthorne	43	54	8	26	20
<b>4 - Smaller Village</b>	Ansty	54	54	N/A	173	0
	Staplefield	3	3	N/A	9	0
	Slaugham	0	0	N/A	0	0
	Twineham	25	6	19	19	6
	Warninglid	0	0	N/A	0	0
<b>Totals</b>		<b>15,940</b>	<b>13,501</b>	<b>2,439</b>	<b>14,295</b>	<b>1,507</b>

Figure 3 Table showing minimum residual amount of development for each settlement (Draft Site Allocations DPD, November 2019)

- 3.19 The latter section of this criterion states that “sites that deliver levels of growth, significantly beyond that required by the District Plan strategy, are not considered to be compliant with the strategy.”
- 3.20 Crest Nicholson have significant concerns over the use of this criterion to identify additional development sites across the remainder of the plan period. In part this concern arises due to the fact that the requirements for specific settlements are expressed in the MSDP as being “minimum requirements”, rather than absolute

requirements. Figure 3 above is taken from the emerging Site Allocations DPD provides an updated position with regards to the minimum residual development within the plan period to that shown in Figure 2.

- 3.21 Paragraph 59 of the National Planning Policy Framework (2019) highlights the *“Government’s objectives of significantly boosting the supply of homes for development”*. In this context, that the potential that sites could deliver growth beyond that indicated in the District Plan for specific settlements should not be as a basis to disqualify them from assessment.
- 3.22 It is clear that by discounting sites which could ‘over deliver’ the requirement set out in the District Plan strategy would not provide any flexibility in order to help achieve the housing requirement across the plan period, nor reflect an approach which assisted in maintain the Council’s rolling five year housing land supply position across this period.
- 3.23 As a consequence, if the expected supply, particularly the large scale allocation at to the north and north-west of Burgess Hill (Policy DP9 of the adopted District Plan) for 3,500 additional dwellings, does not progress and deliver as expected then this could have very severe implications for the supply of housing in Mid Sussex District, compounding the overall supply and availability of dwellings across this plan period and beyond, should a Local Plan Review take place in 2021 as expected.
- 3.24 This criterion represents an unjustified approach as it expects the anticipated sources of supply to deliver both on time and the manner in which they are currently predicted whilst not taking account for potential shifts in the housing market.
- 3.25 Crest Nicholson find it pertinent to note that the SADPD proposes allocations for residential development at less sustainable settlements than that of Haywards Heath, namely at the Tier 2 settlement of Hassocks, the Tier 3 settlements of Ardingly and Handcross and the Tier 4 settlement of Ansty.
- 3.26 It is clear than none of those other settlements are located in such a strategically significant and important area proximate and accessible to the main urban area of Haywards Heath. The Settlement Sustainability Review (published 2015) has identified that Ardingly, Handcross, and Ansty are all without any banking facilities, direct access to a railway station, a secondary school and peak hours public transport service to significant employment opportunity.
- 3.27 In addition, Crest Nicholson are concerned that this approach to discounting sites on the basis that it could result in the ‘over delivery’ against the MSDP expectations could, by implication cause additional housing to be directed to less sustainable and accessible locations.
- 3.28 Crest Nicholson highlight that the SADPD does makes an over provision of housing at Hassocks, a Tier 2 settlement, for an additional 100 dwellings. A similar unjustified approach is taken at both Ardingly and Handcross for both 100 and 65 dwellings respectively, when compared to the requirement set out in the Mid Sussex District Plan.

- 3.29 The site at land north of Old Wickham Lane, Haywards Heath, represents a much greater opportunity for sustainable development at a Tier 1 settlement, being able to provide a greater variety of community services such as schools and leisure facilities than those in lower tier settlements, which is enhanced by the proximity to Haywards Heath railway station and onwards connectivity to other settlements within the district and the wider south east. Further residential development in this location would allow prospective and existing residents to make best use of the facilities and services available within the settlement and without having to travel extensive distances, as would be necessary at other settlements such as Ansty.

### **The Site Selection Paper 3**

- 3.30 The *Site Selection Paper 3: Housing – Appendix B: Housing Site Proformas* provides an evaluation of sites that progressed to this stage of assessment.
- 3.31 The pro-forma provides the following assessment for the proposed allocation (Policy SA21) at Rogers Farm, Fox Hill, Haywards Heath:
- “The site is at the southern perimeter of Haywards Heath and as such is likely to be more than a 20 minute walk to services and facilities. Additionally, there is a degree of landscape sensitivity by virtue of the site’s location at the entrance to the town and by the contribution it currently makes to the character of the southern approach. However, in the context of Haywards Heath being a Category 1 settlement and mindful of the existing development activity at the adjacent parcel of land it is considered that the site offers a sustainable location for growth on balance.”*
- 3.32 Crest Nicholson would like to take this opportunity to highlight that this site at Rogers Farm is in a less sustainable location to that being promoted through these representations by way of the travel distances to services and facilities available in Haywards Heath. As identified early, the Site is within walking distance of the town centre and railway station, whilst being closer still to other services such as convenience store.
- 3.33 The assessment of this site identified a degree of landscape sensitivity *“by virtue of the site’s location at the entrance to the town and by the contribution it currently makes to the character of the southern approach”*. Whilst it is acknowledged that the Site is of some landscape value, the Council’s own evidence base has identified that this area is more suitable to accommodate development, with any external views being mitigated by the presence of extensive woodland that surrounds the site and the urbanising presence of existing built development in this area.
- 3.34 In addition to this, the Site would not extend the built up area boundary of Haywards Heath beyond the existing northernmost extent as shown in Figure 1 above. Rather the allocation of this site will effectively see the rounding off the northern perimeter of Haywards Heath.
- 3.35 Crest Nicholson find it pertinent to reiterate the sites highly sustainable location with regards to its location to a plethora of facilities, services and employment opportunities within the Tier 1 settlement of Haywards Heath, and beyond, given its connectivity by public transport or by private car.

## 4. Conclusions

- 4.1 Land North of Old Wickham Lane, Hayward Heath is considered to be directly contiguous with the existing built urban fabric of Haywards Heath and is a logical urban extension to the settlement in accordance with the adopted Spatial Strategy for Mid-Sussex.
- 4.2 It has been shown that safe and suitable access to the Site can be achieved through the neighbouring residential development to the east. The deliverability of this access is not undermined by the presence of third party land as this site is also under the control of Crest Nicholson. With regards to the existing landscape character of the area, the site is well-screened on all sides, with any visual impact mitigated by its assimilation with the neighbouring land uses to the north of Haywards Heath.
- 4.3 As demonstrated in these representations, the District Council has adopted to pursue an approach allocates major development at less sustainable settlements to Haywards Heath, whilst also exceeding the minimum residual requirements at these settlements, including those which are also classed as Category 3 and 4 settlements and within settlements in the AONB. The Council has not provided any explanation as to why those 'minimum' requirements are not proposed to be exceeded at Haywards Heath.
- 4.4 As such, Crest Nicholson believe that the proposed Site Allocations DPD does not go far enough in establishing the most sustainable pattern of housing growth. The failure to allocate sites at Haywards Heath, shown to be one of the most sustainable location in the District to accommodate new homes, demonstrates how the Council are directing housing towards less sustainable settlements.
- 4.5 Crest Nicholson consider that Haywards Heath has clear spatial advantages in comparison to other settlements, including through the range of services and facilities, the public transport connections available and the proximity and accessibility of the large settlements of Crawley, East Grinstead and Burgess Hill.
- 4.6 In summary, Haywards Heath is one of the most sustainable settlements within the District and based upon the vision and objectives of the Local Plan, it is evident that the allocation of housing to this settlement would be a sustainable option for new development that would maintain and enhance its vitality and sustainability. As demonstrated through these representations, there are sites available at Haywards Heath, the settlement is sustainable (an impression the Council has suppressed), and the allocation and subsequent development at Land north of Old Wickham Lane can make a modest but valuable contribution to the vitality of the town by way of additional market and affordable dwellings.

## **Appendix 1: Indicative Layout**

- KEY**
- Site Boundary
  - 1 Development Area
  - 2 Main Vehicular Access
  - 3 Shared Surface
  - 4 Equipped Play Area
  - 5 Wild Flower & Meadow Area
  - 6 Buffer To Listed Buildings
  - 7 Sustainable Urban Drainage
  - 8 Linear Park / Buffer To Railway Line
  - 9 Informal Open Space
  - 10 Listed Buildings
  - 11 Retained Existing Trees
  - 12 Existing Public Rights of Way
  - 13 Proposed Footpaths
  - 14 Maintain Green Corridors
  - 14 Consented Scheme Providing Access



**CLIENT:**  
Crest

**PROJECT:**  
Haywards Heath, Mid Sussex

**DRAWING:**  
Framework Masterplan

**PROJECT NUMBER:**  
CRES3002

**DRAWING NUMBER:** 3000  
**CHECKED BY:** LA

**REVISION:** -  
**STATUS:** DRAFT

**DATE:** November 2019  
**SCALE:** 1:2,000

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**Turley**

747

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA11

**ID:** 747

**Response Ref:** Reg19/747/2

**Respondent:** Mr P Davis

**Organisation:** Turley

**On Behalf Of:** A2Dominion Horsham Road PP

**Category:** Developer

**Appear at Examination?** x



**From:** Peter Davis <peter.davis@turley.co.uk>  
**Sent:** 28 September 2020 16:10  
**To:** Idfconsultation  
**Cc:** David Murray-Cox  
**Subject:** Mid Sussex Draft Site Allocations Reg 19 consultation - Turley on behalf of A2 Dominion  
**Attachments:** A2Dom Final Mid Sussex Reg 19 Site Allocation Reps (003).pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed  
**Categories:** TBC

Dear Sir / Madam,

Please find attached representations submitted by Turley on behalf of A2Dominion in response to Mid Sussex Draft Site Allocations Reg. 19 consultation regarding site at 'Land the north of Horsham Road and west of Old Brighton Road North, Pease Pottage'.

If you have any queries or require any further information, please do not hesitate to get in touch.

I look forward to confirmation that you have received the above.

Kind Regards

Peter

**Peter Davis**  
Assistant Planner

## Turley

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All Turley teams are now [remote working](#) wherever possible in line with Government guidance.

Our co-owners are contactable in the usual ways and we suggest using mobile numbers in the first instance. We are doing all we can to maintain client service during this challenging time.

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28 September 2020  
**Delivered by email**

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

Dear Sir / Madam,

## **REPRESENTATIONS TO MID SUSSEX SITE ALLOCATIONS DPD REG. 19 CONSULTATION**

On behalf of our client, A2 Dominion, I am writing to provide formal representations in response to the current public consultation on the Mid Sussex Site Allocations Development Plan Document. These representations also take account of the associated evidence base.

A2 Dominion has an active land interest in land to the north of Horsham Road and west of Old Brighton Road North, Pease Pottage (hereafter referred to as 'the site'). The site is considered to be directly contiguous with the existing built urban fabric of Pease Pottage and is a logical urban extension to the settlement in accordance with the adopted Spatial Strategy for Mid-Sussex. A plan showing the location of that site is shown at Appendix 1.

The proposed site currently comprises of redundant golf course land, characterised by open grassland being located within the grounds of Cottessmore Golf and Country Club. The grounds of the Cottessmore Golf and Country Club continue to extend out to the west of the site. To the north lies an area of undeveloped land which is designated as a priority habitat, consisting mainly of tree and woodland vegetation, beyond which is the A264 and the town of Crawley. To the south and east lies existing residential development granted under references *DM/17/0747*; *DM/15/3772* and *12/02128* respectively. The south-eastern boundary abuts an area of ancient woodland. The site is located with the High Weald Area of Outstanding Natural Beauty, however the site is well-screened by mature tree and hedgerow vegetation that runs across all of the site boundaries, which help restrict external views of the site.

The site is well positioned in relation to the strategic road network that provides direct access to the local amenities including those in Crawley (including in the town centre). The M23 runs close to the east of the site running north and the A23 runs south. The A264 lies approximately 0.3 miles to the north of the site and runs west for approximately 5 miles to the town of Horsham and the A24. The site is located approximately 2 miles from the centre of Crawley, 5 miles to Horsham, and 17 miles to Brighton and 28 miles to central London. The nearest Airport is London Gatwick which is 8 miles to the north of the site and is a key driver of economic growth in the region.

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A2Dominion consider that the relationship of Pease Pottage to Crawley (and the myriad of facilities, employment opportunities and public transport connections that the town provides) sets it apart from other settlements, including the other Tier 3 villages, in Mid Sussex District.

A2Dominion are pro-actively working with surrounding landowners and respective parties to assist in the delivery of the north of Horsham Road and west of Old Brighton Road North, Pease Pottage.

We strongly consider that our client’s site can and should assist the Council to meet its housing land requirements, as well as facilitate the sustainable growth of the District’s most sustainable settlements.

These representations respond to the Regulation 19 ‘submission draft’ of the emerging Site Allocations Development Plan Document and the evidence base used to inform its production.

In summary, our concerns are that the Council has failed to assess the site properly as that assessment appears to be based upon a defined settlement edge to Pease Pottage, rather than the actual built extent of the village. In addition, we note that sites have been discounted from further assessment due to the size of the site in relation to the existing settlement hierarchy and indicative housing requirement for individual settlements. Whilst we understand that there has been growth at Pease Pottage, the site promoted by A2Dominion is smaller than those other allocations and in our view there is no disparity between the size of the proposal and the role of Pease Pottage in the settlement hierarchy.

We consider that if the site were properly considered, then it would be found to be in a sustainable location, consistent with the scale of development which has been directed to settlements such as Pease Pottage and consistent with the wider spatial planning considerations set out in this letter. In that case, the site should be considered a suitable, available and achievable site.

## RESPONSE TO THE DRAFT SITE ALLOCATIONS DPD

The minimum housing requirement for the Mid Sussex District, including the agreed quantum of unmet housing need to be addressed within the district, is for at least 16,390 dwellings to be delivered in the plan period between 2014 and 2031. The adopted development plan sets out that delivery will be at an average of 876 dwellings per annum (dpa) until 2023/24. Thereafter an average of 1,090 dpa will be delivered between 2024/25 and 2030/31.

It is proposed that the 22 additional housing sites allocated within the Site Allocations DPD will deliver additional means to meet the outstanding requirement following the spatial distribution set out in the table below:

Settlement Category	Settlements	Minimum Required over Plan Period	Updated Minimum Residual Housing Figure	Site Allocations – Housing Supply
1 – Town	Burgess Hill East Grinstead Hayward’s Heath	10,653	706	1,409
2 – Larger Village (Local Service Centre)	Copthorne Crawley Down Cuckfield Hassocks and Keymer Hurstpierpoint Lindfield	3,005	198	105

3 – Medium Sized Village	Albourne	2,200	371	238
	Ardingly Balcombe			
	Bolney			
	Handcross Horsted			
	Keynes Pease			
	Pottage Sayers			
	Common Scaynes			
	Hill Sharpthorne			
	Turners Hill			
West Hoathly				
4 – Smaller Village	Ansty	82	5	12
	Staplefield			
	Slaugham			
	Twineham			
	Warninglid			

The proposed Site Allocations DPD continues to make allocations at lower tier settlements than Pease Pottage and we maintain the view that the Council should make use of sites in more sustainable locations, particularly where they can serve wider cross-boundary issues such as the unmet need from Crawley, and locating new homes close to that very sustainable settlement. Pease Pottage is identified as a Tier 3 settlement in the recently adopted Mid Sussex District Plan (2014 – 2031) (MSDP). Tier 3 settlements are defined as:

*“Medium sized villages providing essential services for the needs of their own residents and immediate surrounding communities. Whilst more limited, these can include key services such as primary schools, shops, recreation and community facilities, often shared with neighbouring settlements”.*

It is strongly considered that Pease Pottage has clear spatial advantages in comparison to other settlements in the District. Accordingly, the allocation and subsequent delivery of this site could meet the needs of both Mid Sussex whilst also assisting the neighbouring authority of Crawley. This is of particular importance given the existing and proposed expansion of operations of Gatwick Airport, one of the main generators of economic growth and development with its influence in the Gatwick Diamond area (including the Local Authorities of Horsham, Brighton, Mid Sussex and Crawley respectively).

The recent strategic allocation at Pease Pottage demonstrate that Pease Pottage is widely recognised as a suitable and sustainable location to allocate additional growth, without the need to place undue pressures on lower Tier settlements in the District as the Council seeks to address its housing land supply for the remainder of the District Plan period. From the table above, it appears that the Council continues to propose allocations at other Tier 3 settlements; including at Ardingly and Handcross for both 70 and 65 dwellings respectively. It is clear that neither of these settlements are located in such a strategically significant and important area proximate and accessible to a wide range of facilities as found at Pease Pottage. Further residential development in this location would allow prospective residents to make best use of the facilities and services available within the settlement without having to travel extensive distances, as would be necessary at other, lower tier settlements in less sustainable locations.

A2Domnion would like to take this opportunity to reiterate that the site is well positioned relation to the strategic road network that provides direct access to the local amenities including those in Crawley (including in the town centre), with the M23 running to the east and the A23 directing traffic south towards Brighton and wider south coast. In addition, it is considered that the site is well connected to the public transport network with Crawley

railway located approximately 2 miles away with services to London, Brighton, Portsmouth and Southampton with opportunities for enhanced pedestrian and cycle network to and from Crawley and the local facilities and services, including at the strategic allocation at Pease Pottage.

## SITE ASSESSMENT

As noted in previous representations, the Site Allocations DPD evidence base draws upon the results from the SHELAA and a further two criteria to establish whether sites are compliant with the adopted District Plan Strategy:

- Connectivity with existing settlements
- Size of the site in relation to the existing settlement hierarchy and indicative housing requirement for individual settlements

It has been considered that north of Pease Pottage, West of Old Brighton Road, Pease Pottage does not meet one or both either of the aforementioned criteria, with the Council not providing an assessment as to why the site was not carried forward for further assessment.

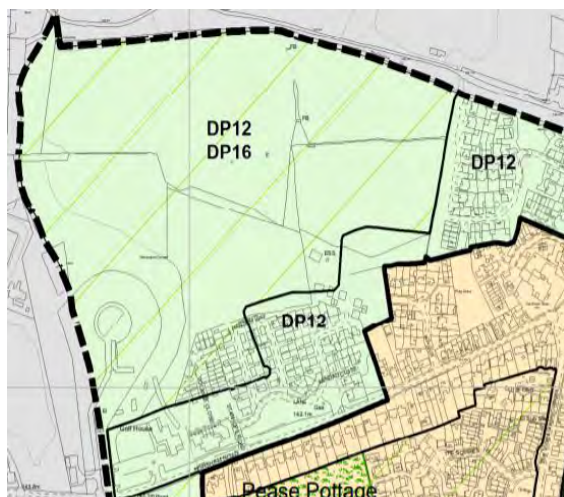
For this reasons set out in this letter

- The Council has failed to assess the site properly as that assessment appears to be based upon a defined settlement edge to Pease Pottage, rather than the actual built extent of the village.
- Sites have been discounted from further assessment due to the size of the site in relation to the existing settlement hierarchy and indicative housing requirement for individual settlements. Whilst we understand that there has been growth at Pease Pottage, the site promoted by A2Dominion is smaller than those other allocations and in our view there is no disparity between the size of the proposal and the role of Pease Pottage in the settlement hierarchy.

We consider that if the site were properly considered, then it would be found to be in a sustainable location, consistent with the scale of development which has been directed to settlements such as Pease Pottage and consistent with the wider spatial planning considerations set out in this letter.

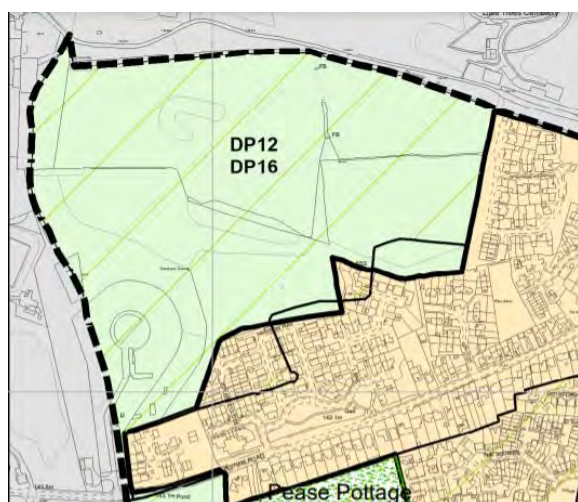
There is no specific housing requirement for settlements, and, as a consequence, no reason why sites such as this could not still be allocated through the emerging Site Allocations DPD.

The first criteria '*connectivity with exiting settlements*' seeks to assess the degree of separation is based on a distance of 150m from the built up area boundary (as defined on the Policies Maps). The adopted policy map is shown in Figure 1 below:



**Figure 1 Adopted Policy Map extract of Pease Pottage**

As noted in earlier representations, the existing policy map fails to take account of major residential development located outside of that boundary which has been approved and subsequently delivered at Pease Pottage. It is evident that these developments have altered the built form and edge of Pease Pottage, extending the settlement to the north and west beyond the built up area boundary as defined on the Policies Map. Accordingly, the emerging policy map (shown in Figure 2) demonstrates that the site which is the focus of these representations is clearly not detached from the settlement, with the site situated adjacent to the built up area boundary with various options for access to the site.



**Figure 2 Emerging Policy Map extract of Pease Pottage**

A2Dominion would reiterate that the location of ancient woodland outside of the site boundary should not be considered a constraint that would preclude the site's allocation or its development. Mid Sussex District Council has previously approved development to the east and south of this parcel of ancient woodland, of which both developments have taken account of this constraint and applied a 15m buffer. Any future development of this site will be designed so as to take account of the ancient woodland supplemented with a thorough landscape and planting strategy so as to ensure any built development is located outside of 15m in accordance with the adopted development plan.

Therefore it is reasonable to conclude that whilst not identified within the built up area of Pease Pottage, the proposed site relates well to the existing settlement, including adjoining residential developments. Thus the site

accords with the first criterion regarding ‘Connectivity with existing settlements’ and should be assessed as such within the Council’s evidence base.

The second criterion had regard “*Size of the site in relation to the existing settlement hierarchy and indicative housing requirements for individual settlements*”.

The strategic allocation of land to the East of Pease Pottage (‘the Strategic Allocation’) under Policy DP10 of the MSDP will see the addition of a further 600 dwellings, and community facilities including community buildings, primary school and associated café and retail facilities in the Pease Pottage area. Notwithstanding the site’s close proximity to the town of Crawley and the range of employment opportunities and community uses available through primary and secondary schools, leisure facilities, and travel connections to London and the wider south east, the strategic allocation of development to the east of Pease Pottage will alter the existing character of settlement from a medium sized village to one of a larger scale and capacity and with a greater range of services and facilities.

Approximately 50% of the Mid Sussex District is located within the AONB, including the whole of the area adjacent to Crawley and much of the boundary with East Grinstead. Since Crawley is likely to have ongoing issues in terms of accommodating its own need, there is likely to be an ongoing expectation that part of Crawley’s need should be accommodated in Mid Sussex District. In order to ensure that is accommodated in close proximity and/or is highly accessible to Crawley, that is likely to indicate a continuing requirement for growth in the AONB.

A2Dominion consider the strategic allocation of the land east of Pease Pottage for 600 dwellings reflects the important and strategic role that this area plays in accommodating development in a proximate and accessible location to Crawley. These and earlier representations consider that the site being promoted at land north of Horsham Road and west of Old Brighton Road North can further assist Mid Sussex District Council in providing residential development in a sustainable and accessible location.

Table 1 demonstrates that the SADPD proposes allocations at other Tier 3 settlements; however it is clear than none of those other settlements are located in such a strategically significant and important area proximate and accessible to the main urban area of Crawley. The site at Pease Pottage represents a much greater opportunity for sustainable development, being able to provide a greater variety of community services which is enhanced by the provision emerging from the strategic allocation, as well as the sites close proximity to the town of Crawley.

A2Dominion reiterate that this is an unjustified approach, as it is considered that the sustainability of Pease Pottage has been demonstrated, and will be enhanced by the existing allocation and of land east of Pease Pottage for approximately 600 additional dwellings, with accompanying community and retail facilities with additional open space. Further residential development in this location would allow prospective and existing residents to make best use of the facilities and services available within the settlement and nearby at Crawley without having to travel extensive distances, as would be necessary at other settlements such as Ansty.

A2Dominion consider that the Council’s misinterpretation of the evidence base and assessment methodology has led to a situation whereby this site has been discounted from further assessment without regard being given to the actual circumstances at the settlement. In this case, the site at Pease Pottage and subsequent assessments have not had regard to recent development and the fact that the built up area boundary of the village is out of date. This is recognised by the change in urban area boundaries on the emerging policy map that demonstrates how the site is a logical urban extension to the settlement of Pease Pottage that is contiguous with the pattern of built form that has been permitted. The Council’s evidence base and approach has resulted in the distribution of housing development to less sustainable settlements and has failed to have regard to the key spatial, sustainability and accessibility benefits which could be gained from focusing additional development at Pease Pottage in close proximity to the main urban area of Crawley.



## **WIDER STRATEGIC GROWTH**

A2Dominion are aware of ongoing Local Plan consultations in the neighbouring District of Horsham, who recently closed consultation on the Reg.18 Draft Local Plan on 30<sup>th</sup> March 2020. A2Dominion have actively sought to submit representations to the consultation on Horsham's emerging Local Plan, with a view to working constructively working with Officers to consider a wider site (crossing both Mid Sussex and Horsham's administrative boundaries) in a strategically important area in the Gatwick Diamond with strong transport links to the M23 and A23 so as to be accessible to those working at, or near to, Gatwick Airport which is accessible using public transport services through Crawley.

A2Dominion are open to working in partnership with Horsham District and Mid Sussex District Officers in relation to this site, given its strategic location straddling the Horsham/Mid Sussex boundary Horsham as it offers a significant opportunity to meet needs of Horsham and Mid Sussex Districts whilst also assisting the neighbouring authority of Crawley in meeting its own, unmet needs.

## **SUMMARY**

As demonstrated through this submission, as well as A2Dominion's previous representations, the site's strategic location offers significant benefits that would otherwise be unavailable in assist in meeting the increased housing needs of the District as well as neighbouring authorities, including through the range of services and facilities, which will be expanded through the Strategic Allocation, the public transport connections available and the proximity and accessibility of the settlement to Crawley including its ability to service Gatwick Airport and the employment opportunities available in the District and beyond.

I would be grateful if you would provide acknowledgment of receipt of these representations and would keep us informed of the LPA's progress. In the meantime, should you have any queries with regard to the above, please do not hesitate to contact me.

Yours sincerely

Peter Davis  
**Assistant Planner**

[Peter.Davis@turley.co.uk](mailto:Peter.Davis@turley.co.uk)

## Appendix 1: Site Location Plan



**NOTES**  
 This drawing is the copyright of Thrive Architects Ltd ©. All rights reserved.  
 Ordnance Survey Data © Crown Copyright. All rights reserved.  
 Licence No. 100007359. DO NOT scale from this drawing.  
 Contractors, Sub-contractors and suppliers are to check all relevant dimensions and levels of the site and building before commencing any shop drawings or building work. Any discrepancies should be recorded to the Architect.  
 Where applicable this drawing is to be read in conjunction with the Consultants' drawings.

REV	DESCRIPTION	DATE	AUTHOR	CHK'D
P1	Preliminary Issue	18/05/18	MB	VL

**KEY**

- Site Boundary
- Development Parcel
- Key Building Frontage
- Principal Vehicular Route Options
- Proposed Pedestrian / Cycle Route
- Roads / Streets / Private Drives
- Stream / SuDS
- ✳ Play Area
- ✳ Proposed Planting
- Existing Vegetation
- Ancient Woodland Buffer (15m)

**thrive.**  
architects

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**PROJECT**  
 Land North of Horsham Road  
 Pease Pottage  
 For: A2 Dominion

**DRAWING**  
 Concept Masterplan - 01

SCALE	DATE	AUTHOR	CHK'D
1:1000 @ A1	18/05/18	MB	VL
JOB NO.	DRAWING NO.	REV	
A2D0180326	CMP-01	P1	

748

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA11

**ID:** 748

**Response Ref:** Reg19/748/1

**Respondent:** Ms L Brook

**Organisation:** Sussex Wildlife Trust

**On Behalf Of:**

**Category:** Statutory Consultee

**Appear at Examination?** x

---

**From:** Brook, Laura <laurabrook@sussexwt.org.uk>  
**Sent:** 28 September 2020 11:42  
**To:** ldfconsultation  
**Subject:** Sussex Wildlife Trust response to the Mid Sussex Regulation 19 Consultation DPD Site Allocation. September 2020  
**Attachments:** SWT response - MSDC REGULATION 19 DPD Allocations Consulation Sep2020.pdf

Please find attached the Sussex Wildlife Trust response to the Mid Sussex Regulation 19 Consultation DPD Site Allocation. September 2020

Kind Regards

Laura Brook  
Conservation Officer  
Sussex Wildlife Trust  
*Regular Working Days Tuesday and Wednesday*



**Sussex**  
Wildlife Trust

[www.sussexwildlifetrust.org.uk](http://www.sussexwildlifetrust.org.uk)

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**Sussex**  
Wildlife Trust

Contact: Laura Brook  
E-mail: [swtconservation@sussexwt.org.uk](mailto:swtconservation@sussexwt.org.uk)  
Date: 28 September 20

**By email only**

[LDFconsultation@midsussex.gov.uk](mailto:LDFconsultation@midsussex.gov.uk)

**Mid Sussex District Council Submission Draft Site Allocations Development Plan Document (DPD) (Regulation 19 Consultation August – September 2020)**

---

The Sussex Wildlife Trust wish to submit the following comments to the Regulation 19 consultation for the - Mid Sussex District Council Submission Draft Site Allocations Development Plan Document (DPD)

**Overview comments - Site Allocations**

As stated in our Regulation 18 comments The Sussex Wildlife Trust (SWT) appreciates that the DPD site selection methodology led to the exclusion of sites that were likely to result in an impact on locally designated sites, as explained in figure 3.1 of the Site Selection Paper 3. This is very welcome and SWT considers this approach to be in line with the NPPF requirement to distinguish between the hierarchy of designated sites and allocate land with the least environmental or amenity value (paragraph 171). Local Wildlife Sites act as core areas within the district's ecological network and therefore should be maintained and enhanced.

That said, overall SWT is very concerned about the proportion of greenfield sites being allocated within the DPD, particularly given that no site specific ecological data appears to have been provided or considered in the site selection process.

The NPPF is clear that local authorities should make as much use as possible of previously developed land. However with over 60% of housing allocations obviously on greenfield, and another 18% appearing to contain some element of greenfield, SWT are particularly concerned

**SWT therefore does not believe that the DPD is consistent with national policy as it does not comply with paragraph 118 of the NPPF.**

In the Regulation 18 Consultation submitted by SWT, we highlighted that The NPPF is clear that plans and policies need to be justified – based on proportional and up-to date evidence (paragraphs 31 and 35). SWT acknowledge that we were given the opportunity in October 2018 to comment on a number of candidate sites which had the potential to impact on locally designated sites. In our letter to MSDC (dated 15/10/18) we stated that:

*'Should MSDC decide that SHELAA sites proceed to allocation within the DPD, SWT recommends that they are subject to up to date ecological surveys. This will enable MSDC to evaluate each allocation's suitability for delivering sustainable development, in line with the Mid Sussex Local Plan evidence base and in particular, policies 37 (Trees woodland and Hedgerow) and 38 (Biodiversity).'*

SWT note that all of the housing site allocation policies include requirements under 'Biodiversity and Green Infrastructure' which is welcome. However, these do not appear to be strategic in nature in terms of considering a robust evidence base. In particular, it appears that it is assumed that sites will be able to deliver both the number

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01273 492 630 | [enquiries@sussexwt.org.uk](mailto:enquiries@sussexwt.org.uk) | [sussexwildlifetrust.org.uk](http://sussexwildlifetrust.org.uk)

of dwellings allocated and net gains to biodiversity, when no evidence has been provided of the current biodiversity value or how this is likely to be impacted.

SWT is therefore disappointed that we are unable to identify any site-specific ecological evidence by this final round of consultation. Given the current uncertainty of the ecological value individually and cumulatively of the site allocations. **It is not clear how MSDC can ensure the net environmental gains will be delivered by the DPD as required by paragraphs 8, 32, 170 and 174 of the NPPF.**

### **Overview comments – Sustainability**

We also see no evidence that consideration has been given to the capacity for the district's natural capital to absorb this level and location of development. The NPPF is clear that delivering sustainable development means meeting the needs of the present without compromising the ability of future generations to meet their own needs. In achieving this, local planning authorities must pursue all three objectives; economic, social and environmental, in mutually supportive ways ensuring net gains across all three.

It is not clear that any of the greenfield sites allocated meet the environmental objective. In Particular, none of the allocated greenfield sites are considered to have a positive impact on any of the 8 environmental objectives within the Sustainability Appraisal (SA). Many have negative or unknown impacts, and for biodiversity it appears that only formal designations have been considered.

Although the lack of ecological information available makes it very hard for SWT to assess the potential impact of any of the site allocations or the assessment of their suitability against the SA objectives, we are particularly concerned about additional sites that are not considered to be sustainable, namely SA12 and SA13.

The addition of these two 'marginal' sites takes the number of units allocated within Category 1 settlements to 1409, this is 703 units above the minimum residual housing figure for Category 1 as demonstrated in *Table 2.4: Spatial Distribution of Housing Requirement*. If you take account of the undersupply for some of the other sized settlements, there is still a total oversupply of 484 dwellings as demonstrated in *Table 2.5 Sites DPD housing Allocations*. This oversupply is not justified within the DPD or supporting evidence base. Removing these 'marginal' sites will still result in the DPD that delivers more than the minimum housing requirement in the lifetime of the local plan. We note that again the impacts on biodiversity for these sites are listed as unknown in the SA simply because no site specific ecological information has been assessed.

**SWT asks MSDC to reduce the amount of greenfield land allocated within the DPD and consider the environmental capacity of the district in a more robust fashion. Any assessment of allocated sites should look at their individual, collective and multifunctional role in delivering connectivity and function for biodiversity. This would ensure the DPD reflects the requirements under sections 170 & 171 of the NPPF.**

### **SA GEN: General Principles for Site Allocations**

It appears that this policy has now been placed in the main body of the Draft Plan. SWT welcomes the inclusion of wording within this policy that recognises the importance of biodiversity informing planning applications. We also acknowledge that it highlights the importance of delivering biodiversity net gains through forthcoming development.

For clarity SWT would propose that there is an amendment to the wording relating to ecological information as we want to ensure that developers are aware that this information is required before validation/determination of the application, so earliest opportunity is not misunderstood as after permission has been approved.

SWT propose the following amendment to the first bullet point under the section references Biodiversity and Green Infrastructure (~~struck through~~ means a proposed deletion and **bolded text** references a proposed addition)

- Carry out **and submit** habitat and species surveys at the earliest opportunity in order **to inform the design and** ~~to~~ conserve important ecological assets from negative direct and indirect effects.

### **Comments for Site Allocations**

As stated previously, without more detailed ecological information for each of the allocated sites it is difficult for SWT to assess their suitability for development. However, we will make some site specific comments based on the aerial photographs and desktop information available to us.

**A lack of comments does not constitute support for the allocation.**

#### **SA12: Land South of 96 Folders Lane, Burgess Hill**

As stated under our general comments, SWT does not believe that the allocation of this greenfield site is justified. It is not required to deliver the overall minimum residual housing requirement or that required for Category 1 settlements and is not considered sustainable within the SA. We acknowledge that the number of the dwellings for the site has been reduced by 3, however the biodiversity impacts for this site are still listed as unknown as no site specific ecological information has been provided. The site appears to contain hedgerow and trees and is clearly connected to a wider network of linear habitats.

**SWT therefore does not believe that the Allocation is consistent with national policy as it does not comply with paragraph 171 of the NPPF.**

#### **SA13: Land East of Keymer Road and South of Folders Lane, Burgess Hill**

As with SA12, SWT objects to the allocation of this greenfield site. It is not justified by MSDC's own evidence base and does not represent sustainable development. Again the biodiversity impacts for this site are still listed as unknown as no site specific ecological information has been provided. However, the site appears to contain rough grassland, hedgerows and trees and is clearly connected to a wider network of linear habitats and ponds with potential for priority species.

**SWT therefore does not believe that the Allocation is consistent with national policy as it does not comply with paragraph 171 of the NPPF.**

#### **SA15: Land South of Southway, Burgess Hill**

SWT objects to the allocation of a designated Local Green Space for housing. This is not compliant with NPPF paragraph 101 which states that policies for managing development within Local Green Space should be consistent with those for Green Belts i.e. in line with the requirements of chapter 13 of the NPPF.

We do not believe that MSDC have justified the 'inappropriate construction of new buildings' within a local green space. In particular, the fact that this area of the LGS is 'overgrown and inaccessible' does not negate its value. The Burgess Hill Neighbourhood Plan states that this LGS is an important "green lung" for the west of Burgess Hill, a function which does not require accessibility. The NPPF is clear that LGSs should only be designated where they are demonstrably special. The Planning Inspector who examined the Burgess Hill Neighbourhood Plan clearly felt that this had been demonstrated and therefore the site should be protected.

**SWT therefore does not believe that the Allocation is consistent with national policy as it does not comply with paragraphs 99-101 of the NPPF.**



### **SA19: Land south of Crawley Down Road, Felbridge**

SWT is very concerned about this significant greenfield allocation given the lack of any baseline biodiversity data and its proximity to Hedgecourt Lake SSSI and The Birches ancient woodland. SWT would like to see much more evidence of the current value of the site, in particular in terms of ecosystem services delivery. There also needs to be further consideration of the cumulative impacts when combined with policy SA20.

**SWT therefore does not believe that the Allocation is consistent with national policy as it does not comply with paragraph 171 & 175 of the NPPF.**

### **SA20: Land south and west of Imberhorne Upper School, Imberhorne Lane, East Grinstead**

SWT commented on this allocation in our letter dated (dated 15/10/18) and stated that up to date ecological surveys should be conducted in order to assess the site's suitability for delivering sustainable development. It is disappointing that this information has not been provided. Without it we cannot assess the ability of this site to meet the environmental objectives required by the NPPF. We note that the allocation boundary appears to be amended from the Regulation 18 consultation and that a section of the Worth Way LWS, namely part of Imberhorne Cottage Shaw ancient woodland, appears to no longer be within the allocation. We would ask MSDC to inform SWT if this is not the case.

**SWT remain concerned that this Allocation is not consistent with national policy as it does not comply with paragraph 171 & 175 of the NPPF**

SWT note the policy requirements under Biodiversity and Green Infrastructure heading includes a bullet point which states:

*Potential impacts of the development on Hedgecourt Lake SSSI, which is accessible via existing PRoW to the north and the Worth Way LWS to the south should be understood and adequately mitigated.*

SWT propose the following amendment to this bullet point to ensure clarity of the importance of avoid within the mitigation hierarchy is fulfilled as per 175 of the NPPF (~~struck through~~ means a proposed deletion and **bolded text** references a proposed addition)

*Potential impacts of the development on Hedgecourt Lake SSSI, which is accessible via existing PRoW to the north and the Worth Way LWS to the south should be understood **so they can be avoided and if this is not possible adequately mitigated or, as a last resort, compensated for.***

## **DEVELOPMENT POLICIES**

### **SA35: Safeguarding of Land for delivery of Strategic Highways improvements**

SWT acknowledges that the Regulation 19 consultation now includes maps of the broad locations for the safeguarding, which did not appear to be present in the main body of the Regulation 18 draft DPD.

We note that the policy refers to how new development in the area of safeguarding should be carefully designed. Given that the NPPF encourages a net gain to biodiversity through development, we would expect the policy wording to reflect that biodiversity gains are design carefully into the development to ensure they are not compromised by future schemes. We therefore propose the following amendments to the policy wording to ensure that it complies with sections 170 & 171 of the NPPF.

SWT propose the following amendment to the Policy Wording (~~struck through~~ means a proposed deletion and **bolded text** references a proposed addition)

*'New Development in these areas should be carefully designed having regard to matters such as building layout, noise insulation, landscaping, the historic environment, **biodiversity net gains** and means of access.'*

### **SA36: Wivelsfield Railway Station**

While we support the integrated use of sustainable transport it is disappointing to see another area allocated as Local Green Space within a made Neighbourhood Plan being developed. As stated in our comments for policy SA15, the suitability of the LGS designation was assessed by a Planning Inspector and found sound. It should therefore be preserved through the DPD. SWT is particularly concerned as the Burgess Hill Neighbourhood Plan states that this Local Green Space is:

*'Land immediately west of Wivelsfield Station, north and south of Leylands Road: The land parcel is rich in birdlife and reflective of the historic field pattern. The Land is an important open space that is particularly well used by dog walkers.'*

Whilst it appears that not all of the LGS has been allocated for the upgrading of the station, we are not clear of the biodiversity value of the area that has been allocated. If MSDC are minded to retain the policy, SWT would like to see consideration of the compensation required for the loss of the LGS and in particular the rest of the LGS managed/enhanced in a way that benefits the assets lost.

**SWT therefore does not believe that the Development Policy is consistent with national policy as it does not comply with sections 99-101 of the NPPF.**

### **SA37: Burgess Hill /Haywards Heath Multifunctional Network**

SWT remain supportive of measures to embed multifunctional networks in delivering non-motorised sustainable transport options, but remain concerned at the level of uncertainty from this policy. We appreciate that the regulation 19 consultation now embeds a map within the main document, which provides an indication of safeguarded routes for the cycleway. As stated in our Regulation 18 comments the creation of a network could aid or hinder connection and function in the natural environment, therefore the policy should be clear in its intention. In particular, we are unclear how this route has been selected and what ecological information has been considered. Any impacts on biodiversity should be avoided through good design and particular consideration should be given to the value of sensitive linear habitats such as hedgerows. Lighting and increased recreational use both have the potential to harm biodiversity and must be considered at an early stage. It would not be appropriate to safeguard a route that has not yet been assessed in terms of potential biodiversity impacts.

Yours sincerely,

Laura Brook  
Conservation Officer  
Sussex Wildlife Trust

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## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA11

**ID:** 753  
**Response Ref:** Reg19/753/4  
**Respondent:** Mr J Pearson  
**Organisation:** Lewis and Co Planning  
**On Behalf Of:** Globe Homes  
**Category:** Promoter  
**Appear at Examination?** ✓



## Site Allocations Development Plan Document Regulation 19 Submission Draft Consultation Form

The District Council is seeking representations on the Submission Draft Site Allocations Development Plan Document, which supports the strategic framework for development in Mid Sussex until 2031.

The Site Allocations DPD, has four main aims, which are:

- i) to allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan;
- ii) to allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development;
- iii) to allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development, and
- iv) to set out additional Strategic Policies necessary to deliver sustainable development.

All comments submitted will be considered by a Planning Inspector, appointed by the Secretary of State, at a public examination to determine whether the plan is sound.

The Site Allocations DPD is available to view at:

[www.midsussex.gov.uk/planning-building/development-plan-documents/](http://www.midsussex.gov.uk/planning-building/development-plan-documents/)

A number of documents have been prepared to provide evidence for the Site Allocations DPD and these can be viewed on the Council's website at the above address.

Paper copies will also be at the Council offices (see address below) and your local library and available to view if the buildings are able to open during the consultation period.

**Please return to Mid Sussex District Council by midnight on 28<sup>th</sup> September 2020**

### How can I respond to this consultation?

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

[www.midsussex.gov.uk/planning-building/development-plan-documents/](http://www.midsussex.gov.uk/planning-building/development-plan-documents/)

The online form has been prepared following the guidelines and standard model form provided by the Planning Inspectorate. To enable the consultation responses to be processed efficiently, it would be helpful to submit a response using the online form, however, it is not necessary to do so. Consultation responses can also be submitted by:

**Post:** Mid Sussex District Council  
Planning Policy  
Oaklands Road  
Haywards Heath  
West Sussex  
RH16 1SS

**E-mail:** [LDFconsultation@midsussex.gov.uk](mailto:LDFconsultation@midsussex.gov.uk)

A guidance note accompanies this form and can be used to help fill this form in.

## Part A – Your Details (You only need to complete this once)

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### 1. Personal Details

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Joseph"/>
Last Name	<input type="text" value="Pearson"/>
Job Title (where relevant)	<input type="text" value="Senior Planning Consultant"/>
Organisation (where relevant)	<input type="text" value="Lewis &amp; Co Planning"/>
Respondent Ref. No. (if known)	<input type="text"/>
On behalf of (where relevant)	<input type="text" value="Globe Homes"/>
Address Line 1	<input type="text" value="2 Port Hall Road"/>
Line 2	<input type="text" value="Brighton"/>
Line 3	<input type="text"/>
Line 4	<input type="text"/>
Post Code	<input type="text" value="BN1 5PD"/>
Telephone Number	<input type="text" value="01273 413700"/>
E-mail Address	<input type="text" value="Joseph.pearson@lewisplanning.co.uk"/>



Information will only be used by Mid Sussex District Council and its employees in accordance with the Data Protection Act 1998. Mid Sussex District Council will not supply information to any other organisation or individual except to the extent permitted by the Data Protection Act and which is required or permitted by law in carrying out any of its proper functions.

The information gathered from this form will only be used for the purposes described and any personal details given will not be used for any other purpose.

## Part B – Your Comments

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You can find an explanation of the terms used in the guidance note. Please fill this part of the form out for each representation you make.

Name or Organisation:

Globe Homes

### 3a. Does your comment relate to:

Site Allocations DPD	<input checked="" type="checkbox"/>	Sustainability Appraisal	<input checked="" type="checkbox"/>	Habitats Regulations Assessment	<input type="checkbox"/>
Community Involvement Plan	<input type="checkbox"/>	Equalities Impact Assessment	<input type="checkbox"/>	Draft Policies Maps	<input type="checkbox"/>

### 3b. To which part does this representation relate?

Paragraph  Policy SA  10 + 11 Draft Policies Map

### 4. Do you consider the Site Allocations DPD is:

4a. In accordance with legal and procedural requirements; including the duty to cooperate. Yes  No

4b. Sound Yes  No

### 5. With regard to each test, do you consider the Plan to be sound or unsound:

	Sound	Unsound
(1) Positively prepared	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(2) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(3) Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**6a.** If you wish to support the legal compliance or soundness of the Plan, please use this box to set out your comments. If you selected 'No' to either part of question 4 please also complete question **6b**.

**6b.** Please give details of why you consider the Site Allocations DPD is not legally compliant or is unsound. Please be as precise as possible.

See supporting letter for full details. The assessments that inform allocations within the DPD are not accurate and result in the allocation of less sustainable sites for new residential development.

The DPD has not been positively prepared or justified and as a result is not effective or consistent with national policy as more suitable and sustainable development sites have been excluded without good reason.

**7.** Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The assessment of our client's site at land to the rear of 2 Hurst Road and to the west of London Road, Hassocks is inaccurate and the Sustainability Appraisal draws conclusions that are not supported by its methodology. Our client's site forms one of the most sustainable locations for new residential development and should be allocated accordingly.

See supporting letter for further details.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick below as appropriate)

**No**, I do not wish to participate at the oral examination

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Council have failed to accurately assess our client's site despite representations to them throughout the preparation process setting out the inaccuracies in their previous assessments.

It is therefore imperative that these assessments and the decision to allocate other sites within the DPD are closely scrutinised by the Inspector and we would be happy to participate in the oral part of the examination so these matters can be fully considered.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**10. Please notify me when:**

- (i) The Plan has been submitted for Examination
- (ii) The publication of the recommendations from the Examination
- (iii) The Site Allocations DPD is adopted

Signature:

Date:

**Thank you for taking time to respond to this consultation**



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

Sent by email only to: [LDFconsultation@midsussex.gov.uk](mailto:LDFconsultation@midsussex.gov.uk)

10<sup>th</sup> September 2020

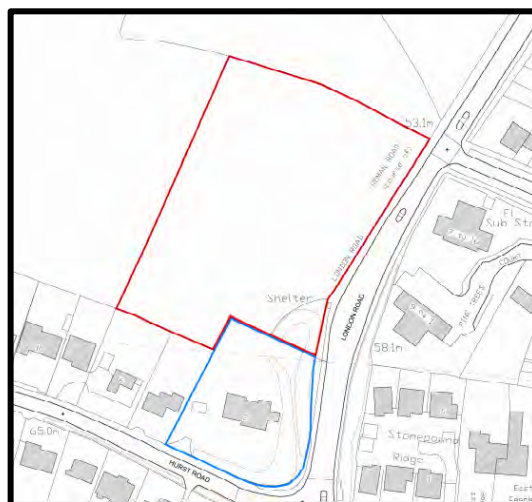
Dear Sir/Madam,

## Site Allocations DPD Consultation

Thank you for the opportunity to comment on the Site Allocations Development Plan Document. We write to you on behalf of Globe Homes who are promoting a site comprised of land to the rear of 2 Hurst Road and to the west of London Road.

These comments follow our earlier representations on the Regulation 18 (Issues and Options) Consultation for this Development Plan Document (attached at Appendix A).

Site ownership is shared with the Clayton with Keymer Parochial Church Council (PCC) who own the north-eastern part of the site. The PCC are also promoting the site and support a residential allocation of the whole site.



*Site Location Plan*

## **Summary**

The assessments that inform the allocations within the proposed submission Site Allocations DPD do not accurately reflect the merits of our client's site and lead to decisions to allocate less sustainable sites for new residential development contrary to national policy and guidance. For example:

- The rationale applied to our client's site contradicts assessments on other allocated sites and leads to unjustified and inconsistent conclusions
- The sustainability appraisal draws conclusions that are not supported by its methodology
- The scoring for our client's site (within the sustainability appraisal) gives neutral scores to clear positive benefits, which would show our client's site as a more sustainable location for development than other allocated sites

We consider that the proposed submission documents fail to meet the legal requirements for the Sustainability Appraisal and the tests of soundness in terms of the Site Allocations DPD's justification, effectiveness and consistency with national policy.

## **Site Description**

Our client's site is located within Hassocks in the south of the District and lies at the rear of 2 Hurst Road, to the west of London Road. Hassocks is a category 2 settlement with a wide range of services and railway station.

Land at the rear of 2 Hurst Road is the most sustainable site within Hassocks for new residential development and performs significantly better in terms of sustainable development objectives than the majority of site allocations within the DPD. The site is within 500m of the train station and village centre, under 15mins (1.2km) walking distance from three schools (Hassocks Infants School, Downlands Community School and Windmills Junior School) and 950m from the village Health Centre.

The site is referred to in the Site Selection paper as '*Land opposite Stanford Avenue, London Road, Hassocks*' (SHLAA Reference 210). The site has been identified as suitable, available and achievable for residential development. Ongoing transport and archaeology work shows that any potential adverse impacts can be appropriately mitigated or avoided entirely. The site scores very favourably against most of the identified environmental criteria. The site also adjoins a recent development (to the north) and its development would help create a new defensible western boundary to the settlement.

The site is unaffected by flood risk, would not affect any designated heritage assets, ancient woodland, SSSIs, local nature reserves, or other notable constraints. The District Council's arboricultural experts have concluded that any adverse impacts on TPO trees within and surrounding the site can be avoided or appropriate mitigated.

Close attention has been given to the access arrangements for the site to ensure that any development of the site would not result in severe impacts to the highway network, particularly given the close proximity of the nearby junction. Off-site highway works have been identified by our client's appointed highway consultant and further work is being undertaken to fully address advice from West Sussex County Council.



*Outline plan showing how 25 homes could feasibly be accommodated within the site (alongside the new Barratt Homes development to the north)<sup>1</sup>*

Proposals for 25 new homes on the site were refused in 2018 due to the location of the site outside (but adjoining) the defined built-up area boundary. The Site Selection Paper considers the site to have a potential housing yield of 45 new units. The site can therefore accommodate a significant development that would provide clear benefits to the parish and deliver much needed new homes.

Our client and the District Council (through their SHELAA process) are in agreement that between 25 and 45 homes would be an appropriate yield for the site. It should be noted that the approved development on the Barratt Homes site to the north of the site would be delivered at a density of 24.4 dwelling per hectare. The 25-home scheme proposed would deliver a comparable density appropriate to the character of the wider area and would ensure that existing natural features within the site (including TPO trees) can be comfortably incorporated into the development.

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<sup>1</sup> Indicative plan - not intended as a final layout

Whilst the site is clearly appropriate for new housing development, failure to allocate the site for a larger quantum of development would likely result in the site coming forward as a windfall site of 9 units or less. This would be a less efficient use of the site, would not generate a requirement for affordable housing types and may prevent the District Council from securing infrastructure contributions. Support through a specific allocation in the Site Allocations DPD would make the proposals an exception to District Plan Policy DP12 and would allow a better-quality development to proceed in principle.

The allocation of this site would create a coherent overall approach to the growth and development of Hassocks over the Plan period to 2031. A self-contained residential development within our client's site, alongside other sites to the western side of London Road would also complete a defensible western boundary to the village.

### **Proposed Submission Site Allocations DPD**

The Site Allocations DPD seeks to allocate new housing land to meet what is described as the District's 'residual' housing need to 2031. However, the clear backdrop to this document is an urgent need for additional housing across the sub-region – with unmet need in neighbouring authorities highlighted under Policy DP5 of the District Plan.

Whilst a future review of the Plan is expected to address this unmet sub-regional need, it is evident that the Site Allocations DPD should deliver new housing wherever it is appropriate and sustainable to do so, as the issues of unmet needs in neighbouring authorities worsen. This document cannot be considered in a vacuum and its soundness must be considered in the context of present-day evidence of housing needs.

The Government's housing delivery test provides reliable evidence that five of the eight local authorities within the Coastal West Sussex and Greater Brighton Strategic Planning area have failed to deliver their minimum housing requirement over recent years (in addition to the unmet need not addressed through their Local Plans). This under-delivery will further exacerbate the scale of unmet needs across the sub-region identified through the District Plan and the social and economic sustainability impacts of failing to adequately address these needs.

There is therefore an evidenced need for additional housing development where appropriate sites are available to meet this wider unmet need within the Coastal West Sussex and Greater Brighton sub-region. The authorities struggling to deliver their minimum housing requirements include Adur (56% delivered), Brighton (70% delivered) and Lewes (93% delivered) – those authority areas closest to our client's site.

In addition to these needs across relevant housing market areas, the proposed new Standard Method for housing need shows that the District Plan strategy still has an under-provision of housing as the figures show an annual increase in housing need of 191 homes a year in Mid Sussex alone. Across the wider housing market areas that affect Mid Sussex the shortfall is more pronounced, with a 1,108 home shortfall (per annum) in the North West Sussex area

alone (Crawley, Horsham and Mid Sussex) and a further 2,039 home shortfall (per annum) across the Coastal West Sussex area.

Although the Site Allocations DPD is not intended to provide a full review of the District Plan housing strategy, these objective facts provide an up-to-date background of the worsening housing crisis that is affecting the local area. Much of this information has been available to the local planning authority through the preparation of the DPD and should have informed the decisions being made on the Site Allocations DPD itself through the Sustainability Appraisal and assessment of alternatives. This is discussed further below.

Policy SA GEN is clear that site allocations should support sustainable transport objectives and provide a high degree of integration and connectivity between new and existing communities and our client's site offers significantly better potential for integration than other edge of settlement sites proposed for allocation.

### **Sustainability Appraisal**

The DPD states that 'reasonable alternatives' were assessed through the Sustainability Appraisal. We previously raised concerns about significant factual flaws in the assessments for Hassocks and flaws in the methodology for considering marginal sites.

We do not consider that our client's site should be considered a 'marginal site' as it scored lower on some objectives than we believe is accurate and otherwise achieves a comparable score to the allocated site at Shepherds Walk.

The Council's conclusion (page 133) that Option (b) [the Shepherds Walk site] performs "more positively" is fundamentally incorrect as the same scores are achieved across all 16 Objectives (albeit with a minor variation between different objectives). The conclusion goes on to state that the Shepherds Walk site "*can contribute towards growth required at category 2 in the settlement hierarchy*" but then rejects our client's site on the basis that it is not needed – this is entirely contradictory.

In addition to the above, our client's site is given a neutral score when assessed in terms of education, despite being within walking distance of local schools – clearly a positive.

The site is within walking distance of all local services and lies in close proximity to Hassocks railway station. There is a bus stop directly outside the site. Sustainable modes of transport are therefore very much a genuine travel choice and private car use would be minimised. Despite this, the site is given a score of "?" when assessed against the District's Transport objectives.

The Sustainability Appraisal assessment of the site therefore poorly reflects actual performance against sustainability objectives and this flawed assessment likely leads to flawed conclusions discussed further below. The site has been identified as a 'marginal site' despite being clearly suitable for sustainable residential development.

### Reasonable alternatives

We are also concerned that the Council have not rigorously considered the reasonable alternative of allocating more of, or all, remaining sites (that meet the Council's own suitability criteria). Their reasons for rejecting this alternative are that:

- The District Plan supports a minimum requirement of 16,390 homes throughout the Plan period, and a significant increase in housing delivery *may* not be supported by the existing evidence base
- Allocating additional housing is not in accordance with the District Plan strategy
- There *may* be negative in-combination effects

These conclusions are not based on any evidence and don't demonstrate any genuine attempt to investigate whether this approach could lead to any of the negative effects described in this section of the Sustainability Appraisal. We would expect to see an actual assessment of the in-combination impact of allocating all suitable sites within each settlement – especially given the significant amount of work already invested into the site selection process. We doubt that any 'in-combination' adverse impacts would genuinely outweigh the benefits of additional housing delivery (particularly given the known under-delivery of housing across many neighbouring local authority areas).

For example, in Hassocks only two sites have been included in this forty-seven site shortlist. The allocation of both sites would clearly not result in an unbalanced spatial distribution or deliver a significantly higher amount of housing for the settlement than that envisaged in the District Plan housing strategy.

A slightly more robust assessment of these considerations would likely result in different policy outcomes and the preparation of the Site Allocations DPD (subject to similar scrutiny to the District Plan) provides a reasonable opportunity to reconsider some of the evidence base that underpins the District Plan strategy.

It may well be the case that in some settlements the in-combination effects would be significant enough to outweigh the benefits of allocating all sites (Ansty may be one such location where this could be the case) but the assumptions given for ruling out the allocation of additional sites are broad and generalised and this position has not been justified.

### **Air Quality**

In the Proposed Submission Site Allocations DPD the site remains a 'marginal site' which has been considered for allocation but excluded for the following reason (paragraph 6.47 of the Sustainability Appraisal):

*"The site at Hassocks is on the edge of an Air Quality Management Area, and may impact upon it. Hassocks need has been exceeded by better performing sites, including a strategic allocation within the District Plan"*

This is entirely speculative, and has not been justified with no further investigation undertaken or contact with the site owners about this matter. The Council have produced air quality modelling for Stonepound Crossroads AQMA<sup>2</sup> to assess potential scenarios from the Site Allocations DPD but they have not included any scenario where our client's site is allocated – despite this clearly being a central matter in their decision to exclude the site and one of only two potential development options within the settlement.

Notwithstanding this, the modelling shows that there will be a negligible impact on air quality at Stonepound Crossroads and the long-term trend since 2013 has been a downward trend of NO<sub>2</sub> levels at this location. Modelling shows that the annual mean NO<sub>2</sub> concentrations are predicted to be well below the national (maximum) objective of 40 µgm<sup>-3</sup> with results at relevant receptors ranging from 12.9 to 29.9 µgm<sup>-3</sup>. The highest anticipated increase from the Site Allocations DPD is a 1.2% increase and in this location guidance from the Institute of Air Quality Management<sup>3</sup> is clear that even a change of up to 5% would have a negligible impact.

This modelling shows that Hassocks can accommodate additional development without having a significant adverse impact on air quality – which will continue to improve to the end of the Plan period at this location, particularly as motor vehicle technology advances and fleet buying choices change. If the local planning authority are concerned about the potential for a significant adverse impact from residential development of our client's site then they should incorporate that scenario into their modelling.

In addition to the above, our client's site is much more sustainably located than other 'marginal' sites identified for allocation. The site would therefore have a significantly reduced impact on air quality and pollution than the identified sites that would necessitate car use for many normal day-to-day activities. Further details are provided below.

### **Comparison with allocated sites**

Instead of allocating our client's site, the Council have prioritised the allocation of three additional 'marginal' sites in Burgess Hill. The District Plan and other site allocations already focus a significant proportion of the District's housing development in Burgess Hill at a scale vastly exceeding Burgess Hill's own need (as stated within the 'Justification' at 6.47 of the Sustainability Appraisal).

In contrast, the local planning authority have stated that 'Hassocks need has been exceeded' in their conclusions for our client's site – in direct contradiction to their decision to allocate these other marginal sites.

There is no direct comparison of all marginal sites, which have been instead subjected to arbitrary and sometimes contradictory commentary. Compared comparatively to the other marginal sites that have been supported through the Sustainability Appraisal, our client's site scores significantly better in terms of access to services:

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<sup>2</sup> <https://www.midsussex.gov.uk/media/4726/reg-19-sites-dpd-stonepound-crossroads.pdf>

<sup>3</sup> Land-Use Planning & Development Control: Planning For Air Quality (January 2017)

	<b>Train Station</b>	<b>Town/Village Centre</b>	<b>Schools</b>	<b>Health Centre</b>
<b>Land to the rear of 2 Hurst Road</b>	500m	500 - 750m	Hassocks Infants School: 750m  Downlands Community School: 1.2km  Windmills Junior School: 1.3km	950m
<b>Land south of Folders Lane and east of Keymer Road, Burgess Hill (Site 557)</b>	1.2km	1.4km	Birchwood Grove Primary School: 1.05km  Burgess Hill Girls School: 1.05km	1.15km
<b>Land east of Greenacres, Keymer Road and south of Folders Lane (Site 738)</b>	1km-1.5km	1.2km-1.4km	Birchwood Grove Primary School: 500-800m  Burgess Hill Girls School: 800m-1km	880m-1.2km
<b>Land south of 96 Folders Lane, Burgess Hill (Site 827)</b>	1.9km	2.1km	Birchwood Grove Primary School: 850m  Burgess Hill Girls School: 1.5km	1.75km
<b>Haywards Heath Golf Course (Site 503)</b>	1.8km – 2.5km	3.2km	Lindfield Primary Academy: 1.5km – 2.2km  Blackthorns Community Primary Academy: 1.65km - 2.3km  Oathall Community College: 1.35km - 2.05km	1.7km – 2.3km



Given the distances from relevant services, walking and other sustainable modes of transport will be a genuine travel choice for future residents. In contrast, distances on the proposed allocations will make this a less attractive option for future residents despite these sites being within a Category 1 settlement. The logic of allocating these sites over our client's site is therefore not supported by the sustainability objectives identified by the Council in their preparation of the Site Allocations DPD. We believe that our client's site should be prioritised for allocation on this basis.

Whilst the Category 1 settlements have a greater range of services available, this does not necessarily provide sustainability benefits if those services can only reasonably be reached by private car. The methodology for selecting these sites over other 'marginal' sites is therefore flawed and this exercise has meant these sites have not been assessed on an objective evidence-led basis.

The Site Allocations DPD assessed two suitable sites in Hassocks and allocates the other Hassocks site, at Shepherds Walk. Shepherds Walk is further from all services, partially within a flood zone and is three times further from the train station (500m from our client's site) but both have a '?' score for transport. The Sustainability Appraisal shows the Shepherds Walk site as performing better in terms of access to education even though the site is 600m further from any education facilities in the village than our client's site. These significant flaws in the assessment result in the Council incorrectly concluding that the Shepherds Walk site is the 'most strongly performing site in Hassocks'.

Allocations identified within the current draft of the DPD therefore do not represent the most sustainable and appropriate strategy for meeting the District's residual housing needs. We consider that the allocation and residential development of our client's site would better meet the objectives of the Site Allocations DPD. A residential development of the site would integrate well with the village of Hassocks and represent a highly sustainable location for delivering the additional housing required. The site has no significant development constraints.

The site has been assessed through the Mid Sussex Strategic Housing and Employment Land Availability Assessment (Site Ref. 210) and the Site Selection process forming part of the evidence base for the Site Allocations DPD. These assessments find the site to be suitable, available and achievable.

Although our client's site performs better than other allocated sites, the significant unmet housing needs across the subregion show that there is a clear need for appropriate housing sites to be allocated for development and the site could be allocated in addition to (rather than instead of) other allocations within the DPD.

### **Other matters**

The District Council's Site Selection Paper 3 negatively describes the landscape capacity of the site as 'low' but also indicates that the site is screened from public views and would only

impact on private views from existing properties to the south of the site. The assessment is clear that this scoring relates to views out of the existing settlement rather than views towards Hassocks from the surrounding countryside (or National Park) and notes that the natural screening around the eastern and northern edges of the site would minimise any impact if retained. The site is surrounded by development on three sides and the site, along with the adjacent field to the west, is well screened from longer views.

The site would deliver a complementary development alongside the Barratt Homes development on London Road. Combined, the developments will set a new, defensible edge to the village that will reinforce the policy intentions of other District-wide and Neighbourhood Plan policies.

### **Conclusion**

We believe that the site clearly presents a positive opportunity for residential development in a highly sustainable location that positively contributes to the objectives of the District Plan. The assessment of marginal sites is not sufficiently robust and results in less sustainable sites being identified for allocation.

Lewis & Co Planning would welcome the opportunity to discuss these matters in greater detail. Please contact Joseph Pearson or Simon Bareham on 01273 413700.

Yours faithfully,

Lewis & Co Planning  
[Joseph.pearson@lewisplanning.co.uk](mailto:Joseph.pearson@lewisplanning.co.uk)

**Appendix A – Site Allocations DPD Regulation 18 Consultation Response**

757

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA11

<b>ID:</b>	<b>757</b>
<b>Response Ref:</b>	Reg19/757/2
<b>Respondent:</b>	Mr C Noel
<b>Organisation:</b>	Strutt and Parker
<b>On Behalf Of:</b>	Croudace Henfield Road Albourne
<b>Category:</b>	Developer
<b>Appear at Examination?</b>	✓



## Site Allocations Development Plan Document Regulation 19 Submission Draft Consultation Form

The District Council is seeking representations on the Submission Draft Site Allocations Development Plan Document, which supports the strategic framework for development in Mid Sussex until 2031.

The Site Allocations DPD, has four main aims, which are:

- i) to allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan;
- ii) to allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development;
- iii) to allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development, and
- iv) to set out additional Strategic Policies necessary to deliver sustainable development.

All comments submitted will be considered by a Planning Inspector, appointed by the Secretary of State, at a public examination to determine whether the plan is sound.

The Site Allocations DPD is available to view at:

[www.midsussex.gov.uk/planning-building/development-plan-documents/](http://www.midsussex.gov.uk/planning-building/development-plan-documents/)

A number of documents have been prepared to provide evidence for the Site Allocations DPD and these can be viewed on the Council's website at the above address.

Paper copies will also be at the Council offices (see address below) and your local library and available to view if the buildings are able to open during the consultation period.

**Please return to Mid Sussex District Council by midnight on 28<sup>th</sup> September 2020**

### How can I respond to this consultation?

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

[www.midsussex.gov.uk/planning-building/development-plan-documents/](http://www.midsussex.gov.uk/planning-building/development-plan-documents/)

The online form has been prepared following the guidelines and standard model form provided by the Planning Inspectorate. To enable the consultation responses to be processed efficiently, it would be helpful to submit a response using the online form, however, it is not necessary to do so. Consultation responses can also be submitted by:

**Post:** Mid Sussex District Council  
Planning Policy  
Oaklands Road  
Haywards Heath  
West Sussex  
RH16 1SS

**E-mail:** [LDFconsultation@midsussex.gov.uk](mailto:LDFconsultation@midsussex.gov.uk)

A guidance note accompanies this form and can be used to help fill this form in.

## Part A – Your Details (You only need to complete this once)

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### 1. Personal Details

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Craig"/>
Last Name	<input type="text" value="Noel"/>
Job Title (where relevant)	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Strutt and Parker"/>
Respondent Ref. No. (if known)	<input type="text"/>
On behalf of (where relevant)	<input type="text" value="Croudace Homes"/>
Address Line 1	<input type="text" value="201 High Street"/>
Line 2	<input type="text" value="Lewes"/>
Line 3	<input type="text"/>
Line 4	<input type="text"/>
Post Code	<input type="text" value="BN7 2NR"/>
Telephone Number	<input type="text" value="01273407045"/>
E-mail Address	<input type="text" value="craig.noel@struttandparker.com"/>



Information will only be used by Mid Sussex District Council and its employees in accordance with the Data Protection Act 1998. Mid Sussex District Council will not supply information to any other organisation or individual except to the extent permitted by the Data Protection Act and which is required or permitted by law in carrying out any of its proper functions.

The information gathered from this form will only be used for the purposes described and any personal details given will not be used for any other purpose.

## Part B – Your Comments

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You can find an explanation of the terms used in the guidance note. Please fill this part of the form out for each representation you make.

**Name or Organisation:**

Craig Noel – Strutt and Parker on behalf of Croudace Homes

### 3a. Does your comment relate to:

Site Allocations DPD	<input checked="" type="checkbox"/>	Sustainability Appraisal	<input checked="" type="checkbox"/>	Habitats Regulations Assessment	<input type="checkbox"/>
Community Involvement Plan	<input type="checkbox"/>	Equalities Impact Assessment	<input type="checkbox"/>	Draft Policies Maps	<input type="checkbox"/>

### 3b. To which part does this representation relate?

Paragraph  Policy SA  Draft Policies Map

### 4. Do you consider the Site Allocations DPD is:

4a. In accordance with legal and procedural requirements; including the duty to cooperate. Yes  No

4b. Sound Yes  No

### 5. With regard to each test, do you consider the Plan to be sound or unsound:

	Sound	Unsound
(1) Positively prepared	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(2) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(3) Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**6a.** If you wish to support the legal compliance or soundness of the Plan, please use this box to set out your comments. If you selected 'No' to either part of question 4 please also complete question 6b.

Please refer to representation from Strutt & Parker dated 28<sup>th</sup> September 2020

**6b.** Please give details of why you consider the Site Allocations Development Plan Document is not legally compliant or is unsound. Please be as precise as possible.

**6b.** Please give details of why you consider the Site Allocations DPD is not legally compliant or is unsound. Please be as precise as possible.

Please refer to representation from Strutt & Parker dated 28<sup>th</sup> September 2020

**7.** Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to representation from Strutt & Parker dated 28<sup>th</sup> September 2020

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick below as appropriate)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We reserve a right to participate at the oral part of the examination

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Please notify me when:

(i) The Plan has been submitted for Examination

(ii) The publication of the recommendations from the Examination

(iii) The Site Allocations DPD is adopted

Signature:



Date:

28/09/2020

**Thank you for taking time to respond to this consultation**





## Mid Sussex District Council Site Allocations DPD

### Regulation 19 Consultation

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**Representations on behalf of Croudace Homes**

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Our ref: CN 208855

28<sup>th</sup> September 2020

Appendix 1 – Site Plan, Land South of Henfield Road, Albourne

Appendix 2 – Representation on behalf of Croudace Homes – Regulation 18 Consultation

### Introduction

- 1.1. Strutt and Parker are instructed by Croudace Homes (South Thames) to respond to the Regulation 19 consultation Site Allocations Development Plan Document (SADPD) published by Mid Sussex District Council in July 2020. Croudace has a legal interest in land at Albourne which it is promoting for new housing alongside additional open space, a community orchard and a potential scheme to assist the village primary school to facilitate a safer drop-off and pick-up arrangement for parents.
- 1.2. Croudace are a well-established five-star house builder with an excellent track record of housing delivery. They are committed to bringing this opportunity forward.
- 1.3. Land South of Henfield Road is identified edged red on the plan at Appendix 1. Our representation on behalf of Croudace Homes in response to the Regulation 18 SADPD (attached at Appendix 2) included a summary of information on the technical work undertaken in support of the proposal.
- 1.4. The site was not considered further by MSDC following the detailed site assessment (February 2020), ostensibly for sustainability reasons.
- 1.5. This representation focusses on the spatial strategy for the District, its relationship to sustainability, and the associated housing numbers addressed through the Regulation 19 proposals.

### Spatial Strategy for the District

- 2.1. It is notable that the Regulation 19 SADPD under-delivers housing numbers in Category 3 settlements when assessed against District Plan targets. We consider that this shortcoming should be addressed prior to advancing the SADPD by identification of additional sites in Category 3 Medium Sized Villages. This will have sustainability advantages in addition to meeting the District Plan targets, including ensuring that the spatial distribution of affordable housing provision more accurately mirrors that anticipated in the District Plan.
- 2.2. The District Plan table which identified the spatial distribution of the housing requirement (page 32 of the District Plan) also provides minimum figures for each of the settlement Categories.
- 2.3. The minimum housing requirement for Category 1 settlements (Towns) has been revised to 706 dwellings, from the figure of 840 units in the Regulation 18 document. In Category 2 settlements (Local Service Centres), this has decreased from 222 dwellings to 198 dwellings (as a result of planning permission being granted at Land North of Shepherds Walk, Hassocks). In Category 3 (Medium Sized Villages), the requirement has reduced from 439 to 371. In Category 4 the requirement has decreased from 6 units to 5. These housing supply figures have been revised following an update to completion, commitments and windfall figures.
- 2.4. Despite the minimum residual requirement for Category 3 decreasing, this category remains the most underrepresented in the proposed site allocations. Only 238 of the minimum 371

## MSDC SADPD Reg 19: Representations on behalf of Croudace Homes

homes required are proposed in the Regulation 19 SADPD, providing a shortfall of 133 dwellings. This position is shown in the table below:

Category	Settlements	District Plan Allocations	Minimum Requirement (2014-2031)	Minimum Residual (2017 +)	Minimum Residual Reg 18 SADPD	Minimum Residual Reg 19 SADPD	Reg19 SADPD Sites	Category Difference
1 Towns	Burgess Hill, E Grinstead, Haywards Heath	3,287	10,653	1,272	840	706	1069	363
2 Larger Village	Crawley Down, Cuckfield, Hassocks	500	3,005	838	222	198	105 (Figure does not include recent consent at Shepherds Walk, Hassocks)	37
3 Medium Village	Albourne, Ardingly, Ashurst Wood, Balcome, Bolney, Handcross, Horsted Keynes, Pease Pottage, Sayers Common, Scaynes Hill, Sharpthorne, Turners Hill, West Hoathly	600	2,200	311	439	371	238	-133
4 Smaller Village	Ansty, Staplefield, Slaugham,, Twineham, Warninglid	0	82	19	6	5	12	7
5	Hamlets	N/A	N/A	N/A	N/A	N/A	N/A	
Windfall			450					
<b>Total</b>			16,390	2,439	1,507	1,280	1,764	

**Table 1:** Spatial Distribution of Housing Requirement (Source of data: SADPD Regulation 18 and 19 draft documents.)

- 2.5. The number of dwellings at Site Allocation 27 (Land at St Martins Close (West) Handcross) has reduced from 65 to 30 dwellings because the Slaughtam Neighbourhood Plan is now made and Land at St Martins Close (East) is now a commitment as at 1<sup>st</sup> April 2020. Therefore, only 30 units are identified to avoid double counting. However, there would still be a shortfall of 103 units in Category 3 if the additional 30 dwellings had been included in the housing figures.
- 2.6. The Settlement Sustainability Review (May 2015) forms part of the evidence base for the Mid Sussex District Plan (2014-2031). Paragraph 1.4 notes the Settlement Sustainability Review (May 2015) identifies strategic allocations for housing at Burgess Hill. However, additional “housing development is proposed to be met at the district’s other towns and villages to help meet the needs of existing communities.” This suggests housing supply should be proposed across the numerous settlements and not concentrated to only a select number.
- 2.7. As Table 1 shows, there is over-provision in the Category 1 settlements against under provision in Category 2 and 3 settlements. The approved settlement hierarchy constitutes a policy for delivering the spatial strategy, ensuring a sustainable pattern of development across the District. It would be wrong therefore to regard additional provision in Category 1 settlements as essentially more sustainable than provision in accordance with the spatial strategy. The latter has been formulated to produce an appropriate balance of development across settlements in the interests of sustainability.
- 2.8. The settlement hierarchy table included as part of District Plan Policy DP6 outlines the characteristics and functions of a Category 3 settlement: “Medium sized villages providing essential services for the needs of their own residents and immediate surrounding communities.” As a result, settlements within Category 3 should be considered as sustainable settlements.
- 2.9. Thus, there is sufficient justification for amending the Site Allocations DPD to increase the number of sites and units allocated within Category 3 settlements, to ensure consistency with the District Plan and the approved spatial strategy, and in turn support a sustainable pattern of development.

### Housing Supply

- 3.1. Policy SA10 (Housing) within the SADPD Regulation 19 sets out how the Council propose to distribute housing across the district. Policy SA11 (Additional Housing Allocations) proposes how the 1,764 dwellings required through the SADPD will be distributed. The figure of 1,764 dwellings presents an excess of 484 dwellings above the residual amount required of 1,280.
- 3.2. Nevertheless, there is a clear under provision of homes in Category 3 settlements and therefore the settlements cannot meet their guideline (Policy DP6) residual housing requirement.
- 3.3. 158 sites out of 253 sites were taken forward following a High level Assessment (Site Selection Paper 1). Following the Detailed Evidence Testing stage (Site Selection Paper 3), 51 sites remained as having potential for allocation and were subject to further evidence base testing and assessment. The SADPD Regulation 19 document includes 22 housing allocations. This

is a narrow proportion of the sites that were positively assessed and were regarded as having potential for allocation following the Detailed Evidence Testing stage.

- 3.4. Whilst there is an over-supply from the 22 sites proposed for allocation, this may not be a sufficient buffer should sites fall out of the allocations process between now and adoption. In addition, the non-deliverability of any proposed site allocation could result in the Council jeopardising housing supply for the District.
- 3.5. MSDC should consider allocating more sites in the SADPD to ensure a continuous supply of sites during the plan period. Therefore, it would be sensible to look at settlements that are not currently meeting the residual housing requirement, most notably Category 3 settlements, to provide the necessary flexibility.

### **Assessed Housing Options and Sustainability Appraisal**

- 4.1. This section is an update to assessed housing options and sustainability appraisal discussion presented in the representation in response to the SADPD Regulation 18 document.
- 4.2. MSDC are required to assess potential reasonable alternative strategies against the selected approach developed for the purposes of the Regulation 19 version of the SADPD. Similarly, to the preparation of the Regulation 18 draft document, the Council purports to have carried out that exercise by considering three potential Options for the SADPD consultation, as set out in the SADPD Sustainability Appraisal – Non-technical Summary Regulation 19 (July 2020).
- 4.3. As with the SADPD Sustainability Appraisal Regulation 18 document (September 2019), the Options presented were not sufficiently different in terms of addressing the approved spatial strategy. 20 of the 22 sites ultimately identified in the selected Option were common to all 3 Options.
- 4.4. Option B included three additional sites at Burgess Hill (Category 1 settlement) while Option 3 included those sites plus a 3<sup>rd</sup> site at Haywards Heath (again a Category 1 settlement). This means that the choice around options was solely a choice around the overall number of units to be delivered in excess of the minimum residual requirement. There was no reasonable alternative presented in relation to the spatial strategy and the distribution of development between the settlement categories. Options B and C simply added additional dwellings to Category 1 settlements and did not seek to redress imbalances between the other settlement categories. The choice provided was against delivering either 144, 484 or 774 dwellings above the minimum residual requirement. In each scenario, the minimum target provision was exceeded in Category 1, 2 and 4 settlements. None of the Options met the Category 3 target residual minimum.
- 4.5. This is surprising given that there are nearly the same number of settlements in Category 3 (13) than in all of the other settlement categories where sites are proposed for allocation combined (14). It is not credible that there are no potentially suitable additional Category 3 sites that might be considered as reasonable alternatives for the purpose of the sustainability appraisal.

- 4.6. Paragraph 1.36 of the Sustainability Appraisal (July 2020) says that additional sites should ideally be drawn from sites from the highest settlement category in the hierarchy. As noted at paragraph 4.5, all additional sites were only considered from Category 1 settlements.
- 4.7. Housing supply should not be directed primarily at Category 1 settlements, not only because that would be contrary to the Spatial Strategy in the District Plan, but indeed because Category 3 settlements should be considered as sustainable locations to provide housing in Mid Sussex. There is strong justification that settlements in Category 3 of the Settlement Hierarchy should be considered as sustainable locations for site allocations as locations outside of the main town centres become increasingly desirable places to live, and there is less need to commute to offices in the main towns. An increase in home-working has eased pressures on public transport links in the District, and will continue to do so as employers prepare for the longevity of home-working.
- 4.8. The assessment criteria in the Sustainability Appraisal should be reviewed as a result of rapidly changing employment environments in response to the COVID-19 crisis; the pandemic has shifted transport movements and commuting patterns, in particular.

### Windfalls

- 5.1. The Regulation 19 SADPD proposes to increase the windfall allowance to 84 dwellings per annum, amounting to a total of 504 dwellings over the final 7 years of the Plan period (2024-2031). Proportionately then, there are more windfall units to be provided for than are now proposed to be identified in categories 2 and 3 combined.
- 5.2. Part of this increase is attributed to the inclusion of sites of up to 9 units in the assessment. MSDC are still very reliant on the delivery of homes from windfall sites. This could potentially negatively impact the delivery of affordable housing. In addition, site-specific infrastructure requirements are more readily made out in policies supporting the delivery of allocated sites, meaning that generally speaking greater public benefit can be anticipated in plans where a higher proportion of the number of dwellings targeted are to be provided on sites specifically allocated in Local Plans. It is also important to note that windfall sites cannot be assumed to come forward in proportion to the balance of development contemplated through the spatial strategy. This means that the spatial strategy may be further compromised (in addition to the under-provision in categories 2 and 3 identified above), given that windfall developments most commonly derive from within the larger settlements. These issues can be overcome by identifying more housing sites through the SADPD, and specifically with Category 3 settlements.
- 5.3. Without allocating further sites to meet the adjusted housing need, there will be a greater reliance on windfall sites. The Council is therefore encouraged to rely less on non-identified sources of housing growth (which by their nature are unpredictable in relation to the realisation of the spatial strategy) and to plan more effectively by identifying additional sites for allocation in the SADPD.

### Suitability of Albourne

- 6.1. Albourne is acknowledged to be one of 13 settlements within Category 3 in the settlement hierarchy, identified as a Medium-Sized Village that provides essential services and which is capable of accommodating additional residential development. The District Plan identifies a minimum residual requirement for Category 3 settlements of 311 dwellings. This has been increased to 371 in the context of the current Regulation 19 consultation. The current draft SADPD delivers 238 units in such settlements, an under-provision of 133 units.
- 6.2. Under-provision is also apparent within Albourne itself. Table 12 produced at paragraph 6.12 of the sustainability appraisal demonstrates that (in addition to the 133-unit shortfall across Category 3 Settlements), the Regulation 19 SADPD under-delivers against the expectation for sustainable growth for Albourne – namely a further 36 dwellings. The SADPD does not allocate any sites in Albourne, leaving at least 36 units to be found if the residual for the village is to be met. The Albourne Neighbourhood Plan (made September 2016) identifies very little in the way of housing allocations to meet this identified shortfall (only 2 dwellings under policy ALH2).
- 6.3. In terms of sustainability and connectivity, Albourne is a Category 3 settlement in the District Plan hierarchy. Bus stops within 350m of the Croudace site serve Sayers Common, Hurstpierpoint, Keymer, Burgess Hill, Horsham, Crawley, and Brighton. The closest train station is at Hassocks – a 15-minute cycle journey or 25-minute bus journey away. Albourne's position within the settlement hierarchy recognises that there is access to sufficient services and facilities to justify additional housing during the plan period.
- 6.4. Of the thirteen Category 3 settlements, eight fall entirely within the AONB. Albourne on the other hand is not subject to any national or local landscape designations. The Croudace site at Land South of Henfield Road is well-placed to help to re-balance the spatial strategy, address the sustainable needs of Albourne itself, and do so while delivering additional benefits including affordable housing, open space and improved arrangements to support the primary school. It is wrong for this site to be ruled out on sustainability grounds when it would clearly contribute towards achieving the balance of growth anticipated by the spatial strategy established in the adopted Local Plan, following a full sustainability appraisal.

### Albourne Primary School

- 7.1. One of the key advantages of Land South of Henfield Road is that Albourne Primary School abuts the site to the east. The school takes pupils from Hurstpierpoint, Sayers Common, Poynings, Pyecombe, Newtimber and Albourne itself.
- 7.2. The majority of children are driven to school as a result, but there is no suitable parking or drop-off arrangements. Parents tend to park along Henfield Road/ HOLDERS, and have to cross the main road to get to the school gates.
- 7.3. There are community aspirations for a safe drop-off/pick up arrangement to be made, which is not currently possible within the school's control. There is an opportunity to find a solution to this problem through the allocation of the Croudace site in the SADPD.




- 7.4. Croudace are conducting an online survey which aims to seek the views of parents to establish whether there is a need for a drop-off/parking area to serve Albourne Primary School and how this could be delivered.
- 7.5. The survey is still 'live.' However, responses to thus far establish that 79% travel to the Primary School by car, and all car users would find a dedicated parking area close to the school useful, with most saying they would use a dedicated parking area every day.
- 7.6. The survey responses are further evidence that a school drop-off/parking area would be of great benefit to parents at school.

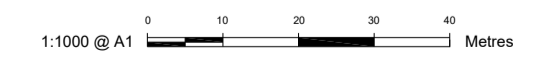
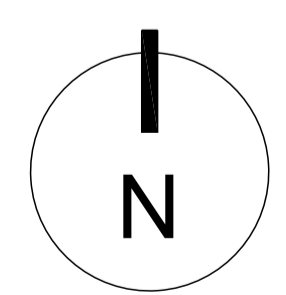
### Summary

- 8.1. It is evident from the figures published in the Regulation 19 SADPD that there remains a significant shortfall of homes in Category 3 settlements across the District. In particular, there are no sites identified in Albourne, despite the findings of the sustainability appraisal.
- 8.2. Our representation at Regulation 18 highlighted that there are suitable sites to meet an acknowledged shortfall in housing provision against the District Plan's residual minimum requirements, both in Albourne, and in Category 3 settlements generally.
- 8.3. As noted in our previous representation, the Regulation 19 SADPD over-relies on windfall development, and more so in the latest iteration of the DPD. If the SADPD relies too heavily on windfall despite the availability of suitable residential sites, it cannot be considered justified, effective or consistent with national policy and therefore would be unsound. Difficulties with delivery on some of the District Plan's strategic sites and the unproven response to Policy DP6 mean that further site allocations are the safest way to ensure that a five-year supply is maintained through the Plan period.
- 8.4. Land South of Henfield Road, Albourne is well-suited to meet an acknowledged shortfall in housing provision against the District Plan's residual minimum requirements in Albourne, and in Category 3 settlements generally. An allocation of this site has the potential to deliver policy-compliant affordable housing in a sustainable manner, and further local benefits including a much-needed solution to primary school parking /drop-off problems which would be a great benefit to teachers and parents. Land South of Henfield Road is in single ownership and Croudace are in a position to commit to the delivering homes at the at the site within a short phasing timeline.
- 8.5. We do not consider the SADPD to be 'sound' in its current form. In addition to the heavy reliance on windfall sites, the approach to reasonable alternatives presented in the Sustainability Appraisal (July 2020) is not consistent with the spatial strategy of the District Plan. The SADPD not only under-provides for housing in Category 3 settlements, but MSDC also risk not meeting housing numbers across the District if any of the proposed site allocations are non-deliverable.

**KEY**



Boundary of Proposed Housing Area Approx. 2.98Ha





**Mid Sussex District Council  
Site Allocations DPD**

**Regulation 18 Consultation**

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**Representations on behalf of Croudace Homes**

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**Our ref: CN 208855**

19 November 2019

Appendix A – Site Plan, Land South of Henfield Road, Albourne

Appendix B – Housing Supply Technical Note, Strutt & Parker

Appendix C - Transport Note, Paul Basham Associates

Appendix D - Technical Note, Arc Landscape Design and Planning Ltd

Appendix E – Concept Plan, Paul Brown RIBA

Strutt and Parker are instructed by Croudace Homes (South Thames) to respond to the Regulation 18 consultation Site Allocations Development Plan Document (SADPD) published by Mid Sussex District Council on 9<sup>th</sup> October 2019. Croudace has a legal interest in land at Albourne which it is promoting for new housing alongside a new car park for the village primary school to facilitate a safer drop off and pick up arrangement for parents.

### **Issue 1: Deliverability**

- 1.1. The Croudace interest is in Land South of Henfield Road, Albourne, more particularly as identified edged red on the plan at Appendix A.
- 1.2. The legal interest in the land was secured relatively recently, and the site has not therefore been previously assessed through the formal SHELAA process, nor the Council's site assessment work for the purpose of preparation of the Regulation 18 SADPD. Nevertheless, the interest extends to all land needed to deliver the site and there are currently no known obstacles to achieving the development.
- 1.3. Croudace are a well-established house builder with an excellent track record of housing delivery, and are presently building homes in Mid-Sussex to house local families. They are committed to bringing this opportunity forward.

### **Issue 2: Insufficient Site Allocations**

- 2.1. Objection is made to the Regulation 18 draft plan on the basis that the Site Allocations DPD fails to identify a sufficient number of sites in order to be likely to deliver the residual housing requirement established under District Plan DP4. This should be remedied at Regulation 19 stage by the identification of more otherwise acceptable sites.
- 2.2. The Site Allocations DPD proposes to meet the residual requirement through the allocation of just 22 further sites. This runs a significant risk. The strategic sites identified in the District Plan are themselves relatively small in number, and that approach is already proving to be problematic in terms of housing delivery (see section 5 below). One of the potential advantages of preparing a Site Allocations DPD after a period of monitoring progress with strategic sites is the ability to balance the positive benefits that larger strategic allocations can produce with the greater predictability that smaller site allocations can provide. However, the potential advantages are significantly compromised by the Regulation 18 approach as the sites proposed for identification are insufficient in number to adequately compensate for the over-reliance of the District Plan on a small number of larger sites. Whilst it is acknowledged that the SADPD identifies sites with more than sufficient capacity to meet the residual requirement (assuming for the time being that the increased reliance on windfalls is acceptable), the limited number of sites nevertheless places the overall level of delivery at risk, given that the relationship with the

District Plan is not effectively balanced. Nor is there evidence that the approach established under DP6 to support the release of small sites is helping to re-address that balance.

**Issue 3: Under-delivery of sites in Category 3 settlements**

- 3.1. It is notable that the SADPD under-delivers housing numbers in Category 3 settlements when assessed against District Plan targets. This should be addressed in the Regulation 19 Plan by identification of additional sites in Category 3 Medium Sized Villages. This will have a number of advantages in addition to meeting the District Plan targets, including ensuring that the spatial distribution of affordable housing provision more accurately mirrors that anticipated in the District Plan.
- 3.2. The District Plan table which identified the spatial distribution of the housing requirement (p32 of the District Plan) also provides minimum figures for each of the settlement Categories.
- 3.3. The minimum housing requirement for Category 1 settlements (Towns) has been revised to 840 dwellings, down from 1,272 units. In Category 2 settlements (Local Service Centres), this has decreased from 838 dwellings to 222 dwellings (partly as a result of consented appeals in Copthorne and Crawley Down in 2018). It is noteworthy that the number of units needed in Category 3 has increased from 311 dwellings to 439. In Category 4 the requirement has decreased from 19 units to 6.
- 3.4. What is particularly noteworthy is that while the minimum residual requirement for Category 3 has increased, this is the category that is most underrepresented in the proposed site allocations. Only 303 of the minimum 439 homes required are proposed in the Regulation 18 SADPD, providing a shortfall in that category of 136 dwellings. This position is shown in the table below:

Category	Settlements	District Plan Allocations	Minimum Requirement (2014-2031)	Minimum Residual (2017 +)	Minimum Residual Reg 18 SADPD	Reg18 SADPD Sites
1 Towns	Burgess Hill, E Grinstead, Haywards Heath	3,980 (3,287 in Plan period)	10,653	1,272	840	1412
2 Larger Village	Crawley Down, Cuckfield, Hassocks	500	3,005	838	222	235
3 Medium Village	Albourne, Ardingly, Ashurst Wood, Balcome, Bolney, Handcross, Horsted Keynes, Pease Pottage,	600	2,200	311	439	303

	Sayers Common, Scaynes Hill, Sharpthorne, Turners Hill, West Hoathly					
4 Smaller Village	Ansty, Staplefield, Slaugham,, Twineham and Warninglid	0	82	19	6	12
5	Hamlets	N/A	N/A	N/A	N/A	N/A

3.5. Thus, there is a prima facie case for amending the Site Allocations DPD at Regulation 19 stage to increase the number of sites and units allocated within Category 3 settlements, to ensure consistency with the District Plan and the approved spatial strategy.

**Issue 4: Windfalls**

- 4.1. The SADPD places significantly greater reliance on windfall sites than the District Plan, without providing suitable evidence to support the assumptions made. The Council is therefore encouraged to rely less on non-identified sources of housing growth (which by their nature are unpredictable in relation to the realisation of the spatial strategy) and to plan more effectively by identifying additional sites for allocation in the Regulation 19 version of the SADPD.
- 4.2. The District Plan makes provision for a windfall allowance of 45 dwellings per annum on small sites of up to 5 units, from year 6 of the plan period, contributing a total of 450 units over the plan period 2014-2031.
- 4.3. The Regulation 18 SADPD proposes to increase that allowance to 84 dwellings per annum, amounting to a total of 588 dwellings over the final 7 years of the Plan period (2024-2031). Part of this increase is attributed to now including sites of up to 9 units in the assessment.
- 4.4. This is the figure that has been used for the purpose of assessing the residual housing requirement for the SADPD.
- 4.5. Strutt & Parker has produced a separate paper analysing the justification for this approach. A copy is provided as Appendix B to these representations. The conclusions of the analysis are that:
  - The extension of the qualifying sites to include those with a capacity of up to 9 units risks double-counting of sites identified in one of the many neighbourhood plans in the District;
  - The Council’s latest assessment relies on evidence produced over a short period of time in a relatively buoyant housing market;

- Evidence of delays in achieving the anticipated housing trajectory from strategic sites is likely to result in a significant deficit against the housing requirement later in the Plan period;
  - The windfall allowance should be reduced, and further sites allocated through the SADPD process instead.
- 4.6. There are a number of potential implications from over-reliance on windfalls. Not only is the spatial strategy put at risk (there being a reduced ability to steer the quantity of development to locations consistent with the District Plan's strategy), the potential benefits arising from site allocation policies themselves are also much reduced. In particular, the likely quantum of affordable housing delivery is put at greater risk given that windfall sites are much less likely to deliver affordable provision. In addition, site-specific infrastructure requirements are more readily made out in policies supporting the delivery of allocated sites, meaning that generally speaking greater public benefit can be anticipated in Plans where a higher proportion of the number of dwellings targeted are to be provided on sites specifically allocated in Local Plans. All these issues can be overcome by identifying more housing sites through the SADPD process.

### **Issue 5: Strategic Sites under-delivery**

- 5.1. The District Plan's strategic sites are very unlikely to meet the anticipated target numbers within the Plan period. As a result, there is a strong case for the identification of additional provision through further site identification through the SADPD (rather than reliance on an increased level of windfalls). This should be addressed by further site identification at the Regulation 19 stage.
- 5.2. The District Plan includes strategic site allocations at Burgess Hill, Hassocks and Pease Pottage, totalling 5,080 units. Of this total, 4,867 are expected to be delivered during the plan period to 2031.
- 5.3. There are however already signs that this trajectory will not be met.
- 5.4. At Burgess Hill, outline planning permission has only very recently been granted for the Northern Arc scheme, and then for 3,040 dwellings rather than the 3,500 contemplated in the District Plan strategic allocation. The Council's Housing Land Supply Position Statement, produced in July 2019 nevertheless anticipated completions to begin in 2021/22.
- 5.5. Given that the recent permission (DM/18/5114) is in outline only and that reserved matters and/or discharge of conditions applications have yet to be submitted, completion of any units in a little over 12 months seems very unlikely.
- 5.6. Delivery is expected to reach 156 dwellings per annum by 2023/2024 but even at that rate, the level of provision originally anticipated within the Plan period will not be reached.



- 5.7. At Hassocks, an outline application for 500 units has been presented to MSDC but remains undetermined, with no committee date yet fixed. Again, the July 2019 HLS Position Statement assumes first completions in 2021/22. This site is far less complex than the Northern Arc scheme, but this start date remains ambitious. The site ought to provide 50 dwellings per annum once commenced as suggested in the Position Statement.
- 5.8. The Kings Way (Burgess Hill) and Pease Pottage strategic sites are progressing acceptably but together are not large enough to compensate for likely delays with the others. It is therefore important that greater certainty be afforded through the SADPD process to bolster supply. Such certainty cannot be reliably achieved through an increased windfall allowance. Instead, additional site allocations should be made at Regulation 19 stage.

### **Issue 6: Assessed Housing Options and the Sustainability Appraisal**

- 6.1. MSDC are required to assess potential reasonable alternative strategies against the selected approach developed for the purposes of the Regulation 18 version of the SADPD. The Council purports to have carried out that exercise by considering three potential Options for the SADPD consultation, as set out in the committee report.
- 6.2. The Options presented however were not sufficiently different in terms of addressing the approved spatial strategy. 20 of the 22 sites ultimately identified in the selected Option were common to all 3 Options.
- 6.3. Option 2 included two additional sites at Burgess Hill (Category 1 settlement) while Option 3 included those sites plus a 3<sup>rd</sup> site at Haywards Heath (again a Category 1 settlement). This means that the choice around options was solely a choice around the overall number of units to be delivered in excess of the minimum residual requirement. There was no reasonable alternative presented in relation to the spatial strategy and the distribution of development between the settlement categories. Options 2 and 3 simply added additional dwellings to Category 1 settlements and did not seek to redress imbalances between the other settlement categories. The choice provided was against delivering either 112, 455 or 742 dwellings above the minimum residual requirement. In each scenario, the minimum target provision was exceeded in Category 1, 2 and 4 settlements. None of the Options met the Category 3 target residual minimum.
- 6.4. This is surprising given that there are nearly the same number of settlements in Category 3 (13) than in all of the other settlement categories where sites are proposed for allocation combined (14). It is not credible that there are no potentially suitable additional Category 3 sites that might be considered as reasonable alternatives for the purpose of the sustainability appraisal.
- 6.5. This is all the more pertinent given that the minimum residual provision targeted in the District Plan for Category 3 settlements is the only requirement to have increased under the analysis carried out in support of the SADPD (see section 3 and table above).

**Issue 7: Suitability**

- 7.1. Albourne is acknowledged to be one of 13 settlements within Category 3 in the settlement hierarchy, identified as a Medium-Sized Village that provides essential services and which is capable of accommodating additional residential development. The District Plan identifies a minimum residual requirement for Category 3 settlements of 311 dwellings. This has been increased to 439 units as at 1<sup>st</sup> April 2019 in the context of the current Regulation 18 consultation. The current draft SADPD delivers 303 units in such settlements, an under-provision of 136 units.
- 7.2. Under-provision is also apparent within Albourne itself. The table produced at paragraph 6.42 of the sustainability appraisal demonstrates that (in addition to the 136-unit shortfall across Category 3 Settlements), the Regulation 18 SADPD under-delivers against the spatial strategy expectation for Albourne – namely 39 dwellings. The SADPD does not allocate any sites in Albourne, leaving at least 39 units to be found if the residual for the village is to be met. The Albourne Neighbourhood identifies very little in the way of housing allocations to meet this identified shortfall (only 2 dwellings under policy ALH2).
- 7.3. The site South of Henfield Road consists of 3 hectares of agricultural land in total, to the west of Albourne and adjacent to the settlement confines. The land proposed for allocation lies to the south of a mature hedgerow/tree boundary which runs east/west and which itself is behind a further hedgerow running along the southern side of Henfield Road. The eastern boundary is formed by the rear of the Primary School site, with a public footpath forming the southern boundary. The western boundary of the site runs broadly north/south and follows a change in the topography of the site following the site's lowest contours before the land rises again to the west. Croudace also control land with an extensive frontage to Henfield Road (including the adjacent orchard), from which the existing access to the site itself is taken via a field gate. The site is currently uncultivated.
- 7.4. Public Right of Way (PROW) 15\_1AL forms the southern boundary and connects the site with The Street. The site lies some 1.8km from the South Downs National Park and the High Weald AONB is some 5.7km to the north of the site.
- 7.5. The site benefits from minimal overlooking by existing properties and its development would have minimal adverse impact on the amenity of existing residents and businesses. Nevertheless, the site lies immediately adjacent to the settlement confines and provides a logical potential extension to the village.
- 7.6. In terms of settlement structure, Church Lane and Henfield Road (B2116) and associated mature hedgerows provide a natural enclosure to the land within Croudace's control. Further afield, the B2118 London Road forms a natural boundary to the east of the village, restricting further growth in that direction with the need to prevent coalescence with Hurstpierpoint. A23 road noise also restricts growth to the east.

- 7.7. To the north and south of the village, two promoted sites were discounted at the SHELAA Stage 1 (ref. 58 and 789). This is compounded by a Local Gap policy in the Neighbourhood Plan which prevents development to the north and east of the village (policy C3). Growth to the west of the village is the only remaining area where additional housing could be located, and which has not been explored to date given the late stage at which the Croudace site has been presented to Mid Sussex. Indeed, none of the previously promoted sites in Albourne progressed beyond the high level site assessment (Stage 2) as all were considered to be non-compliant with the District Plan spatial strategy. Land South of Henfield Road would be compliant given its excellent relationship to the existing settlement and its scale relative to the settlement and its position in the hierarchy, whilst having the added benefit of providing a safe drop off and pick up area for the adjacent primary school.
- 7.8. In terms of sustainability and connectivity, Albourne is a Category 3 settlement in the District Plan hierarchy. Bus stops within 350m of the site serve Sayers Common, Hurstpierpoint, Keymer, Burgess Hill, Horsham, Crawley, and Brighton. The closest train station is at Hassocks – a 15-minute cycle journey or 25-minute bus journey away. Albourne's position within the settlement hierarchy recognises that there is access to sufficient services and facilities to justify additional housing during the plan period.
- 7.9. Transport work has been undertaken by Paul Basham Associates. Their assessment can be summarised as follows:
- Average traffic speeds (outside half-term break) indicate 85th percentile speeds of 39mph.
  - Visibility splays of 120m (DMRB standards), based on current vehicle speeds, can be achieved.
  - Access to the site should be taken from Henfield Road. While Croudace control an extensive frontage, a new access approximately 45m west of the junction between The Street and Henfield Road is proposed. This would involve the closure of the existing agricultural access between this point and the junction with The street. This access point is well-related to the village centre.
  - Relocating the 30mph speed limit change further west could help to reduce vehicle speeds and reduce visibility requirements, but this is not essential to the deliverability of the scheme. Pre-app discussions with WSCC Highways have indicated that this is not essential.
  - Additional pedestrian access can be provided to the south of the site where it abuts PROW No. 15\_1A1. This connects to The Street, past the school grounds.
- 7.10. The vehicular access to the site would be formed at the point that the two hedgerows referred to above join and would continue to provide a continuous hedgerow around the adjacent orchard, thereby minimising impact on the landscape and ecology.

- 7.11. Pre-application advice has been sought from WSCC as highways authority over the access and transport considerations associated with a potential development of 40 dwellings. The advice provided (in August 2019) considered a proposal to relocate the 30mph speed limit and suggested access arrangement improvements. This is discussed further in the accompanying Transport Note (Appendix C), where a number of access options have been explored.
- 7.12. Of the thirteen Category 3 settlements, eight fall entirely within the AONB. Albourne on the other hand is not subject to any national or local landscape designations, although views from the nearby South Downs National Park do need to be taken into consideration.
- 7.13. Arc Landscape Design and Planning Ltd have prepared a technical note (Appendix D) which explores the landscape impact of development on the site. While the prominent ridge of the South Downs is visible from views within the site, inter-visibility is limited. When viewed from the top of the South Downs ridge, the site is indiscernible within the wide panoramic views experienced from these locations. Again, whilst there are views out from the site looking north and north-west, due to the lower lying nature of the landscape to the north, combined with intervening boundary vegetation and woodland, there are no notable views back towards the site.
- 7.14. The report notes:
- Any new development comprising built form of up to two storeys would be visible over the existing hedgerow along Henfield Road from the properties to the north. There would also be views of new buildings from Wellcroft Cottages to the south, however these views would become increasingly screened over time once the trees and hedgerow along the southern boundary (recently planted) are established.
  - Users of the PROW as it crosses the site would experience a change in views looking to the north, however this change would be experienced for only a relatively short length (some 114m) of the much longer footpath. The relationship between the footpath and any new buildings should be carefully considered.
  - The site is largely indiscernible in views from the South Downs. The introduction of built form at the densities proposed is unlikely to increase visibility, however materials for south facing facades and roofing materials should be selected to tie in visually with existing properties in the nearby villages.
- 7.15. The illustrative Concept Plan at Appendix E shows one way in which the site could be developed.
- 7.16. The development of the site at an appropriate density that reflects the character of the existing settlement, together with sensitive design and appropriate use of materials and mitigation planting, will mean that development of this site will be suitable in terms of the Council's overall assessment. The net developable area of the site is approximately 2.3ha. This area is capable of delivering approximately 40 dwellings at a density of 17 dwellings/hectare.

- 7.17. Arc's report also considers the Council's landscape capacity studies undertaken in 2007, 2014 and 2015, and offers a site-specific opinion of the landscape capacity of the site. The site falls within a larger character area that was assessed as having medium/low landscape capacity in the 2014 LUC report. This character area received negative scores due to the presence of listed buildings and proximity to Sayers Common. In fact, the site being promoted here is not located close to any heritage assets and is sufficiently small scale and distant from Sayers Common such that its 'Landscape Sensitivity' and 'Landscape Value' should be assessed more favourably. The report concludes that the landscape capacity of the site, when assessed separately from the remainder of the character area, is 'Medium'.

### **Issue 8: Albourne Primary School**

- 8.1. One of the key advantages of Land South of Henfield Road is that Albourne Primary School abuts the site to the east. The school takes pupils from Hurstpierpoint, Sayers Common, Poynings, Pyecombe, Newtimber and Albourne itself. Many pupils travel from Hurstpierpoint in particular, where the primary school is at capacity.
- 8.2. The majority of children are driven to school as a result, but there is no suitable parking or drop-off arrangements. Parents tend to park along Henfield Road/ HOLDERS, and have to cross the main road to get to the school gates.
- 8.3. There are community aspirations for a safe drop-off/pick up arrangement to be made, which is not currently possible within the school's control. There is an opportunity to find a solution to this problem through the allocation of the Croudace site in the SADPD.
- 8.4. It is envisaged that a parking area could be provided in the north eastern part of the site (via the new residential access), with a footpath connection into the school grounds. These arrangements are shown indicatively in the Concept Plan (Appendix E).

### **9: Summary**

- 9.1. Land South of Henfield Road, Albourne is well-suited to meet an acknowledged shortfall in housing provision against the District Plan's residual minimum requirements in Albourne, and in Category 3 settlements generally. An allocation of this site at Regulation 19 stage has the potential to deliver policy-compliant affordable housing in a sustainable manner, and further local benefits including a much-needed solution to primary school parking /drop-off problems.
- 9.2. The Regulation 18 SADPD over-relies on windfall development. Difficulties with delivery on some of the District Plan's strategic sites and the unproven response to Policy DP6 mean that further site allocations are the safest way to ensure that a five-year supply is maintained through the Plan period.
- 9.3. The Council should give serious consideration to revising the windfall provision, and should instead target new sites at Category 3 settlements.

- 9.4. That a site with such positive merits as Land South of Henfield Road, Albourne should nevertheless be available and suitable suggests that the Council has yet to leave “no stone unturned” (in particular in Category 3 settlements) in seeking appropriate opportunities for further site allocation.



# **Mid Sussex District Council Site Allocations Development Plan Document**

**Regulation 18 Consultation Draft**

## **Housing Supply Technical Note**

**Prepared by Strutt & Parker**

**S&P Ref: 210906 / GW/SC**

October 2019

## **Executive Summary**

1. This technical note has been prepared by Strutt & Parker in response to the emerging Site Allocations Development Plan Document (DPD) Regulation 18 Consultation, to provide commentary on elements of the Council's housing supply, in particular its revised windfall estimate and the deliverability of strategic allocations.
2. The National Planning Policy Framework (NPPF) is clear that where a windfall allowance is included as part of housing supply, it should be justified by compelling evidence. There are a number of concerns at this stage with whether the Council's approach to calculating windfalls is justified, in particular due to the risk of double counting with neighbourhood plans, and the limited period used to estimate the revised windfall figure.
3. With respect to the deliverability of strategic allocations, the Council are relying on four strategic sites as a key element of their housing supply over the remaining plan period. Whilst development has commenced on two of these sites, there is a risk of the Burgess Hill Northern Arc in particular delivering significantly less housing within the plan period than expected.
4. We recommend the Council reappraise its approach to windfalls and revise the housing trajectory to understand the likely impact of these issues. Additional land for development should be allocated through the Site Allocations DPD to ensure it can maintain a five year supply of housing land over the remainder of the plan period.



## Windfalls

### Policy Background

5. Paragraph 70 of the NPPF 2019 states:

*'Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.'*

6. Windfalls are simply defined in the glossary of the NPPF as '*sites not specifically identified in the development plan.*'
7. National Planning Practice Guidance simply refers back to paragraph 70 of the NPPF.

### Adopted District Plan

8. The adopted Mid Sussex District Plan (March 2018) sets out that a windfall of 45 dwellings per annum (dpa) can be delivered on small sites of up to 5 units, from year 6 of the plan period, contributing a total of 450 units over the plan period 2014-2031.
9. The basis of this windfall estimate is set out in the Council's Windfall Study dated November 2015. The figure has been derived by first calculating the average annual number of completions on previously developed sites of between 1-5 dwellings, for the seven years 2007-2014. This figure has then been discounted by 20% to ensure a robust figure which can be used as a reliable source of supply.

### Emerging Site Allocations DPD

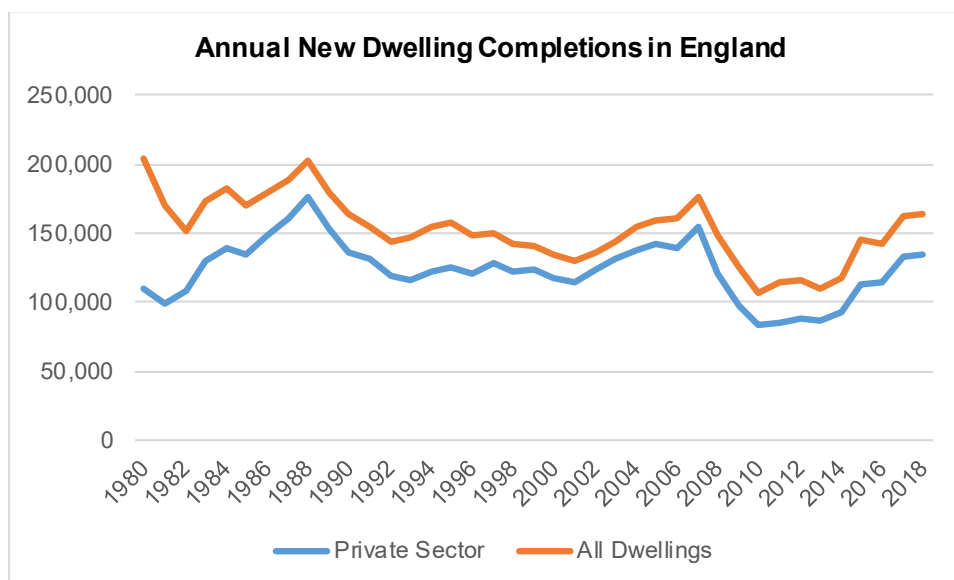
10. The emerging Site Allocations DPD proposes to include an increased windfall allowance of 84dpa, or a total of 588 dwellings over the final 7 years of the plan period (2024-2031). The Council have produced a Windfall Study Update (dated September 2019). This sets out that the figure of 84dpa has been derived by applying a broadly similar methodology as previously, although with a number of key differences. The primary difference is that the range of sites which have been considered as potential windfalls has been increased from sites with a capacity of 1-5 units to sites with 1-9 units. National Policy does not set any limit on the size of site which can be considered a windfall, and there is a logic in increasing the range to sites with a capacity of up to 9 units as this aligns with the definition of non-major development as defined in the NPPF. This change in approach does however need to be clearly justified by robust evidence.
11. An important factor which has to be considered is whether increasing the windfall site threshold creates a risk of double counting with sites between 6-9 dwellings which have been allocated

through the Development Plan. None of the District Plan, Small Site Allocations DPD or emerging Site Allocations DPD include any site allocations between 6-9 units. There are however a number of Neighbourhood Plans within Mid Sussex District for sites below 10 units including:

- Land at Hay Lane, Albourne – 2 dwellings
- Barn Cottage, Ansty – 8 dwellings
- 98-104 Maypole Road, Ashurst Wood – 5 dwellings
- Mount Pleasant Nursery, Ashurst Wood – 3 dwellings
- Willow Trees, Lewes Road, Ashurst Wood – 2-4 dwellings
- Spinney Hill, Ashurst Wood – 2-4 dwellings
- G&W Motors, Bolney – 9 dwellings
- Bolney House Garden, Bolney – 3-5 dwellings
- Site of 11 Manor Drive, Cuckfield – 3 dwellings
- Meadway Garage, Lowdells Lane, East Grinstead – 9 dwellings
- 67-69 Railway Approach, East Grinstead – 7 dwellings

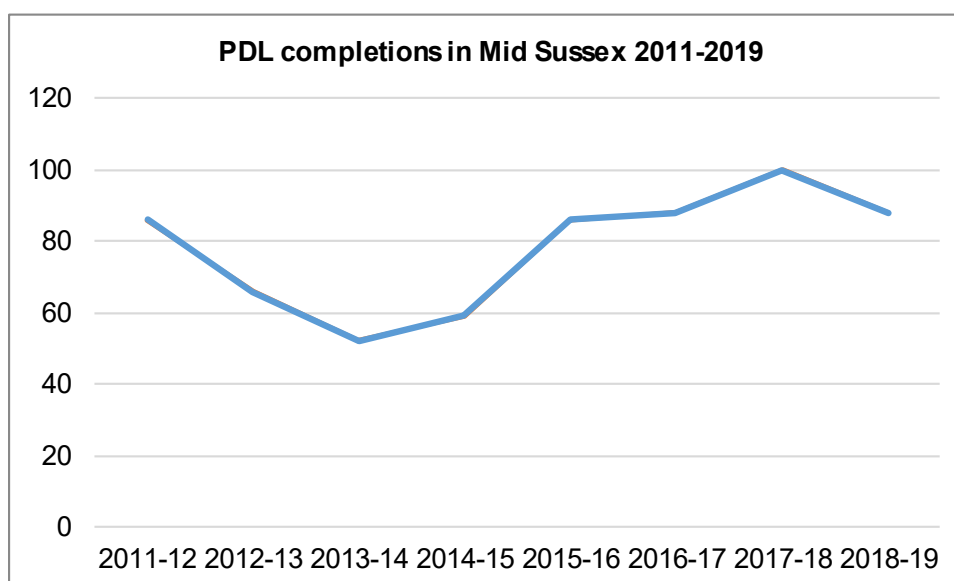
12. It is likely further sites with a capacity of less than 10 units will be allocated in future Neighbourhood Plans and Neighbourhood Plan reviews. There is a clear risk of double counting, and indeed the fact that a number of Neighbourhood Plan allocations are for sites of 5 dwellings or less, there is a clear question over whether the inclusion of any windfall allowance is robust. At the very least a significant discount should be applied to avoid double counting.
13. Another change to the Council approach to calculating its windfall estimate is that it has used a relatively short period to calculate its windfall estimate, the five years 2014-2019. This approach is flawed as it only captures completions from a relatively buoyant period in the housing market. Private sector house building, and housing building overall tends to reflect economic cycles, as illustrated by Table 1 below which shows annual completions in England since 1980.

**Table 1. – Annual New Dwelling Completions in England<sup>1</sup>**



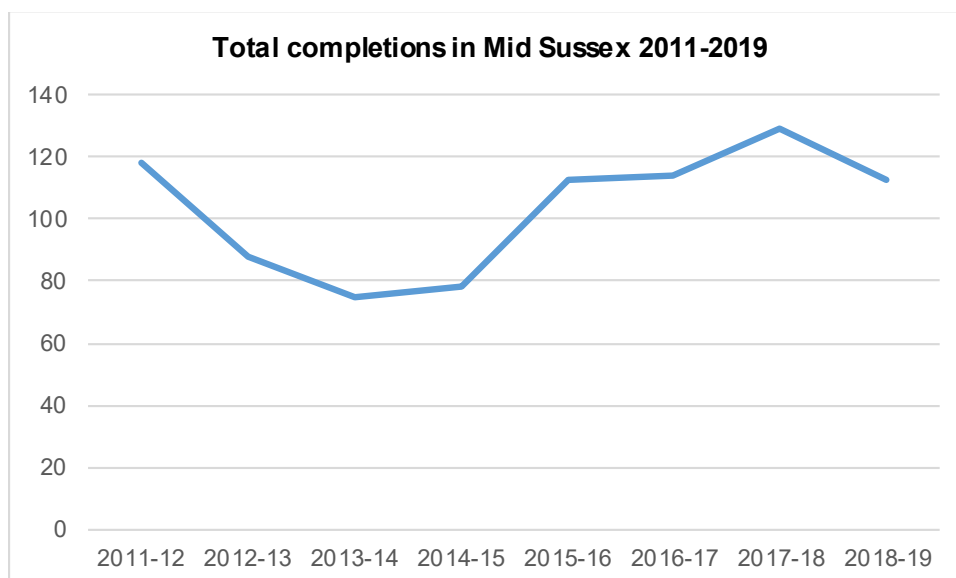
14. Making long term projections on the basis of a small range is statistically flawed, and in this case overinflates the Council’s windfall estimate. We recommend a longer period is used in order to capture the full economic cycle and provide a more robust calculation. Using housing land supply data published on the Council’s website, Tables 2 and 3 show the number of completions on sites of less than 10 units, on previously developed land and overall respectively. Table 4 shows net annual completions in England which illustrates how the trend in completions in Mid Sussex reflects the national trend.

**Table 2. – Net annual completions on previously developed sites for less than 10 units.**

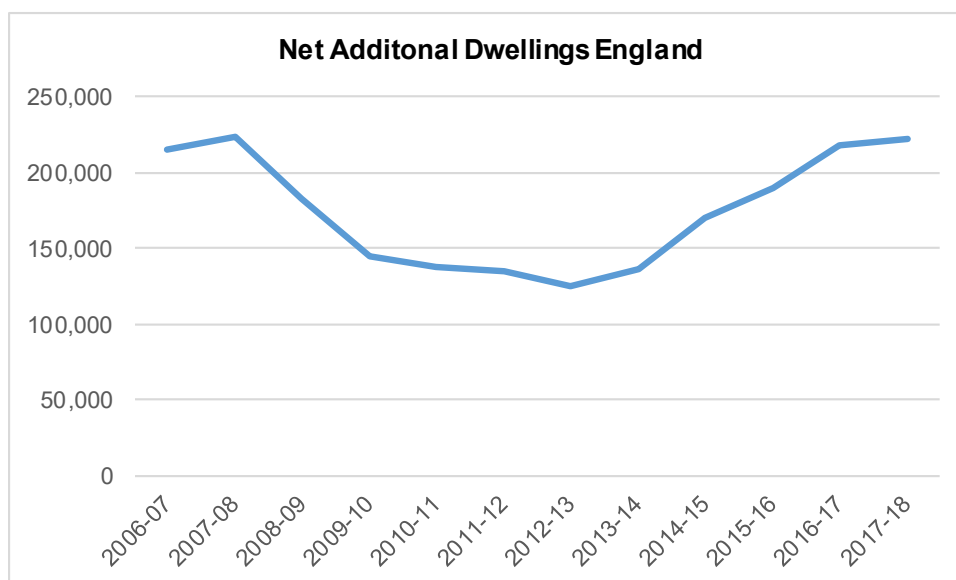


<sup>1</sup> MHCLG Table 244: permanent dwellings started and completed, by tenure, England, historical calendar year series

**Table 3. – Net annual completions on all sites for less than 10 units**



**Table 4. – Net annual completions in England<sup>2</sup>**



15. Using the period 2011-2019, and leaving the Council’s methodology otherwise unchanged, the updated windfall figure would reduce from 84dpa to 78dpa.
16. Another underlying concern with the robustness of the Council’s revised approach to calculating windfalls is that the Council is basing its revised windfall calculation on a dataset which does not relate to the policy change it is looking to reflect. Paragraph 2.24 of the consultation Draft Site Allocations DPD states that the windfall allowance is being:

<sup>2</sup> MHCLG Live Table 120: Components of housing supply; net additional dwellings, England 2006-07 to 2017-18

*'updated to reflect changes in national policy and District Plan Policy DP6 that supports development of up to 9 dwellings that are contiguous to existing Settlement Boundaries and based on past performance.'*

17. As set out in paragraph 3.2 of the Windfall Study Update 2019, there has only been one monitoring year where Policy DP6 has been the policy position. As such past completions do not provide any real guidance as to what effect this policy change will have, if any, and it is not robust to use this change in policy to justify a change to the windfall estimate at this stage.
18. In summary, there are clear flaws in the Council's approach to Windfalls, and there is no compelling evidence to justify an increase in the estimated contribution windfalls will make above 45dpa in the adopted District Plan. Indeed, the potential double counting with small sites allocated in Neighbourhood Plans brings into question whether a windfall allowance is justified at all.

## **Deliverability of Strategic Allocations**

19. The adopted District Plan includes four strategic housing allocations. Two of these allocations, Kings Way at Burgess Hill and East of Pease Pottage are progressing broadly as expected with development having commenced. Progress has been slower however on the other two allocations.

### North of Clayton Mills, Hassocks

20. An outline planning application (DM/18/4979) for up to 500 dwellings on this site was submitted in December 2018 but has not yet been determined. The Council's submitted Housing Land Supply Position Statement July 2019 sets out that completions on this site are expected from the monitoring year 2021/22, with delivery of 50dpa. At this build rate final completions would be in the final year of the plan period.
21. As the outline permission has yet to be determined, assuming this is approved, for completions to start in 2021/22 is ambitious although not necessarily unrealistic. As such it appears realistic that this site can deliver in full within the plan period, however any delays risk pushing completions beyond the end of the plan period.

### Northern Arc, Burgess Hill

22. An outline planning application (DM/18/5114) for 3,040 homes was submitted in December 2018 and finally approved on 4 October 2019. The Council's submitted Housing Land Supply Position Statement July 2019 states the first completions are expected in 2021/22, with delivery rising from 80 in the first year to 132 and 156 in subsequent years.
23. Assuming a delivery rate of 156dpa is maintained, this site would only deliver 1,460 dwellings over the plan period, significantly below the 3,500 dwellings it is allocated for. For a site of this size, for completions to start in 2021/22 appears overly ambitious.
24. Research by Lichfields<sup>3</sup> in 2016 found that sites of 2,000 units or more on average took six years from first submission of an application to full, hybrid, or first reserved matters approval. This reflects the inherent complexities of delivering sites of this size and associated infrastructure. At this rate, first completions are unlikely to take place until 2024-2025, with the site likely to deliver less than 1,000 units within the plan period to 2031.
25. Despite Homes England seeking to unlock supporting infrastructure, there does not appear to be any reliable evidence at this stage that this is likely to significantly accelerate delivery. Whilst the submitted Housing Land Supply Position Statement states at paragraph 3.5 that the majority of the dwellings this site is allocated for will be delivered within the plan period, this is manifestly not the case.
26. The Council however has the opportunity, through the Site Allocations DPD to allocate a number of additional deliverable small and medium-sized sites. This will provide greater

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<sup>3</sup> NLP (2016) *Start to Finish* (<https://lichfields.uk/media/1728/start-to-finish.pdf>)

certainty and help ensure the Council it is building the homes which are needed, and that it will be able to demonstrate a robust supply of housing over the remainder of the plan period, rather than opening the door for unplanned speculative development.

## **Conclusion**

1. National policy sets out that if an allowance of windfalls is to be included as part of housing supply, this should be justified by compelling evidence. There are a number of concerns at this stage with whether the Council's approach to calculating windfalls is justified. In particular, there is a risk of double counting with sites which have a capacity of less than 10 dwellings allocated through neighbourhood plans. This brings into question whether any windfall allowance is justified at all, and as a minimum we recommend a significant discount should be applied to address this issue. The Council has also used a short period of time during a relatively buoyant construction period to estimate its windfall allowance, with has the effect of overestimated the likely contribution from small sites to housing supply in future years.
2. The Council are relying of four strategic sites as a key element of their housing supply over the remaining plan period. Whilst development has commenced on two of these sites, there is a risk of the Burgess Hill Northern Arc in particular delivering significantly less housing within the plan period than expected. This is likely to result in a significant deficit against the housing requirement in the later years of the plan.
3. We recommend the Council review its approach to windfalls and the housing trajectory for the remainder of the plan period to take account of these concerns, allocating additional land for development through the Site Allocations DPD to ensure a five year supply of housing land can be maintained over the remainder of the plan period.



<b>Project Name:</b>	Land South of Henfield Road, Albourne
<b>Document Reference:</b>	093.0002/LPTR/5
<b>Document Name:</b>	Land Promotion Transport Report
<b>Prepared By:</b>	Martha Woodley (November 2019)
<b>Checked By:</b>	Harry Cross (November 2019)
<b>Approved By:</b>	James Rand (November 2019)

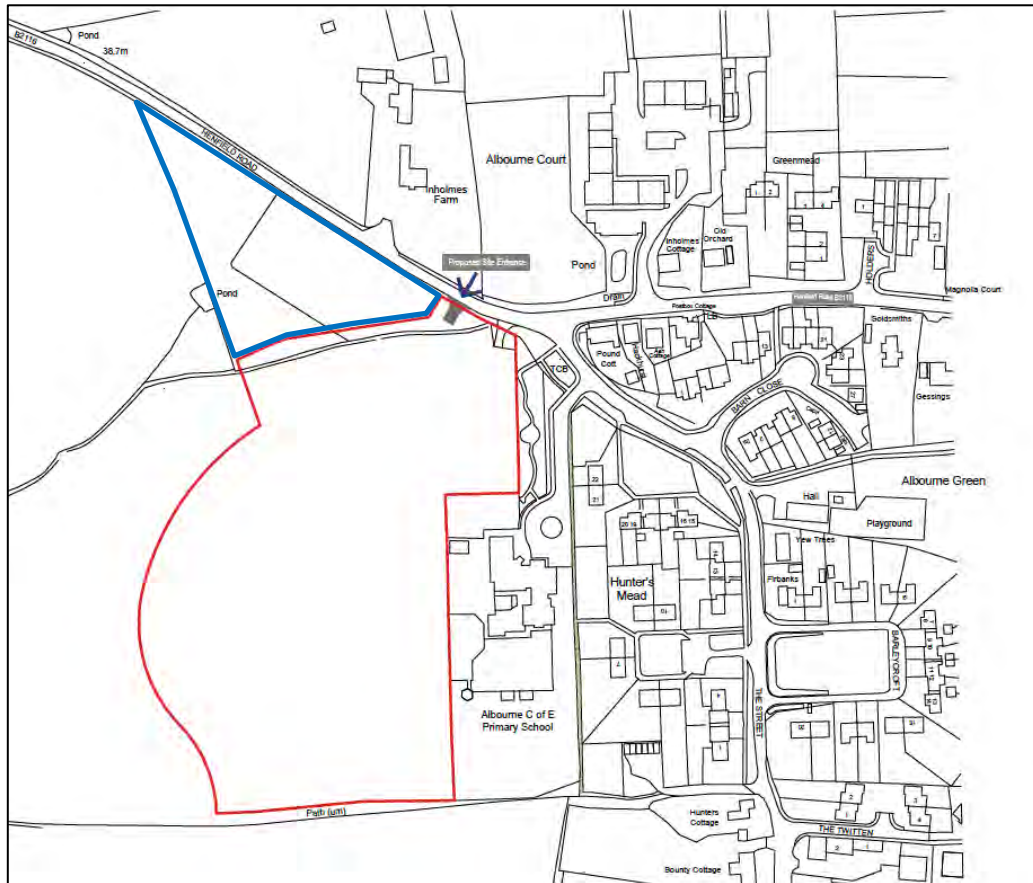
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**1. INTRODUCTION**

1.1 This Land Promotion Transport Report (LPTR) has been prepared by Paul Basham Associates on behalf of Croudace Homes to promote land South of Henfield Road, Albourne for a residential development of circa 40 dwellings. The site location and red line plan is shown below in **Figure 1** with wider land ownership demonstrated in blue.



**Figure 1:** Approximate Site Location

- 1.2 Mid Sussex District Council (MSDC) are in the process of preparing a Site Allocations Development Plan Document (DPD) which identifies sufficient housing sites to provide a five-year housing supply to 2031.
- 1.3 Mindful of the need for sustainable and deliverable sites, this LPTR will demonstrate the suitability and benefits of this particular site through an assessment of site accessibility, development capacity, trip generation and site access proposals before drawing conclusions from the assessment.
- 1.4 This LPTR has been informed by pre-application discussions with WSCC Highways which took place during an on-site meeting in August 2019. A copy of the formal highways pre-application response (Ref: PRE-72-19) is attached within **Appendix A**.

## 2. EXISTING CONDITIONS AND SITE ACCESSIBILITY

- 2.1 The site is situated towards the western edge of Albourne Village, approximately 1.4km south of Sayers Common where a village store is located. Hurstpierpoint is located approximately 1.7km east of the site offering a wider variety of amenities and services including several shops and restaurants, places of worship, a pharmacy, dentist, health centre, and library.
- 2.2 The site comprises undeveloped agricultural land bordered by Henfield Road to the north, Albourne CE Primary School to the east and neighbouring agricultural fields to the immediate south and west.
- 2.3 The site comprises two separate parcels of land, each with their own access. The triangular parcel of land which extends across the site frontage comprises of an orchard and is accessed via a gated access approximately 90m west of The Street/Henfield Road junction.
- 2.4 The rear parcel of land, also used for agricultural purposes, is served by a different gated access towards the north-east corner of the site on Henfield Road. This access is situated approximately 10m west of The Street/Henfield Road junction and is demonstrated in **Photograph 1**. The existing site conditions are demonstrated in **Photograph 2**.



**Photograph 1:** Existing Access Arrangement



**Photograph 2:** Existing Site Conditions

### Local Road Network

- 2.5 Henfield Road (B2116) is a single carriageway road with an approximate east-west alignment and measures approximately 6.5m in width. Within the vicinity of the existing site access the road is subject to a 30mph speed limit. Approximately 100m west of the existing site access and halfway across along the site frontage, the speed limit changes to

the national speed limit. The existing conditions along Henfield Road within the vicinity of the site are demonstrated in **Photographs 3** and **4**.



**Photograph 3:** Conditions on Henfield Road (Eastbound)



**Photograph 4:** Conditions on Henfield Road (Westbound)

- 2.6 The site has good connections with the wider strategic road network including the B2218 and A23 to the east and the A272 to the north. The A23 is accessible via a 3-minute drive (2.5km) from the site and provides connections with Crawley to the north (18 minutes) and Brighton to the south (23 minutes).

#### **Pedestrian Network**

- 2.7 Pedestrian footways are provided along Henfield Road between The Street/Henfield Road junction and the B2118/Henfield Road junction 250m to the east of the site. Footways then continue along the B2118.
- 2.8 Although the existing footway along Henfield Road does not currently extend to the site it is proposed that either the footpath will be extended or that a footpath is provided within the site to The Street eliminating the need for a footway along this stretch of carriageway.
- 2.9 The site is situated within the vicinity of a number of Public Right of Ways (PROWs), which provide pedestrian routes towards the neighbouring village of Hurstpierpoint as well as local facilities including the Singing Hills Golf Course and the Albourne Equestrian Centre. An overview of the PROW's within the vicinity of the site is illustrated in **Figure 2**.

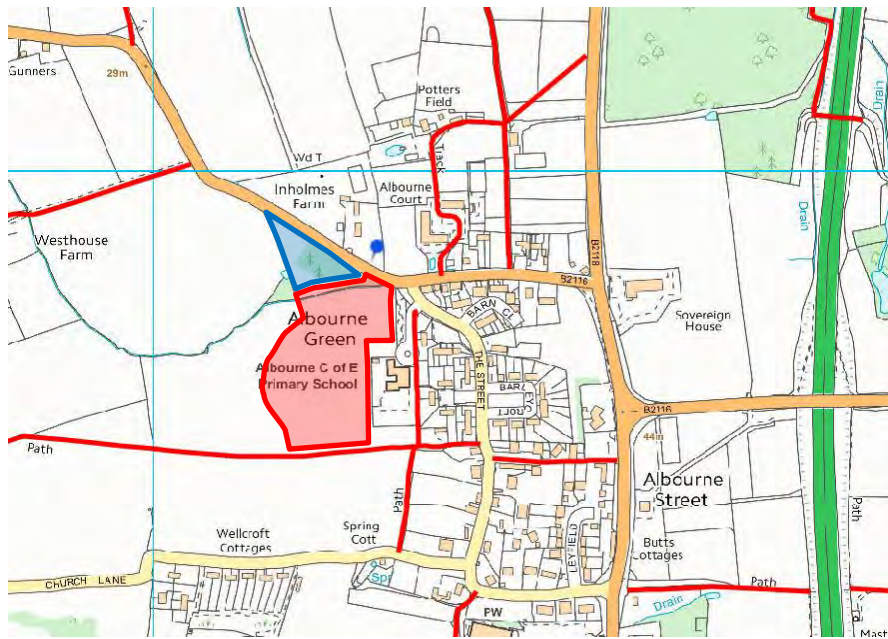


Figure 2: PROW's within the vicinity of the site

- 2.10 There is potential to provide an additional pedestrian connection to the village centre which joins with PROW No.15\_1A1. This particular PROW runs along the southern border of the site and provides connections with both The Street as well as the B2118 where several bus stops are situated.

### Cycle Network

- 2.11 The site is situated approximately 275m west of National Cycle Route (NCR) 20 which follows the route of the B2118 (Figure 3). The route connects the site with Crawley to the north via Sayers Common, Hickstead, Bolney, Staplefield, Handcross and Pease Pottage. To the south, the route connects the site with Brighton via Pyecombe, Withdean and Preston.

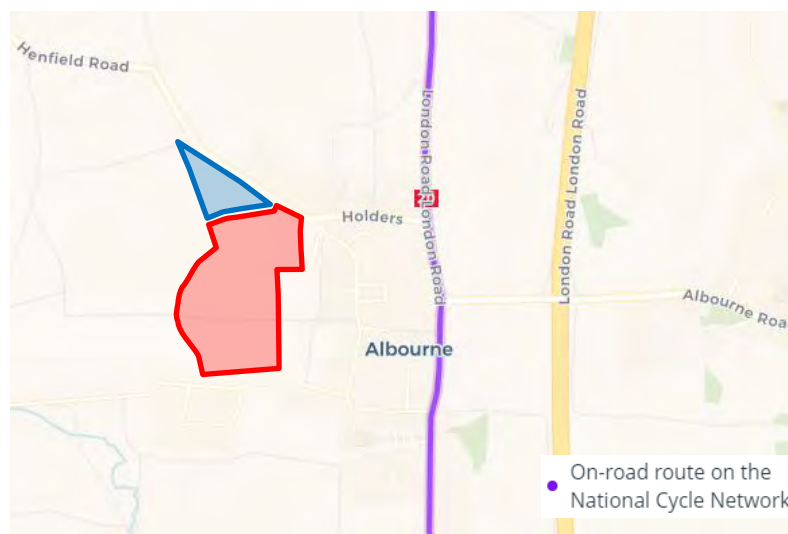


Figure 3: Local Cycle Routes (Sourced from: [www.sustrans.org.uk](http://www.sustrans.org.uk))

### Public Transport

- 2.12 The closest bus stops to the site are the ‘Village Hall’ and ‘The Street’ bus stops, both located within 150m of the site (a two-minute walking distance). Both stops are served by the 590 bus service which departs at 08:25 during the week and serves Sayers Common, Muddleswood, Hurstpierpoint, and Clayton.
- 2.13 Better served bus stops include the ‘Traffic Lights’ bus stops, located on the B2118, approximately 350m east of the site (five-minute walking distance). The northbound stop comprises a layby and sheltered seating, whilst the southbound stop comprises a flag and pole style stop with printed timetables.
- 2.14 A summary of the services provided within the vicinity of the site is outlined in **Table 1**.

Service	Stops At: (Closest Stop)	Route	Operator	Frequency		
				M-F	Sa	Su
590	Village Hall & The Street	Sayers Common – Hurstpierpoint – Keymer – Albourne	The Sussex Bus	Once a day: 08:25	No Service	
100	Traffic Lights	Burgess Hill – Henfield – Steyning – Storrington – Pulborough - Horsham	Compass Travel	Hourly	Hourly	No Service
273	Traffic Lights	Crawley – Hurstpierpoint – Brighton	Metrobus	Every 2 hours approx.		No Service
331	Traffic Lights	Keymer – Hurstpierpoint – Sayers Common	The Sussex Bus	Once a day: 15:31	No Service	

**Table 1:** Summary of Local Bus Services

### Rail Services

- 2.15 The closest railway station to the site is Hassocks Station, situated approximately 4.5km east of the site. The station can be accessed from the site via a 15-minute (approx.) cycle or 25 minute journey (approx.) via the 273 bus service from the ‘Traffic Lights’ stop.
- 2.16 The station benefits from ticket machines, sheltered cycle storage spaces, step free access and ramps for train access.
- 2.17 The station provides frequent train services to destinations including Burgess Hill (4 minutes), Haywards Heath (10 mins), Brighton (11 mins), London Victoria via Gatwick Airport (54 mins), and Cambridge (2 hours 20 mins).

- 2.18 It is therefore considered that the site has reasonable access to public transport and some local facilities. As such the site is considered to be relatively sustainably located.

### 3. ACCESS ARRANGEMENTS

3.1 This LPTR has been prepared to support a development of circa 40 residential dwellings served via a single vehicular access onto Henfield Road. The existing accesses to the site will be closed-off (with hedgerow reinstated) with a new formalised access provided approximately 45m east of the existing orchard access and 50m west of the junction with The Street. The proposed access location has been informed by the formal pre-application response which stated the following:

*“On site it was observed that access on the slight outside bend and closer to junction with The Street could afford greater visibility and it is advised that maximum achievable visibility from the decided access location be demonstrated at full planning application stage and to ensure that splays are in accordance with 85th percentile speeds regardless of location inside or outside of the 30mph limit”.*

3.2 The feasibility of an access located further west on Henfield Road (approximately where the speed limit change is located) has previously been explored. However, despite this being a perfectly viable access (meeting all relevant standards in relation to junction spacing, visibility and tracking etc.) comments received from WSCC suggested that locating the access further east towards Albourne would be more favourable, and so this has therefore informed the current proposals.

3.3 Therefore, an indicative access has been designed to demonstrate the feasibility of the proposed arrangement. The proposed access is in the form of a bellmouth junction with access radii of 6m and an access road width of 5.5m. Sufficient space is, however, available for the geometries to be modified if required.

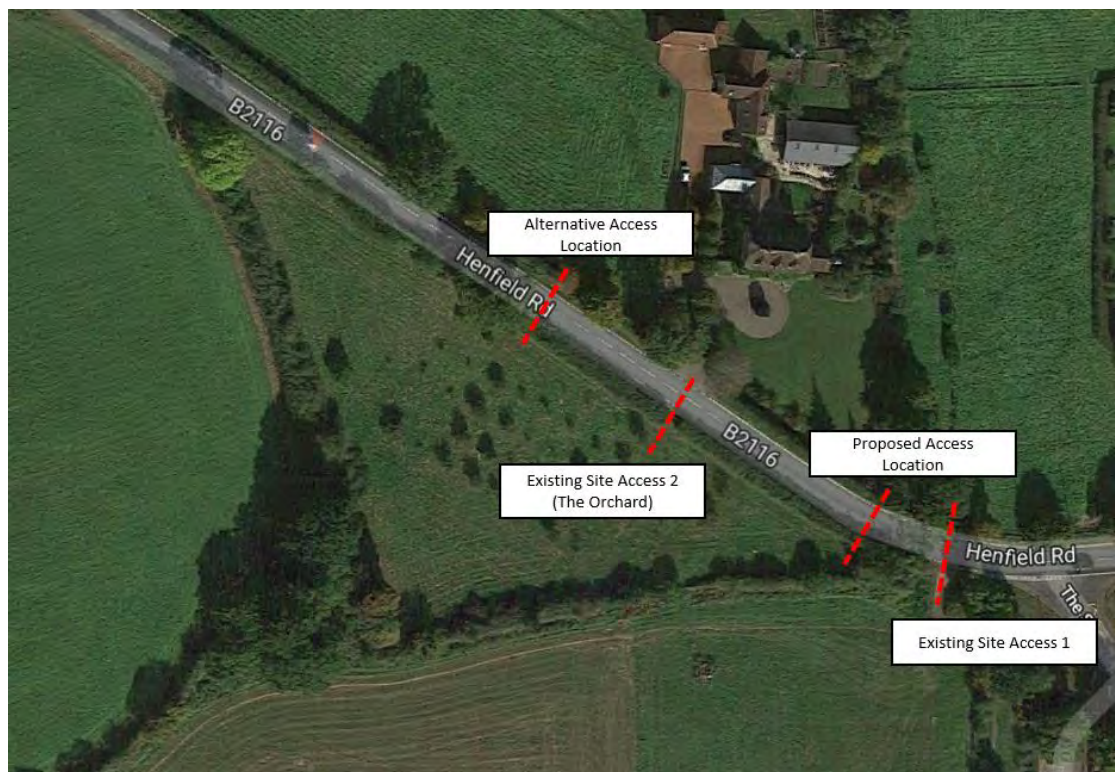
3.4 The indicative access location maintains appropriate junction spacing with The Street whilst allowing for the appropriate extents of visibility to be achieved. Speed surveys were undertaken along Henfield Road, Albourne in May 2019 outside the school holidays and recorded 85<sup>th</sup> percentile vehicle speeds of 35.79mph (WB) and 42.67mph (EB). The full outputs are attached within **Appendix B**.

3.5 WSCC suggested that a further speed survey be undertaken in order to record speeds further around the bend, though despite undertaking a survey in this suggested location in October 2019, the tubes were tampered with and a full week of data was unfortunately



unobtainable. Having said this, the speeds that were recorded were comparable with the existing survey (with eastbound 85<sup>th</sup> percentile speeds of 39mph) however for the purposes of robustness the existing 7 days' worth of data has been used for the purposes of this assessment and included for reference.

- 3.6 Visibility splays of 2.4m x 120m have been demonstrated to be achievable as required by DMRB for vehicle speeds of approximately 40mph and it is therefore considered that safe and suitable access is achievable in accordance with the requirements of NPPF. The parameters of the visibility assessment were agreed with WSCC during the pre-application discussions and a copy of the relevant drawing is attached within **Appendix C**.
- 3.7 Vehicle tracking exercises have been undertaken using the relevant-sized refuse vehicle to demonstrate the feasibility of the access proposals. The relevant drawing is attached within **Appendix D** which shows there is sufficient space for these vehicles to use the junction.
- 3.8 The location of the proposed access relative to the two existing access is demonstrated in **Figure 4**.



**Figure 4:** Proposed Access Location

### **Pedestrian Access**

- 3.9 As mentioned previously, pedestrian access would also be provided to the site. As part of the indicative access design, a footpath measuring 2m in width has been designed which would connect the site with 'The Street' to the east. There are also possibilities for footpaths within the site to connect with PROW No.15\_1A1 which runs along the southern site border. The precise form and location of these infrastructure provisions would be further considered as part of any planning application.

#### 4. TRIP GENERATION AND TRIP DISTRIBUTION

##### Trip Generation

4.1 To assess the impact that the proposed development would have on the local highway network a trip generation assessment has been undertaken using the TRICS database. In the absence of any survey data and for the sake of robustness it has been assumed that there are no trips generated from the existing site.

4.2 For the 40 residential dwellings, the TRICS database has been interrogated as follows:

- *Under land-use class 'residential' and sub-category 'Houses Privately Owned';*
- *Sites in England and Wales (Excluding Scotland, Ireland and Greater London);*
- *Weekdays Only;*
- *Sites in 'Edge of Town' locations; and*
- *Parameter of 0 to 80 units.*

4.3 The results of this TRICS assessment are found in **Table 2**, with full outputs contained within **Appendix E**.

TRICS (V.7.6.1)	AM Peak (0800-0900)			PM Peak (1700-1800)			12 hour Total Daily Trips
	Arrivals	Departures	Total	Arrivals	Departures	Total	
Trip Rate per Flat	0.112	0.367	0.479	0.361	0.142	0.503	4.575
Trip Generation (40 Units)	4	15	19	14	6	20	183

**Table 2:** Proposed Development Trip Generation

4.4 **Table 3** indicates that the proposed development is anticipated to generate 183 daily vehicle trips across a 12 hour day, 19 trips in the AM peak and 20 trips in the PM peak. This equates to approximately one vehicle trip every four minutes throughout the day.

4.5 The trip generation outlined in **Table 3** represents a worst-case scenario for 40 dwellings where all housing units have been treated as 'private houses'. The site layout would likely include a mix of affordable and private units; therefore, the trip generation is likely to be lower than outlined above. Regardless, this level of additional trip generation is negligible and would have a minimal impact on the operation of the local road network.

### Trip Distribution

4.6 Having estimated the number of trips likely to be generated by the site, the 2011 Census 'Travel to Work' data for Albourne (Output Area: E01031698) has been reviewed in order to assess the likely trip distribution from the proposed development. The trip distribution is summarised in **Table 3**.

Employment Destination	Route Description	% of total
Mid Sussex (North)	Eastbound on Henfield Road, Northbound on B2118, Northbound on A23	29%
Mid Sussex (South)	Eastbound on Henfield Road, Southbound on B2118, Southbound on A23	9%
Crawley	Eastbound on Henfield Road, Northbound on B2118, Northbound on A23	11%
Brighton & Hove	Eastbound on Henfield Road, Southbound on B2118, Southbound on A23	11%
Horsham	Eastbound on Henfield Road, Northbound on B2118, Northbound on A23	9%
Westminster – City of London	Eastbound on Henfield Road, Northbound on B2118, Northbound on A23	7%
Other	Eastbound on Henfield Road, Northbound on B2118, Northbound on A23	17%
	Eastbound on Henfield Road, Southbound on B2118, Southbound on A23	6%
	Westbound on Henfield Road, Southbound on A24	1%
<b>Total:</b>		<b>100%</b>

**Table 3:** 2011 Census 'Travel to Work Data' - Trip Distribution

4.7 The 2011 Census Travel to work data indicates that 99% of all trips are expected to travel eastbound on Henfield Road towards the B2118, with 73% of trips expected to travel northbound on the B2118 before joining the A23 (northbound). 26% of trips are expected to travel southbound along the B2118 and join the A23 (southbound). The remaining 1% of trips are expected to travel westbound along Henfield Road before joining the A24. The impact of these trips on the local road network will be minimal.

## 5. SUMMARY AND CONCLUSIONS

- 5.1 This LPTR has been prepared by Paul Basham Associates on behalf of Croudace Homes to support the promotion of a site on Henfield Road, Albourne for a residential development of up to 40 dwellings. The report has been informed by pre-application discussions with West Sussex County Council (WSSC).
- 5.2 The site is located towards the western side of Albourne and has good connections with neighbouring villages Sayers Common and Hurstpierpoint where a range of services and amenities are available. Regular bus services are available from the 'Traffic Lights' bus stops, located within a 5-minute walking distance from the site.
- 5.3 It is proposed that the existing site accesses will be closed off and that a new bellmouth junction will be provided approximately 45m east of the existing orchard access. The access location has been informed by formal pre-application discussions with WSSC. A pedestrian access will also be provided connecting the site to the existing footways along The Street.
- 5.4 Tracking exercises have been undertaken demonstrating the feasibility of the access proposals and visibility splays of 2.4m x 120m have been demonstrated to be achievable as required by DMRB for recorded 85<sup>th</sup> percentile vehicle speeds of circa. 40mph.
- 5.5 Vehicular trip rates for the proposed development have been assessed using the TRICS database. As a worst-case scenario, the proposed 40 units will generate in the order of 183 daily vehicle trips, with 19 two-way trips in the AM peak, and 20 in the PM peak. However, given that the site layout would likely include a mix of affordable and private units, the actual trip generation is likely to be lower than this.
- 5.6 This LPTR has demonstrated that the proposed development would not have a significant impact upon the operation of the local road network, and that safe and suitable access is achievable. We would, therefore, recommend that the local planning and highway authorities consider this site for inclusion in the Mid Sussex District Council Site Allocations Development Plan Document.

## Appendix A

**WEST SUSSEX COUNTY COUNCIL  
PRE APPLICATION CONSULTATION**

<b>TO:</b>	Paul Basham Associates FAO: Harry Cross
<b>FROM:</b>	WSCC - Highways Authority
<b>DATE:</b>	21 August 2019
<b>LOCATION:</b>	Residential Development of Circa 40 dwellings, Henfield Road, Albourne, Hassocks, BN6 9DH
<b>SUBJECT:</b>	Internal Reference: PRE-72-19 Residential Development of circa. 40 dwellings with access taken via Henfield Road.
<b>DATE OF SITE VISIT:</b>	22 August 2019
<b>RECOMMENDATION:</b>	Advice

**Site Context**

The land parcel in question is located on southern side of Henfield Road (B2116), west of the junction with The Street. Albourne Primary School and residential dwellings exist to the east/ south-east of site and open agricultural land is present to the west. The land is currently open field/ agricultural use and thus existing vehicle movements are anticipated to be negligible and have not been included within trip generation assessments.

Albourne is a small village with the nearest village store located at Sayers Common, approximately 1.2 miles north of the site. The unconnected footway network begins at junction with The Street and leads east toward the B2118. Main bus stops are located on east and west side of B2118 near traffic lights.

A number of Public Rights of Way (PROW) exist in the vicinity and provide off road link to The Street.

The larger settlement of Hurstpierpoint lies to the east with the A23 providing a vehicular link to Brighton at the south and Crawley to north.

**Access Arrangements and Vehicle Visibility**

The indicative access location plan details the 2 x existing field accesses which will be closed off and the approximate location for new bellmouth access with 6m radii. The currently indicated access position is at the point where 30mph speed restriction changes to National Speed Limit (NSL).

A seven day speed survey was carried out and location of speed counter confirmed to be within vicinity of extent of western splay for eastbound traffic and eastern splay for westbound traffic. Depending on the final proposed location for access the LHA may need to reassess the suitability of speed counter location. 85th percentile speeds of 35.79mph westbound (eastern splay) and 42.67mph eastbound (western splay) were recorded. Splays of 2.4m by 120m have been demonstrated which are suitable to recorded speeds following Manual for Streets (MfS) and Design Manual for Roads & Bridges (DMRB) coefficients, respectively.

On site the proposals to extend 30mph speed restriction further west along Henfield Road was discussed. This was proposed in order for the site access to be located further east toward village and designed wholly to MfS guidance by being inside the 30mph limit. WSCC Speed Limit Policy stipulates that mean average speed should be used to determine whether

a 30mph speed restriction is appropriate. Mean average speeds should be 33mph or lower. Whilst the mean speeds were 30.9mph westbound they were 36.9mph eastbound (although this is considered to be as a result of location of speed counter further west). Furthermore, the Road Safety Group Manager has advised that change in speed limit to 30mph would not meet WSCC policy due to the level of frontage/direct accesses not being predominant. This could therefore not be an officer decision and any proposal to change speed limit may require cabinet member decision. Additionally, it is advised that change of speed limit would require Traffic Regulation Order (TRO) a process separate to the planning process without guarantee of approval. Speeds may not reduce even if scheme was approved and thus the applicant may wish to consider additional measures to promote speed reduction in the vicinity such as vehicle activated signs (VAS).

On site it was observed that access on the slight outside bend and closer to junction with The Street could afford greater visibility and it is advised that maximum achievable visibility from the decided access location be demonstrated at full planning application stage and to ensure that splays are in accordance with 85th percentile speeds regardless of location inside or outside of the 30mph limit.

Swept path tracking has been provided at the site access. Whilst a refuse collection vehicle would cross the opposing carriageway the LHA consider this would be an infrequent manoeuvre and that forward visibility is sufficient in this location. Full tracking within the site would also be expected and demonstration that two cars can pass.

### **Road Network Capacity**

On site the requirement for junction modelling was discussed and considering scale of proposals and predictions from TRICs that less than 30 vehicle movements would be expected in the peak hour, junction modelling was not considered necessary.

The LHA broadly accept the resultant trip generation figures from TRICs which set out 19 trips in AM and 20 in PM peak hour. It is expected that parameters will be refined further when housing tenure mix is known. Considering the level of traffic supported by the district distributor road the LHA does not raise an objection in principle in capacity terms, on the basis that safe and suitable access and all other matters are addressed.

Trip distribution data from 'Travel to Work' census data suggests that 1% of commuter travel will be westbound on Henfield Road then southbound to A24 with 99% of trips travelling east of site and onwards. Considering proximity of A23 to east this is broadly expected to be the case although in reality some further trips westbound may take place. Whilst the applicant could undertake a more robust survey of trip distribution the LHA do not raise an immediate concern with respect to additional vehicle trips across the road network in this location.

### **Accessibility & Local Infrastructure Improvements**

If a footway link is proposed within the confines of the public highway then these works should be included within the Road Safety Audit of the access works. It is understood that there is preference to keep pedestrian/cycle links within the site and off the carriageway edge. Any links toward The Street and/ or PROW network should be detailed. Whether the road will be shared surface/ planned for adoption/ separate footways proposed should also be clarified at planning stage. It is also advised that any lighting within the site is sympathetic to dark skies and planning pre-app with the Local Planning Authority can provide more advice in this respect.

The nearest train station is at Hassocks and is anticipated to be reached by car or cycle for the more confident cyclist. It is advised that as part of the planning application the Transport Statement (TS) refer to walking/cycling distances as set out in national guidance. Other matters such as road traffic collision data and Travel Plan Statement which could



provide a residents welcome pack including information on walking/cycling routes should be addressed.

There are limited facilities within the village with the exception of the adjacent primary school. Commuting and retail trips are anticipated to be further afield and whilst may be by private car the LHA acknowledge that main bus stops on B2118 are approximately 5 minute walk distant. It is noted that to stay on footway from The Street eastwards it is necessary to cross the carriageway a couple of times. Whilst some dropped kerb is present the applicant may wish to consider providing tactile paving crossing points for pedestrians at key locations on the local footway network. These proposals should also be safety audited. The applicant should also liaise with local bus companies to scope out any improvements that could be made to local bus stops such as whether a bus shelter could be provided on east side of B2118.

### **Albourne Neighbourhood Plan**

It is advised that the applicant consider the Neighbourhood Plan in relation to transport and parking topics. It is noted that para. 4.2 of plan states that any new housing development shall take account of a number of matters including lack of transport connections and distance from rail, congestion in village centre exacerbated by road layouts and limited parking. Para. 6.4 goes on to state that parking in and around The Street at pick up/ drop off times for school can be significant. It is therefore advised that sufficient parking provision in line with WSCC revised standards be provided for the development. It is understood that dedicated parking for the school may also be provided as part of the development and it is advised that the Parish Council is consulted regards these proposals.

Para. 6.2 also refers to an Aim of the plan to create specific scheme aimed at improving safety of road users and pedestrians on B2118 and B2116. Any proposals such as VAS, gateway features etc would be advised to be consulted with the parish council. and should be safety audited if submitted alongside a planning application.

The Highway Authority would require the following documents to be submitted as part of any future application:

- A site location plan scale (1:1250) with site boundary indicated
- Schedule of existing uses including planning history with reference numbers
- Description, including site layout plans, of the proposed development and schedule of uses
- Summary of reasons supporting the site access/highways works proposals, including plan (scale 1:250 or similar) with achievable visibility splays indicated
- Final Stage 1 Road Safety Audit of site access and any proposed highway works, with designers response and including amended plans.
- A Transport Statement, including location plan of key services, availability of sustainable modes of transport and existing/future vehicular generation
- Reference to supporting national, regional, and local planning documents and policies
- Parking strategy, including provision of parking for all modes of transport
- Relevant data collected to date
- Proposed trip rates supported with TRICS outputs and site selection methodology

The 'Additional Information' section of the WSCC Pre-application advice for roads and transport webpage provides a range of additional advice and guidance which you may find useful in preparing your application. Please click the link below and navigate to the 'Additional Information' section.

<https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/pre-application-advice-for-roads-and-transport>

Here you will be able to access our Local Design Guide which provides further advice on how MfS is to be interpreted and applied within West Sussex.

The page also includes a link to our latest parking standards which we adopted in August 2019 as Supplementary Planning Guidance (SPG) that sets out parking standards for development in West Sussex. Within you will find recommended levels for cycle parking and also guidance on levels of Electric Vehicle charging points for new developments.

Manual for Streets:

<http://www2.dft.gov.uk/pgr/sustainable/manforstreets/pdfmanforstreets.pdf>

DMRB supplementary documents TD/93:

<http://www.dft.gov.uk/ha/standards/dmr/vol6/section1/td993.pdf>

I trust you appreciate that any advice given by council officers for pre-application enquiries does not constitute a formal response or decision of the council with regard to the granting of planning permission in the future. Any views or opinions expressed are given in good faith, and to the best of ability, without prejudice to the formal consideration of any application, which will be the subject of public consultation and ultimately decided by the Local Planning Authority.

**Katie Kurek**  
**Planning Services**

## Appendix B

## Phoenix Traffic Surveys Ltd, Speed Report

**Report Id** - CustomList-721

**Site Name** - PAUALB01

**Description** - HENFIELD ROAD, WEST OF THE ST, EAST SIDE

**Direction** - West

**Virtual Week (Partial weeks = 2.28571)**

Time	Total	Vbin 0 5	Vbin 5 10	Vbin 10 15	Vbin 15 20	Vbin 20 25	Vbin 25 30	Vbin 30 35	Vbin 35 40	Vbin 40 45	Vbin 45 50	Vbin 50 55
Mon	1044	1	1	8	57	71	262	448	181	16	2	0
Tue	1339	1	1	7	55	91	324	569	263	27	2	1
Wed	1327	0	1	5	48	104	324	593	228	26	0	0
Thu	1140	0	0	7	57	93	268	488	196	30	2	0
Fri	1094	0	1	5	44	79	276	471	192	23	3	0
Sat	939	0	1	4	39	71	223	395	183	19	3	3
Sun	710	0	1	6	46	56	168	298	119	15	2	1

Vehicles = 17419

Posted speed limit = 0 mph, Exceeding = 17419 (100.0%), Mean Exceeding = 30.86 mph

Limit 1 (PA) (0 \* 100%) + 15 = 15 mph, Exceeding = 17313 (99.39%)

Limit 2 (ACPO) (0 \* 110%) + 2 = 2 mph, Exceeding = 17419 (100.0%)

Maximum = 54.1 mph, Minimum = 3.4 mph, Mean = 30.9 mph

85% Speed = 35.79 mph, 95% Speed = 38.36 mph, Median = 31.48 mph

10 mph Pace = 27 - 37, Number in Pace = 12682 (72.81%)

Variance = 28.60, Standard Deviation = 5.35 mph

# Phoenix Traffic Surveys Ltd, Speed Report

**Report Id** - CustomList-722

**Site Name** - PAUALB02

**Description** - HENFIELD ROAD, WEST OF THE ST, WEST SIDE

**Direction** - East

**Virtual Week (Partial weeks = 2.28571)**

Time	Total	Vbin 0 5	Vbin 5 10	Vbin 10 15	Vbin 15 20	Vbin 20 25	Vbin 25 30	Vbin 30 35	Vbin 35 40	Vbin 40 45	Vbin 45 50	Vbin 50 55
Mon	1011	0	7	22	9	8	46	215	405	226	59	8
Tue	1211	0	4	14	4	15	82	257	443	293	82	13
Wed	1236	0	7	12	6	9	88	283	463	284	71	11
Thu	1048	0	5	14	4	11	78	231	387	236	63	14
Fri	982	0	7	9	4	7	66	211	377	218	68	11
Sat	905	0	7	27	9	7	45	182	353	196	57	13
Sun	787	0	13	50	11	6	33	165	293	158	43	9

Vehicles = 16385

Posted speed limit = 0 mph, Exceeding = 16385 (100.0%), Mean Exceeding = 36.91 mph

Limit 1 (PA) (0 \* 100%) + 15 = 15 mph, Exceeding = 15960 (97.41%)

Limit 2 (ACPO) (0 \* 110%) + 2 = 2 mph, Exceeding = 16385 (100.0%)

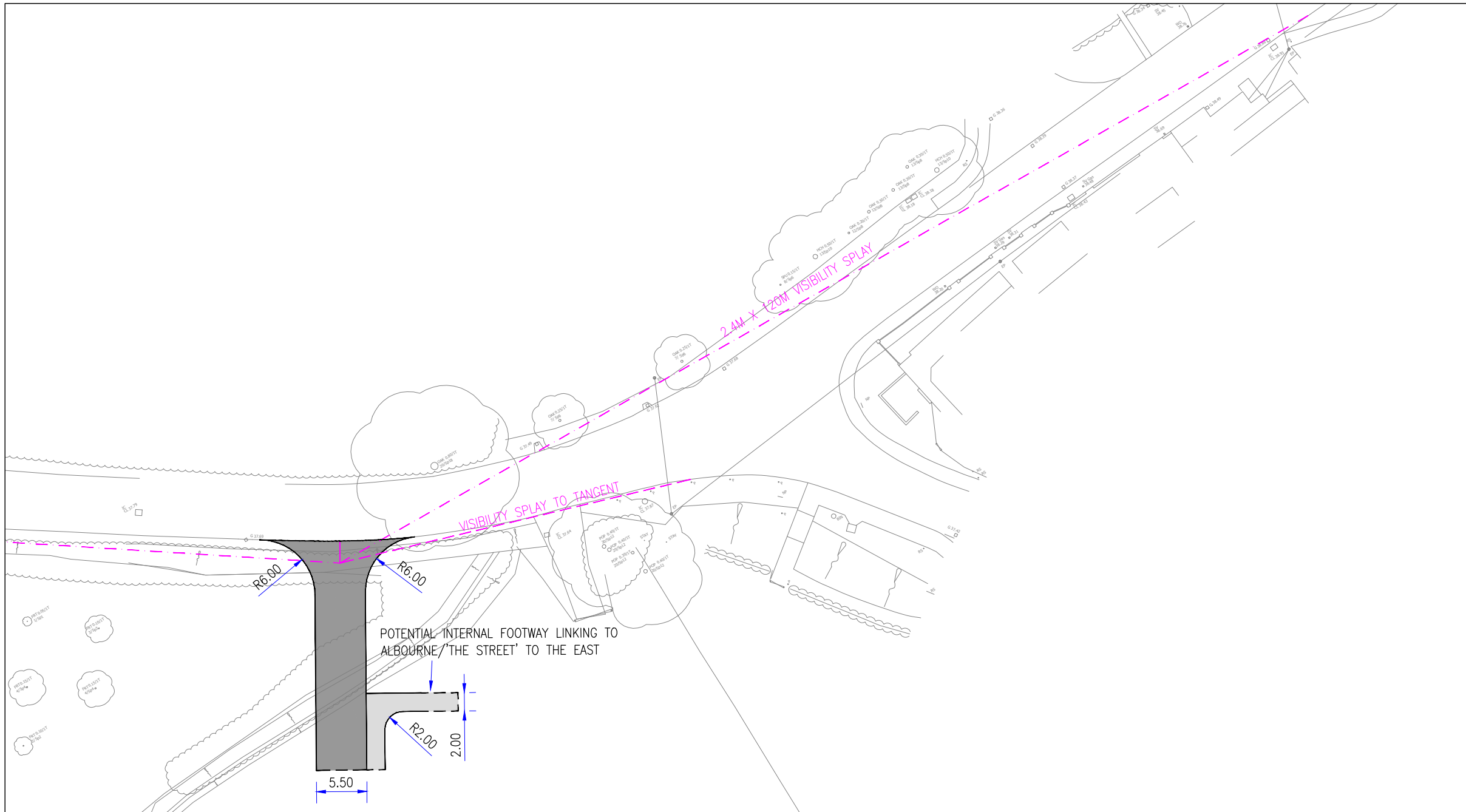
Maximum = 90.3 mph, Minimum = 3.4 mph, Mean = 36.9 mph

85% Speed = 42.67 mph, 95% Speed = 46.42 mph, Median = 37.41 mph

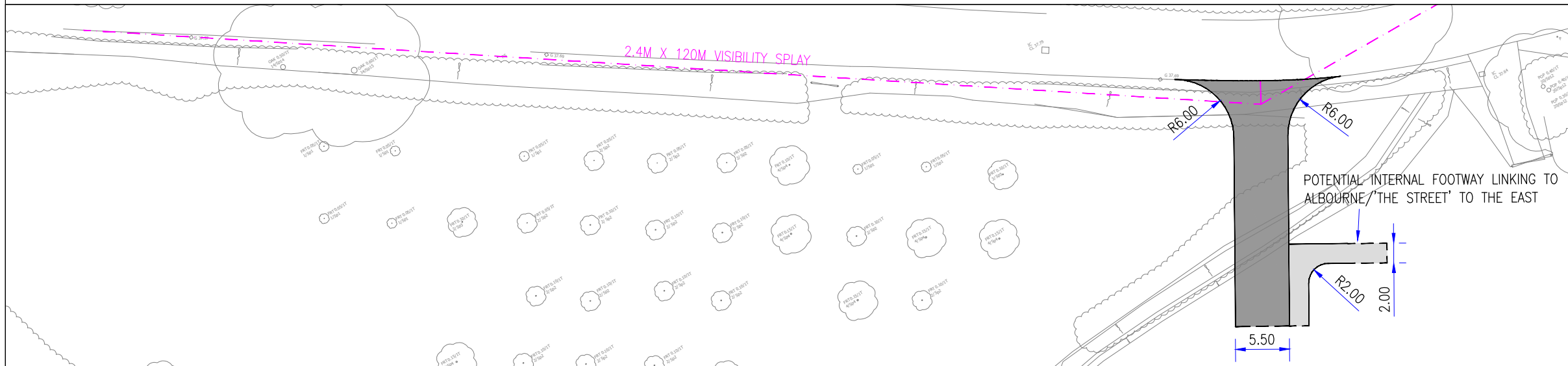
10 mph Pace = 32 - 42, Number in Pace = 10791 (65.86%)

Variance = 49.86, Standard Deviation = 7.06 mph

## Appendix C



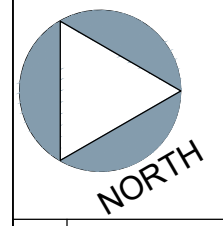
PRIMARY DIRECTION – 2.4M X 120M VISIBILITY SPLAY



SECONDARY DIRECTION – 2.4M X 120M VISIBILITY SPLAY

**GENERAL NOTES**

1. THIS DRAWING IS INTENDED TO BE VIEWED IN COMBINATION WITH ALL RELEVANT ARCHITECTS, ENGINEERS, SERVICES AND SPECIALIST DRAWINGS AND SPECIFICATION.
2. ANY VARIATIONS OR DISCREPANCIES BETWEEN THESE DRAWINGS IN TERMS OF DIMENSIONS OR DETAILS SHOULD BE DRAWN TO THE ATTENTION OF THE ARCHITECT AND/OR THE ENGINEER FOR CLARIFICATION.
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Rev	Description	Date	By	Chkd
A	CLIENT COMMENTS	19.11.19	MW	JR

**Project Name**  
LAND SOUTH OF HENFIELD ROAD,  
ALBOURNE

**Project Phase**  
PRELIMINARY

**Title**  
INDICATIVE EASTERN ACCESS LOCATION  
& VISIBILITY SPLAY



**Checked By**  
JR

**Checked Date**  
19.11.19

**Drawn By**  
MW

**Drawn Date**  
19.11.19

**Scale**  
1:500

**Client Drawing No.**  
-

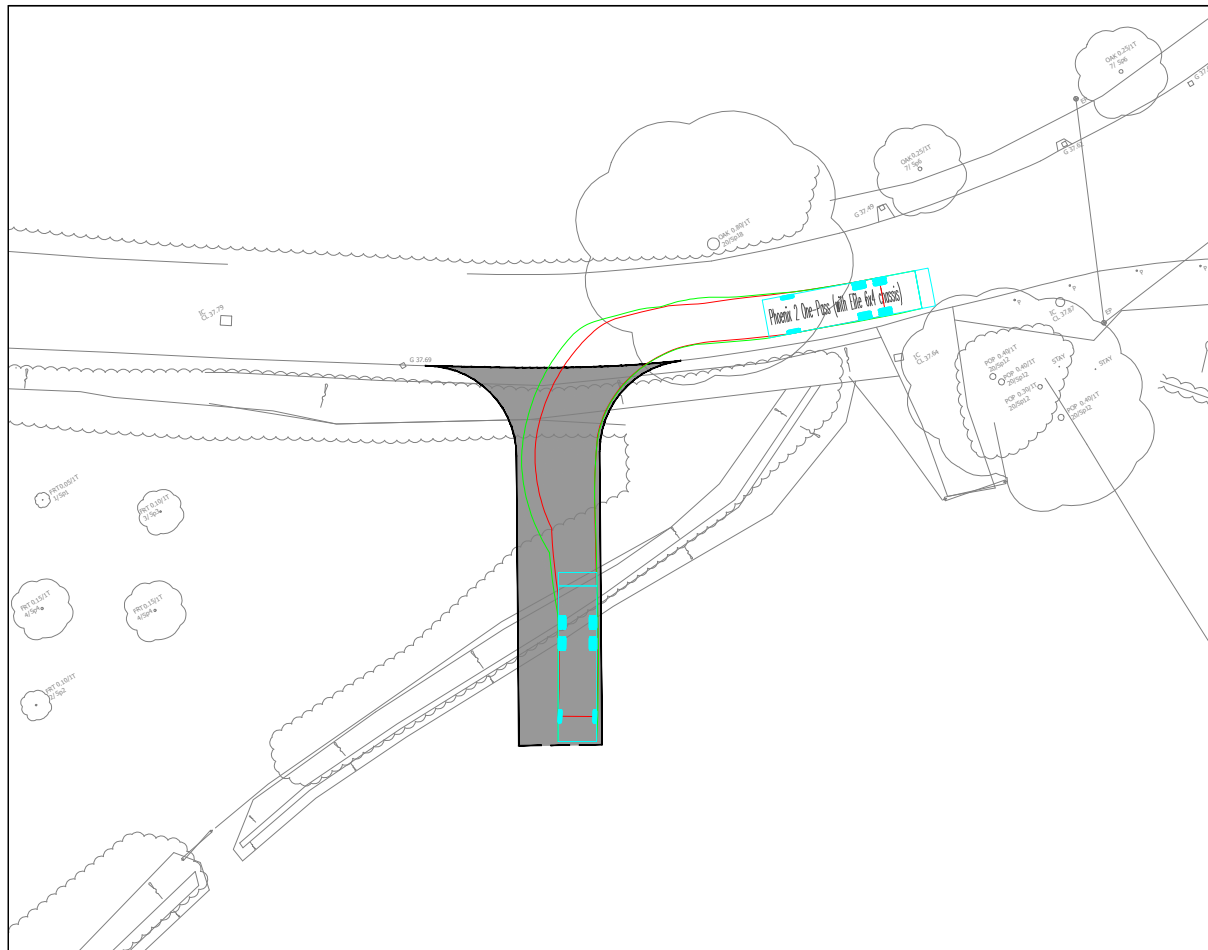
**PBA Drawing No.**  
093.0002.002

**Revision**  
A

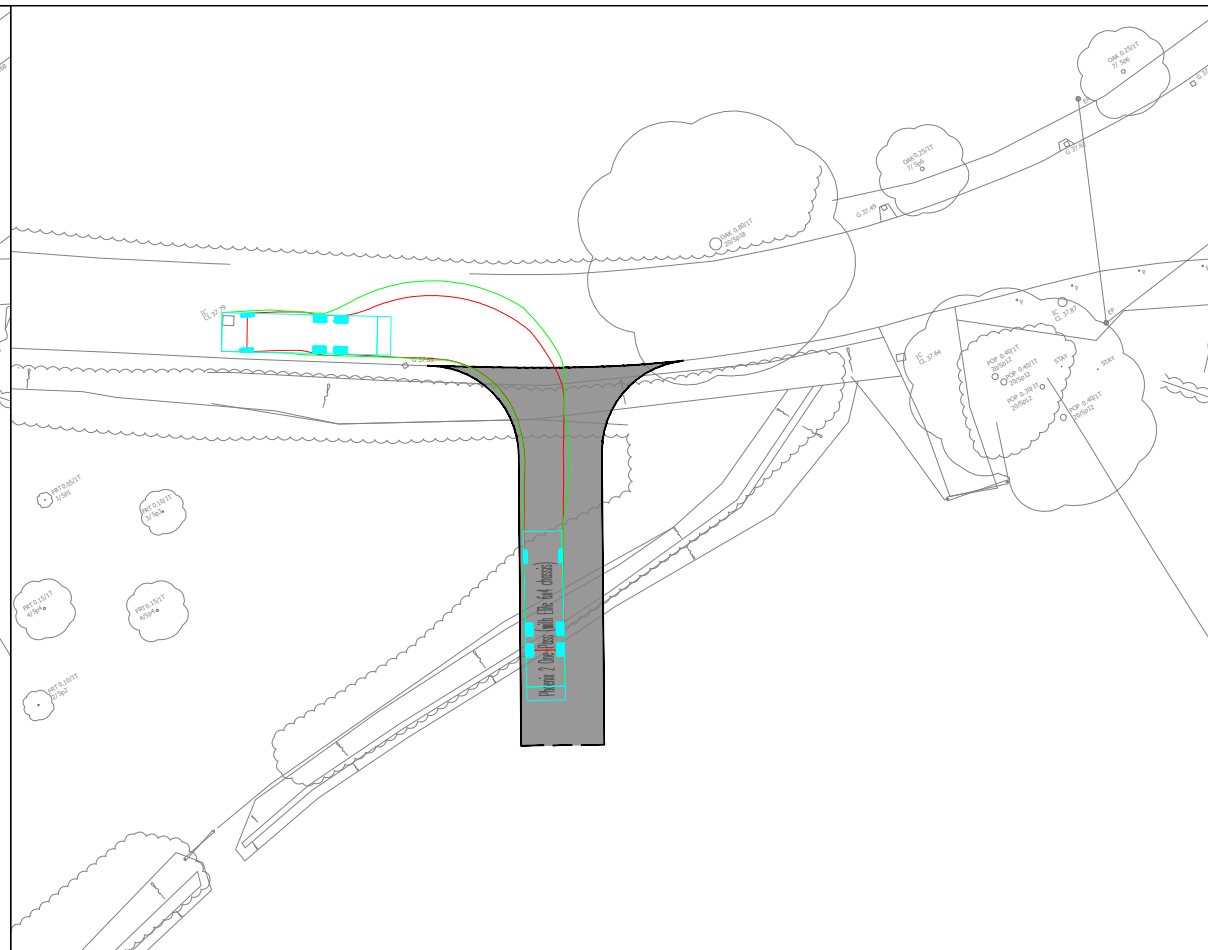
**(AT A3 SIZE)**

## Appendix D

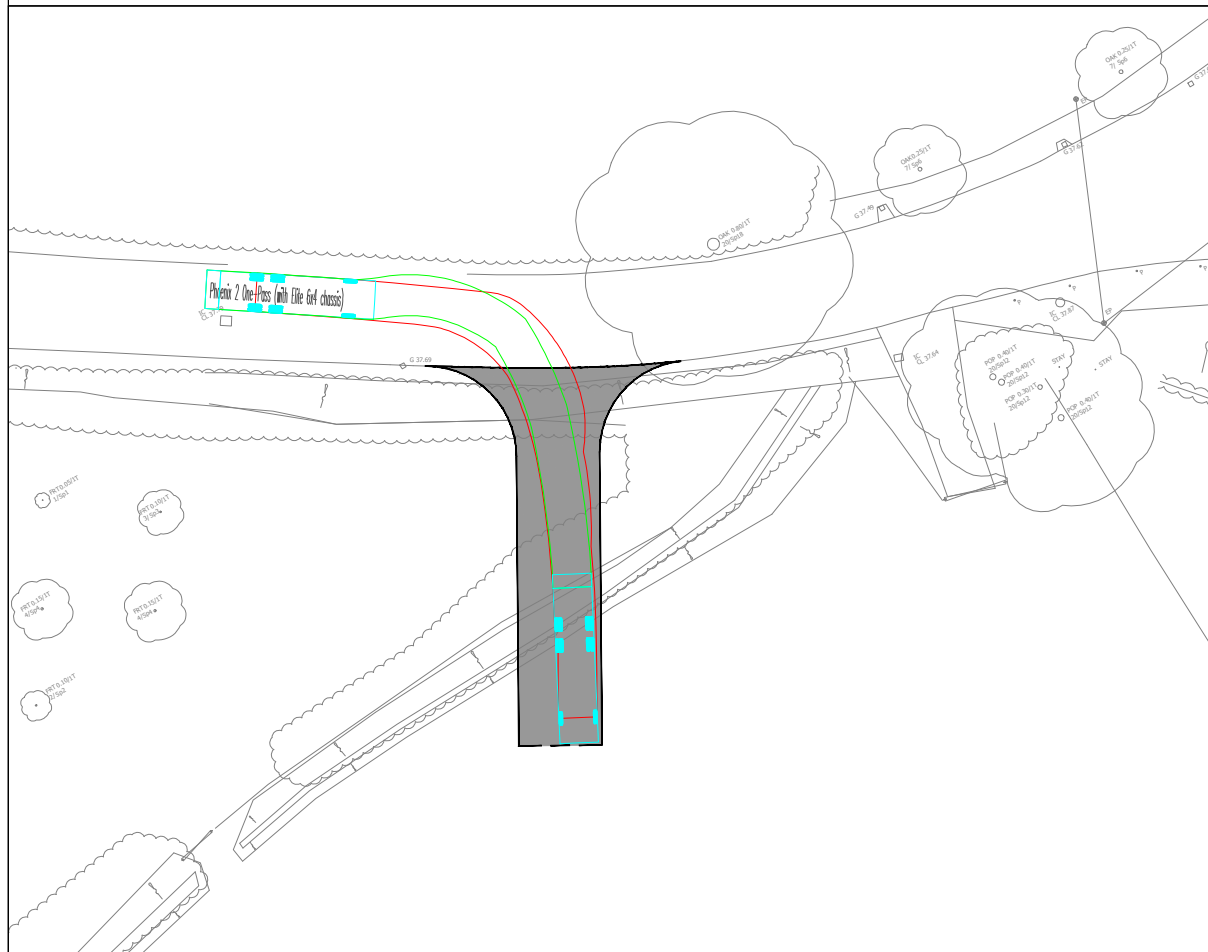




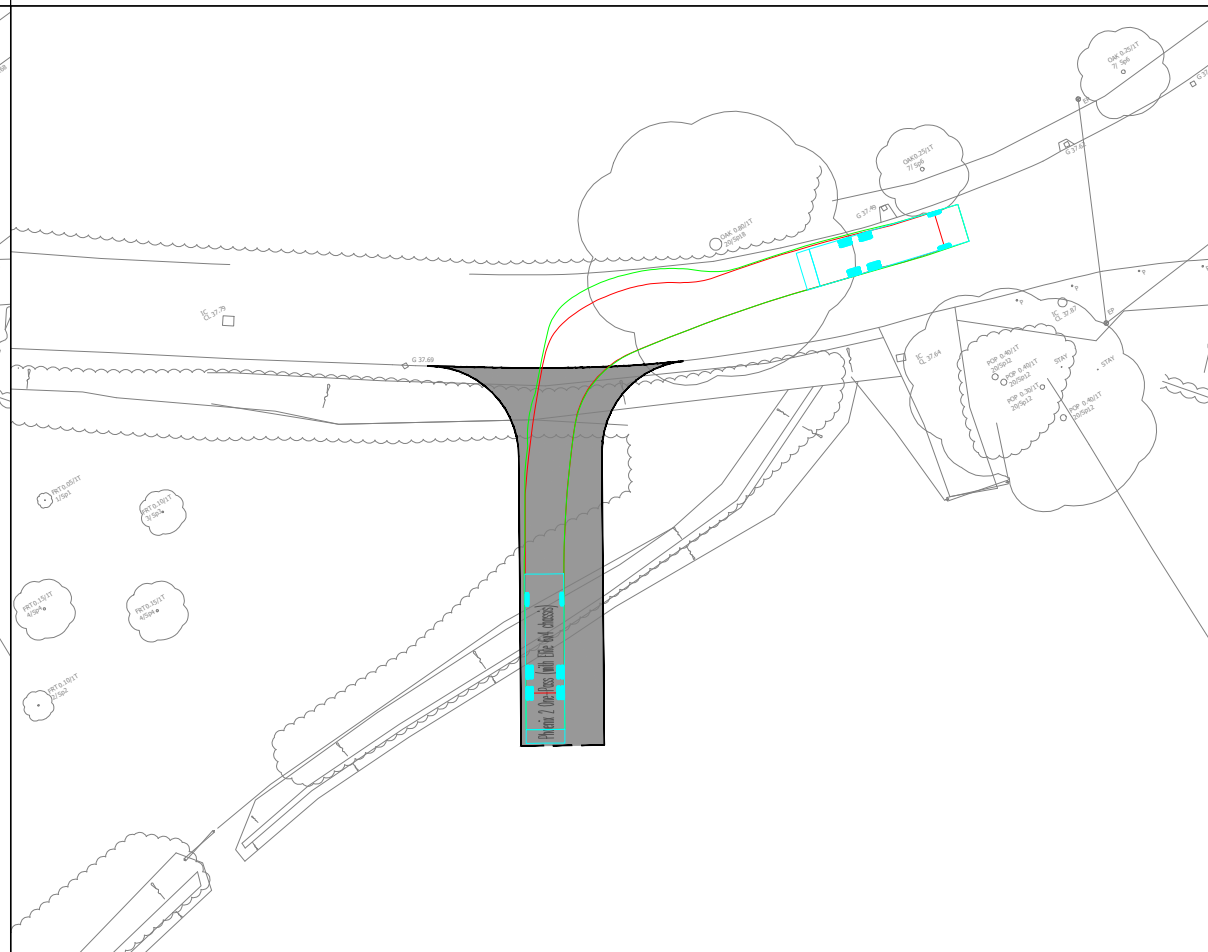
REFUSE TRACKING – LEFT IN



REFUSE TRACKING – LEFT OUT



REFUSE TRACKING – RIGHT IN

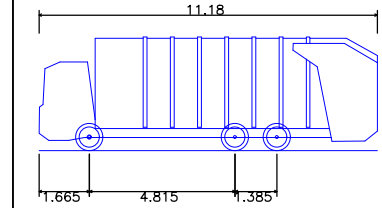


REFUSE TRACKING – RIGHT OUT

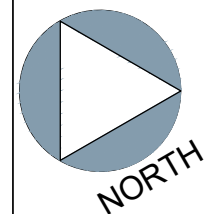
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2. ANY VARIATIONS OR DISCREPANCIES BETWEEN THESE DRAWINGS IN TERMS OF DIMENSIONS OR DETAILS SHOULD BE DRAWN TO THE ATTENTION OF THE ARCHITECT AND/OR THE ENGINEER FOR CLARIFICATION.
3. PAUL BASHAM ASSOCIATES ACCEPTS NO RESPONSIBILITY FOR THE ACCURACY OF BACKGROUND INFORMATION PRODUCED BY THIRD PARTIES – THIS MUST BE TREATED AS INDICATIVE ONLY.
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**VEHICLE PROFILE**



Phoenix 2 One-Pass (with Elite 6x4 chassis)	
Overall Length	11.180m
Overall Width	2.550m
Overall Body Height	3.760m
Min Body Ground Clearance	0.312m
Track Width	2.550m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	10.150m



Rev	Description	Date	By	Chkd
-	-	---	--	--

Project Name LAND SOUTH OF HENFIELD ROAD, ALBOURNE	Title INDICATIVE EASTERN ACCESS REFUSE TRACKING	<p>Paul Basham Associates Ltd Suite 4, Hitching Court, Blacklands Way, Abingdon Business Park, Abingdon, OX14 1RG 01235 425460 info@paulbashamassociates.com www.paulbashamassociates.com</p>	Client <b>Croudace</b> HOMES.CO.UK	Checked By JR	Checked Date 19.11.19	Scale 1:500	(AT A3 SIZE)		
Project Phase PRELIMINARY				Drawn By MW	Drawn Date 19.11.19	Client Drawing No. -	PBA Drawing No. 093.0002.003	Revision -	

Appendix E



Calculation Reference: AUDIT-247601-190520-0534

## TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL  
 Category : A - HOUSES PRIVATELY OWNED  
 VEHICLES

Selected regions and areas:

02	SOUTH EAST	
	ES EAST SUSSEX	1 days
	HC HAMPSHIRE	2 days
	WS WEST SUSSEX	1 days
03	SOUTH WEST	
	SM SOMERSET	1 days
04	EAST ANGLIA	
	NF NORFOLK	1 days
	SF SUFFOLK	1 days
06	WEST MIDLANDS	
	SH SHROPSHIRE	2 days
	ST STAFFORDSHIRE	1 days
07	YORKSHIRE & NORTH LINCOLNSHIRE	
	NY NORTH YORKSHIRE	3 days
08	NORTH WEST	
	CH CHESHIRE	1 days
	LC LANCASHIRE	1 days
10	WALES	
	VG VALE OF GLAMORGAN	1 days

*This section displays the number of survey days per TRICS® sub-region in the selected set*

## Secondary Filtering selection:

*This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.*

Parameter: Number of dwellings  
 Actual Range: 10 to 79 (units: )  
 Range Selected by User: 0 to 80 (units: )

Parking Spaces Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/11 to 20/11/18

*This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.*

Selected survey days:

Monday	2 days
Tuesday	3 days
Wednesday	6 days
Thursday	3 days
Friday	2 days

*This data displays the number of selected surveys by day of the week.*

Selected survey types:

Manual count	16 days
Directional ATC Count	0 days

*This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.*

Selected Locations:

Edge of Town 16

*This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.*

Selected Location Sub Categories:

Residential Zone	14
No Sub Category	2

*This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village,*

Secondary Filtering selection:

Use Class:

C3 16 days

*This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.*

Population within 1 mile:

1,001 to 5,000	3 days
5,001 to 10,000	1 days
10,001 to 15,000	6 days
15,001 to 20,000	4 days
20,001 to 25,000	2 days

*This data displays the number of selected surveys within stated 1-mile radii of population.*

Population within 5 miles:

5,001 to 25,000	2 days
25,001 to 50,000	2 days
50,001 to 75,000	2 days
75,001 to 100,000	6 days
125,001 to 250,000	4 days

*This data displays the number of selected surveys within stated 5-mile radii of population.*

Car ownership within 5 miles:

0.6 to 1.0	3 days
1.1 to 1.5	13 days

*This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.*

Travel Plan:

Yes	4 days
No	12 days

*This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.*

PTAL Rating:

No PTAL Present	16 days
-----------------	---------

*This data displays the number of selected surveys with PTAL Ratings.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED  
VEHICLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	16	34	0.086	16	34	0.337	16	34	0.423
08:00 - 09:00	16	34	0.112	16	34	0.367	16	34	0.479
09:00 - 10:00	16	34	0.145	16	34	0.171	16	34	0.316
10:00 - 11:00	16	34	0.134	16	34	0.138	16	34	0.272
11:00 - 12:00	16	34	0.143	16	34	0.168	16	34	0.311
12:00 - 13:00	16	34	0.149	16	34	0.145	16	34	0.294
13:00 - 14:00	16	34	0.143	16	34	0.158	16	34	0.301
14:00 - 15:00	16	34	0.140	16	34	0.160	16	34	0.300
15:00 - 16:00	16	34	0.266	16	34	0.190	16	34	0.456
16:00 - 17:00	16	34	0.328	16	34	0.145	16	34	0.473
17:00 - 18:00	16	34	0.361	16	34	0.142	16	34	0.503
18:00 - 19:00	16	34	0.294	16	34	0.153	16	34	0.447
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
<b>Total Rates:</b>			<b>2.301</b>			<b>2.274</b>			<b>4.575</b>

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP*FACT$ . Trip rates are then rounded to 3 decimal places.

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#### Parameter summary

Trip rate parameter range selected:	10 - 79 (units: )
Survey date date range:	01/01/11 - 20/11/18
Number of weekdays (Monday-Friday):	16
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	4

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

# Land to the west of Albourne

---

## Initial note on Landscape Matters

**Prepared by:** Vanessa Ross  
**File Ref:** A264-NT01b

**Client:** Croudace Homes  
**Date:** May 2019

---

### 1 - Introduction

The following short report provides a summary of the landscape constraints and opportunities in respect of a parcel of land to the west of the village of Albourne in West Sussex. It is understood that the landowner is wishing to promote the site for new, low-density residential development (circa 40 homes) and therefore this note provides commentary on landscape matters which will then contribute to representations to be prepared by Strutt and Parker on behalf of the landowner and Croudace Homes.

This note has been prepared following a site visit in May 2019 and a review of existing published reports, namely:

- Mid-Sussex, Landscape Capacity Study – 2007 (prepared by HDA)
- Capacity of Mid Sussex District to accommodate development – 2014 (prepared by LUC)
- A Landscape Character Assessment for Mid Sussex – 2005 (Mid Sussex District Council)

### 2. Site and its Immediate Context

The site is located to the west of the village of Albourne and south of Henfield Road. It comprises part of a larger field to the south and smaller triangular parcel of land to the north. The northern parcel is bounded by Henfield Road to the north and a field boundary hedge and trees to the south and west. A small orchard has been planted within the northern parcel. The southern field is bound by a recently planted hedgerow with trees to the south and the hedge and fence associated with the boundary of Albourne Primary School to the east. The western boundary is not defined by any visible features, rather, it sub-divides the existing, larger field in a north-south direction.

The site is currently accessed via a field gate into the northern field from Henfield Road. A second field gate is located along Henfield Road at the north east corner of the larger southern field.

A public right of way (ref. 15\_1AI) runs in an east-west direction along the southern boundary of the site and connects with The Street to the east and a north-south running footpath (ref. 12\_1AI) runs along the eastern boundary of the school and connects to Church Lane to the south.

No heritage assets are located within the site or adjacent to its boundaries, however, there are a number of listed buildings within the village, and there is one conservation area within the village (to the south-east of the site).

### **3. Surrounding Context and Landscape Character**

The land surrounding the village and including the site is predominantly rural with small to medium sized agricultural fields bounded by field hedgerows and trees. The site does not fall within any designated landscapes however it does sit some 1.8km to the north of the South Downs National Park (SDNP) and approximately 5.7km to the south of the High Weald Area of Outstanding Natural Beauty (AONB).

The site falls within the Mid Sussex Landscape Character Area 4 - '*Hickstead Low Weald*', however the southern boundary is broadly located on the boundary with the adjacent Landscape Character Area 3 - '*Hurstpierpoint Scarp Footslopes*'.

The site, comprising two small fields, forms only a very small proportion of the south-western part of the large *Hickstead Low Weald* Landscape Character Area, however the following key characteristics are relevant to the site and its immediate surroundings:

- *Alternating west-east trending low ridges with sandstone beds and clay vales carrying long, sinuous upper Adur streams.*
- *Views dominated by the steep downland scarp to the south and the High Weald fringes to the north.*
- *Arable and pastoral rural landscape, a mosaic of small and larger fields, scattered woodlands, shaws and hedgerows with hedgerow trees.*
- *Quieter and more secluded, confined rural landscape to the west, much more development to the east, centred on Burgess Hill.*
- *Mix of farmsteads and hamlets favouring ridgeline locations, strung out along lanes.*

The relevant characteristics provided for the *Hurstpierpoint Scarp Foothills* Landscape Character Area, adjacent to the site are:

- *Undulating Lower Greensand low sandstone ridges and gentle and Gault Clay vales drained by the River Adur.*
- *Views dominated by the steep downland scarp.*
- *Arable and pastoral rural landscape, secluded in places, a mosaic of small and larger fields, woodlands, shaws and hedgerows with hedgerow trees.*
- *Modest network of country lanes and underhill lanes beneath the scarp.*

In summary, the site contributes to the landscape character of the area due to its agricultural land-use and associated field boundaries. Any development on the site would inevitably result in a change in land use and an enlargement of the village envelope. As such, for development to successfully integrate into the landscape, the existing boundary hedgerows should be retained wherever possible and the layout and architectural style should be carefully considered, to ensure a successful relationship with the existing context of the village and the more traditional characteristics of built form (eg building materials, architectural detailing and boundary treatments) found within nearby settlements.



#### **4. Visibility and Visual Amenity**

The site is currently visible within wider views from a small number of properties to the north of Henfield Road and from the upper floors of Wellcroft Cottages. There is limited visibility from the properties located in the village to the east. Those using the public right of way have open views into the site.

From within the site, there are views south towards the South Downs which forms a prominent ridge along the horizon. When viewed from the top of the ridge (eg the viewing points at Devil's Dyke or Summer Down) the site is indiscernible within the wide panoramic views experienced from these locations.

Again, whilst there are views out from the site looking north and north-west, due to the lower lying nature of the landscape to the north, combined with intervening boundary vegetation and woodland, there are no notable views back towards the site.

In summary, any new development comprising built form of up to two storeys would be visible over the existing hedgerow along Henfield Road from the properties to the north. There would also be views of new buildings from Wellcroft Cottages to the south, however these views would become increasingly screened over time once the trees and hedgerow along the southern boundary are established.

Users of the public right of way as it crosses the site would experience a change in views looking to the north, however this change would be experienced for only a relatively short length (some 114m) of the much longer footpath. Notwithstanding the limited extent of the development, along the route of the footpath, the relationship between the footpath and any new buildings or roads should be carefully considered.

As noted, the site is largely indiscernible in views from the South Downs. The introduction of built form at the densities proposed is unlikely to increase visibility, however materials for south facing facades and roofing materials should be selected to tie in visually with the properties in the nearby villages.

#### **5. Landscape Capacity**

##### Mid Sussex District Council (MSDC) studies

The two documents referred to in section 1 above, published on behalf of MSDC, assess both landscape capacity and the capacity of the land to take development.

The 2007 Landscape Capacity Study assessed the 'Landscape Sensitivity' and 'Landscape Value' of land around settlements, in order to determine the 'Landscape Capacity' of specific parcels to accommodate development – this resulted in the mapping of 80 'Landscape Capacity Areas'.

The Landscape Capacity Study located the site within Landscape Capacity Area 63 – *Albourne Low Weald*. Area 63 comprises land between Church Lane to the south and Reeds Lane to the north. The eastern boundary generally follows the B2118 and the western boundary is formed by the lane heading south from the junction with Henfield Lane and Westbourne Cottages.

The Landscape Capacity Study considered a number of different factors to reach a conclusion on both Landscape Sensitivity and Landscape Value. Each factor was scored using a five point scale and the results

aggregated to reach a final conclusion. A matrix, combining these conclusions, was then used to derive an overall judgement on Landscape Capacity.

Tables 1 and 2 below present the Landscape Capacity Study assessments for Area 63. It should be noted that due to the date the Capacity Study was undertaken, the South Downs National Park had not been designated as such and is therefore referred to as an AONB.

Inherent Landscape Qualities (intactness and condition)	Contribution to distinctive settlement setting	Inconsistency with existing settlement form / pattern	Contribution to rurality of surrounding landscape	Contribution to separation between settlements	Sensitivity 1-5 Negligible 6-10 Slight 11-15 Moderate 16-20 Substantial 21-25 Major 5 10 15 20 25	Final Assessment - Landscape Sensitivity
Moderately good.	Provides lower setting to North of Albourne.	Albourne sits on high ground to SE of character area. Some minor consistence.		Albourne and Sayers Common.		<b>Substantial</b>

Table 1: Landscape Sensitivity - Area 63 (2007 Landscape Capacity Study)

Landscape Designation	Other Designation (nature conservation, heritage, amenity, including flood zone)	Contribution to setting of 'outstanding assets'	Special cultural/ historic associations	Perceptual aspects (eg. Scenic beauty, tranquillity, wildness)	Landscape Value 1-5 Negligible 6-10 Slight 11-15 Moderate 16-20 Substantial 21-25 Major 5 10 15 20 25	Final Assessment - Landscape Value
Proximity to AONB.	LBs, RSI/PSI, floodzone, Conservation Area.	Proximity and intervisibility to AONB to the south, lower setting to Albourne Place.		Tranquillity limited by A23.		<b>Moderate</b>

Table 2: Landscape Value – Area 63 (2007 Landscape Capacity Study)

In combining the assessments for Landscape Sensitivity and Landscape Value, the overall conclusion reached in the 2007 Landscape Capacity Study was that Area 63 had a 'Low' Landscape Capacity.

The site – Our review of capacity

In applying the above approach to consider what extent the site itself meets the criteria used to assess Landscape Sensitivity and Capacity in the 2007 Landscape Capacity Study, it is acknowledged that some of the scores for Area 63 remain unchanged.

**Landscape Sensitivity** - In addressing the contribution the site makes to the separation between settlements (identified in the study as being between Albourne and Sayers Common) it is concluded that the site in itself, due to a combination of its limited size, proximity to Albourne and distance from Sayers Common makes only a very limited contribution – and is therefore assessed as 'Negligible'. Combining this with the unchanged scores, the total score is 13 which results in the Landscape Sensitivity of the site being assessed as 'Moderate', compared to an assessment for the wider Area 63 as Substantial.

Inherent Landscape Qualities (intactness and condition)	Contribution to distinctive settlement setting	Inconsistency with existing settlement form / pattern	Contribution to rurality of surrounding landscape	Contribution to separation between settlements	Sensitivity 1-5 Negligible 6-10 Slight 11-15 Moderate 16-20 Substantial 21-25 Major	Final Assessment - Landscape Sensitivity
■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	MODERATE

Table 3: Landscape Sensitivity – The Site

Landscape Value - In relation to the criteria used to assess Landscape Value in the 2007 Landscape Capacity Study, for the site, two need to be re-assessed.

The first is the ‘Contribution to the setting of outstanding assets’. Albourne Place (Grade II\*) is some 1.2km from the site with no intervisibility due to intervening visual barriers such as existing vegetation and properties such as Wellcroft Cottages. It is therefore considered that the site itself makes a negligible contribution to the setting of the heritage asset. Similarly, whilst it is acknowledged that Area 63 as a whole does make some contribution to the overall setting of the SDNP, the site itself makes a negligible contribution with visibility limited to views out towards the north facing slopes and ridge. It is therefore considered that the scoring for this factor should be reduced to 2 for the site.

The second factor that needs to be re-appraised is the Perceptual Aspects. Whilst the site retains some scenic beauty, the overall score is reduced to 2 due to the site’s proximity to the village and inter-visibility with the school, which results in some loss of tranquillity.

Landscape Designation	Other Designation (nature conservation, heritage, amenity, including flood zone)	Contribution to setting of ‘outstanding assets’	Special cultural/ historic associations	Perceptual aspects (eg. Scenic beauty, tranquillity, wildness)	Landscape Value 1-5 Negligible 6-10 Slight 11-15 Moderate 16-20 Substantial 21-25 Major	Final Assessment - Landscape Value
■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	SLIGHT

Table 4: Landscape Value – The Site

Aggregating the scores for each of the factors for the site gives an overall score of 10 which results in the Landscape Value of the site being ‘Slight’, compared to an assessment for the wider Area 63 of Moderate.

Applying the methodology used in the 2007 MSDC Landscape Capacity Study to the site and combining the Moderate Landscape Sensitivity with the Slight Landscape Value results in the site being assessed as having a **Medium/High Landscape Capacity**.

The 2014 District Capacity Study combined the findings of the 2007 Landscape Capacity Study with a number of other factors to provide a more holistic assessment of the land and its functions along with accessibility to services. The 2014 study considered the capacity of land to take development by assessing a much wider range of factors (eg infrastructure, bio-diversity, agricultural land value etc) as well as Landscape Capacity as assessed in the 2007 study and considered a wider land coverage than the 2007 study, although this is of no bearing on the assessments made for the land around Albourne.

In drawing a conclusion regarding the overall Capacity of land within the District, the 2014 study identified ‘Primary Constraints’ and ‘Secondary Constraints’. Primary Constraints related to a number of key issues such as statutory designations, Agricultural Land - Grades 1 and 2 and public rights of way. Secondary Constraints considered matters such as buffer zones around designated land, or land identified as open space within the local PPG17 Assessment.

Each ‘Constraint’ was mapped and an overall map produced (see Figure 1 below) which identified areas covered by Primary Constraints ie where designations, legislation or policy already greatly restricts development, along with a graded scale of where land is covered by one or more Secondary Constraints.

The land within the site has no primary constraints, however the footpath along the southern boundary is identified as a primary constraint. The site is identified as having one secondary constraint which is that it falls within an area assessed in the study as having a Low/Medium Landscape Capacity.

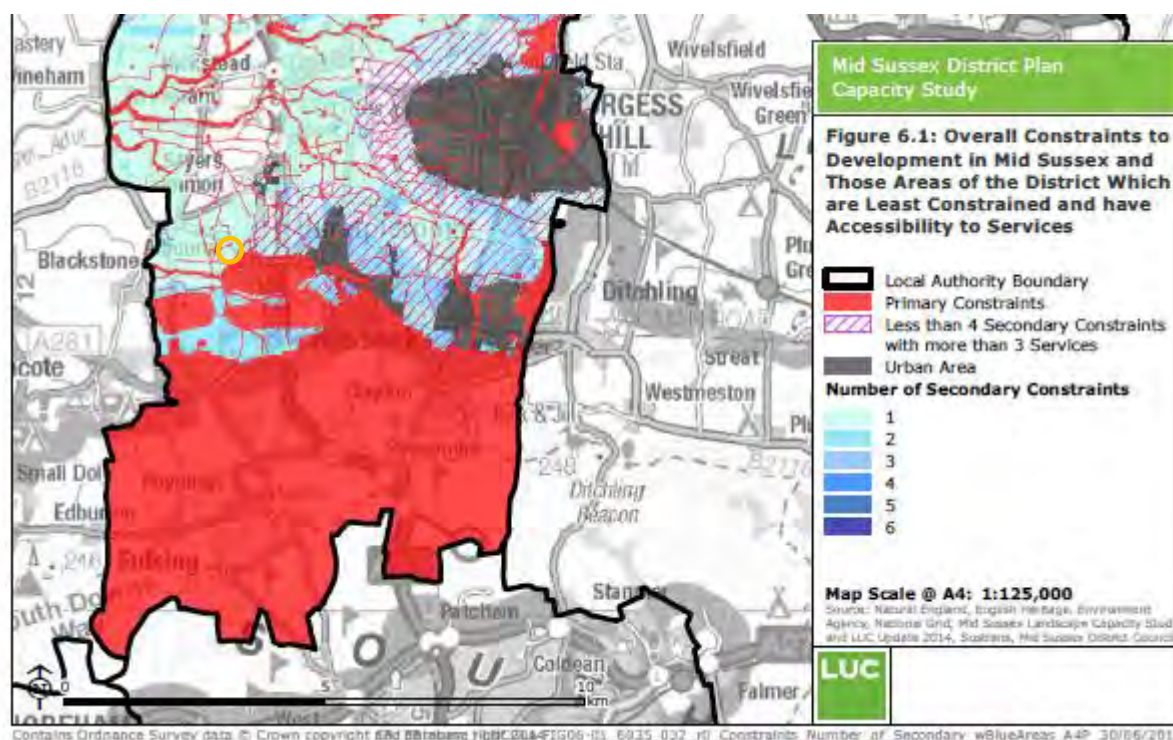


Fig. 1 - Extract from Fig 6.1 of the Mid Sussex District Plan Capacity Study (site highlighted in yellow).

The conclusion to the 2014 Capacity Study notes that “In the parts of the District not covered by primary constraints, development could be more challenging where there is more than one secondary constraint due to the added costs and challenges that would be required to adequately mitigate the potentially significant impacts on the environment in those areas (depending upon the nature of the constraint concerned)”.

It goes on to highlight the potentially constrained nature of the District, noting that 63.6% is covered by Primary Constraints and that 92% is covered by a combination of Primary and at least one secondary

constraint. Combining this with the 4% of the District which comprises built up areas, this leaves only 4% of the District not covered by any of the constraints highlighted in the report.

In considering Landscape Capacity, the 2014 Capacity Study amends the 5 point scale applied for assessing Landscape Capacity and this results in a change to the overall conclusion on Landscape Capacity for Area 63 from Low to 'Low/Medium'.

By applying the same approach to assessing the site itself, our assessment of the Landscape Capacity of the site is raised to Medium. Landscape Capacity is therefore below the threshold needed to meet the criteria of a secondary constraint, meaning that, in applying the methodology and criteria used in the 2014 Capacity Study, the site would not be considered to be constrained.

## **6. Conclusions and recommendations**

In considering the nature of the site, and potential, proposed development, it is acknowledged that there would be an inevitable land-use change and loss of the agricultural landscape type within the site boundaries.

Following a review of the published MSDC Capacity Studies and applying the methodologies used to the site itself, we find that the site, in part due to its location adjacent to the school, on the edge of the Albourne, does have the capacity to accept some development.

For new housing to be integrated into the village successfully, ie., with limited effect on both landscape and visual matters, careful consideration must be given to the layout and architectural style of the new buildings. The low density being proposed will allow a layout that responds to the local context, albeit that the choice of materials, the design of the streetscape, planting and boundaries are of equal importance.

The retention of existing boundary vegetation is an important landscape consideration that will also assist in maintaining biodiversity across the site. New vehicular access, where possible should utilise existing gaps within the hedgerows.

The site benefits from good connectivity to the existing footpath network, however, the effects of introducing new development adjacent to a short length of the path will need to be considered in the layout to ensure that the effects are limited and the benefits for those using the footpath, maintained.

The proximity to the SDNP and the effect of any development on its setting is an important consideration, however if the principles highlighted above are followed, the effects should be negligible.

The site benefits from views out to the surrounding landscape and in particular towards the South Downs National Park. The broad panoramic views looking north from the National Park are key elements of its setting, however it was observed that the site, and indeed the wider village of Albourne, were indiscernible (albeit as seen in summer) in views looking north. The use of contextually appropriate building materials and avoiding the introduction of new street lighting will assist in preserving the existing views out from the National Park.

**ARC LANDSCAPE DESIGN AND PLANNING LTD**

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T - 020 3538 8980 E - admin@arcldp.co.uk www.arcldp.co.uk

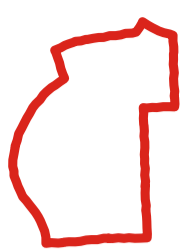
Registered Address: Ferrari House, 258 Field End Road, Ruislip, Middlesex HA4 9UU  
Registered in England. Company Number 8995863. VAT Registration Number 185037893

**URBAN  
DESIGN  
GROUP** REGISTERED  
PRACTICE





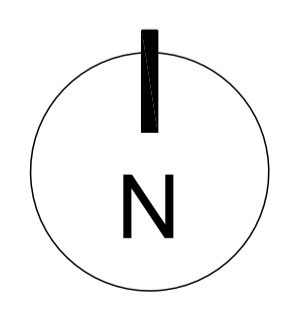
**KEY**

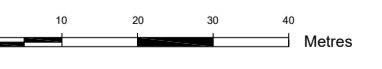
 Boundary of Proposed Housing Area Approx. 2.98Ha

**NOTE:**  
 This Plan shows land available for approximately 40 dwellings and includes provision for sustainable urban drainage systems and public open space.

The nett developable site area is approximately 2.3Ha which would provide 40 dwellings at a density of around 17 dwellings/Ha.

The proposed new school drop-off area would have direct vehicular access from the proposed future housing area site.



1:1000 @ A1  Metres

762

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA11

**ID:** 762

**Response Ref:** Reg19/762/4

**Respondent:** Mr P Rainier

**Organisation:** DMH Stallard

**On Behalf Of:** Mr Simon Dougall

**Category:** Developer

**Appear at Examination?** x



**From:** Stevenson, Holly <Holly.Stevenson@dmhstallard.com>  
**Sent:** 28 September 2020 17:02  
**To:** ldfconsultation  
**Cc:** Rainier, Peter  
**Subject:** Representations - Mid Sussex Site Allocations DPD Regulation 19 Consultation (DMH Stallard Ref:218279-19)  
**Attachments:** 22700469.pdf; 19137 - SK03A (Site Layout).pdf

Dear Sirs,

**Land west of Nash Farm, Church Lane, Scaynes Hill.  
Representations to the MSDC Site Allocations DPD (Regulation 19)  
On behalf of Mr Simon Dougall/Greenplan Designer Homes**

Please find herewith, our representations in relation to the Mid Sussex Site Allocations DPD Regulation 19 consultation.

Regards

---

Holly Stevenson | Paralegal | Tel: +44 1293 663521  
For and on behalf of DMH Stallard LLP  
3rd Floor, Origin One, 108 High Street, Crawley, West Sussex, RH10 1BD



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

Date 28 September 2020  
Your ref  
Our ref 547

Dear Sirs

**Land west of Nash Farm, Church Lane, Scaynes Hill.  
Representations to the MSDC Site Allocations DPD (Regulation 19)  
On behalf of Mr Simon Dougall/Greenplan Designer Homes**

DMH Stallard Planning act on behalf of Mr Simon Dougall in relation to the promotion of land at Nash Farm, Church Lane, Scaynes Hill. As a landowner, Mr Dougall, was not aware of the SHEELA/DPD process until recently and so missed the opportunity for early promotion of the site. He has, however, sent details of the site to both the Parish Council and District Council over recent months. Member of the Parish Council have visited the site on several occasions and at the July 19 Parish Council meeting the principle of development in this area was endorsed subject to a formal application being made. The site area (0.82ha) and indicative layout is shown on the attached plan.

For the reasons stated below we find the DPD 'unsound' and seek to reserve the right to appear at the examination.

General Policy Comments

My clients are generally supportive of the SA DPD and the evidence base that the Council have produced to inform the site selection process and they support the Council's commitment to the allocation of a sufficient supply of land to meet the residual housing requirements as set out in the District Plan and to providing an overprovision of sites to ensure flexibility and a rolling 5 year housing land supply. However, it is submitted that the land west of Nash Farm should also be allocated, to provide an additional small site in Scaynes Hill, to help meet the residual housing requirements for Category 3 settlements on a single, well considered, site. At present, on the basis of the representations contained herewith, we submit that the approach to the site selection process is unsound.

Policy SA10 of the SA DPD sets out how the Council will meet the residual housing need necessary to meet the identified housing target, set out in the adopted District Plan. It states that the residual housing requirement, reflecting Neighbourhood Plans and windfall development is 1,280 dwellings. The policy, at Table 2.4, also demonstrates how the

residual housing figure will be distributed throughout the district, in accordance with the settlement hierarchy. We acknowledge that the Council have sought to distribute the houses towards higher tier settlements, but some of these are considered to have greater environmental impacts, than land west of Nash Farm.

Policy DP6 of the District Plan identifies Scaynes Hill as a Category 3 Settlement, noting that these are “Medium sized villages providing essential services for the needs of their own residents and immediate surrounding communities. Whilst more limited, these can include key services such as primary schools, shops, recreation and community facilities, often shared with neighbouring settlements.” They are therefore considered sustainable settlements, which could accommodate future development, this is reflected in the Council’s identification of land rear of Firlands, Church Lane, Scaynes Hill (SA31).

Table 2.4 of the SA DPD states that the residual housing requirement for category 3 settlements is 371, however, through the SA DPD, they only deliver 238 new homes. The under provision is met by development in Category 1 settlements, which have accommodated significant growth within the District Plan and disproportionately through the SA DPD; East Grinstead is the only Category 1 settlement with further residual housing need.

Table 13 of the SA sets out the number of units deliverable from the final ‘sifted’ pool of deliverable sites, against the residual housing requirements for each settlement. It also notes that all but two settlements in category 1 (East Grinstead – 706 dwellings) and category 2 (Cuckfield – 198 dwellings) settlements have met their residual housing requirement. The residual requirement therefore for category 1 and category 2 settlements is only 904 dwellings, yet they are accommodating 1,409 within the SA DPD. Of these sites, some are considered to have known constraints to development, including impacts on nationally important landscapes, such as the South Downs National Park/high weald AONB, or have currently unknown access arrangements. Conversely, the residual housing requirement for category 3 settlements, such as Scaynes Hill, is 371 dwellings, and the SA DPD only allocates land in these settlements for 238 dwellings. The Council have a pool of sites, including land at Nash Farm, which are suitable, achievable and deliverable, and could be identified in order to meet the residual housing need of category 3 settlements. This would also reduce pressure on other settlement categories which are meeting more than their residual requirement and on less suitable sites.

Of the allocations within the SA DPD, approximately 548 dwellings are considered to be in locations which are visible from the South Downs National Park or the High Weald AONB, or are within the High Weald AONB (153 dwellings). At paragraph 171 of the NPPF, it requires that LPA’s allocate land with the least environmental or amenity value, further noting at paragraph 172 that great weight should be given to conserving and enhancing landscape the scenic beauty of Areas of Outstanding Natural Beauty and National Parks as they are given the highest status of protection. These are landscapes which should clearly afford the greatest level of protection, yet there are housing allocations within or close to these nationally important landscapes in place of more suitable sites. The SA DPD, through the SA, should consider a pallet of non-AONB sites first, to ensure the protection of designations of a national importance, and only when the most appropriate sites have been considered, move towards the identification of AONB sites. Similarly, the Council

have dismissed sites on minimal landscape grounds, but then seek to allocate significant parcels of land close to the South Downs National Park. We submit that sites, such as that west of Nash Farm, where there would be minimal landscape harm, should be considered above those which would have a detrimental affect on either the AONB or National Park.

Additionally, the SA DPD allocates 250 dwellings on land where access is currently unknown (according to the policies, which state that access needs to be explored) - land at Burleigh Lane, Crawley Down (SA 22) and land south of Crawley Down Road, Felbridge (SA 19). In comparison, land west of Nash Farm can be delivered via a suitable access, with no need to purchase additional land, and is therefore deliverable immediately.

The Capacity of Mid Sussex District to Accommodate Development 2014, provides an updated assessment of the Landscape Character Area, which identifies the parcel as having **Medium Capacity** to accommodate development (there are a number of sites allocated within the District Plan and draft SA DPD, within areas identified as having a lower landscape capacity for development). Paragraph 3.24 of the Capacity of Mid Sussex District to Accommodate Development 2014 notes that these areas are “now judged as having medium capacity (shown in yellow on Figure 3.2), and there is the potential for limited development to be located in some parts of these character areas, so long as there is regard for existing features and sensitivities within the landscape.”

It is also pertinent to consider the clear Government Guidance towards the allocation of smaller sites, in order to aid the delivery of housing and maintain adequate supply. The NPPG states; ‘Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.’ Small sites, such as Nash Farm, should, therefore, be promoted through allocation in the DPD.

### The Site

The site is surrounded on three sides by existing residential development, with individual dwellings to the east and west and the village itself to the south. The site rises up to the north, away from Church Lane. The site would, consequently, fill the gap between existing buildings the east and west, while the linear form of the site/scheme would be in-keeping with the character of the locality, following the form of development to the south.

A strong belt of mature trees lie on the eastern boundary of the site, screening development from the wider countryside to the east. The land form (rising to the north, beyond the proposed site boundary reduces the impact of the development in any views from the north. A residential dwelling is situated to the west (Peter’s Place) and further dwellings form the southern boundary, beyond Church Lane. Further mature planting lie to the west and south-west, resulting in the site being well contained and enclosed, minimising any wider landscape impact.

Furthermore, the setting of the Listed Building to the north-east (Nash Farmhouse) is protected given the strong intervening tree belt and the orientation of the dwelling facing east, to other former farm buildings and farmland beyond.

The site at Nash Farm site , performs very well in terms of any objective assessment, as set out below;

### Deliverability

The site owner has agreed terms with a well respected local developer (Greenplan Designer Homes) with an excellent track record in Mid Sussex.

### Site Location and character

The site is situated on the edge of a category 3 settlement. Substantial built form lies to the east, west and south of the site. Residential dwellings are proposed to the church Lane frontage in a sympathetic linear form to mirror that to the south.

### Landscape

The site is very well enclosed by established soft landscaping, including strong planted boundaries to the east, west and south. An SNCI lies to the south-west/west of the site which would be adequately protected. Appropriate buffers to the SNCI can and will be provided and all boundary trees will be retained, resulting in a site which is exceptionally well contained and one where residential development can be assimilated into the wider landscape without detrimental impact on the character of the locality.

The site does not lie with the High Weald AONB.

### Access and Highways

Adequate visibility splays can be provided to the site access. Traffic is relatively slow moving due to the nature of the road which calms traffic speeds. The construction of an access provision for this development will in turn improve the existing visibility for the properties opposite.

### Sustainability/Access to Services

The site lies within 1km of the village centre and all the amenities that are available there, including; the Village Primary School, public House/restaurant, garage, village shop, employment opportunities, and the Scaynes Hill Millennium Village Centre.

Consequently, the site is well located within easy walking distance of Facilities (as is the proposed allocation site).

As can be seen from the plan submitted, pedestrian access from the development to the centre of the village can be easily obtained using land under the owners control or existing public rights of way. These access routes tie into the recent, well considered upgrading of footpaths undertaken in the village providing for greater accessibility for all.

### Flood Risk and Drainage

The site is within Flood Zone 1 – at low risk of flooding.

### Ecology

The site is currently farmland and laid to grass for grazing, therefore, there are no barriers to development in relation to flora or fauna. The intensively managed grassland has very limited to no intrinsic ecological interest and provides very limited opportunity to faunal species. Whilst the tree belts, individual trees and hedge within the site provide a degree of botanical interest, the primary interest is offered through the presence of mature woodland, with this comprising the wider study area, as well as part of the sites boundary. This woodland edge habitat provides modest opportunities for bats and birds in terms of foraging and roosting/nesting opportunities. In contrast, the habitats within the site provide only very limited opportunities for these faunal groups. The site is considered unlikely to be of significant value to other protected or notable species.

The SNCI to the south-west (outside the site) is notable as 'Registered common also falls within slightly larger SNCI. Located on the north-east edge of Scaynes Hill village. It supports acid grassland with some neutral grassland and woodland.' The SNCI would be retained and any proposal would ensure it is adequately protected.

### Heritage

The main issue for consideration is impact of the development upon the Listed Building to the north-east (Nash Farmhouse). Owing to the orientation of Nash Farmhouse and

its; secluded immediate setting, intervening vegetation screening views to and from the area of proposed new housing, the site is not considered to contribute greatly to Nash Farmhouses' significance.

There will be no material impact on Nash Farmhouse by the proposed development and there are no views between the area of proposed new housing and Westlands due to intervening vegetation in both summer and winter.

It is not felt that the change of use of the site to residential would significantly impact on the sense of remoteness and tranquillity Nash Farmhouse experiences today; any noise impact would be neutral.

Taking the above into account, it is our view that the proposals will have a imperceptible impact on the setting of Nash Farmhouse, resulting in a negligible impact to the significance of the asset via a change in its setting. Therefore, it is concluded the impact of the proposed development would constitute the lower end of less than substantial harm as defined by the NPPF.

### Summary

None of the issues are addressed above constitute a barrier to allocation, planning permission or early delivery. It has been demonstrated that the site is suitable and



deliverable, it is within the control of a local housebuilder and is therefore deliverable within the short-term, boosting local housing delivery.

It has been demonstrated that the site at Nash Farm, Scaynes Hill is capable of accommodating a development of up to 6-10 dwellings. This site should be allocated and brought forward in the short-term, boosting the Council's 5yr HLS position.

#### Concept Masterplan

A concept masterplan has been prepared in order to support the allocation of the site (copy enclosed). This has been informed by the technical advice of a range of consultants. The masterplan demonstrates how development can be accommodated on site taking account of all site constraints. A development of 6 chalet bungalows is illustrated, however, a policy compliant mix in terms of tenure and size to meet local housing needs (ie. some smaller units) could be provided through the sub-division of units, hence the proposed allocation of up to 10 dwellings.

#### SHEELA 897/SA 31

Land rear of Firlands, Church Lane, Scaynes Hill is proposed for allocation for 20 dwellings. This proposed allocation site performs similarly to that at Nash Farm.

#### Sustainability Appraisal

The Site Allocations DPD Sustainability Appraisal published with the DPD itself, indicates at para 6.12 and 6.31 that the residual requirement for Scaynes Hill is 134 dwellings and of those only 20 are proposed at Firlands. This leaves a 114 dwelling requirement which has been reallocated elsewhere as no other sites were deemed suitable/promoted for inclusion in the Scaynes Hill area. The Nash Farm site (although modest) should, therefore, be seriously considered as allocation would assist in the delivery of further much needed housing in Scaynes Hill.

#### Conclusion

We consider that the site at Nash Farm is eminently suitable for development; its development would reflect the current pattern of development in the village and utilise a well contained site.

Yours sincerely

*DMH Stallard LLP*



Nash Farm, Nash Lane, Scaynes Hill  
Site Layout

**19137 / SK03A**

Scale 1:500@ A3 June 2019



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## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA11

<b>ID:</b>	<b>764</b>
<b>Response Ref:</b>	Reg19/764/3
<b>Respondent:</b>	Mr P Rainier
<b>Organisation:</b>	DMH Stallard
<b>On Behalf Of:</b>	Reside Hurst Farm CD
<b>Category:</b>	Developer
<b>Appear at Examination?</b>	✓

**From:** Da Silva, Lisa <Lisa.DaSilva@dmhstallard.com>  
**Sent:** 28 September 2020 17:59  
**To:** ldfconsultation  
**Subject:** Representations - Mid Sussex Site Allocations DPD Regulation 19 Consultation (DMH Stallard Ref:298182-8)  
**Attachments:** 22701075.pdf; 22110262.pdf; 22110258.pdf; 22110260.pdf; 22110256.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Sir / Madam,

**Mid Sussex Site Allocations DPD – Regulation 19 Consultation  
Land at Hurst farm, Turners Hill Road, Crawley Down (SHELAA Site ref: 743)  
On behalf of Reside Developments Limited**

Please find herewith, our representations in relation to the Mid Sussex Site Allocations DPD Regulation 19 consultation.

Kind regards

Lisa

---

Lisa Da Silva | Associate Planner | Tel: +44 1293 605098  
For and on behalf of DMH Stallard LLP  
Griffin House, 135 High Street, Crawley, West Sussex, RH10 1DQ



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

Date 28 September 2020  
Your ref Site Ref #743  
Our ref 298182-8

Dear Sir / Madam,

**Mid Sussex Site Allocations DPD Pre-Submission Consultation – Regulation 19  
Hurst farm, Turners Hill Road, Crawley Down (SHELAA Site ref: 743)  
On behalf of Reside Developments Limited (Reside)**

DMH Stallard Planning act on behalf of Reside in relation to the promotion of land at Hurst Farm, Turners Hill Road, Crawley Down. The site has been promoted through the Call for Sites exercise and has been assessed as Site ref.743, the site area is shown on the attached plan.

In general it should be noted that Reside support the Council's commitment to the site allocation document in order to help provide a sufficient supply of land to meet the residual housing requirements as set out in the District Plan and to provide an overprovision of sites to ensure flexibility and a rolling 5 year housing land supply. However, it is submitted that the land at Hurst Farm should also be allocated.

The Mid Sussex District Plan sets out the development strategy for the District over the plan period, the strategy is to focus the development toward sustainable locations in accordance with the Settlement Hierarchy. In this regard Crawley Down is identified in the District Plan as a Category 2 settlement, the second tier of settlement behind the main towns of Burgess Hill, East Grinstead and Haywards Heath. Policy DP4 of the District Plan sets out that there is a minimum District housing requirement of 16,390 dwellings between 2014 – 2031. Policy DP4 sets out the spatial distribution of the District's housing requirement, allocating the majority of housing to category 1 and 2 settlements.

The Mid Sussex District Plan allocates strategic sites, however, there is a residual housing need over these allocations, as such policy DP4 Policy DP4 confirms that the Council commits to producing a Site Allocations DPD to identify further sites.

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Policy SA10 of the SA DPD sets out how the Council will meet the residual housing need necessary to meet the identified housing target which is set out in the adopted District Plan. It states that the residual housing requirement, reflecting Neighbourhood Plans and windfall development is 1,280 dwellings. The policy, at Table 2.4, also demonstrates how the residual housing figure will be distributed throughout the district, in accordance with the settlement hierarchy.

We acknowledge that the Council have sought to distribute the houses towards higher category 1 tier settlements, but some of these are considered to have greater environmental impacts, than land at Hurst Farm.

It is noted that within the SA DPD only 2 sites have been allocated within Category 2 settlements, and only 1 in Crawley Down, this is despite the fact that Category 2 settlements are considered to be among the more sustainable settlements in the District.

The SA DPD instead elects to identify 4 further sites on the edges of category 1 settlements, of these, 3 are allocated for development, however, these sites are on land close to, or adjoining, the boundary of the South Downs National Park and are visible from viewpoints within. Whilst we acknowledge that the Council have sought to direct any shortfall to higher order settlements, the Council should place significant weight on the protection of nationally designated sites, this would then have directed the Council towards other more suitable sites within Category 2 settlements such as land at Hurst Farm.

We are extremely disappointed to see that land at Hurst Farm has not been included as an allocation in the Draft Site Allocations DPD. At present, on the basis of the representations contained herewith, we submit that the approach to the site selection process is unsound.

Policy DP6 of the District Plan identifies Crawley Down as a Category 2 Settlement, noting that these are *“Larger villages acting as Local Service Centres providing key services in the rural area of Mid Sussex. These settlements serve the wider hinterland and benefit from a good range of services and facilities, including employment opportunities and access to public transport.”* They are therefore considered sustainable settlements, which could accommodate future development, this is reflected in the Council’s identification of land to be allocated at Crawley Down; Land North of Burleigh Lane (SA22).

Table 2.4 of the SA DPD states that the residual housing requirement for category 2 settlements is 198, however, through the SA DPD, only 105 new homes are allocated.

The DPD advises that the under provision is met by development in Category 1 settlements, which have accommodated significant growth within the District Plan and disproportionately through the SA DPD; East Grinstead is the only Category 1 settlement with further residual housing need.

Of the sites, allocated in Category 1 settlements some are considered to have known constraints to development, including impacts on nationally important landscapes, such as the South Downs National Park, or have currently unknown access arrangements. Conversely, the residual housing requirement for category 2 settlements, such as Crawley Down, is 198 dwellings, and the SA DPD only allocates land in these settlements for 105 dwellings. The Council had a pool of sites, including land at Hurst Farm, which are suitable, achievable and deliverable, and could be identified in order to help meet the residual housing need of category 2 settlements. This would also reduce pressure on other settlements categories which are meeting more than their residual requirement and on less suitable sites.

Of the allocations within the SA DPD, approximately 548 dwellings are considered to be in locations which are visible from the South Downs National Park or the High Weald AONB, or are within the High Wealden AONB (153 dwellings). At paragraph 171 of the NPPF, it requires that LPA's allocate land with the least environmental or amenity value, further noting at paragraph 172 that great weight should be given to conserving and enhancing landscape and scenic beauty of Areas of Outstanding Natural Beauty and National Parks, they are given the highest status of protection. These are landscapes which should clearly afford the greatest level of protection, yet they have been allocated for housing in place of more suitable sites, and on the edges of settlements which have already met their residual housing requirement. This process is considered unsound.

The SA DPD, through the SA, should consider a pallet of non-AONB sites first, to ensure the protection of designations of a national importance, and only when the most appropriate sites have been considered, move towards the identification of AONB sites. Similarly, the Council have dismissed sites on minimal landscape grounds, but then seek to allocate significant parcels of land close to the South Downs National Park. We submit that sites, such as that at Hurst Farm, where there would be minimal landscape harm, should be considered above those which would have a detrimental affect on either the AONB or National Park.

Additionally, the SA DPD allocates 250 dwellings on land where access is currently unknown (according to the policies, which state that access needs to be explored) - land at Burleigh Lane, Crawley Down (SA 22) and land south of Crawley Down Road, Felbridge (SA 19). In comparison, land at Hurst Farm, can be delivered via an existing

access which is already considered acceptable, with no need to purchase additional land, and is therefore deliverable immediately.

### **Land at Hurst Farm (Site Ref #743)**

We continue to have concerns regarding the site selection process, especially given that the site seems to have been discounted at a relatively early stage (Stage 3) and therefore failed to make the shortlist of sites for consideration. We note that the summary of reasons for discounting the site were; *'Inconsistent with the established nearby settlement form; potential for adverse effects on the rural character and setting of the adjacent listed Building (Westlands).'*

As set out in previous representations, those concerns are ill-founded and fundamentally flawed. The part of the site proposed for development is consistent with the nearby development form of the village immediately to the south. The site is largely previously developed land with utilitarian buildings extending across the site. Mature trees lie on all four boundaries resulting in a very well enclosed site where development would have no substantive impact on the character of the locality. Furthermore, the setting of the Listed Building to the north-east would be adequately protected.

The background documents within the evidence library published alongside the Site Allocations DPD includes Site Selection Paper 3: Housing, and Appendix B: Housing Site Proformas. We note that the proforma site assessments in this document are the final site assessments, however, in respect of Site 743 (Hurst Farm) it appears that the assessment to discount site 743 was taken on the basis of an earlier inaccurate version.

It should be noted that the SHELAA assessment for the The site at Hurst Farm, performs very well in terms of any objective assessment, as set out below;

#### ***Deliverability***

The site is promoted by Reside a well respected local developer with an excellent track record in Mid Sussex.

#### ***Site Location and character***

The site is a predominantly brownfield site on the edge of a category 2 settlement. Within the site there is substantial built form of utilitarian buildings across the site, including a farm shop with associated activity and car parking. Residential dwellings to the site frontage and a recently constructed small housing estate are located to the south. It should be noted that if this is site is not allocated for residential development, the site could potentially be progressed via Prior Notification/Permitted Development

rights, however, this would be a less attractive/comprehensive manner through the change of use of some existing buildings for commercial/residential purposes.

The fact that this site is a brownfield site should weigh heavily in its favour, and brownfield sites / Previously Developed Land (PDL) should be considered over other greenfield sites in choosing site allocations. The NPPF echoes this and states at paragraph 117 that: "Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land"

### ***Landscape***

The site lies outside the High Weald AONB. The site is very well enclosed by established soft landscaping, including Ancient Woodland (AW) to the west and south. Appropriate buffers to the AW can and will be provided and all boundary trees will be retained. The AW buffers can be retained leaving the central part of the site available for development). Strong tree belts also lie to the north, resulting in a site which is exceptionally well contained and one where residential development could be assimilated into the wider landscape without impact on the character of the locality.

In addition, the fact that this site is brownfield on PDL rather than a greenfield site also helps to reduce any impact on the landscape, the proposed re-development of this site to residential would result in an improvement on the wider landscape, consequently it is considered that there is not likely to be a negative effect on countryside as the site will make efficient use of a brownfield site.

### ***Access and Highways***

The site benefits from a wide existing established access which farm vehicles, lorries and cars use on a daily basis when entering and leaving the site. No issues have been raised by WSCC Highways in relation to visibility and access.

### ***Sustainability/Access to Services***

Having measured the distances to the Village School and Health Centre we estimate that, at the industry accepted walking speed of 80m per minute, those facilities are 1km and 0.9km away, so 12 and 11 mins respectively, and similar to other services such as local shops, confirming that the site is well located within easy walking distance of facilities. It is also noteworthy that the residential sites immediately to the south, which are situated an almost identical distance to local facilities, have recently been considered to be sustainably located by the LPA/Planning Inspectorate/SoS. Furthermore, a pedestrian crossing is secured under those consents providing safe

access to the village centre to the east. It is, therefore considered evident that this site is also sustainably located.

### ***Flood Risk and Drainage***

The site is wholly located within Flood Zone 1 and is therefore a low risk of flooding. All forms of development are considered acceptable in principle in Flood Zone 1.

### ***Ecology***

Reside have commissioned an ecological survey (copy attached), which confirms that there are no barriers to development in relation to flora or fauna. The report concludes that; 'the site is dominated by areas of built form, hard-standing, bare ground and intensively managed grassland, all of which are of limited to no intrinsic ecological interest and which provide very limited opportunities to faunal species. Whilst the tree belts, individual trees and hedge within the site provide a degree of botanical interest, the primary interest is offered through the presence of mature woodland, with this comprising the wider study area, as well as part of the site's boundary. This woodland edge habitat provides modest opportunities for bats and birds in terms of foraging and roosting/nesting opportunities, as well as potential opportunities for Dormice. In contrast, the habitats within the site provide only very limited opportunities for these faunal groups, albeit some areas of ruderal vegetation offers a degree of potential opportunities for common reptiles. The site is considered unlikely to be of significant value to other protected or notable species, with specific survey work confirming the absence of Badgers and Great Crested Newts.'

### ***Heritage***

Reside have commissioned a detailed Heritage report (attached). The main issue for consideration is impact of the development upon the Listed Building to the north-east (Westlands). Owing to the orientation of Westlands, its secluded immediate setting, intervening vegetation screening views to and from the area of proposed new housing, and the change of use of the site since the mid-20th century, the report concludes that the site is not considered to contribute greatly to Westlands' significance. There will be no material impact on Westlands by the proposed development and there are no views between the area of proposed new housing and Westlands due to intervening vegetation in both summer and winter.

There is a considerable degree of traffic noise from the B2028, aircraft noise from planes going to and from Gatwick Airport, and general noise from the farm complex (movement of machinery, band sawing, chickens etc), audible from both the site itself and along the footpath past Westlands. As such, it is not felt that the change of use of the site to residential would significantly impact on the sense of remoteness and tranquillity Westlands experiences today; any noise impact would be neutral. Taking the



above into account, the heritage report comes to the conclusion that; 'it has been determined that the proposals will have an imperceptible impact on the setting of Westlands resulting in a negligible impact to the significance of the asset via a change in its setting. Therefore, it is concluded the impact of the proposed development would constitute the very lower end of less than substantial harm as defined by the NPPF.'

### ***Site Assessment - Summary***

It is acknowledged that a previous proposal for 45 dwellings on the site was refused by the Council in 2018, however, this was primarily on the grounds that the site was outside the defined settlement boundary, this would be overcome by the allocation of the site in the forthcoming Site Allocations DPD.

Other issues are addressed above, none of which in our view, constitute a barrier to planning permission or early delivery. The Council have already undertaken technical assessments of the site through the planning application process, supported by the evidence submitted as part of that process and enclosed herewith (ecology and heritage assessments). It has been demonstrated that the site is suitable and deliverable, it is within the control of a regional housebuilder and is therefore deliverable within the short-term, boosting local housing delivery.

Furthermore, the site is a brownfield site, redeveloping such sites over greenfield sites is considered to be favourable. It is considered that there is a need to prioritise brownfield land for development and encourage this wherever possible. With this in mind it is considered that the site would offer a more suitable option for allocation than those on greenfield land, or on sensitive land such as that adjoining the South Downs National Park or within the High Weald AONB.

### **SHEELA 519/SA 22**

The only site to be allocated within the SA DPD which is situated within Crawley Down is Land north of Burleigh Lane. Land north of Burleigh Lane, Crawley Down is proposed for allocation for 50 dwellings. In our view the site performs poorly when compared to Hurst farm for a number of reasons;

- 50 units is excessive in respect of the need required for Crawley Down (a smaller site such as Hurst Farm would be more appropriate).
- Deliverability is doubtful given acknowledged uncertainties in respect of vehicular access (much less certain than Hurst Farm)
- Landscape impact is significant given the relatively open boundaries particularly to the south (much greater impact upon character and visual amenity than Hurst Farm)

- Predominantly greenfield site in comparison to Hurst Farm being mainly brownfield.
- Impact on neighbouring Listed Building greater than at Hurst Farm.
- Impact in respect of public views much greater than at Hurst Farm, given the single-track rural nature of Burleigh Lane to the south.

### **Pre-application**

Reside have recently engaged in a pre-application process with MSDC officers and an information booklet with concept masterplan has been prepared in order to support the pre-application (copy enclosed). This has been informed by the technical advice of a range of consultants. The masterplan demonstrates how development can be accommodated on site taking account of all site constraints. A development of approximately 37 dwellings is proposed with a policy compliant mix (including 2-bed homes and single storey accommodation) in terms of tenure and size to meet local housing needs. The accompanying information booklet and concept masterplan demonstrates that this can be accommodated within the site.

Reside have also undertaken public consultation on the proposal via a leaflet drop to neighbouring residents, and overall the response on the proposal has been positive.

### **Conclusion**

We consider that the site at Hurst Farm is eminently suitable for development; its development would reflect the current pattern of development in the village and utilise a largely brownfield site containing large buildings and attracting activity. If taking a sequential approach, the allocation and development on brownfield sites must be considered preferable to Greenfield land. The allocation of brownfield sites and bringing these sites into a more appropriate use in sustainable locations, such as would be the case here, is a key provision in achieving sustainable development which lies at the heart of national and local planning policies.

It is considered that there is a need to prioritise brownfield land for development and encourage this wherever possible. With this in mind it is considered that the site would offer a more suitable option for allocation than those on greenfield land, or on sensitive land such as that adjoining the South Downs National Park or within the High Weald AONB. Allocating the land at Hurst Farm would relieve pressure on greenfield sites and other more sensitive locations close to, or within, the South Downs National Park and High Weald AONB.

In light of the evidence contained herein, it is considered that the site allocations process and the SA DPD site assessment of Hurst Farm is unsound. We therefore submit that the land at Hurst Farm should be identified as an additional site in the SA DPD. We would respectfully request the opportunity to speak on behalf of our clients at any future examination.

Yours faithfully

A handwritten signature in black ink that reads "DMH Stallard LLP". The signature is written in a cursive, slightly slanted style.

DMH Stallard LLP

Enclosures: Previous representation (Reg 18)  
Ecology Report  
Heritage Report  
Information Booklet with Concept Masterplan



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

Date 19<sup>th</sup> November 2019  
Your ref Site 743  
Our ref

Dear Sir / Madam

**Hurst farm, Turners Hill Road, Crawley Down (SHELAA Site ref: 743)  
Representations to the MSDC Draft Site Allocations DPD (Regulation 18)  
On behalf of Reside Developments Limited (Reside)**

DMH Stallard Planning act on behalf of Reside in relation to the promotion of land at Hurst Farm, Turners Hill Road, Crawley Down. The site has been promoted through the Call for Sites exercise and has been assessed as Site ref.743, the site area is shown on the attached plan.

We write in response to the consultation on the Draft Site Allocations DPD and to put forward additional information demonstrating the suitability of the site for residential development.

We are extremely disappointed to see that land at Hurst Farm has not been included as an allocation in the Draft Site Allocations DPD. We continue to have concerns regarding the site selection process, especially given that the site seems to have been discounted at a relatively early stage (Stage 3) and therefore failed to make the shortlist of sites for consideration. The summary of reasons for discounting the site were;

*'Inconsistent with the established nearby settlement form; potential for adverse effects on the rural character and setting of the adjacent listed Building (Westlands).'*

As set out in previous representations, those concerns are ill-founded and fundamentally flawed. The part of the site proposed for development is consistent with the nearby development form of the village immediately to the south. The site is largely previously developed land with utilitarian buildings extending across the site. Mature trees lie on all four boundaries resulting in a very well enclosed site where development would have no substantive impact on the character of the locality. Furthermore, the setting of the

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Listed Building to the north-east would be adequately protected. The inaccurate initial appraisal of the site appears to have been accepted as such by the Council. The final version of the Housing Site Proformas has largely (although not fully) taken our criticisms on-board.

The background documents published alongside the Draft Site Allocations DPD includes Site Selection Paper 3: Housing, and Appendix B: Housing Site Proformas. We note that the proforma site assessments in this document are the final site assessments, however, in respect of Site 743 (Hurst Farm) it appears that the assessment to discount site 743 was taken on the basis of an earlier inaccurate version. The site at Hurst Farm, performs very well in terms of any objective assessment, as set out below;

### **Deliverability**

The site is promoted by Reside a well respected local developer with an excellent track record in Mid Sussex.

### **Site Location and character**

A predominantly brownfield site on the edge of a category 2 settlement. Substantial built form of utilitarian buildings across the site. Farm shop with associated activity and car parking. Residential dwellings to the site frontage and recently constructed small housing estate to the south. If not allocated for residential development, the site could potentially be progressed via Prior Notification/Permitted Development rights in a less attractive/comprehensive manner through the change of use of some existing buildings for commercial/residential purposes.

### **Landscape**

The site is very well enclosed by established soft landscaping, including Ancient Woodland (AW) to the west and south. Appropriate buffers to the AW can and will be provided and all boundary trees will be retained. The AW buffers can be retained leaving the central part of the site available for development). Strong tree belts also lie to the north, resulting in a site which is exceptionally well contained and one where residential development could be assimilated into the wider landscape without impact on the character of the locality.

The site lies outside the High Weald AONB.

## **Access and Highways**

The site benefits from a wide existing established access which farm vehicles, lorries and cars use on a daily basis when entering and leaving the site. No issues have been raised by WSCC Highways in relation to visibility and access.

## **Sustainability/Access to Services**

Having measured the distances to the Village School and Health Centre we estimate that, at the industry accepted walking speed of 80m per minute, those facilities are 1km and 0.9km away, so 12 and 11 mins respectively, and similar to other services such as local shops, confirming that the site is well located within easy walking distance of facilities. It is also noteworthy that the residential sites immediately to the south, which are situated an almost identical distance to local facilities, have recently been considered to be sustainably located by the LPA/Planning Inspectorate/SoS. Furthermore, a pedestrian crossing is secured under those consents providing safe access to the village centre to the east. It is, therefore, evident that this site is sustainably located.

## **Flood Risk and Drainage**

The site is within Flood Zone 1 – at low risk of flooding.

## **Ecology**

Reside have commissioned an ecological survey (copy attached), which confirms that there are no barriers to development in relation to flora or fauna. The report concludes that; 'the site is dominated by areas of built form, hard-standing, bare ground and intensively managed grassland, all of which are of limited to no intrinsic ecological interest and which provide very limited opportunities to faunal species. Whilst the tree belts, individual trees and hedge within the site provide a degree of botanical interest, the primary interest is offered through the presence of mature woodland, with this comprising the wider study area, as well as part of the site's boundary. This woodland / edge habitat provides modest opportunities for bats and birds in terms of foraging and roosting/nesting opportunities, as well as potential opportunities for Dormice. In contrast, the habitats within the site provide only very limited opportunities for these faunal groups, albeit some areas of ruderal vegetation offers a degree of potential opportunities for common reptiles. The site is considered unlikely to be of significant value to other protected or notable species, with specific survey work confirming the absence of Badgers and Great Crested Newts.'

## Heritage

Reside have commissioned a detailed Heritage report (attached). The main issue for consideration is impact of the development upon the Listed Building to the north-east (Westlands). Owing to the orientation of Westlands, its secluded immediate setting, intervening vegetation screening views to and from the area of proposed new housing, and the change of use of the site since the mid-20th century, the report concludes that the site is not considered to contribute greatly to Westlands' significance. There will be no material impact on Westlands by the proposed development and there are no views between the area of proposed new housing and Westlands due to intervening vegetation in both summer and winter.

There is a considerable degree of traffic noise from the B2028, aircraft noise from planes going to and from Gatwick Airport, and general noise from the farm complex (movement of machinery, band sawing, chickens etc), audible from both the site itself and along the footpath past Westlands. As such, it is not felt that the change of use of the site to residential would significantly impact on the sense of remoteness and tranquillity Westlands experiences today; any noise impact would be neutral. Taking the above into account, the heritage report comes to the conclusion that; 'it has been determined that the proposals will have an imperceptible impact on the setting of Westlands resulting in a negligible impact to the significance of the asset via a change in its setting. Therefore, it is concluded the impact of the proposed development would constitute the very lower end of less than substantial harm as defined by the NPPF.'

## Summary

It is acknowledged that a previous proposal for 45 dwellings on the site was refused by the Council in 2018, however, this was primarily on the grounds that the site was outside the defined settlement boundary, this would be overcome by the allocation of the site in the forthcoming Site Allocations DPD. Other issues are addressed above, none of which constitute a barrier to planning permission or early delivery. The Council have already undertaken technical assessments of the site through the planning application process, supported by the evidence submitted as part of that process and enclosed herewith (ecology and heritage assessments). It has been demonstrated that the site is suitable and deliverable, it is within the control of a regional housebuilder and is therefore deliverable within the short-term, boosting local housing delivery.

**It has been demonstrated that Site 743 (Hurst Farm, Crawley Down) is capable of accommodating a development of approximately 37 dwellings. This site should be allocated and brought forward in the short-term, boosting the Council's 5yr HLS position.**

## **Concept Masterplan**

A concept masterplan and promotional document has been prepared in order to support the allocation of the site (copy enclosed). This has been informed by the technical advice of a range of consultants. The masterplan demonstrates how development can be accommodated on site taking account of all site constraints. A development of approximately 37 dwellings is illustrated with a policy compliant mix (including 2-bed homes and single storey accommodation) in terms of tenure and size to meet local housing needs.

## **SHEELA 519/SA 22**

Land north of Burleigh Lane, Crawley Down is proposed for allocation for 50 dwellings. In our view the site performs poorly when compared to Hurst farm for a number of reasons;

- 50 units is excessive in respect of the need required for Crawley Down (a smaller site such as Hurst Farm would be more appropriate).
- Deliverability is doubtful given acknowledged uncertainties in respect of vehicular access (much less certain than Hurst Farm)
- Landscape impact is significant given the relatively open boundaries particularly to the south (much greater impact upon character and visual amenity than Hurst Farm)
- Predominantly greenfield site in comparison to Hurst Farm being mainly brownfield.
- Impact on neighbouring Listed Building greater than at Hurst Farm
- Impact in respect of public views much greater than at Hurst Farm, given the single-track rural nature of Burleigh Lane to the south.

## **Conclusion**

We consider that the site at Hurst Farm is eminently suitable for development; its development would reflect the current pattern of development in the village and utilise a largely brownfield site containing large buildings and attracting activity. We hope therefore, that the Council will identify Hurst Farm as an additional or more appropriate site, through the DPD process, in view of the evidence contained herein.



We would welcome the opportunity to discuss this site with you further.

Yours faithfully

A handwritten signature in black ink that reads "DMH Stallard LLP". The signature is written in a cursive, slightly slanted style. The letters "DMH" are connected, and "Stallard" is written in a more fluid, cursive script. "LLP" is written in a simpler, more upright font at the end.

DMH Stallard LLP

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## **LAND AT HURST FARM, TURNERS HILL ROAD, CRAWLEY DOWN**

### **Briefing Note: Interim Phase 1 habitat survey & protected species assessment**

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#### Introduction

1. Ecology Solutions were commissioned by Reside Development Ltd in June 2019 to undertake Ecological Assessment work of land at Hurst Farm, Turners Hill Road, Crawley Down (the site) as well as a wider study area (see Plan ECO1).
2. Emerging proposals are for small-scale residential development alongside the provision of open space.
3. The wider site comprises a small farmstead (chicken farm), dominated by species-poor grassland, agricultural buildings, bare ground and hardstanding. The wider study area, adjacent to the site at its western and part of the south southern edge, comprises an area of ancient, semi-natural, broad-leaved woodland known as Pescotts Wood.
4. Woodland forms much of the site's northern and western boundaries, as well as a portion of the southern boundary. Agricultural land forms the remainder of the southern boundary, with roads and built form (residential development) to the east.
5. The purpose of the Phase 1 survey was to ascertain the biodiversity value of the habitats present, to identify the potential for the site to support protected and notable faunal species and to advise on the appropriateness of development within the site.

#### Survey Methodology

##### *Habitat Survey Methodology*

6. Ecology Solutions undertook a habitat survey of the site in July 2019. The survey was based around an extended Phase 1 survey methodology<sup>1</sup>, as recommended by Natural England, whereby the habitat types present are identified and mapped, together with an assessment of the species composition of each habitat. This

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<sup>1</sup> Joint Nature Conservation Committee (2010). *Handbook for Phase 1 Habitat Survey – a Technique for Environmental Audit*. JNCC, Peterborough.

technique provides an inventory of the basic habitat types present and allows identification of areas of greater potential which require further survey. Any such areas identified would then be examined in more detail.

7. The habitats present within the site and wider study area were classified into areas of similar botanical community types with a representative sample of those species present at the time of the survey being described where necessary.
8. The habitat survey was undertaken within the recommended optimal survey period for Phase 1 habitat and botanical surveys. The vegetation present enabled the habitat types to be satisfactorily identified and an accurate assessment of the ecological interest of the habitats to be undertaken.

### *Faunal Surveys*

9. General faunal activity observed during the course of the surveys was recorded, whether visually or by call. Specific attention was paid to the potential presence of any protected, rare, notable or priority (i.e. those included on BAPs) species. In addition, specific surveys were undertaken for Badgers *Meles meles*, Great Crested Newts (eDNA) and bats.
10. Further survey work is ongoing for a range of protected and notable faunal species within the site and wider study area, as discussed in the faunal section below.
11. **Badgers.** Specific surveys were undertaken as part of the habitat survey in July 2019. Surveys comprised two main elements. The first of these was a thorough search for evidence of Badger setts. For any setts that were encountered each sett entrance was noted and plotted even if the entrance appeared disused. The following information was recorded:
  - i) The number and location of well used or very active entrances; these are clear from any debris or vegetation and are obviously in regular use and may, or may not, have been excavated recently.
  - ii) The number and location of inactive entrances; these are not in regular use and have debris such as leaves and twigs in the entrance or have plants growing in or around the edge of the entrance.
  - iii) The number of disused entrances; these have not been in use for some time, are partly or completely blocked and cannot be used without considerable clearance. If the entrance has been disused for some time all that may be visible is a depression in the ground where the hole used to be and the remains of the spoil heap.
12. Secondly, Badger activity such as well-worn paths and run-throughs, snagged hair, footprints, latrines and foraging signs was recorded so as to build up a picture of the use of the site (if any) by Badgers.
13. **Bats.** All trees and structures within and adjacent to the site were assessed for their potential to support roosting bats in July 2019.
14. For a tree to be classed as having some potential for roosting bats it must usually have one or more of the following characteristics:
  - obvious holes, e.g. rot holes and old woodpecker holes;

- dark staining on the tree below a hole;
  - tiny scratch marks around a hole from bats' claws;
  - cavities, splits and / or loose bark from broken or fallen branches, lightning strikes etc; and / or
  - very dense covering of mature Ivy over trunk.
15. The probability of a building being used by bats as a summer roost site increases if it:
- Is largely undisturbed;
  - Dates from pre-20th Century;
  - Has a large roof void with unobstructed flying spaces;
  - Has access points for bats (though not too draughty);
  - Has wooden cladding or hanging tiles; and/or
  - Is in a rural setting and close to woodland or water.
16. Conversely, the probability decreases if a building is of a modern or pre-fabricated design/construction, is in an urban setting, has small or cluttered roof voids, has few gaps at the eaves or is a heavily disturbed premises.
17. **Great Crested Newts.** Two small ponds are present within the site, both of which were considered sub-optimal to support breeding amphibians on account of either an absence of aquatic vegetation or their ephemeral nature.
18. Nonetheless, and on a precautionary basis, these waterbodies were subject to eDNA surveys in June 2019.
19. Pond water sampling kits supplied by SureScreen Scientifics were utilised for the eDNA survey work, with the sampling methodology undertaken fully according with that recommended by the supplier. Water samples were subsequently sent to SureScreen Scientifics for laboratory analysis.

## **Survey Findings and Evaluation**

### **Habitat Survey Results**

20. The following main habitat / vegetation types were identified within/adjacent to the site and wider study area:
- Improved Grassland;
  - Buildings / Structures;
  - Ruderal Vegetation;
  - Hard-standing;
  - Bare Ground;
  - Hedgerow;
  - Waterbodies;
  - Woodland; and
  - Trees.

### **Improved Grassland**

21. Much of the site comprises areas of improved (species-poor) grassland which are regularly managed through mowing.

22. These areas support a typical assemblage of species, being invariably dominated by Yorkshire Fog *Holcus lanatus* and Perennial Rye-grass *Lolium perenne*, with occasional Creeping Bent *Agrostis stolonifera*. Herbs were only sparsely recorded and included for a limited range of common species such as White Clover *Trifolium repens*, Meadow Buttercup *Ranunculus acris*, Broad-leaved Dock *Rumex obtusifolius*, Field Forget-me-not *Myosotis arvensis*, Bird's-foot Trefoil *Lotus corniculatus*, Ribwort Plantain *Plantago lanceolata*, Selfheal *Prunella vulgaris*, Mugwort *Artemisia vulgaris*, Silverweed *Argentina anserina* and Scarlet Pimpernel *Anagallis arvensis*.
23. An area of amenity grassland was recorded in the east of the site and comprised an area of species-poor, regularly mown lawn with a minimal herb assemblage.

### **Buildings and Structures**

24. The site supports several agricultural buildings, these labelled B1-B6 on Plan ECO1.
25. **B1** and **B4** are metal framed buildings with metal roofs and walls and which are open at one aspect. **B2** and **B3** are breezeblock buildings with wood panel walls and corrugated sheet roofs. They are utilised as chicken pens. **B5** and **B6** are wooden sheds with corrugated sheet roofs.
26. The remaining structures on site comprise small wooden sheds.

### **Ruderal Vegetation**

27. Several pockets of ruderal vegetation are present within the site. These areas support a small assemblage of species typical of disturbed ground and enriched soil conditions, including Greater Willowherb *Epilobium hirsutum*, Common Nettle *Urtica dioica*, Redshank *Persicaria maculosa*, Cleavers *Galium aparine*, Creeping Thistle *Cirsium arvense*, Hogweed *Heracleum sphondylium*, Spear Thistle *Cirsium vulgare*, Bristly Ox-tongue *Helminthotheca echioides*, Hawkbit *Leontodon* sp., Silverweed, Germander Speedwell *Veronica chamaedrys*, Pendulous Sedge *Carex pendula*, Scentless Mayweed *Tripleurospermum inodorum*, Tufted Vetch *Vicia cracca*, Knotgrass *Polygonum aviculare*, Purple Toadflax *Linaria purpurea* and Fleabane *Pulicaria dysenterica*.
28. Scattered scrub is occasionally recorded in these areas and is dominated by Bramble. Occasional tree saplings, including Birch *Betula* sp, and Oak *Quercus robur*, were also recorded.

### **Hardstanding**

29. An area of hardstanding is present within the site in the form of a farm access track. This habitat supports little floristic diversity and is of negligible ecological interest.

### **Bare Ground**

30. Areas of bare ground are present around several of the buildings on site. These areas are again of negligible ecological value.

## Hedgerow

31. A small stretch of hedge (**H1**) is present within the site. **H1** forms part of the site's southern boundary at its eastern extent and supports a limited range of native and amenity species including Dog Rose *Rosa canina*, Apple *Malus* sp., Ash *Fraxinus excelsior*, Pedunculate Oak *Quercus robur*, Goat Willow *Salix caprea*, Travellers Joy *Clematis vitalba* and Sweet Pea *Lathyrus odoratus*.

## Waterbodies

32. Two waterbodies are present within the site. **P1** is a wet pond present in the north of the study area. The pond measures approx. 5m by 4m and is over-shaded, with no aquatic vegetation present. **P2** held a shallow depth of water in June 2019 however was dry at the time of survey in July 2019. It is located in the south-east of the site. No true aquatic vegetation was present, with this area supporting Willows *Salix* sp. and Hard Rush *Juncus inflexus*.

## Woodland / Tree Belts

33. An area of broad-leaved woodland is present to the west of the site (**W1**) and comprises the entirety of the wider study area. Additional woodland is present along the southern (**W2**) and northern site boundaries (**W3**).
34. Woodland **W1**, known as Pescotts Wood, is an area of mature broad-leaved woodland which is identified on the ancient woodland register. The woodland includes for several large and mature Pedunculate Oak, with Silver Birch *Betula pendula* and Sweet Chestnut also present *Castanea sativa*. Beech *Fagus sylvatica* is present at the western boundary of the woodland. Shrub species associated with the woodland were largely limited to the eastern frontage and include for Rowan *Sorbus aucuparia*, Holly *Ilex aquifolium* Goat Willow, Bramble, Elder *Sambucus nigra* and Hazel *Corylus avellana*. Rhododendron was also abundantly recorded. Hybrid Bluebell *Hyacinthoides non-scripta x hispanica* was occasional throughout the woodland.
35. **W2** is also known as Pescotts and has a comparable composition to **W1**, with Silver Birch abundant and Oak, Hazel, Holly, Beech and Sweet Chestnut all present. Goat Willow and Rowan were recorded in the understorey, as was Bramble. Ground flora included for Bracken, Common Nettle and Foxglove *Digitalis purpurea*. This area of woodland is again recorded on the ancient woodland register.
36. **W3** is located beyond the northern boundary of the site and supports a belt of trees along its frontage. Species recorded included Silver Birch, Beech, Ash, Oak, Rowan, Grey Willow *Salix cinerea* and Goat Willow recorded. Three belts of trees (**T1 - T3**) which adjoin **W3**, are located within the site and are described below.
37. **T1** comprises a belt of semi-mature trees with Oak, Sycamore *Acer pseudoplatanus*, Ash and Beech.
38. **T2** runs along part of the site's northern boundary (adjacent to **W2**) before turning into the site. It is a scrubby belt comprising Hazel, Oak, Goat Willow, Grey Willow, Beech, Silver Birch and Holly. Bramble is also occasionally present, with Common Nettle and Bracken comprising the ground flora.

39. **T3** is located within an amenity garden. It includes for Ornamental Willow *Salix* sp., Oak, Cherry *Prunus* sp., *Rhododendron* sp., Copper Beech, *Magnolia* sp., Ash, Holly and Bramble.

### **Trees**

40. In addition to the area of woodland and tree belts, a number of scattered trees are present within the study area. The species composition of these individual trees is comparable to that recorded within the tree belts, albeit with a number of amenity species also present.

### Fauna

41. General observations were made during the surveys of any faunal use of the site with specific attention paid to the potential presence of any protected, rare, notable or priority species. In addition, specific survey work has been undertaken in relation to bats, and Badgers.

### **Bats**

42. The buildings / structures within the site are considered completely unsuitable to support roosting bats, being built of prefabricated materials which heat and cool rapidly and with an absence of any voids. No evidence of bats was recorded during the internal and external survey work undertaken by Ecology Solutions.
43. A single tree within the site was considered to be of some (low) potential to support roosting bats on account of its maturity and the presence of dense Ivy, however no distinct roosting features, such as holes or cracks, were noted. The location of this tree is shown on Plan ECO1. In addition, a small number of trees with bat potential were also recorded within **W1** in the wider study area. Initial inspections of these trees found no evidence of roosting bats.
44. The habitats within the site are predominantly considered to be of low value to foraging and commuting bats, being dominated by buildings, hardstanding and species-poor grassland. On this basis, foraging and commuting opportunities are considered to be largely restricted to the boundary woodland habitats, including that within the wider study area.
45. Noting the above and given the small size of the site, it is considered that the retention of areas of woodland and boundary vegetation as part of an appropriately designed landscape strategy and the adoption of a sensitive lighting strategy would ensure that the value of the site for bats is retained as part of any emerging development proposals. Indeed, opportunities for enhancement exist through the establishment of diverse woodland edge habitat as buffers adjacent to existing areas of ancient woodland.
46. Notwithstanding the limited value of the habitats within the site and on a precautionary basis (noting the site's proximity to optimal off-site habitats including ancient woodland), a suite of bat surveys are proposed in the summer and autumn of 2019.
47. At this stage and subject to the findings of initial surveys, it is considered that the completion of two or three bat activity surveys (transect surveys and static detector deployment), in suitable weather conditions, would be sufficient to ascertain the

use of the site by bats and confirm the suitability of mitigation measures in this regard.

48. Should trees with bat potential be lost or adversely impacted, further survey effort of these features would also be required in the first instance.

### **Badgers**

49. Specific surveys for Badgers were undertaken in July 2019. No evidence of current or past use by Badgers was recorded within the site. As such, whilst the site may provide an occasional resource for Badgers present in the local area, the site is not of significance to this faunal group.
50. No mitigation would be required for this faunal group. Nonetheless it is noted the new landscaping as part of the proposals would have the potential to provide improved opportunities for any Badger group(s) in the local area.

### **Birds**

51. The scattered scrub, hedgerows and trees within the site offer a degree of suitable foraging and nesting habitats for bird species, albeit it is noted that significantly improved opportunities area present within the wider study area and indeed in the local area (where mature woodland is frequent).
52. A range of generally common 'garden' bird species were noted on site during the habitat survey including Robin *Erithacus rubecula*, Wren *Troglodytes troglodytes*, Greenfinch *Chloris chloris*, Blackbird *Turdus merula*, Starling *Sturnus vulgaris*, Green Woodpecker *Picus viridis*, Pied Wagtail *Motacilla albe*, Great Tit *Parus major* and Collared Dove *Streptopelia decaocto*.
53. The retention and buffering of boundary woodland, including that within the wider study area, would be sufficient to ensure that opportunities for nesting birds are retained and enhanced as part of any emerging proposals.

### **Reptiles**

54. Parts of site were considered to provide potential opportunities for common reptile species, albeit these are limited to smaller pockets of taller ruderal vegetation within the site. The grass sward was suppressed to such an extent that this was not considered suitable for reptiles.
55. Notwithstanding the limited extent of suitable habitat, a suite of reptile presence/absence surveys are proposed for Summer/autumn 2019. These surveys will be sufficient to determine the use of the site by reptiles (if any) and to identify appropriate mitigation measures. In the event that reptiles are recorded, it is considered that the population(s) could be appropriately safeguarded within retained habitats within the site (i.e. landscaped woodland buffers) and will not affect the developable area.

### **Amphibians**

56. There are two 'ponds' located within the site, albeit one of these (**P2**) only appears to hold water on an ephemeral basis. The only other pond identified within a 250m radius of the site (when accounting for barrier to dispersal) was located 150m to the north of the site at its closest point. The majority of the site provides sub-optimal



terrestrial opportunities for amphibian species, comprising extensive areas of built form, short managed grassland and bare ground.

57. Notwithstanding the limited suitability of the on-site ponds to support breeding amphibians, an eDNA survey was undertaken in June 2019. The landowner of the offsite pond, located 150m to the north of the site, refused access to the pond.
58. The eDNA survey confirmed the absence of GCN from the site (negative return for both ponds). The technical report produced by SureScreen is provided at Appendix 1.
59. Great Crested Newts (GCN) are known to travel up to 500 metres – without barriers that inhibit dispersal – to a breeding pond, however it is widely accepted that they most commonly utilise suitable terrestrial habitat within a much closer distance, and activity is usually concentrated within 100 metres of breeding ponds with key habitat being located within 50 metres<sup>2</sup>. Indeed, Research Report 576 produced by English Nature (now Natural England) concludes that “Captures on fences (and by other methods) at distances between 100m and 200-250m from breeding ponds tended to be so low as to raise serious doubts about the efficacy of this as an approach”.
60. Indeed, current guidance by Natural England takes this a step further, stating that *‘impacts beyond the core area often have little or no tangible impact on the viability of populations’*<sup>3</sup>.
61. In light of the above, given the small size of the site and the sub-optimal nature of the terrestrial habitats present, that GCN are not utilising ponds within the site and given the distance of any off-site features (regardless of whether they support GCN), it is not considered that GCN would be present within the site, nor that the site offers any significant opportunities for this species.
62. In due course, an appropriate landscaping regime for the proposals could provide improved opportunities for common amphibians which may be present in the local area, such as through delivering areas of rough/meadow grassland as well as small water features.

### **Dormouse**

63. The hedgerow and tree belts within the site offers a degree of potential habitat for Dormouse, with significantly improved opportunities offered by the woodland habitats which form the wider study area and elements of the site boundary.
64. At this stage it is understood that these woodland habitats will be retained in their entirety and moreover enhanced as part of emerging development proposals, not least through the establishment of a 15m landscaped buffer adjacent to areas of ancient woodland (see below). Such enhancements would provide improved opportunities for Dormouse, should they be present in the local area.
65. Notwithstanding the minimal habitat losses envisaged, and on a precautionary basis, a suite of Dormouse presence / absence surveys are underway within the site.

---

<sup>2</sup> English Nature (2001) *Great Crested Newt Mitigation Guidelines*. Version: August 2001

<sup>3</sup> Natural England. Great Crested Newt Method Statement for EPS Licence Application.

66. On the basis that only small areas of relatively sub-optimal habitat are likely to be lost to the emerging proposals, with areas of woodland retained and enhanced, a suitable mitigation strategy could be adopted, if required, to retain and enhance the favourable conservation status of Dormouse within the site and wider study area (should they be present in the first instance).

### **Other Species**

67. The site will provide a degree of opportunities for a range of small mammal species however given the small size of the site as well as the habitats present, there is nothing to suggest that the site would be of significance to these faunal groups, nor any other protected or notable species.

### **Other Considerations**

68. The two areas of woodland identified as Pescotts Wood are identified on the ancient woodland inventory. Noting these designations, emerging development proposals will seek to safeguard and enhance these areas of woodland, as desired through both national and local planning policy.
69. At this stage it is considered that all areas of ancient woodland will be buffered from built form by a 15m landscaped buffer. This buffer will comprise native planting of an appropriate species composition to complement the existing woodland. It is envisaged that these buffers will be managed as woodland edge habitat, with a gradation of structure from mature trees to shrub and subsequently ruderal vegetation, rough grassland and meadow grassland. The biodiversity value of these areas may be further enhanced through the inclusion of appropriately designed water features.

### **Summary**

70. The site is dominated areas of built form, hard-standing, bare ground and intensively managed grassland, all of which are of limited to no intrinsic ecological interest and which provide very limited opportunities to faunal species. Whilst the tree belts, individual trees and hedge within the site provide a degree of botanical interest, the primary interest is offered through the presence of mature woodland, with this comprising the wider study area, as well as part of the sites boundary.
71. This woodland / edge habitat provides modest opportunities for bats and birds in terms of foraging and roosting/nesting opportunities, as well as potential opportunities for Dormice. In contrast, the habitats within the site provide only very limited opportunities for these faunal groups, albeit some areas of ruderal vegetation offers a degree of potential opportunities for common reptiles.
72. The site is considered unlikely to be of significant value to other protected or notable species, with specific survey work confirming the absence of Badgers and Great Crested Newts.

### **Summary, Recommendations and Next Steps**

73. The habitat survey undertaken in July 2019 identified the majority of habitats on site to be of limited ecological value, with the majority of interest contained in the boundary habitats and within the wider study area (woodland).

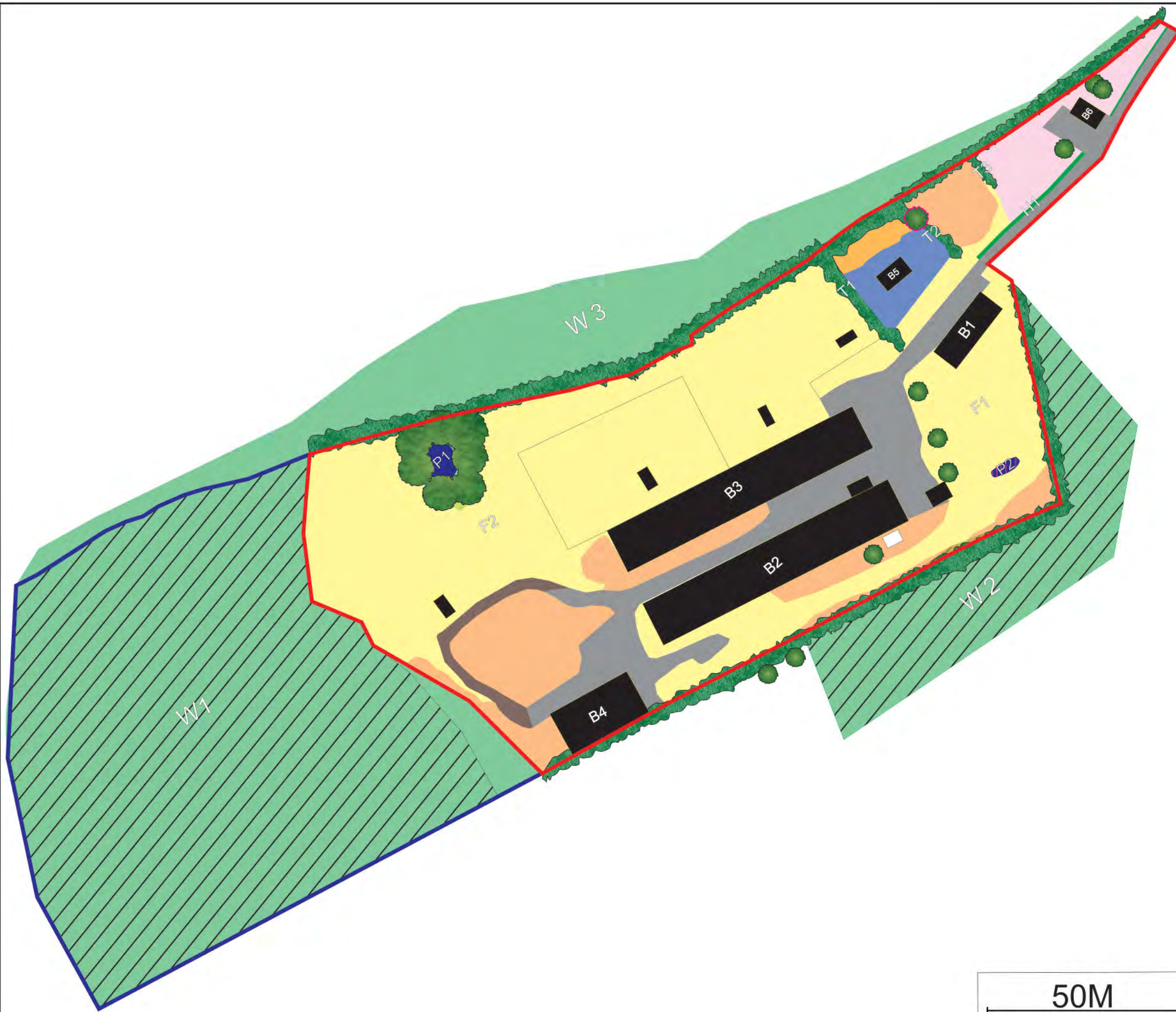
74. Emerging development proposals should seek to retain and enhance these areas of woodland, implementing appropriate native landscape buffers between these habitats and any built form. Indeed, the establishment of an appropriate buffer provides significant opportunities to realise enhancements, allowing the creation of high quality edge habitat that is currently absent within the site. Further opportunities for enhancement exist through the removal of non-native species (including garden escapes) and overly dominant species such as Bramble.
75. In terms of protected species, specific surveys have confirmed the absence of Badgers and GCN. The habitats within the site moreover offer limited opportunities for other protected and notable species, albeit with boundary woodland (including within the wider study area) being relatively optimal for a range of species such as bats, birds and Dormouse.
76. In order to further ascertain the use of the site by bats, Dormouse and reptiles, further survey effort is recommended, with this to include a suite of bat activity surveys, detailed tree roost surveys (should any trees with bat potential be adversely impacted by the emerging proposals) and presence / absence surveys for Dormouse and reptiles. A desk study exercise, to include a review of species data issued by the Local Records Centre, will also be undertaken to inform the emerging proposals.
77. At this stage it is considered that the emerging landscape proposals, which would include for the retention of woodland and boundary vegetation and the creation of new landscaped buffers within the site, would more than mitigate for any impacts on these species (should they be present) and indeed realise enhancements for them in the long-term.
78. From Ecology Solutions' site survey and the background information obtained, there is no evidence to suggest that there are any overriding ecological constraints which would prevent an appropriate planning application coming forward for the site. With the implementation of the recommendations in this report, it is considered that any forthcoming proposals may conform to relevant national and local policy with respect to nature conservation and biodiversity and further realise an enhancement over the current situation.

## **PLANS AND APPENDICES**

## **PLANS**

**PLAN ECO1**

Ecological Features



**KEY:**

-  APPLICATION SITE
-  WIDER SURVEY AREA
-  BUILDING
-  HARDSTANDING
-  BROADLEAVED WOODLAND
-  ANCIENT WOODLAND
-  RUDERAL SCRUB
-  RE-COLONISING HARDSTANDING (TRACK)
-  IMPROVED GRASSLAND
-  AMENITY GRASSLAND
-  BARE GROUND
-  POND
-  DRY POND
-  GREENHOUSE
-  TREE
-  TREE WITH LOW BAT POTENTIAL
-  TREELINE
-  HEDGEROW
-  FENCE



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8488: HURST FARM, CRAWLEY DOWN

PLAN ECO1: ECOLOGICAL FEATURES

Rev: A  
 JUL 2019

## **APPENDICES**



## **APPENDIX 1**

eDNA Technical Report  
(SureScreen)

Folio No: E5773  
Report No: 1  
Order No: HL8488  
Client: ECOLOGY SOLUTIONS LTD  
Contact: Harri Lee  
Contact Details: harri.lee@ecologysolutions.co.uk  
Date: 10/07/2019

## TECHNICAL REPORT

### ANALYSIS OF ENVIRONMENTAL DNA IN POND WATER FOR THE DETECTION OF GREAT CRESTED NEWTS

**Date sample received at Laboratory:** 28/06/2019  
**Date Reported:** 10/07/2019  
**Matters Affecting Results:** None

#### RESULTS

Lab Sample No.	Site Name	O/S Reference	SIC	DC	IC	Result	Positive Replicates
2655	Pond P1, Crawley	TQ 33535 38150	Pass	Pass	Pass	Negative	0
4310	Pond P2, Crawley	TQ 33665 38003	Pass	Pass	Pass	Negative	0

#### SUMMARY

When Great Crested Newts (GCN); *Triturus cristatus* inhabit a pond, they deposit traces of their DNA in the water as evidence of their presence. By sampling the water, we can analyse these small environmental DNA (eDNA) traces to confirm GCN habitation, or establish GCN absence.

The water samples detailed below were submitted for eDNA analysis to the protocol stated in DEFRA WC1067 (Latest Amendments). Details on the sample submission form were used as the unique sample identity.

#### RESULTS INTERPRETATION

Lab Sample No.- When a kit is made it is given a unique sample number. When the pond samples have been taken and the kit has

been received back in to the laboratory, this sample number is tracked throughout the laboratory.

Site Name- Information on the pond.

O/S Reference - Location/co-ordinates of pond.

SIC- Sample Integrity Check. Refers to quality of packaging, absence of tube leakage, suitability of sample (not too much mud or weed etc.) and absence of any factors that could potentially lead to results errors. Inspection upon receipt of sample at the laboratory. To check if the Sample is of adequate integrity when received. Pass or Fail.

DC- Degradation Check. Analysis of the spiked DNA marker to see if there has been degradation of the kit since made in the laboratory to sampling to analysis. Pass or Fail.

IC- Inhibition Check- PCR inhibitors can cause false results. Inhibitors are analysed to check the quality of the result. Every effort is made to clean the sample pre-analysis however some inhibitors cannot be extracted. An unacceptable inhibition check will cause an indeterminate sample and must be sampled again.

Result- NEGATIVE means that GCN eDNA was not detected or is below the threshold detection level and the test result should be considered as no evidence of GCN presence. POSITIVE means that GCN eDNA was found at or above the threshold level and the presence of GCN at this location at the time of sampling or in the recent past is confirmed. Positive or Negative.

Positive Replicates- To generate the results all of the tubes from each pond are combined to produce one eDNA extract. Then twelve separate analyses are undertaken. If one or more of these analyses are positive the pond is declared positive for the presence of GCN. It may be assumed that small fractions of positive analyses suggest low level presence but this cannot currently be used for population studies. In accordance with Natural England protocol, even a score of 1/12 is declared positive.

## **METHODOLOGY**

The laboratory testing adheres to strict guidelines laid down in WC1067 Analytical and Methodological Development for Improved Surveillance of The Great Crested Newt, Version 1.1

The analysis is conducted in two phases. The sample first goes through an extraction process where all six tubes are pooled together to acquire as much eDNA as possible. The pooled sample is then tested via real time PCR (also called q-PCR). This process amplifies select part of DNA allowing it to be detected and measured in 'real time' as the analytical process develops. qPCR combines PCR amplification and detection into a single step. This eliminates the need to detect products using gel electrophoresis. With qPCR, fluorescent dyes specific to the target sequence are used to label PCR products during thermal cycling. The accumulation of fluorescent signals during the exponential phase of the reaction is measured for fast and objective data analysis. The point at which amplification begins (the Ct value) is an indicator of the quality of the sample. True positive controls, negatives and blanks as well as spiked synthetic DNA are included in every analysis and these have to be correct before any result is declared so they act as additional quality control measures.

The primers used in this process are specific to a part of mitochondrial DNA only found in GCN ensuring no DNA from other species present in the water is amplified. The unique sequence appropriate for GCN analysis is quoted in DEFRA WC 1067 and means there should be no detection of closely related species. We have tested our system exhaustively to ensure this is the case in our laboratory. We can offer eDNA analysis for most other species including other newts.

Analysis of eDNA requires scrupulous attention to detail to prevent risk of contamination. Kits are manufactured by SureScreen Scientifics to strict quality procedures in a separate building and with separate staff, adopting best practice from WC1067 and WC1067 Appendix 5. Kits contain a 'spiked' DNA marker used as a quality control tracer (SureScreen patent pending) to ensure

any DNA contained in the sampled water has not deteriorated in transit. Stages of the DNA analysis are also conducted in different buildings at our premises for added security.

SureScreen Scientifics Ltd also participate in Natural England's proficiency testing scheme and we also carry out inter-laboratory checks on accuracy of results as part of our quality procedures.

**Reported by:** Chris Troth

**Approved by:** Sarah Evans

End Of Report

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# Hurst Farm, Turners Hill Road, Crawley Down, West Sussex

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## Heritage Statement





**Project:** Hurst Farm, Turners Hill, Crawley Down, West Sussex

**Client:** Reside Developments Ltd

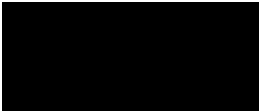
**Job Number:** 4430002

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**Document Checking:**

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<b>Approved by:</b> Jason Clemons IHBC MRTPI Director, Heritage Planning	<b>Signed:</b> 
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Abbreviations and Conventions used in the text		Periods referred to in the text	
aOD	above Ordnance Datum	Palaeolithic	900,000 to 10,000 BC
BGS	British Geological Survey	Mesolithic	10,000 to 4000 BC
c.	circa	Neolithic	4000 to 2200 BC
CA	Conservation Area	Bronze Age	2200 to 800 BC
ha	hectares	Iron Age	800 BC to AD 43
HA	Heritage Asset	Romano-British	AD 43 to 410
HE	Historic England	Anglo-Saxon	410 to 1066
HER	Historic Environment Record	Medieval	1066 to 1540
km	kilometres	Post-medieval	1540 to 1699
LB	Listed Building	18th century	1700 to 1799
LPA	Local Planning Authority	19th century	1800 to 1899
m	metres	20th century/Modern	1900 to present
NHLE	National Heritage List for England		
NPPG	National Planning Practice Guidance		
NPPF	National Planning Policy Framework		
OS	Ordnance Survey		
RP&G	Registered Park and Garden		
SM	Scheduled Monument		

### Assumptions and Limitations

This report is compiled using primary and secondary information derived from a variety of sources, only some of which have been directly examined. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.

### Compliance

This document has been prepared in accordance with the requirements stated within the National Planning Policy Framework (NPPF; (Ministry of Housing, Communities & Local Government, 2019) National Planning Practice Guidance (NPPG; (Department for Communities and Local Government), and the Chartered Institute for Archaeologists' Standard and guidance for historic environment desk-based assessment, and Standard and guidance for commissioning work on, or providing consultancy advice on, archaeology and the historic environment (Chartered Institute for Archaeologists, December 2017).

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## Executive Summary

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*Savills Heritage Planning has been commissioned by Reside Developments to carry out a Heritage Statement (HS) in advance of a proposed development on land at Hurst Farm, Crawley Down, West Sussex. The main aim of the HS is to provide relevant and proportionate information with regard to the heritage constraints and impact that may influence development. The application for the proposed development is to construct 45 new dwellings within the Site.*

*This Heritage Statement has shown that there are no known heritage assets within the Site boundary and the potential for encountering any heritage assets, of any date, during groundworks associated with the proposed development has been assessed as **Negligible to Low**.*

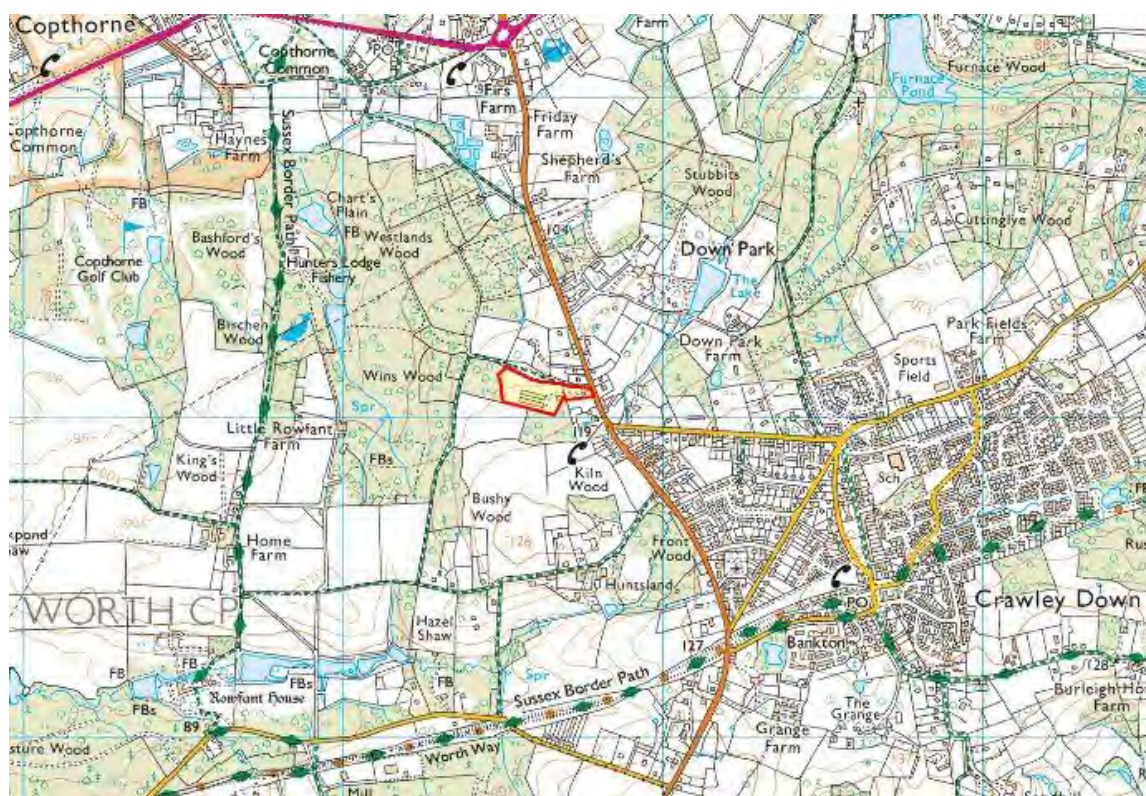
*The proposals would have a Imperceptible impact on the setting of Westlands. The impact to the significance of Westlands caused by changes to its setting would constitute a negligible degree of harm at the lowest end of **less than substantial harm** as defined by the NPPF, with the proposals seeking to mitigate any harm through detailed design and the public benefits the scheme will bring.*

*This Heritage Statement meets the requirements of the NPPF and provides sufficient and proportionate information in regards to heritage considerations relating to the proposal, as currently known.*

## 1.0 Introduction

### 1.1 Project Background

- 1.1.1 This Heritage Statement has been researched and prepared by Savills Heritage Planning on behalf of Reside Developments Ltd (hereafter 'the Client') to provide relevant and proportionate information with regard to the heritage constraints and impact that may influence demolition of existing buildings and the erection of 45 new dwellings on land at Hurst Farm, Turners Hill Road, Crawley Down, West Sussex (hereafter 'the Site').



**Figure 1** Site Location Plan with the Site outlined in red. OS mapping © Crown Copyright. All rights reserved. Licence No. AL100024244 .

### 1.2 Site Description

- 1.2.1 The Site lies at the north-western fringe of the settlement of Crawley Down (Centred on NGR TQ 33544 38089). It is located to the west of the busy B2028 Turners Hill Road and consists of a farm shop set within a barn, and other barns, outbuildings, chicken sheds and small-scale fields, some

containing chicken runs and houses. The Site is served by an entrance track that passes two detached single storey residential properties. The adjacent property to the north – Westlands – is a Grade II Listed house and other detached properties are threaded along the B2028. There are two infill residential developments to the south of the Site accessed from the B2028. To the west and southeast are areas of Woodland known as Pescotts Wood that include a number of blocks of scheduled ancient woodland. The Site is largely enclosed by woodland, with further mature deciduous woodland to the north extending along the entire length of Hurst Farm. Within this is Public Footpath running east to west. This path turns and continues south approximately 100m west of the Site boundary. There is an existing recent infill development to the east of the Site. The area to the west of the B2028 road comprises woodland, threaded with small waterways and ponds, and scattered detached properties and farmsteads. To the northwest is the settlement of Copthorne and the agricultural landscape and woodlands to the north and east are blended with detached residential properties and individual and clusters of residential dwellings and infill developments.

1.2.2 The Site comprises of a collection of non-descript traditional agricultural barns used for storage, and to contain the Farm Shop. Two low level chicken sheds extend east to west behind these barns, and other two-story barns and smaller single-story outbuildings are interspersed throughout the Site. To the north is an area of pasture, the western end of which contains runs and accommodation for chickens and geese. Other agricultural paraphernalia is interspersed around the Site including derelict buildings, machinery, vehicles and spoil. The Site is contained to the north east and south by estate style fencing in a mixed condition. The boundary at the western end of the Site is undefined, merging into Pescotts Wood. The Site boundary encloses an area of c. 2.2ha.

### 1.3 **Soils and Geology**

1.3.1 The predominant soil type identified in the vicinity of the proposed development comprises slightly acid loamy and clayey soils with impeded drainage ([magic.defra.gov.uk](http://magic.defra.gov.uk)). The underlying geology is Upper Tnbridge Sand – sandstone and siltstone interbedded ([bgs.ac.uk](http://bgs.ac.uk)).

### 1.4 **Proposed Development**

1.4.1 The proposed residential Site layout and outline landscape proposals are shown on **Figure 2**. The



proposals are for the construction of up to 45 new dwellings and associated landscape, car access and parking, footways and pedestrian routes and dedicated areas for refuse. The main area of proposed development lies in the central part of the Site.



Figure 2 Indicative Site Plan

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## 2.0 Archaeological and Historical Baseline

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### 2.1 Introduction

2.1.1 The following section provides a detailed account of the archaeological and historical development of the Site and its environs, compiled from sources as listed in the References and drawing on previous studies in the area surrounding the Site.

2.1.2 Baseline conditions were established through consideration of all recorded heritage assets within a 1km Study Area buffered from the Site and a desk-based review of existing sources of publicly accessible primary and synthesised information, comprising:

- National heritage datasets including The National Heritage List for England (NHLE), Historic England Archive (HEA), Images of England, PastScape, NMR Excavation Index, Portable Antiquities Scheme (PAS), Multi-Agency Geographic Information for the Countryside (MAGIC), [www.britainfromabove.org.uk](http://www.britainfromabove.org.uk), and Google Earth;
- Grey literature reports;
- West Sussex Record Office;
- The West Sussex Historic Environment Record (HER); and
- Historic manuscripts and maps.

### 2.2 Conservation Areas

2.2.1 There are no Conservation Areas within the Site or the wider study area.

### 2.3 Scheduled Monuments

2.3.1 There are no Scheduled Monuments recorded within the Site or the wider study area. The nearest Scheduled Monument is Warren Furnace (NHLE Ref. 10005815) c. 1.5km to the north-east of the Site.

### 2.4 Listed Buildings

2.4.1 There are no Listed Buildings within the Site and twelve Grade II Listed Buildings within the wider study area. The nearest Listed Building is Westlands (NHLE Ref. 1284416) which lies c. 10m to the north of the eastern end of the northern Site boundary, c. 75m to the east of proposed new



build. The twelve Listed Buildings are summarised in Table 1 below:

NHLE Ref:	Grade	Description	Heritage Importance	Distance & Direction from Site
1284416	II	Westlands	Medium	c. 10m North
1025533	II	East Cottage Farthings	Medium	c. 465m East-south-east
1025539	II	The Firs	Medium	c. 980m North
1025540	II	Chelsea Cottage	Medium	c. 280m North
1039935	II	Barn to East of Poplars Place	Medium	c. 900m North
1182679	II	Poplars Place	Medium	c. 900m North
1182619	II	Leigh Wood	Medium	c. 700m East-south-east
1182671	II	Lemon Meadow Yew Tree Cottage	Medium	c. 950m South-east
1284412	II	Shepherd's Farmhouse	Medium	c. 615m North
1354911	II	Granary to the South of Poplars Place	Medium	c. 900m North
1372077	II	Large Barn to South West of Poplars Place	Medium	c. 900m North
1393329	II	Heatherwood South and Heatherwood West (Formerly Oaklawn)	Medium	c. 125m East

Table 1 Summary of Listed Building within the wider study area

## 2.5 Registered Battlefields, Parks and Gardens

2.5.1 There are no Registered Battlefields, Parks and Gardens, or World Heritage Sites within the Site boundary or the wider study area.

## 2.6 Archaeological Notification Areas

2.6.1 There are two Archaeological Notification Areas within the wider study area. These are summarised in Table 2 below:

Desig UID	Grade	Description	Distance & Direction from Site
DWS 9083	Amber	Huntsland Farm Medieval to Post-Medieval Historic Farmstead, Worth:  Huntsland Farm, Worth, has been identified as a Historic Farmstead through the 'Historic Farmsteads and Landscape Character in West Sussex' Project. The project aimed to represent all farmsteads shown on the Ordnance Survey 2nd Edition 25" mapping of 1895.  Huntsland is a 19 <sup>th</sup> century U-Plan regular courtyard farmstead with additional detached elements to the main plan. The farmhouse is detached and set away from the yard. It is in an isolated location and is extant (no apparent alteration).	c. 500m south
DWS 9087	Amber	Westlands Farm Medieval to Post-Medieval Historic Farmstead, Worth:  Westlands Farm is a Medieval-Post-Medieval farm complex as recorded on Historic mapping and Historic Landscape Characterisation. The Farmhouse dates to the C16 or earlier.	c. 10m north

Desig UID	Grade	Description	Distance & Direction from Site
		Westlands Farm, Worth, has been identified as a Historic Farmstead through the 'Historic Farmsteads and Landscape Character in West Sussex' Project. The project aimed to represent all farmsteads shown on the Ordnance Survey 2nd Edition 25" mapping of 1895. Westlands Farm is a 19th century single farmstead. It is in an isolated location and is extant (no apparent alteration).	

**Table 2** Summary of Archaeological Notification Areas within the wider study area

(These areas are purely for identifying where there is a likelihood of archaeological work being necessary. Please be advised that these areas are part of an alert system to local planning authorities which are based on known archaeological finds/historic assets. They should not be taken as comprehensive or an exhaustive analysis of areas of archaeological potential where field work and research have not hitherto been undertaken)

## 2.7 Previous Archaeological Works

2.7.1 There are no recorded programmes of archaeological works within the Site and seven recorded within the wider study area. Where relevant these works are detailed in Section 2.8 below.

## 2.8 Non-designated heritage assets

### Prehistoric (900,000 BC – AD43)

2.8.1 There are no heritage assets of Prehistoric date recorded within the Site or the wider study area.

2.8.2 Prehistoric activity within the Weald is sparse. The region was covered in dense forest throughout this period, and much of the known settlement pattern concentrates around the rim of the Weald, exploiting the better soils of the Chalk and Greensand. A small amount Mesolithic activity is known from the Weald and this reflects activities associated with resource exploitation, often on a seasonal basis, and mainly comprises evidence for hunter gathering activity. Some small-scale agricultural exploitation of the more tractable soils is suggested by pollen evidence from the Neolithic onwards, and the presence of Bronze Age barrows (burial mounds) within the High Weald points to some level of settlement at this period. The Iron Age saw the exploitation of iron ore deposits, and the presence of fortified hilltop enclosures suggesting some level of control of this industry.

### Romano-British (AD 43 – AD 410)

2.8.3 There are no heritage assets of Romano-British date recorded within the Site or the wider study area. Few settlement sites have been found in the Weald (Rudling 1999), although some sites

such as villas at Chiddingfold in Surrey and Wiggonholt in West Sussex are known from the less bleak periphery (Gardiner 1990).

#### **Anglo-Saxon (early medieval period – AD 410 – AD 1066)**

2.8.4 No heritage assets of Anglo-Saxon date are recorded within the Site or the wider study area.

2.8.4 During the Anglo-Saxon period, the Weald was largely covered by the great forest of *Andredeswald*, within which the Site was located. The heavily forested nature of the region limited settlement at this period, and the iron-working industry seems to have shrunk in scale in comparison with the Roman period. Many settlements in the area originated as outlying forest pasture of manors situated on the more fertile soils. Many of the north-south aligned roads, tracks and footpaths in the region originated at this time as droveways.

2.8.5 The Site lies within the parish of Worth, an Anglo-Saxon estate whose name means ‘enclosure’ – in reference to the defended estate centre near the present village – and by extension ‘high status’ or ‘important’ (as in the modern ‘worthy’). Under King Edward the Confessor it was part of Reigate Hundred, and tenanted by Oswol; by 1086 it was held by Siward, presumably an Anglo-Saxon noble ‘survivor’ of the Conquest, from the Norman Richard de Tonbridge. Additional land was also held here 1086 by a Norman lord named Ralph from the Count of Mortain (Salzman 1940; Williams and Martin 2002, 52).

#### **Medieval (AD 1066 – AD 1485)**

2.8.6 No heritage assets of medieval date are recorded within the Site or the wider study area.

2.8.7 The name Crawley Down is first attested in written records in 1272/4, when the Hundred Roll compiled for Edward I records that the ‘King’s Street’ at *Crauledun* had been encroached upon by Maurice de Hewekene (Salzman 1942-3). This entry indicates that Crawley Down, occupying a higher ridge of land, was utilised as a highway, although perhaps not frequently enough to prevent boundary disputes. This trackway remained important throughout the medieval and later centuries. In 1724, Richard Budge recommended it as a reasonably good route on his map of Sussex, avoiding by virtue of its height the worst of the Wealden clay (Margary 1946; Margary 1971). The whole of the Site itself is likely to have been woodland at this time, which will have left

little or no archaeological trace.

### Post-medieval & Modern (AD1540 – Present)

2.8.8 The late 16<sup>th</sup> century saw the enclosure of Worth Forest and the area was divided up between thirty-five farms (Brandon 1974, 162). Many of the nearby farms originate from this time, including Westlands, and the house at Yew Tree Cottage /Lemon Meadow. Ownership at this time was split between the Earls of Derby and Arundel (Salzman 1940, 195), and the process reflects the changing views of the aristocracy regarding economic and financial affairs, views often quite different from those of their medieval predecessors. The greatest impact to the later history of the Weald, however, was not agricultural but industrial as the area experienced the rapid growth of a major iron-working industry, dwarfing any of the earlier extractive phases (Brooks 2015). Although there is no direct evidence for iron-working within the Study Area, industrial exploitation is represented by a brickfield behind Bowers Place (MWS4931), c. 990m south-east from the Site.

Twelve heritage assets of Post-medieval and Modern date are recorded in the wider study area; in addition to the twelve Listed Buildings summarised in Table 1 above. These are summarised in Table 2 below:

HER Ref:	Description	Distance & Direction from Site
MWS992	All Saints Church is the parish church of Crawley Down, Worth	c. 700m South-east
MWS4931	Brickfield behind Bowers Place	c. 990m south-east
MWS5472	The Three Bridges to East Grinstead railway was a branch line running from Three Bridges to the East Grinstead High Level station.	c. 900m south
MWS7179	Anti-Aircraft - The Kentish Gun Belt - Huntsland	c. 700m south-east
MWS9071	War Memorial, Crawley Down	c. 770m east-south-east
MWS10062	Down Park Farm, Worth, has been identified as a Historic Farmstead dating to the 19th century.	c. 525m north-east
MWS11821	Huntsland, Worth, has been identified as a Historic Farmstead dating to the 19th century.	c. 500m south
MWS12864	Site of Outfarm East of Down Park Farm, Worth, has been identified as a Historic Outfarm dating to the 19th century - the Outfarm has been totally demolished/lost.	c. 860m east-north-east
MWS13030	Site of Outfarm North East of The Haven, Worth, has been identified as a Historic Outfarm dating to the 19th century - the Outfarm has been totally demolished/lost.	c. 955m east
MWS13126	Site of Outfarm South East of Huntsland, Worth, has been identified as a Historic Outfarm dating to the 19th century - the Outfarm has been totally demolished/lost.	c. 850m south

HER Ref:	Description	Distance & Direction from Site
MWS13470	Rowfant Farm, Worth, has been identified as a Historic Farmstead dating to the 19th century.	c. 990m south-west
MWS13693	Sunnyhill Farm, Worth, has been identified as a Historic Farmstead dating to the 19th century.	c. 700m east-south-east

**Table 3** Summary of non-designated heritage assets of Post-medieval/Modern date recorded in the wider study area

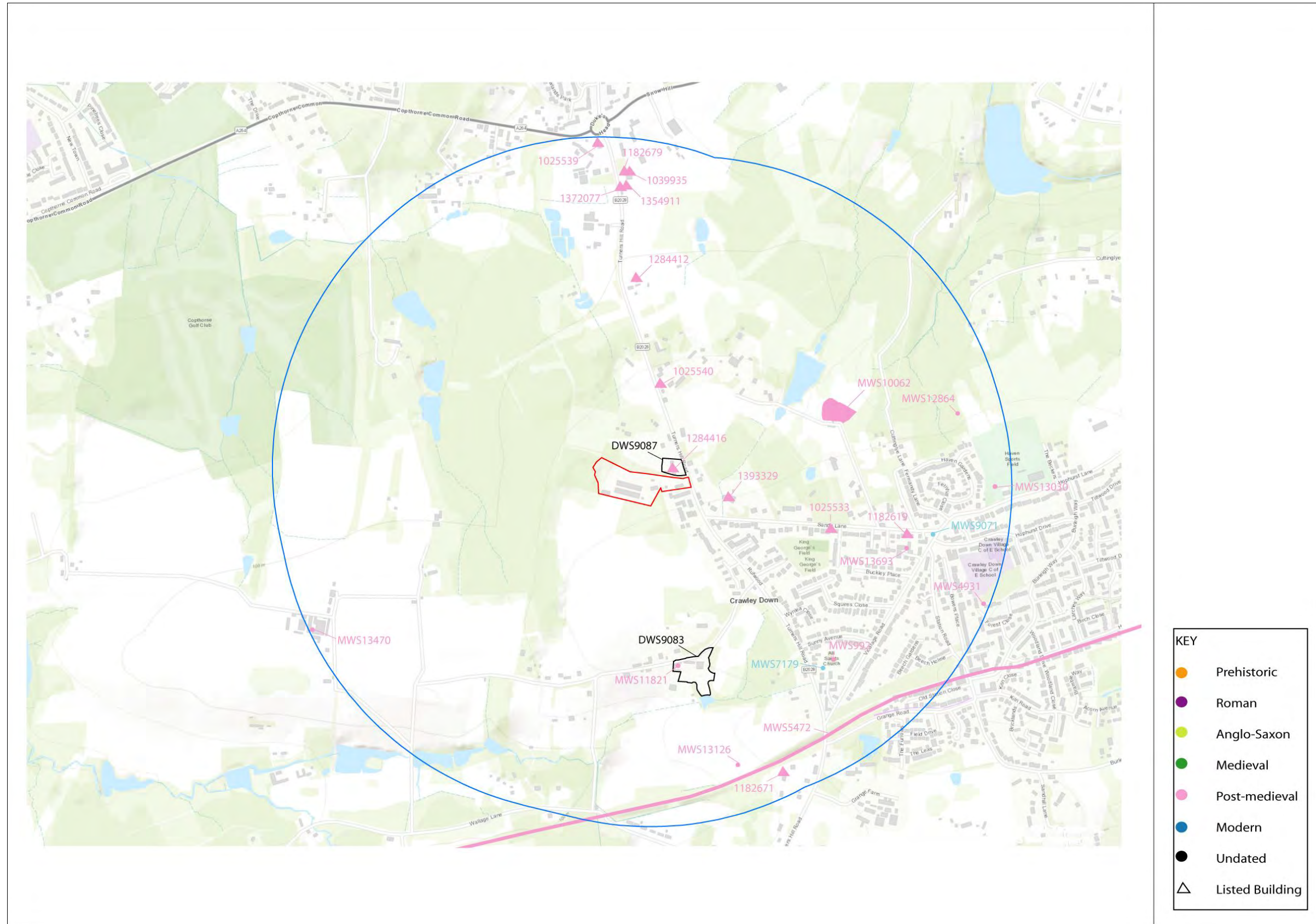


Figure 3 Heritage assets recorded within the 1km study area

## 2.9 Historic Maps

- 2.9.1 The earliest available maps, by Saxton in 1575 and Norden in 1595, do not show the area in great detail or accuracy (not illustrated). Worth Forest is shown as a large unit of enclosed woodland, presumably incorporating what is now Pescott's Wood.
- 2.9.2 The first map to show the Site in any appreciable detail is the Middle Worth Tithe Map of 1839-40 (**Figure 4**) which shows the Site divided into three separate plots of land (421, 422, and 423). The majority of the Site lies within Plot 421 which is recorded on the accompanying apportionment as woodland, owned and occupied by Fredrick Walker, Plot 422 is recorded on the apportionment as meadow and the far eastern end of the Site was occupied by the garden of a cottage recorded in Plot 423 immediately to the south of the Site. Within the wider landscape the Grade II Listed Building of Westlands Farm is shown to the north of the north-eastern corner of the Site



**Figure 4** 1839 - 40 Middle Worth Tithe Map with the Site outlined in red

- 2.9.3 The Ordnance Survey map of 1874 (**Figure 5**) shows the Site as it was on the Tithe map with the exception of the cottage and garden in Plot 423, which appear to have been demolished along with a further cottage in Plot 425 further to the south. The wooded area covering the western two