
7 March 2023

Dear Councillor,

A meeting of **SCRUTINY COMMITTEE FOR PLANNING, ECONOMIC GROWTH AND NET ZERO** will be held in the **COUNCIL CHAMBER** at these offices on **WEDNESDAY, 15TH MARCH, 2023 at 7.00 pm** when your attendance is requested.

Yours sincerely,
KATHRYN HALL
Chief Executive

A G E N D A

	Pages
1. To note Substitutes in Accordance with Council Procedure Rule 4 - Substitutes at Meetings of Committees etc.	
2. To receive apologies for absence.	
3. To receive Declarations of Interests from Members in respect of any matter on the Agenda.	
4. To confirm the Minutes of the meeting of the Scrutiny Committee for Housing, Planning and Economic Growth held on 5th and 18th October 2022.	3 - 16
5. To consider any items that the Chairman agrees to take as urgent business.	
6. Water Resources - Resilience and Future Planning.	17 - 34
7. District Plan 2021 - 2039 - Summary Of Responses To Draft Mid Sussex District Plan Consultation (Regulation 18).	35 - 98
8. Questions pursuant to Council Procedure Rule 10.2 due notice of which has been given.	

To: **Members of Scrutiny Committee for Planning, Economic Growth and Net Zero:**
Councillors N Walker (Chair), A Peacock (Vice-Chair), R Bates, M Belsey, P Brown,
R Clarke, P Coote, R Eggleston, B Forbes, S Hatton, J Henwood, C Laband, G Marsh,
J Mockford and R Whittaker

**Minutes of a meeting of Scrutiny Committee for Planning,
Economic Growth and Net Zero
held on Wednesday, 5th October, 2022
from 7.00 - 8.52 pm**

Present: N Walker (Chair)
A Peacock (Vice-Chair)

R Bates	P Coote	C Laband
M Belsey	R Eggleston	G Marsh
A Bennett	B Forbes	J Mockford
P Brown	J Henwood	R Whittaker

Absent: Councillors R Clarke and S Hatton

Also Present: Councillors J Ash-Edwards and K Adams

Also Present as Cabinet Members: Councillors S Hillier and R Salisbury

The Chairman introduced the officers and the Cabinet Members.

**1 TO NOTE SUBSTITUTES IN ACCORDANCE WITH COUNCIL PROCEDURE
RULE 4 - SUBSTITUTES AT MEETINGS OF COMMITTEES ETC.**

Councillor Alison Bennett substituted for Councillor Hatton.

2 TO RECEIVE APOLOGIES FOR ABSENCE.

Apologies were received from Councillors Clarke and Hatton.

**3 TO RECEIVE DECLARATIONS OF INTERESTS FROM MEMBERS IN RESPECT
OF ANY MATTER ON THE AGENDA.**

None.

**4 TO CONFIRM THE MINUTES OF THE MEETING OF THE SCRUTINY
COMMITTEE FOR HOUSING, PLANNING AND ECONOMIC GROWTH HELD ON
19 JANUARY AND 11 MAY 2022.**

The minutes of the meeting of the Committee held on 19 January and 11 May 2022 were agreed as a correct record and were signed by the Chairman.

**5 TO CONSIDER ANY ITEMS THAT THE CHAIRMAN AGREES TO TAKE AS
URGENT BUSINESS.**

None.

6 DISTRICT PLAN REVIEW AND UPDATE - STRATEGY AND NON-HOUSING SITE POLICIES.

The Chairman reminded the Committee that they were reviewing the scope of the District Plan Review, the draft revised District Plan Strategy and the non-site-specific generic policies. The full suite of documents for consultation would be considered at the next meeting on 18 October. He reiterated the consequences of not having a District Plan and reminded the Committee of the appeal costs the Council incurred to defend planning appeals. He outlined the work of the cross-party Members Working Group which was formed following the resolution passed at this Committee's meeting in January 2022. He commended the Working Group for their input during their four meetings in Summer, and also thanked their Chairman, Cllr Gary Marsh.

Judy Holmes, Deputy Chief Executive introduced the report and reminded the Committee that at the meeting in January they asked officers to do more work on the policies and sites. The additional work included a brownfield study, detailed transport modelling ongoing work with neighbouring local authorities on unmet need, and work with site promoters to strengthen the evidence and support allocations – particularly in relation to infrastructure and site yield. She highlighted the work of the Working Group and outlined the purpose of this meeting, noting the sites would be reviewed at the next meeting along with the full suite of consultation documents. Attention was drawn to the recommendations, noting the new title of the Scrutiny Committee. She made clear that the proposed tracked changes to the policies were available online. Subject to Scrutiny Committee's recommendation on 18th October, Council would be asked to approve the draft District Plan for Regulation 18 Consultation at its meeting on 2nd November.

Robert Salisbury, Cabinet Member for Housing thanked the Deputy Chief Executive, officers and external partners for their work. He noted he supported a plan led approach, which would give the Council control over planning applications and the infrastructure to support it. He advised that the Spatial Strategy was crucial to the plan. He thanked the Working Group for their input and advised he had attended the Working Group meetings with Cllr Ash-Edwards.

The Chairman advised the report was complex, and Members would be given the opportunity to comment on the Scope, Spatial Strategy, and the policies a section at a time.

The Members had no comments on the scope of the report or the Spatial Strategy. The Chairman led the Committee to consider each Chapter of the Plan in turn.

Sustainability:

A Member made a general comment on the wording used across the whole of the draft plan requesting the language was firmed up to provide more control over the policies and to place obligations on developers.

Sally Blomfield, Assistant Director for Planning and Sustainable Economy advised the wording is led by the National Planning Policy Framework (NPPF), some policies the Council can apply more force to and for some policies more flexibility is required.

Members expressed concern with the policies on carbon emissions and questioned the use of the Home Quality Mark rather than Energy Performance Certificates.

The Assistant Director highlighted that the requirement to meet Home Quality Mark standards had been added to the policy since the January version as it was better for residential development than the BREEAM standards. Energy Performance Certificates relate to existing properties and not new developments. Using the Home Quality Mark rather than BREEAM would achieve a higher standard than using the current building regulations. The Council wants to encourage developers to work to the highest standards.

Members queried what was meant by the 20-minute neighbourhood. The Assistant Director noted that the concept of 20-minute neighbourhoods was detailed in the Spatial Strategy; they are well defined; are used by Government and relate to access to goods and services within a short walk or cycle ride. She highlighted that the 20-minute neighbourhood concept is a powerful way to drive sustainable developments.

To demonstrate a reduction in carbon emissions developers must reach an accredited level, these are the minimum standards the Council will expect. In response to a Members' questions, she advised that the changes to Policy DPS5 clarify the requirement for developments to ensure an adequate supply of infrastructure for water rather than the water supply. She noted that the 2014 energy study is still relevant, and that the Ricardo study provides the evidence to support the Council's Net Zero target.

In response to a question from a Member, Andrew Marsh, Head of Planning Policy and Housing Enabling confirmed the Gatwick Water Cycle Study had been updated in 2021 and was available in the evidence library on the Council's website. It provides the evidence base for DPS2. He noted that Mid Sussex was in a water stressed area which permitted the use of tighter standards than the current minimum building regulations. The requirements for significant sites are tighter and would be provided in the full suite of documents for the meeting on 18 October.

He noted that, as a result of Water Neutrality issues in neighbouring areas, Crawley, Horsham and Chichester are developing a water neutrality strategy to enable them to progress their Local Plans, and to be approved by Natural England. For Mid Sussex, only a small part of Twineham was affected by Water Neutrality. The Deputy Chief Executive advised there would be an expectation for Mid Sussex to assist if those authorities cannot meet their unmet need: the Council is working closely with them as part of its legal duty under the Duty to Co-Operate.

Natural Environment and Green Infrastructure:

Members expressed concern with the minimum requirement for biodiversity net gain and the timescales to achieve it in DPN2, and the protection of woodland from unauthorised activity.

The Assistant Director emphasised it was a minimum requirement and significant sites are expected to achieve 20%. The timetable to achieve the net gain would be secured through s106 planning conditions. She noted that legislation regarding biodiversity net gain is still evolving.

The Head of Planning Policy and Housing Enabling confirmed the policies would only protect woodland from activity where a planning application was required and not from activities related to permitted development. The Assistant Director noted the policies seek to control planned development and any unauthorised work would be dealt with by the Building Control Enforcement Team.

Countryside:

Members expressed concern on the policy wording for DPC2 preventing coalescence and policy DPC4 on developments within the AONB, discussed settlement boundaries, and the increased use of farmland for housing. A Member thanked Cllr Marsh for chairing the meetings of the Working Group and asked for reassurance that the evidence base for DPC4 would be published. It was confirmed that all evidence is available in the District Plan evidence library.

In relation to coalescence, the Head of Planning Policy and Housing Enabling noted the NPPF does not include coalescence as a national policy. The District Plan includes a policy to protect the character of settlements and provides a definition. The definition must be flexible so that it can be assessed on a site-by-site basis. The policy allows Neighbourhood Plans to set Local Gaps, if two adjacent towns/parishes want to define a gap between their areas they could include the same policies in both of their neighbourhood plans.

He advised DPC1 had a minor clarification update a national definition has been used and the Council has no powers to define land as arable only in order to prevent its use for rearing livestock. He stated most farmland in Mid Sussex is Grade three. The definition of Best and Most Versatile Agricultural land is set nationally and determined on a site-by-site basis. He confirmed that all topic papers would be published alongside the next Scrutiny report considering site allocations and the plan as a whole.

In response to a Member's observation about welcoming growth in the ANOB the Deputy Chief Executive advised many Town and Parish Councils want some growth in areas classified as AONB, however the draft policy reflects national policies which have recently been tightened. The Assistant Director noted the policy does not stop development in AONB settlements, but that any development must conserve and enhance the natural beauty of the AONB; the NPPF has given clear weight to and protection of the AONB.

In response to a Member's request to make a reference to the Kelvin Temperature Scale in DPN8, the Deputy Chief Executive advised the request would be considered by the officers, and if appropriate would be included in the report that will be presented to the Scrutiny Committee on 18 October.

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A Member queried whether Batchelors Field could be protected as open space as it was not in the Council's ownership. The Head of Planning Policy and Housing Enabling advised that it could be protected as open space regardless of ownership.

Built Environment:

Members had no comments on this section.

Transport:

Members discussed cycle routes, including SA37 Burgess Hill/Haywards Heath Cycle Network noting implementation of the cycle network would encourage a modal shift. The Head of Planning Policy and Housing Enabling confirmed SA37 is an existing policy in the Sites DPD and would remain in force until it has been implemented. The Chairman of the District Plan Review Working Group advised the Council would not compulsorily purchase land to implement the cycle network if the landowners do not agree to the construction.

Economy:

Members had no comments on this section.

Sustainable Communities:

The Chairman advised that this would be in the full report at the next meeting on Tuesday 18 October.

Housing:

With regard to DPH3 a Member expressed concern with the intent to change built-up area boundaries and the impact this would have on countryside and coalescence. The Assistant Director clarified existing policy DP6 allows for development adjacent to built-up areas where criteria are met, and this supports the Council's brownfield and windfall allowances.

The Head of Planning Policy and Housing Enabling advised that the built-up area boundary is amended to include proposed allocations as by their nature they will contain built development rather than be in the countryside. The boundaries form part of the policy examined and agreed by the independent Inspector. It is important to update the boundaries as policies related to windfall and brownfield are dependent on them; updated boundaries help to maintain the supply from these sources.

Infrastructure:

A Member welcomed the wording on DPI1 Securing Infrastructure, as it strengthened the policy. The Deputy Chief Executive confirmed the Council has a strategy for community, cultural and leisure facilities; the evidence base has been updated to support the work of the District Plan and Infrastructure Delivery Plan which too will be subject to consultation alongside the full evidence base.

As there were no further questions the Chairman took the Committee to the recommendations which was agreed with 12 votes in favour and 2 abstentions.

RESOLVED:

The Scrutiny Committee for Planning, Economic Growth and Net Zero:

(i) Considered and commented on the Scope of the District Plan Review, the draft revised District Plan Strategy, and the draft non-housing site policies.

7 MID SUSSEX NET ZERO TARGETS.

The Chairman reminded the Members of the importance of net zero targets.

Sally Blomfield, Assistant Director for Planning and Sustainable Economy introduced the report; and reminded Members that the Council agreed a Sustainable Economy Strategy and Action Plan in April 2022. She noted that there are 7 in the strategy to achieve a reduction in carbon emission. One action is to create a net zero carbon programme and the commissioned work from Ricardo will inform the Council's actions and officers have considered issues that would impact the deliverability of the targets. She highlighted that the Council only has control of 2.6% of their own emissions and very little over the district wide emissions. The Council is reliant on

national legislation and activities to achieve its net zero ambitions. She noted the error in numbering the recommendations.

Cllr Stephen Hillier, Cabinet Member for Economic Growth and Net Zero noted his approval of the report before the committee and thanked the officers and consultants for their hard work. He cautioned that the Council must be pragmatic as the emissions from Mid Sussex are just a small part of a global issue, but the United Kingdom should be leaders in achieving net zero. The Council is reliant on the Government's guidance to tackle emissions from energy production and transport, and emerging technology will play a major part.

In response to a Member's question, the Deputy Chief Executive noted that the Committee had been asked to agree to recommend to Council the 3 targets, as each target deals with a different aspect.

A Member thanked the officers for the comprehensive report and asked for clarification of the areas identified on the map on page 262.

The Assistant Director identified the waste treatment plant at Goddard's Green; noting increased investment to convert waste products to energy, other areas denoted energy from solar.

Members discussed sustainable transport, the location of parking enforcement officers, the food waste trial and queried how the pilot would be judged. Concern was expressed on tree coverage, and the national statistics on population growth and housing targets set by Government.

The Deputy Chief Executive advised that the food waste pilot has a clear success criterion for evaluating the trial. Updates on the trial will go to the scrutiny committee at various stages of the pilot. It was noted that it was too early in the trial to provide a useful update. She noted the Council's good track record on recycling. For sustainable growth in the economy, population growth is important, and the number of houses do not directly correlate to the number of people in the District. The Assistant Director noted that the use of electric vehicles by parking enforcement officers could be considered at the next stage of the project, a programme will be established on how the objectives will be met and she highlighted that there are 50 actions sitting within the Action Plan of the Sustainable Economy Strategy.

In response to a query on licences for gas exploration, the Deputy Chief Executive advised it was too early to say what impact the lifting on any moratorium would have on achieving net zero targets. Phil Whiting, Interim Sustainability Officer commented that the Scrutiny Report sets out the programme for the periodic re-baselining of emissions as it will be necessary to keep them under review.

Cllr Marsh thanked a Member for their question, as Chairman of the Planning Committee he advised that the Planning Inspector has to decide whether they uphold the decision of WSCC to refuse the licence for fracking. He noted that most licenses for fracking in Mid Sussex are in the High Weald Area of Outstanding Natural Beauty. The Head of Planning Policy and Housing Enabling noted that under paragraph 176 of the NPPF National Parks, Areas of Outstanding Natural Beauty and the Broads have the highest protection.

A Member wanted to put on record their thanks to the officers and Ricardo for the work to establish a good evidence base for the net zero targets for Mid Sussex; they

highlighted that the Council's policy must be flexible and adaptable. The Chairman also thanked the officers for their hard work.

As there were no further questions the Chairman took the Committee to the recommendations which was agreed unanimously.

RESOLVED

That the Scrutiny Committee:

- (i) Considers and comments on the following recommended net zero targets:
 - a. A District-wide net zero target aligned to the national target.
 - b. A Council-only net zero target of 2040 for emissions the Council can directly control.
 - c. A Council-only net zero target aligned to the national target for emissions the Council can only indirectly influence.

- (ii) Recommends to Council that the recommended net zero targets be approved.

8 SCRUTINY COMMITTEE FOR PLANNING, ECONOMIC GROWTH AND NET ZERO - WORK PROGRAMME 2022/23.

Tom Clark, Solicitor to the Council introduced the Committee's Work Programme. He noted that the site specific policies in the draft District Plan Review would be on the agenda for next meeting on 18 October, and the work programme would be updated as appropriate.

Cllr Brown requested to move a motion to include a report on the Water Infrastructure and Water Environment at the meeting on 18 January 2023. Kathryn Hall, Chief Executive advised it would be a significant piece of work and the officers would have to consider the resourcing implications if a report was to be produced by the meeting in January. The Corporate Solicitor asked Cllr Brown to submit his request in writing so it could be considered.

RESOLVED

The Committee noted the Committee's Work Programme as set out at paragraph 5 of the report.

9 QUESTIONS PURSUANT TO COUNCIL PROCEDURE RULE 10.2 DUE NOTICE OF WHICH HAS BEEN GIVEN.

None.

The meeting finished at 8.52 pm

Chairman

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**Minutes of a meeting of Scrutiny Committee for Planning,
Economic Growth and Net Zero
held on Tuesday, 18th October, 2022
from 7.00 - 8.43 pm**

Present: N Walker (Chair)
G Marsh (Vice-Chair)

R Bates	J Henwood	P Bradbury
R Eggleston	C Laband	J Dabell
B Forbes	J Mockford	A Eves
S Hatton	R Whittaker	L Stockwell

Absent: Councillors A Peacock, M Belsey, P Brown, R Clarke and P Coote

Also Present: Councillors J Ash-Edwards and P Chapman

Also Present as Cabinet Members: Councillor R Salisbury

The Chairman introduced the officers and Cabinet Members.

**1 TO NOTE SUBSTITUTES IN ACCORDANCE WITH COUNCIL PROCEDURE
RULE 4 - SUBSTITUTES AT MEETINGS OF COMMITTEES ETC.**

Councillor Eves substituted for Councillor Brown, Councillor Stockwell substituted for Councillor Clarke, Councillor Bradbury substituted for Councillor Coote and Councillor Dabell substituted for Councillor Peacock.

2 TO RECEIVE APOLOGIES FOR ABSENCE.

Apologies were received from Councillors M Belsey, Brown, Clarke, Coote and Peacock.

**3 TO RECEIVE DECLARATIONS OF INTERESTS FROM MEMBERS IN RESPECT
OF ANY MATTER ON THE AGENDA.**

Councillor Bradbury declared a non-pre-determined interest in item 4 as he is Chairman of the High Weald ANOB. Councillor Gary Marsh declared a non-pre-determined interest in item 4 as he is the Council's representative for the South Downs National Park.

In response to a Member's question Tom Clark, Corporate Solicitor advised the minutes of the meeting held on 5 October 2022 were available online, but it had not been possible to include the minutes in the agenda pack.

4 DISTRICT PLAN - CONSULTATION DRAFT (REGULATION 18).

The Chairman reminded the Committee that they were reviewing the work of the officers and the Members Working Group to scrutinise and debate the consultation draft District Plan and to recommend the draft Plan to Council for public consultation at Regulation 18 stage. He assured the Committee that all due processes were followed, the findings are evidence based and approved methodologies have been used. Following this meeting any further questions should be raised during the public consultation. He noted that approving the draft Plan would ensure a five-year land supply and protect the District from unwanted, speculative development. The Members should only raise new comments on the parts of the report already discussed at the meeting on 5 October and this meeting would discuss sections 14 and 15 of the housing policies and allocations, and appendices two through to five.

Judy Holmes, Deputy Chief Executive introduced the report and advised Members how to navigate the full suite of documents that would go out for Regulation 18 Consultation subject to Council's approval on 2 November 2022. She noted the sections the Committee debated at the last meeting and reiterated that only new comments on those sections should be made. Members were reminded that the sites had been selected using a methodology discussed and agreed by the Members Working Group made up of members of this Scrutiny Committee.

Councillor Robert Salisbury, Cabinet Member for Planning noted that this was the start of the process and that after the Regulation 18 Consultation a report would be presented to this Scrutiny Committee to review any comments received. He thanked the officers for their dedication, professionalism, in helping Members understand the process. He also thanked the Committee and those who were part of the Working Group. He noted the importance of having a Plan for stakeholders such as., utility, health and education providers to help them plan changes to infrastructure requirements.

Councillor Gary Marsh, as Chairman of the Working Group also thanked the officers for their diligence. He assured the Committee that the Working Group looked at every policy and every site; they may not have agreed on each site, but they agreed the methodology had been followed. He suggested the Committee recommend the report go to Council and then review the comments received from the consultation.

Members queried the final calculation of the housing requirement and the time allowed for the consultation. Andrew Marsh, Head of Planning Policy and Housing Enabling noted the housing requirement results in a potential oversupply of 302 which is a 3.7% increase compared to the residual requirement. The 5% buffer noted in the NPPF relates to the five-year land supply calculation and not a requirement for plan making. The Deputy Chief Executive noted that the Council has traditionally used six weeks for consultation and that is the requirement set out in the regulations. Historically six 6 weeks has always resulted in a high return number of representation when compared to other councils. Appendix 4, the Community Involvement Plan details how the Council will engage over the six weeks.

Appendix 1 section 14 – Significant Sites p102 – 107

DPSC1: Land to the West of Burgess Hill - Members expressed concern over water resources and the provision of new wastewater treatment works at Sayers Common and the constraints of the facilities at Goddard's Green. They also queried the level of biodiversity to meet our planning policy, the number of units for a site to be classified as a significant site and the anticipated water consumption per person. Members suggested including provision for burial grounds in significant developments and queried the impact of unmet need for Crawley and Horsham on Mid Sussex.

Sally Blomfield, Assistant Director for Planning and Sustainable Economy reassured the Committee that the Infrastructure Delivery Plan will set out the requirements for the water supply and wastewater treatments for each site, the developments should connect to the system and the wording can be amended to make that clearer in the document. She noted that Appendix 3 references the average water consumption of existing residents; the general principle in DPH4 is to apply tighter water consumption standards for the three significant sites.

The Head of Planning Policy and Housing Enabling confirmed the vision statement for Crabbet Park was received before the Council's proposed policy for 20% biodiversity on significant sites was published; any future application must be policy compliant.

The Deputy Chief Executive reiterated that the Council always consults with the statutory providers, who are given opportunities to comment. She advised that the Council has a Duty to Co-Operate with neighbouring authorities on unmet need. She confirmed that officers are working with our neighbours to agree a Statement of Common Ground on how unmet need will be addressed in the housing market area. The neighbouring authorities' plans had been delayed due to water neutrality issues, they are now hoping to progress to Regulation 19 of their plan making. As part of the evidence base the Council will need to make a case regarding unmet need and any potential contribution towards it. The developers may still argue that the Council should contribute more towards unmet need, and new sites may be put forward for consideration. Developers may encourage the Inspector to demand the Council meets the unmet need on the coastal areas, approx.30,000.

The Corporate Solicitor confirmed the water companies have a legal obligation to meet the needs of the developments and provide additional investment if required.

The Vice-Chairman highlighted that any additional comments for the allocated sites should be formally raised at the Regulation 18 public consultation.

Section 15 Policy DPH1 p 109 - 111:

Policy DPH4 p 113 - 116:

Members expressed concern over developments being permitted within 5 metres of trees. The Assistant Director proposed that the officers review the wording and make amendments for clarity ahead of Council.

Policies DPH5 to DPH25 p 117 – 154:

The Vice-Chairman reminded the Committee that the Working Group reviewed all the 260 SHELAA sites, map and proformas, this included DPH7 Burgess Hill Station.

DPH5: Batchelors Farm, Keymer Road, Burgess Hill - A Member asked for the wording to be more prescriptive and suggested adding a reference to the rural setting of Batchelors Farm Nature Reserve, the Deputy Chief Executive advised additional wording could be added.

DPH7: Burgess Hill Station – Members were concerned with the loss of the allotments on the site on Chanctonbury Road, highlighted there is a large waiting list for the allotments and cited Policy G5 of the Burgess Hill Neighbourhood Plan which states the retention of all existing allotment sites in the town. The Assistant Director

confirmed the draft District Plan policy states there must be re-provision of the allotments if there is a need, and the re-provision must be provided to secure delivery of the site and a successful planning application. The Committee were also advised that in line with the 20-minute neighbourhoods principle the proposed West of Burgess Hill site and Northern Arc developments have provision for allotments.

DPH15: Land rear of 2 Hurst Road, Hassocks – A Member queried the availability of this site as there are two landowners and concerns with the air quality management at Stone Pound crossroads. The Head of Planning Policy and Housing Enabling advised the developer questionnaires confirmed availability of the site and this had been confirmed through contact with the site promoters.

DPH9: Land at Hurstwood Lane, Haywards Heath & DPH10: Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath - A Member suggested these should be considered as one site as they are contiguous and have the same landowner and made reference to the adjacent site promoted within Lewes District Council. He noted there is substantial concern with Ward Members about the inclusion of these sites.

DPH11: Land east of Borde Hill Lane, Haywards Heath – a Member expressed concern as the site borders the AONB, is an essential green buffer to Haywards Heath and there is a risk of coalescence.

The Deputy Chief Executive noted their concerns and advised they should make their comments formally through the Regulation 18 public consultation. The Scrutiny Committee will be reviewing the comments received after the consultation and any proposed changes to the District Plan.

Members expressed concern that the built-up area boundary keep changing.

The Deputy Chief Executive reiterated that all promoted sites were examined by the Working Group using the agreed methodology, the Consultation Draft for Regulation 18 includes the best sites for allocation at this current time and stage, and stakeholders will be able to make comments during the consultation. DPH7 is an important brownfield site.

The Head of Planning Policy and Housing Enabling advised the built-up area boundary has to be updated to reflect the principle of development being accepted as sites and to ensure that the windfall and brownfield supply can be justified.

Policies DPH27 and DPH28 p158 - 159:

Following Members' concerns regarding DPH27- Land at Byanda, Hassocks the Assistant Director commented that until the site was developed it would remain on the list of sites proposed for allocation. The Corporate Solicitor advised the Members they would only be seen to have predetermined an application if they declared this at a planning committee meeting.

Appendix 2 - Sustainability Appraisal p 261:

A Member thanked the officers for the comprehensive document and expressed concerns on water supply and waste-water treatment. In response to a Member's question on ranking sites the Head of Planning Policy and Housing Enabling reminded Members that the Site Selection Methodology determines the sites to be appraised as reasonable alternatives in the Sustainability Appraisal. He confirmed the sites are not ranked in order in the Sustainability Appraisal as different weight is

applied to each objective, so it is not possible to compare easily. The findings of the Sustainability Appraisal are only one part of the site selection process, other elements include transport modelling and developers' questionnaires; the officers use all the evidence when making recommendations.

Appendix 3 - Habitats Regulations Assessment p 521:

Members had no comments on this appendix.

Appendix 4 - Community Involvement Plan p 647:

Members had no comments on this appendix.

Appendix 5 - Equality Impacts Assessment p 563

Members had no comments on this appendix.

As there were no further questions the Chairman moved to the recommendations.

A motion was proposed by Councillor Eggleston to amend the recommendation (ii) adding, "subject to reducing DPH7 from 300 to 150 units to retain the allotments in accordance with Policy G5 of the Burgess Hill Neighbourhood Plan".

The motion was seconded by Councillor Eves.

Councillor Eves proposed an amendment to the motion put forward by Councillor Eggleston, she proposed extending the public consultation to 12 weeks. She expressed concern that the process to update the District Plan was being rushed.

The motion was seconded by Councillor Henwood.

The Vice-Chairman reminded the Scrutiny Committee that any development of DPH7 would not be approved unless re-provision of the allotments was confirmed, and six weeks is the normal period for a public consultation. He would not support either motion.

Councillor Bradbury noted the debate on site DPH7, reaffirmed the officers had provided reassurance on the re-provision of the allotments. The six weeks is the statutory period and is standard practice for the Council. He supported the original recommendations.

Councillor Henwood requested more security on the future of the allotments and noted the public consultation was close to the holiday season.

Councillor Laband did not support Councillor Eggleston's motion as site DPH7 was clearly contingent on the re-provision of the allotments. He would not support the motion.

Councillor Whittaker highlighted the substantial work completed by the officers to reach the public consultation stage, and he supported the original recommendations.

The Chairman took Members to a vote on the amendment proposed by Councillor Eggleston, and the amended motion was lost with 5 in favour, 8 against and 1 abstention.

The Chairman took Members to a vote on the amendment proposed by Councillor Eves, and the amended motion was lost with 5 in favour and 9 against.

The Vice-Chairman proposed the original recommendation, and this was seconded by Councillor Bradbury.

The Chairman took Members to a vote on the original recommendations, which were approved with 10 in favour, 3 against and 1 abstention.

RESOLVED:

That the Scrutiny Committee for Planning, Economic Growth and Net Zero:

- (i) Considered and commented on the consultation draft District Plan 2021 – 2039 in Appendix 1 in the light of the Sustainability Appraisal (set out in Appendix 2) and other supporting documentation,
- (ii) Recommended that Council approves the Consultation Draft District Plan (2021 – 2039) in Appendix 1, along with the supporting documentation for six-weeks public consultation starting in November 2022.

5 SCRUTINY COMMITTEE FOR PLANNING, ECONOMIC GROWTH AND NET ZERO - WORK PROGRAMME 2022/23.

Tom Clark, Solicitor to the Council introduced the Committee's Work Programme. He noted that the programme for future meetings was uncertain and the request from Cllr Brown for scrutiny of water neutrality matters was being considered.

RESOLVED

The Committee noted the Committee's Work Programme as set out at paragraph 5 of the report.

6 QUESTIONS PURSUANT TO COUNCIL PROCEDURE RULE 10.2 DUE NOTICE OF WHICH HAS BEEN GIVEN.

None.

The Chairman noted that the Corporate Solicitor would be leaving the Council and he thanked him for his guidance and expertise at committee meetings.

The meeting finished at 8.43 pm

Chairman

WATER RESOURCES – RESILIENCE AND FUTURE PLANNING

REPORT OF: Sally Blomfield – Assistant Director Planning and Sustainable Economy
Contact Officer: Andrew Marsh – Head of Planning Policy and Housing Enabling
Email: Andrew.Marsh@midsussex.gov.uk Tel: 01444 477488
Wards Affected: All
Key Decision: No
Report to: Scrutiny Committee for Planning, Economic Growth and Net Zero
15th March 2023

Purpose of Report

1. This report sets out the background to current and future water supply and water infrastructure in the district which will set the context for a presentation from the water companies operating in Mid Sussex on their draft Regional Strategy and Water Resource Management Plans which this Committee requested at its meeting on the 5 October 2022. South East Water will also be updating Members on the water outages experienced in Mid Sussex in December.

Summary

2. This report:
 - Summarises the responsibilities of the water companies to meet future water demands.
 - Summarises the operational incidents in December which resulted in water outages.

Recommendations

3. **That the Scrutiny Committee for Planning, Economic Growth and Net Zero:**
 - (i) **Notes the content of this report and the presentations to be made by the water companies at this Scrutiny meeting.**

Background

4. When new development is being planned, it is vitally important to ensure there are sufficient water resources to meet increased demands. This must also ensure there are no negative environmental impacts on the waterbodies from which water is abstracted.
5. Water Resources South East (WRSE) is an alliance of 6 water companies in South East England:
 - Affinity Water
 - Portsmouth Water
 - South East Water
 - Southern Water
 - Sutton and East Surrey Water
 - Thames Water

6. WRSE has prepared a draft Regional Plan which sets out the principles for how resilient and sustainable water supplies could be provided in the future. These principles are cascaded to individual Water Resource Management Plans (WRMP) which are prepared by the individual water companies to plan for growth. These are subject to consultation and review by the Secretary of State for Environment, Food and Rural Affairs (DEFRA) before final publication when agreed by DEFRA.
7. The WRMPs set out a range of measures to cater for future demand, based on population projections and growth identified in Local Plans. These plans are set out on a Water Resource Zone (WRZ) basis.
8. The vast majority of Mid Sussex is within the Haywards Heath Water Resource Zone, which is the responsibility of South East Water. Small areas around Twineham (Sussex North WRZ) and Pyecombe (Sussex Brighton WRZ) fall within the responsibility of Southern Water.

Operational Incidents

9. It is recognised that the south east is experiencing more frequent extreme weather, and these incidents have an impact on the water network with rapidly contracting/expanding ground affecting the pipe network. In December 2022, leaks caused by a freeze/thaw increased demand by nearly 100 million litres more than expected at that time of year, the equivalent consumption of three towns the size of Eastbourne. South East Water was therefore required to provide temporary water sources, finding and fixing leaks and repairing customer supply pipes.
10. South East Water will provide additional detail on the incident, their response, and their learnings in their presentation to this Committee this evening.

Water Neutrality

11. As Members will be aware, in September 2021 Crawley and Horsham were notified by Natural England that developments within the Sussex North water supply area (which both authorities are almost wholly within) must not add to impacts on protected nature conservation sites in the Arun Valley Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site and must ensure that they are 'water neutral'. This requirement is driven by the Habitats Directive and is specific to protecting the sensitive Arun Valley Special Protection Area (SPA). Sussex North is Southern Water's responsibility and is planned for within their Water Resources Management Plan which was subject to consultation at the same time as South East Water's WRMP.
12. At present, only a small part of Mid Sussex (in the Twineham area) is within the Sussex North Water Resources Zone supplied by water abstraction from the Arun Valley and is therefore the only part of the district impacted by water neutrality.
13. A joint response by the authorities affected by water neutrality has been submitted to the Southern Water WRMP and is at **Appendix 1**.

Planning for Future Growth

14. As noted in paragraph 6 above, water companies must prepare WRMPs which set out how the water companies intend to achieve a secure supply of water for customers, and, measures to protect and enhance the environment. The WRMP must forecast supply and demand using population projections and household projections (including Local Plan allocations) to estimate future demand. It must then set out supply-side (i.e. increasing the amount of water) or demand-side (reducing the amount of water required) options to address any forecast deficits.
15. Of particular relevance to Mid Sussex is the WRMP prepared by South East Water, as this covers the Haywards Heath Water Resource Zone which supplies almost all the district. The WRMP sets out options and proposals to reduce leakage, reduce customer demand, invest in supply infrastructure to reduce reliance on abstraction (therefore benefitting the environment) and improve resilience to drought.
16. The South East draft WRMP for 2025-2075 was published in late 2022 for consultation, which closed on 20th February 2023. The Council's response is at **Appendix 2**. The Council's response to the Water Resources South East Regional Plan is at **Appendix 3**. Representatives from WRSE and South East Water will present their Plans to the Committee during the meeting and will be available to respond to Councillors questions.

Mid Sussex District Plan: Water Resources

17. The draft District Plan, published for consultation in November 2022, sets out a range of policies related to water resources. The aim of these policies is to reduce demand by seeking tighter efficiency standards compared to building regulations to ensure new developments contribute towards the sustainable use of resources and mitigate the impacts of climate change.
18. The draft District Plan sets out the following relevant policies:
 - **DPS1: Climate Change** seeks development to be designed to minimise vulnerability from the effects of climate change re: water supply
 - **DPS2: Sustainable Design and Construction** requires new development to meet Home Quality Mark standards (which incorporate water consumption standards) and to demonstrate opportunities have been taken to incorporate measures such as water efficient appliances, rainwater harvesting, greywater harvesting and Sustainable Drainage Systems (SuDS)
 - **DPS4: Flood Risk and Drainage** sets out the requirement for flood risk management and supports the use of SuDS for developments of 10 dwellings or more, to protect surface and groundwater quality
 - **DPS5: Water Infrastructure and Water Environment** sets out the requirements for ensuring sufficient water resource and water quality to serve new development
 - **DPH4: General principles for Housing Allocations** requires significant site allocations (1,000+ dwellings) to meet a maximum water consumption of 85 litres/person/day (Building Regulations is currently 110l/p/d)
19. Water companies play an important role in plan-making process. They are statutory consultees and are therefore specifically invited to provide comments at each stage of the process. The water companies are also consulted on the Council's draft Infrastructure Delivery Plan where input is sought on the types of infrastructure required to support growth proposals.

20. Southern Water and South East Water provided comments during production of the adopted District Plan and the recent consultation on the draft District Plan. They confirm that they support the policies above and the ambition to seek reduced water demand through new development. The comments are summarised in the other item on this Agenda regarding the outcome of the consultation over the draft District Plan.

Policy Context

21. The review of the District Plan is a corporate priority identified in the Corporate Plan and Budget 2023/2024. It aligns with the Council's priorities for Sustainable Economic Growth and Strong Resilient Communities.

Other Options Considered

22. None

Financial Implications

23. There are no direct financial implications for the District Council in relation to the content of this report.

Risk Management Implications

24. No risks have been identified in relation to the recommendations contained within this report.

Equality and Customer Service Implications

25. Water companies have an obligation to connect new developments to their networks and to ensure customers have an adequate supply of water. The District Council will continue to engage with the relevant water companies to ensure WRMPs ensure planned growth is supported by adequate infrastructure to support all members of the community.

Other Material Implications

26. There are no other material implications.

Sustainability Implications

27. Paragraph 18 of this report sets out the Council's approach to seeking tighter water efficiency standards within its draft District Plan in order to promote sustainable development and mitigate the impacts of climate change.

Appendices

- **Appendix 1:** Joint response on behalf of Water Neutrality authorities to the Southern Water: draft Water Resources Management Plan
- **Appendix 2:** Mid Sussex District Council response to South East Water: draft Water Resources Management Plan (February 2023)
- **Appendix 3:** Mid Sussex District Council response to Water Resources South East: draft Regional Plan (February 2023)

Southern Water Draft Water Resources Management Plan 2024 Consultation

Joint Response from Chichester District Council, Crawley Borough Council, Horsham District Council, Mid Sussex District Council, West Sussex County Council, South Downs National Park Authority

Date: 20 February 2023

This document is the joint response to the Southern Water WRMP consultation prepared by the Local Planning Authorities affected by the Water Neutrality Issue in the Sussex North Water Resource Zone.

Individual authorities may make additional comments specific to their area in a separate response.

Question 1 Regional Plans
Do you agree that our WRMP should reflect the best value regional plan, so we are aligned with our neighbouring water companies?
YES
Please Explain Your Answer
It is imperative that the water resources both nationally and in the SE Region should be managed holistically. Therefore we agree that Southern Water's WRMP should align with the WRSE strategy as a whole.
Question 2 Increasing resilience to drought
To protect the environment, we currently have a lower level of service in our Central area, covering West Sussex and Brighton and Hove, compared to our target. This means up to 2027 there is an increased likelihood of needing to impose restrictions on water use. We have set out our plan to address this gap.
Do you have any comments or concerns about this level of service in our Central area and our plan to address it?
YES
Please Explain Your Answer
The Water Neutrality issue is having a major impact on all of the planning authorities in the Sussex North Water Resource Zone. Whilst there are other recognised environmental issues affecting your plan, this issue is currently halting much development across the affected authorities. We think that this issue should receive greater recognition from Southern Water in this plan, as well as their current operations in the area – we feel that Southern Water should be doing all they can in the immediate-term to help address the issues facing the affected local authorities.
We welcome the scheduling of the Littlehampton recycling plan and the importing of water from nearby suppliers early in the plan (2025-2035). This will contribute to addressing this issue which is delaying Local Plans, restricting economic development and holding up much needed affordable housing in the local authority areas supplied by the SNWRZ.
Question 3 Drought orders
We propose to stop using drought orders and permits that allow us to continue abstracting from the environment after 2040, unless we experience a severe drought. This means we'll need to develop new water supplies to replace them.
Do you agree with this approach and the timescale we are proposing to deliver it?
NO
Please Explain Your Answer
Whilst we understand that there are significant challenges in developing alternative water sources within the region, the current timescales mean that water will continue to be abstracted from the environment over the next 17 years. It is noted that most areas supplied by Southern Water are heavily dependent on groundwater extraction. The impact on the Sussex North Water Resource zone area has already demonstrated that the

environment is already threatened from such activities. It is therefore considered that further investment is required to fast track and implement this work.
Question 4 Planning for an uncertain future
We have considered a range of future scenarios in our adaptive planning approach.
Are there any other future scenarios that you think we should consider?
NO
Please Explain Your Answer
It is considered that the three scenarios post 2030 and the nine scenarios post 2035 cover a wide enough range of variables at this stage in the process. Taking account of the overall 50 year timescale it is the best that can be reasonably predicted. However this will need to be kept under review and updated to take account of new data and trends as soon as it becomes available. It is essential that the predictions are based on the most realistic position of growth and are flexible over the period to allow for increases in development levels, particularly given the requirement for Local Plans to be reviewed every five years and be based on a “standard method” for calculating housing need that it includes uplifts for affordability. The WRMP24 should be adaptable between scenarios rather than become fixed to a particular scenario approach. We are generally supportive of the flexible approach needed to adapt to changing circumstances.
Question 5 Efficient use of water and minimal wastage across society
Do you support our plan to at least halve leakage by 2050?
YES and NO
Please Explain Your Answer
The Councils are supportive of the requirement to ensure that water is used efficiently and that leakage reduction takes place given that leakage reduction will provide the single biggest benefit in terms of water supply security especially in the short term. It is considered that efforts should be made to bring forward effective leakage reduction as soon as possible and prior to 2050, given that this is nearly 30 years into the future. In our view operations to fix the leaks should be front loaded in the plan between 2023 and 2027. Without sufficient leakage reduction early in the plan period, there is a risk that the development of new water sources could be ineffectual because of continued (or greater) losses through leakage.
Question 6 Water Usage Target
Do you support us achieving our WRMP target of reducing average personal daily use from 131 litres per person per day to a) 109 litres by 2040 or b) should we retain our more ambitious target of 100 litres per person per day by 2040?
NEITHER
Please Explain Your Answer
Overall, the authorities in the Sussex North Water Resource Zone area are supportive of Southern Water’s aims to reduce average personal use below the current level of 131 litres per person per day. Given the impact of water neutrality, we are however aware that there are clear technological innovations which are relatively simple that would allow much lower levels of water efficiency to be achieved. It is this which has informed the proposals for our emerging local plans to set a target of 85 litres per person per day. These targets are considered realistically achievable and include the retrofitting existing housing stock. The Councils are therefore of the view that whilst it may not be possible to achieve 85 litres in all properties, neither target above is sufficiently ambitious. As a minimum however, the more ambitious target of 100 litres per day should be retained. There is also need to consider water usage arising from non-residential development. Our emerging Local Plans set a target for non-residential development to require an advanced BREEAM standard to support water neutrality (i.e. new buildings must achieve 3 credits within the water (WAT01 Water Consumption) issue category).
Question 7 Government Interventions
Do you support additional proposed government interventions and the timing of their introduction?
NO
Please Explain Your Answer
As for the role of Government policies it is agreed that labelling of water-using products by 2024 is realistic. However the minimum standards for water using products by 2045 is inadequate and we agree that this should

<p>be brought forward to at least 2030 as suggested in the draft WRSE regional plan. Given that 2024 is realistic to start introducing this water labelling, there is no reason for this not to start to be introduced through changes to the building regulations. This will assist local authorities affected by water neutrality (the list is expected to grow) to deliver development, and would additionally assist local residents in making good purchasing choices which will also lower their operational costs (as the water bills will come down). This will assist with the cost of living. Waiting until 2040 or 2060 is entirely unacceptable. We suggest all stakeholders lobby the government to accelerate the introduction of improved water efficiency standards which would increase the available supply sooner. We would be happy to work with Southern Water and other water companies in this respect.</p>
<p>Question 8 Temporary restrictions</p>
<p>Our plan continues to rely upon temporary restrictions on water use to help lower demand during droughts to avoid further investment in new supplies.</p>
<p>Do you agree with our approach to continue using temporary water restrictions during droughts?</p>
<p>YES</p>
<p>Please Explain Your Answer</p>
<p>The forecast accelerating rate of climate change will make these restrictions essential rather than optional in the short term so it is prudent to include them in the plan. As outlined in previous replies, further work and investment in new water supplies need to be introduced to minimise the reliance on such restrictions and as soon as possible.</p>
<p>Question 9 New water sources to provide resilient and sustainable supplies</p>
<p>A new strategic reservoir is an integral part of the regional best value plan for the South East. Do you have any comments on the size of the new reservoir?</p>
<p>NOT AT THIS STAGE</p>
<p>Please Explain Your Answer</p>
<p>We do not have any detailed comments on this matter, but would wish to be kept informed of the proposals and implications this may have across the south east as a whole.</p>
<p>Question 10 Strategic Reservoir and Havant Thicket</p>
<p>Does your position change if the size of that reservoir (which will supply the transfer into Hampshire) impacts on the size of water recycling plant needed at Havant Thicket? (See section seven in our technical document for more information)</p>
<p>UNKNOWN</p>
<p>Please Explain Your Answer</p>
<p>It is unclear how the two projects are connected as the Havant Thicket Reservoir and Havant Water Recycling scheme are due to come online 2029-30 whereas the SESRO is not due until 2040, a gap of ten years.</p>
<p>Question 11 Pipelines</p>
<p>Do you support our strategy to develop new pipelines that will transfer water into our supply area, that is made available through the development of new strategic water sources in other water companies' supply areas?</p>
<p>YES</p>
<p>Please Explain Your Answer</p>
<p>The authorities support in principle the potential for new pipelines from outside the Southern Water area. However, we are not yet convinced that this will be a mechanism which can effectively deliver solutions, particularly early in the strategy. Consideration must be given to the potential environmental impact of any particular routes. We are aware that Pipelines of this length may require EIAs or need to be considered through the NSIP process. Furthermore, it is our understanding that at the current time, this would require the water to be chemically compatible across the region in order to transfer from one water company's WTWs to another company's delivery pipeline, and we are unclear as to whether this is currently technologically feasible. Also the transfers would have to be enabled fairly quickly in response to demand. This would require digitisation and monitoring of the regional network to be effective. Different water companies in the region are at different stages of network monitoring so this will need to be evened up.</p> <p>We are also concerned that the water resource issues facing Southern Water will also be felt by other water companies, given the high levels of growth across the whole of the SE. These water companies may therefore</p>

not be able to transfer water (or as much as is planned) to SW. Given this, we are somewhat concerned at the proposed heavy reliance in the SW Plan of transfers from other water companies throughout the plan period.
Question 12 Water Recycling
Do you agree that water recycling has a role to play in securing water supplies for the future?
YES
Please Explain Your Answer
We agree that water recycling opportunities should be explored more. As technology evolves this could deliver more water than drought orders and permits. We are generally supportive of alternative water supply options regardless of the technology used. However, in the short term the Littlehampton water recycling scheme early in the plan (2025-2035) uses existing assets so should be “planning neutral”. Therefore we welcome the plan to supply the water supply works near Pulborough as it will have a material impact in achieving Water Neutrality in the Sussex North WRZ.
Question 13 Desalination Plant
Our plan has shown we could need a desalination plant in Sussex by 2040 and that more could be needed in the future if we experience high population growth, and we need to reduce how much water we take from sensitive sources.
Do you think we should use desalination to provide additional water supplies?
This should be investigated
Please Explain Your Answer
It is considered that desalination may have potential to provide additional water supply in times of water stress and should be investigated. However, it is important that water savings and reduction measures such as leakage reduction are prioritised. It is also understood such technologies are highly energy intensive, and may have other wider ecological impacts that need to be mitigated. If these plants were powered by renewable or other non CO2 emitting energy sources then they would be more able to be supported. Further information is required to understand the costs, feasibility and timescales to introduce such a scheme.
Question 14 Blackstone Reservoir
Our plan has identified the need for a new reservoir to store water in West Sussex.
Do you think we should investigate this further to establish whether it could provide a new source for the area?
YES
Please Explain Your Answer
Given the need to identify a range of alternative water sources, it is considered that all realistic options to provide an alternative water supply for the area should be investigated. However, these proposals have raised questions locally with residents who may potentially be affected by these proposals. At this stage it is difficult to provide effective comment and feedback as the precise location and timescales for the implementation of the scheme are not fully understood. According to the WRSE regional plan this proposed reservoir is not scheduled to come online until 2046. However we suggest the initial hydrogeological groundwork be undertaken to establish if the reservoir is actually feasible. This initial work should be done sooner in the plan (2025-2035) and if it is not deliverable then resources could then be spent investigating other sources. As local planning authorities it is important that we have early sight of any reservoir location in order to factor this in to our business activities including local plan making as appropriate. We therefore request that we are kept informed on the progress and thinking with regard to this reservoir.
Question 15 Water Recycling
Do you think we should look at water recycling options where water is stored in reservoirs, lakes or other waterbodies as well as those where it is released back into nearby rivers and abstracted again?
YES
Please Explain Your Answer
We agree that all water recycling opportunities should be explored more. As technology evolves this could deliver more water than drought orders and permits.
Question 16 Additional Comments
Do you have any additional comments on any of the schemes we have proposed in our draft plan?

NO
Please Explain Your Answer
We wish to be kept informed of developments as the plan progresses.
Question 17 A network that can move water around the region
Do you agree that we should develop our pipeline network so we can move more water between our supply areas and share supplies with our neighbouring water companies?
YES
Please Explain Your Answer
We support the plan for new pipelines within the Southern Water area in principle, however shared supplies would have to overcome the issues raised in the answer to Question 11 above. Assuming these issues are resolved we support this proposal.
Question 18 Catchment and nature-based solutions
Do you support our ambition to proactively use catchment and nature-based solutions where we can, to help improve the quality of the water sources we rely upon so we can abstract water sustainably and deliver wider environmental benefits?
YES
Please Explain Your Answer
We support the use of nature-based solutions in principle as they may have a useful role alongside other water supply solutions. However, the extent to which NBS can affect the region's water supply and the wider impacts are unknown. The environmental and additional benefits may be more immediately obvious but unless they can deliver an appreciable extra supply they may have a limited role within a wider suite of measures. Furthermore, land in the south east is at a premium so the number of sites for NBS may be limited. However, there may be opportunities to align with Local Nature Recovery Strategies. For example, water courses are some of the key corridors in Horsham District's emerging draft Nature Recovery Network and appropriate management of these, which could include NBS, may preserve the water supply to key environmental sites freeing up water from other sources for other uses. There may also be opportunities for land use changes away from water intensive uses and for schemes to contribute to Biodiversity Net Gain for developments off site.
Question 19 Cost of delivery
Do you think that others who benefit from a healthy water environment should contribute to the cost of delivering these solutions?
UNSURE
Please Explain Your Answer
It is not specified in what circumstances and by what mechanism this contribution would be levied. All homes and businesses use water and pay water bills and everybody benefits directly or indirectly from a healthy water environment. Therefore it is not clear who these "others" would be. However it is considered that given the significant levels of investment which are likely to be required to ensure safe, effective and sustainable water resources across the UK as a whole, it is likely that additional levels of national or government investment may be required.
Question 20 Similar work
Do you or your organisation have similar work planned in our catchments?
Do you have any views on how best we can co-ordinate this work so we achieve the most benefits?
N/A
Please Explain Your Answer
The responding NW Sussex authorities do not operate beyond their administrative areas. However it is understood that water neutrality is likely to become more common place, and as the first area to have this requirement placed upon us are happy to share best practice and our experience with others who may need to pursue such an approach.
Question 21 How we'll provide your water
Our draft WRMP includes options that will reduce demand and a mix of different schemes to produce extra water supplies.

Do you think our plan strikes the right balance between demand and supply solutions?
YES
Please Explain Your Answer
In principle we agree that the plan strikes the right balance between demand and supply solutions – however this will need to be informed by further detail as schemes are developed in the future.
About You
Is this a response on behalf of an organisation?
YES
If yes, which organisation?
Horsham District Council, Crawley Borough Council, Chichester District Council, Mid Sussex District Council, West Sussex County Council, South Downs National Park Authority
Does Southern Water supply your water?
YES
Name
Mark Daly
Email
Strategic.Planning@horsham.gov.uk



Horsham District Council, Parkside, Chart Way, Horsham, West Sussex RH12 1RL

Telephone: 01403 215100 (calls may be recorded) www.horsham.gov.uk Chief Executive: Jane Eaton

Contact:
Planning Policy, Telephone: 01444 – 477053
E-mail: planningpolicy@midsussex.gov.uk

Your Ref:
Our Ref: SEWWRMP

Date: 20th February 2023

Submitted Online

Dear Sir / Madam,

South East Water – Consultation on the draft Water Resources Management Plan

Thank you for the opportunity to comment on the emerging Water Resources Management Plan. Mid Sussex District Council supports the co-ordinated and collaborative approach to securing future water supplies and supports the Key Priorities within the WRMP, particularly those related to:

- Reducing leakage
- Reducing reliance on abstraction, to support habitats
- Reducing demand for water through efficiency initiatives
- Reducing household water use

However, the Council has the following detailed comments.

Increasing Resilience of Supply

Mid Sussex residents are concerned that there will be insufficient water supply to serve current and future planned growth. Whilst not directly connected, this concern has been exacerbated by recent weather-related operational incidents which have led to residents being without water supply for a considerable period.

It is therefore vital that reassurance can be provided to residents that there will be sufficient water supply to cater for existing and future demand. The Water Resource Management Plan must be fully conscious of the levels and locations of planned growth in Local Plans and plan for them accordingly.

Therefore, although the Council notes that South East Water was fully engaged during the production of the District Plan and Site Allocations DPD (and were committed to ensuring sufficient water supply to serve planned growth) it would be helpful to remind you of the levels of future planned growth.

The National Planning Policy Framework (NPPF) states that the planning system should be plan-led. To this end, the District Council places great importance on ensuring it has an up-to-date Local Plan to plan for future housing, employment and infrastructure needs. This provides greater certainty for infrastructure providers by setting out where, when and how much development will take place and therefore assist with planning for the infrastructure required to support such development.

Mid Sussex District Council adopted its current District Plan in 2018, covering the period to 2031. This identified a housing requirement of 876 homes per annum until 2023/24, rising to 1,090 for the rest of the plan period. It contained strategic allocations to meet most of this housing need, with a Site Allocations Development Plan Document (DPD) adopted in June

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2022 to allocate further sites to meet the remaining housing need. Overall, the Council has sufficient commitments (allocations and planning permissions) to demonstrate that it can meet its housing need in full – planning for a total of 17,297 dwellings to 2031.

The District Council has now embarked on a review of its District Plan. This will plan for any additional growth identified, noting that housing need has increased since the current District Plan was adopted. The Government's Standard Methodology identifies a starting point of 1,119 dwellings per annum for the district.

The draft District Plan 2021 – 2039 was published for public consultation in November 2022, with adoption anticipated in 2024. The draft District Plan plans for a total of 20,444 dwellings for the period to 2039.

The Council has reviewed the background evidence that supports the draft Regional Plan (which in turn has influenced the WRMP), in particular the "Population and Property Forecasts" document prepared by Vicus/Edge Analytics. Whilst it is recognised that it is difficult to predict future population and water consumption habits with certainty, this document provides a good starting point. It provides the supporting evidence for the High/Medium/Low population growth scenarios set out in the draft Plan.

However, it is unclear as to what extent Local Plan housing growth forecasts have been accounted for. Whilst there are scenarios related to "Housing Need" set out, for Mid Sussex this was based on March 2020 data. The forecasting for the emerging plan does not therefore specifically account for the locations and quantum of housing and employment development set out in the adopted Site Allocations DPD (June 2022) or increased housing need identified by the Standard Method.

Whilst population and household projections are a valid starting point for such forecasts, the Standard Method also applies an 'affordability uplift' which increases housing need further. For Mid Sussex, this increases the housing need identified by ONS Household Projections by over 50% and provides the starting point for Local Plans to plan for. This re-emphasises the fact that Local Plan housing figures are likely to be a better representation of future growth (both quantum and location) and should therefore be considered alongside projections. The forecasts should also account for planned employment growth in Local Plans given water consumption by certain industries is likely to be high.

The Council welcomes South East Water's past engagement with the Local Plan process and encourages ongoing future engagement to ensure that housing and employment growth can be supported by the necessary infrastructure.

Delivering Longer-Term Environmental Improvements

Mid Sussex District is adjacent to the local authorities currently affected by the water neutrality issue in relation to designated nature conservation sites in the Arun Valley. Whilst not directly affected to the same degree, the Council is engaged with its neighbours to identify a water neutrality strategy and supports the approach to reduce the impact of growth on the environment. The Council therefore supports the Regional Plan's ambitions for environmental improvements, for example by reducing reliance on abstraction.

Reducing Household Water Use

The Council recognises the water-stressed nature of the South East. It is also cognisant of environmental issues related to water abstraction, particularly the Water Neutrality position affected the Sussex North Water Resource Zone (Southern Water) and the impacts of climate change.

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To this end, the draft District Plan sets out the Council's ambitions for achieving tight standards for water efficiency in new developments – at least Home Quality Mark 3 Star for residential development and BREEAM Excellent for non-residential development. The draft policies require developers to demonstrate opportunities have been taken to reduce water use through use of efficient fittings and appliances, rainwater harvesting, greywater recycling and Sustainable Drainage Systems.

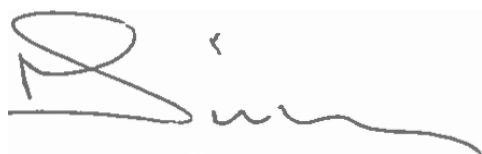
For sites over 1,000 dwellings, 85 litres/person/day will be expected. This is consistent with the standards being sought by authorities in the Sussex North Water Resource Zone as part of the strategy to achieve water neutrality. The Council notes South East Water's response to the draft District Plan consultation and their full support for policies related to reducing water consumption and recommendation for the Council to seek to be even more ambitious once regulation permits.

However, this relates only to new development. It will be vital for the water companies to play their part in encouraging and incentivising reductions in water consumption and achieving efficiencies in existing properties and businesses. The Council recognises the Government's national target to reduce household consumption to 110 litres/person/day by 2050 however given the water-stressed nature of the south east, it is disappointing that the draft Regional Plan predicts only 112 litres per person per day is likely to be achieved and could be more ambitious.

To improve this position and help increase resilience to the effects of climate change, the Council strongly feels that the water companies have a vital role to play in requiring developers to implement higher water efficiency standards and to lobby the Government to tighten Building Regulations sooner than anticipated. Due to the local water neutrality issue and the availability of water resources in general, including the security of future water supply, these interventions are needed now.

Mid Sussex District Council looks forward to engaging with South East Water as the Water Resources Management Plan progresses towards adoption and ongoing input from South East Water to the Council's draft District Plan.

Yours faithfully



Councillor Robert Salisbury
Cabinet Member for Planning

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Contact:
Planning Policy, Telephone: 01444 – 477053
E-mail: planningpolicy@midsussex.gov.uk

Your Ref:
Our Ref: WRSE Consultation Response

Date: 20th February 2023

By e-mail only to contact@wrse.org.uk

Dear Sir / Madam,

Water Resources South East – Consultation on the draft Regional Plan for South East England

Thank you for the opportunity to comment on the emerging Water Resources regional plan for South East England. Mid Sussex District Council supports the co-ordinated and collaborative approach to securing future water supplies and supports the four key principles set out in the Regional Plan related to:

- increasing resilience of supply,
- delivering longer-term environmental improvements,
- reducing leakage, and
- reducing household water use.

However, the Council has the following detailed comments.

Increasing Resilience of Supply

Mid Sussex residents are concerned that there will be insufficient water supply to serve current and future planned growth. Whilst not directly connected, this concern has been exacerbated by recent weather-related operational incidents which have led to residents being without water supply for a considerable period.

It is therefore vital that reassurance can be provided to residents that there will be sufficient water supply to cater for existing and future demand. The draft Regional Plan and associated Water Resource Management Plans must be fully conscious of the levels and locations of planned growth in Local Plans and plan for them accordingly.

Therefore, although the Council notes that the relevant water companies were fully engaged during the production of the District Plan and Site Allocations DPD (and were committed to ensuring sufficient water supply to serve planned growth) it would be helpful to remind you of the levels of future planned growth.

The National Planning Policy Framework (NPPF) states that the planning system should be plan-led. To this end, the District Council places great importance on ensuring it has an up-to-date Local Plan to plan for future housing, employment and infrastructure needs. This provides greater certainty for infrastructure providers by setting out where, when and how much development will take place and therefore assist with planning for the infrastructure required to support such development.

Mid Sussex District Council adopted its current District Plan in 2018, covering the period to 2031. This identified a housing requirement of 876 homes per annum until 2023/24, rising to 1,090 for the rest of the plan period. It contained strategic allocations to meet most of this

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housing need, with a Site Allocations Development Plan Document (DPD) adopted in June 2022 to allocate further sites to meet the remaining housing need. Overall, the Council has sufficient commitments (allocations and planning permissions) to demonstrate that it can meet its housing need in full – planning for a total of 17,297 dwellings to 2031.

The District Council has now embarked on a review of its District Plan. This will plan for any additional growth identified, noting that housing need has increased since the current District Plan was adopted. The Government's Standard Methodology identifies a starting point of 1,119 dwellings per annum for the district.

The draft District Plan 2021 – 2039 was published for public consultation in November 2022, with adoption anticipated in 2024. The draft District Plan plans for a total of 20,444 dwellings for the period to 2039.

The Council has reviewed the background evidence that supports the draft Regional Plan, in particular the "Population and Property Forecasts" document prepared by Vicus/Edge Analytics. Whilst it is recognised that it is difficult to predict future population and water consumption habits with certainty, this document provides a good starting point. It provides the supporting evidence for the High/Medium/Low population growth scenarios set out in the draft Plan.

However, it is unclear as to what extent Local Plan housing growth forecasts have been accounted for. Whilst there are scenarios related to "Housing Need" set out, for Mid Sussex this was based on March 2020 data. The forecasting for the emerging plan does not therefore specifically account for the locations and quantum of housing and employment development set out in the adopted Site Allocations DPD (June 2022) or increased housing need identified by the Standard Method.

Whilst population and household projections are a valid starting point for such forecasts, the Standard Method also applies an 'affordability uplift' which increases housing need further. For Mid Sussex, this increases the housing need identified by ONS Household Projections by over 50% and provides the starting point for Local Plans to plan for. This re-emphasises the fact that Local Plan housing figures are likely to be a better representation of future growth (both quantum and location) and should therefore be considered alongside projections. The forecasts should also account for planned employment growth in Local Plans given water consumption by certain industries is likely to be high.

The Council welcomes the water companies past engagement with the Local Plan process and encourages ongoing future engagement to ensure that housing and employment growth can be supported by the necessary infrastructure.

Delivering Longer-Term Environmental Improvements

Mid Sussex District is adjacent to the local authorities currently affected by the water neutrality issue in relation to designated nature conservation sites in the Arun Valley. Whilst not directly affected to the same degree, the Council is engaged with its neighbours to identify a water neutrality strategy and supports the approach to reduce the impact of growth on the environment. The Council therefore supports ambitions for environmental improvements, for example by reducing reliance on abstraction.

Reducing Household Water Use

The Council recognises the water-stressed nature of the South East. It is also cognisant of environmental issues related to water abstraction, particularly the Water Neutrality position affected the Sussex North Water Resource Zone (Southern Water) and the impacts of climate change.

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To this end, the draft District Plan sets out the Council's ambitions for achieving tight standards for water efficiency in new developments – at least Home Quality Mark 3 Star for residential development and BREEAM Excellent for non-residential development. The draft policies require developers to demonstrate opportunities have been taken to reduce water use through use of efficient fittings and appliances, rainwater harvesting, greywater recycling and Sustainable Drainage Systems.

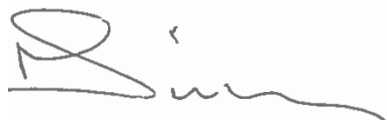
For sites over 1,000 dwellings, 85 litres/person/day will be expected. This is consistent with the standards being sought by authorities in the Sussex North Water Resource Zone as part of the strategy to achieve water neutrality. The Council notes South East Water's response to the draft District Plan consultation and their full support for policies related to reducing water consumption and recommendation for the Council to seek to be even more ambitious once regulation permits.

However, this relates only to new development. It will be vital for the water companies to play their part in encouraging and incentivising reductions in water consumption and achieving efficiencies in existing properties and businesses. The Council recognises the Government's national target to reduce household consumption to 110 litres/person/day by 2050 however given the water-stressed nature of the south east, it is disappointing that the draft Regional Plan predicts only 115 litres per person per day is likely to be achieved.

To improve this position and to help increase resilience to the effects of climate change, the Council strongly feels that the water companies have a vital role to play in requiring developers to implement higher water efficiency standards and to lobby the Government to tighten Building Regulations sooner than anticipated. Due to the local water neutrality issue and the availability of water resources in general, including the security of future water supply, these interventions are needed now.

Mid Sussex District Council looks forward to engaging with Water Resources South East as the draft Regional Plan progresses towards adoption.

Yours faithfully



Councillor Robert Salisbury
Cabinet Member for Planning

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DISTRICT PLAN 2021 – 2039 – SUMMARY OF RESPONSES TO DRAFT MID SUSSEX DISTRICT PLAN CONSULTATION (REGULATION 18)

REPORT OF: Sally Blomfield – Assistant Director Planning and Sustainable Economy
Contact Officer: Andrew Marsh – Head of Planning Policy and Housing Enabling
Email: Andrew.Marsh@midsussex.gov.uk Tel: 01444 477488
Wards Affected: All - outside the South Downs the National Park
Key Decision: No
Report to: Scrutiny Committee for Planning, Economic Growth and Net Zero
15th March 2023

Purpose of Report

1. This report provides information about the outcome of the draft Mid Sussex District Plan 2021-2039 (Regulation 18) consultation which took place from 7th November to 19th December 2022. It asks Members to note the representations made and the next steps.

Summary

2. This report:
 - a) Sets out the background to the draft Mid Sussex District Plan 2021-2039 and the work undertaken to date;
 - b) Provides a summary of the representations which were received during the recent draft Mid Sussex District Plan 2021-2039 (Regulation 18) consultation; and
 - c) Sets out the next steps in the preparation of the Mid Sussex District Plan 2021-2039

Recommendations

3. **The Scrutiny Committee for Planning, Economic Growth and Net Zero are recommended:**
 - (i) **To note the comments received during the public consultation on the Draft Mid Sussex District Plan 2021-2039 and supporting documentation; and**
 - (ii) **To note the additional work required and the next steps ahead of the Regulation 19 stage.**
-

Background

4. The Mid Sussex District Plan 2014-2031 was adopted in March 2018. The adopted District Plan contained a commitment to review the plan (policy DP4: Housing), starting in 2021 with submission to the Secretary of State in 2023.

5. The draft District Plan and supporting documentation was considered by this Committee on 5th October 2022 (Scope of Review, Strategy and Non-Housing Site policies) and 18th October 2022 (Whole Plan). The Committee recommended to Council that the draft District Plan and associated documentation should be approved for consultation purposes. Council approved the draft District Plan for public consultation at its meeting on 2nd November 2022. The consultation commenced on 7th November and concluded on 19th December 2022.

Consultation process

6. The consultation was the first formal opportunity for the community, statutory bodies, organisations and other stakeholders to formally comment on the draft proposals. It is a key stage in the preparation of the Mid Sussex District Plan as it will help to shape future iterations of the Plan.
7. The consultation has been carried out in accordance with the prescribed regulations, the Council's adopted Statement of Community Involvement¹, and the Community Involvement Plan².
8. To ensure as many stakeholders as possible were involved and engaged in the process, the Council:
 - Issued press releases, email alerts and utilised social media;
 - Made documentation available at key locations including at the Council's office, the district's libraries and Help Points and on the Council's website. As well as the draft District Plan and consultation documents, such as the Sustainability Appraisal, the website also included an on-line response form, consultation portal and interactive policies map;
 - Sent letters or emails to specific consultation bodies (statutory consultees) and to other organisations listed in the Community Involvement Plan;
 - Emailed those subscribed to the Planning Policy email alert service;
 - Held two briefings for all Town and Parish Councils as well as individual briefings where requested;
 - Ran six staffed public exhibitions / drop sessions in locations around the district (further details are set out below)
 - Prepared a Frequently Asked Questions pack which was made available on the webpage³ and at the staffed exhibitions / drop in sessions.
9. This approach goes beyond the minimum requirements set out in the regulations and the Council's Statement of Community Involvement.

Consultation Portal: Inovem

10. In line with the Government's push to digitise planning processes, the Council used an online consultation portal: Inovem. A fully navigable version of the draft District Plan was provided on the consultation portal. Once registered, interested parties could write and submit their comments under each section as they were browsing the Plan.

¹ www.midsussex.gov.uk/media/3951/statement-of-community-involvement.pdf

² www.midsussex.gov.uk/media/8591/reg18-dp-cip.pdf

³ www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/district-plan-review

11. The use of the consultation portal has the potential to significantly speed up the analysis and reporting stage of the consultation. It also increases traceability for respondents with the ability to amend their comments for the time of the consultation and review all comments submitted during any consultations held via the portal. Unfortunately, in this first time using Inovem, only a third of responses received were submitted via the portal. Additional promotion of the consultation portal will be key at the next consultation to maximise its benefit.

Public Exhibitions

12. Public Exhibitions were held to support the consultation at six locations across the district between 21st November and 6th December 2022. Settlements where significant housing growth was proposed were prioritised. The content of each session was the same to ensure that those unable to attend their local exhibition received the same information by attending an exhibition in another area.
13. The sessions were advertised via the consultation webpage, social media and Town and Parish Councils. Exhibitions were well attended as shown below.

Exhibition	Approximate Attendance
Bolney (21 st November)	100
Hurstpierpoint (22 nd November)	100
Sayers Common (24 th November)	50-70
Crawley Down (28 th November)	50-60
Burgess Hill (30 th November)	40
Haywards Heath (6 th December)	15

14. Posters summarised the content of the draft District Plan and attendees had the opportunity to ask the Officers questions about the proposals. Maps showing the proposed housing sites were displayed and a summary leaflet and Frequently Asked Questions pack were available in hard copy for attendees to take away. This information was also made available on the District Plan Review webpage⁴.

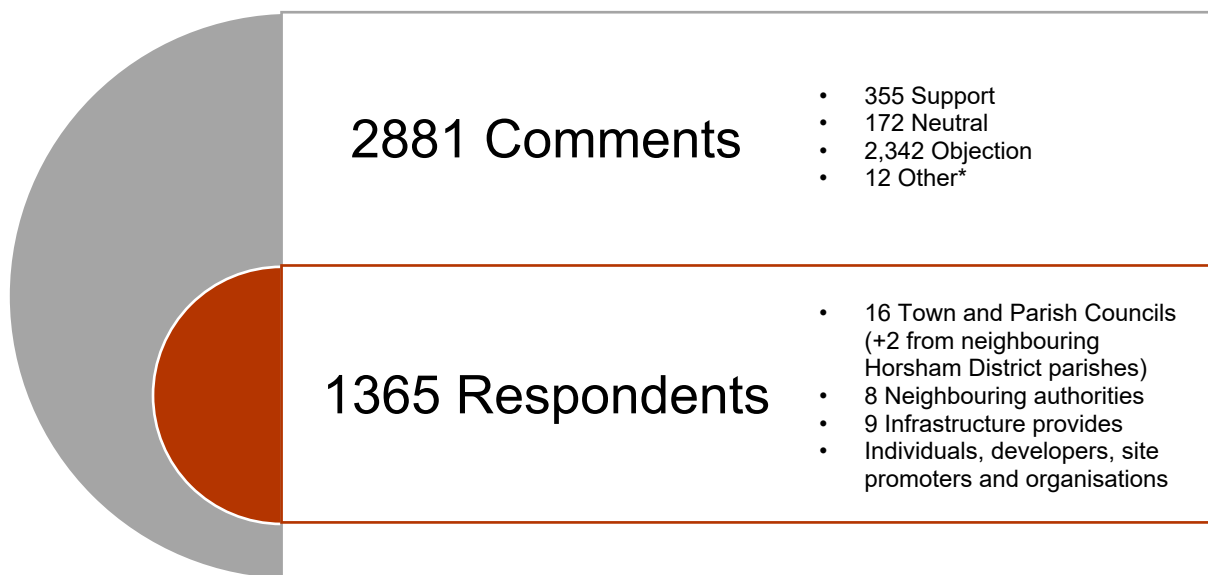
Outcomes of the consultation

15. The consultation commenced on 7th November and concluded on 19th December 2022. In total, **1,365 respondents** submitted **2,881 individual comments**⁵ on the document and supporting evidence (including the Sustainability Appraisal and Habitats Regulations Assessment).
16. **Appendix 1** sets out a summary of all comments received and the key issues raised are summarised below. All the comments in full are available on the District Plan Review webpage⁶.

⁴ www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/district-plan-review

⁵ Some comments are related to multiple policies and/or topics.

⁶ www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/district-plan-review



* Includes comments not related to the District Plan and duplicate comments

Figure 1 - Number of Comments received.

The Proposed Spatial Strategy

17. 209 comments were received on the proposed strategy for the District Plan
 - **Support:** 7
 - **Object:** 184
 - **Neutral:** 18
18. The most significant number of objections to the spatial strategy raised concerns about current infrastructure and its ability to accommodate further growth.
19. Eight comments were received in relation to the 20-minute neighbourhood principle, setting out concerns that people would be restricted to using facilities and services within 20 minutes of their home. Given the recent press interest in this concept it is important to note that this is not the purpose of 20-minute neighbourhoods. It is a sustainable approach to creating places that have facilities and services which provides people with opportunities to meet their day to day needs locally and in a way that can be accessed by foot or on a bicycle.

Policies

20. Over 800 comments were submitted in relation to the 58 draft policies. The table below summaries the number of comments received for each of the draft policies and whether these comments were generally supporting, objecting or neutral.

Policy	Status	Comments received			
		Total	Sup	Obj	Neu
DPS1: Climate Change	New Policy	30	5	21	4
DPS2: Sustainable Design and Construction	Major Update	49	5	40	4
DPS3: Renewable and Low Carbon Energy Schemes	Minor Update	15	1	13	1
DPS4: Flood Risk and Drainage	Minor Update	38	2	36	0
DPS5: Water Infrastructure and Water Environment	Minor Update	21	2	16	3
DPS6: Health and Wellbeing	New Policy	25	4	19	2

Policy	Status	Comments received			
		Total	Sup	Obj	Neu
DPN1: Biodiversity, Geodiversity and Nature Recovery	Major Update	27	6	21	0
DPN2: Biodiversity Net Gain	New Policy	33	4	26	3
DPN3: Green Infrastructure	New Policy	23	3	18	2
DPN4: Trees, Woodland and Hedgerows	Minor Update	82	3	79	0
DPN5: Historic Parks and Gardens	No Update	3	1	2	0
DPN6: Pollution	New Policy	7	1	6	0
DPN7: Noise Impacts	Minor Update	4	0	4	0
DPN8: Light Impacts and Dark Skies	Minor Update	5	0	5	0
DPN9: Air Quality	Minor Update	6	0	6	0
DPN10: Land Stability and Contaminated Land	New Policy	3	0	3	0
DPC1: Protection and Enhancement of the Countryside	Minor Update	18	2	12	4
DPC2: Preventing Coalescence	No Update	21	1	17	3
DPC3: New Homes in the Countryside	Minor Update	13	1	10	2
DPC4: High Weald Area of Outstanding Natural Beauty	Minor Update	16	3	10	3
DPC5: Setting of the South Downs National Park	No Update	7	3	3	1
DPC6: Ashdown Forest SPA and SAC	Minor Update	9	5	1	3
DPB1: Character and Design	Minor Update	13	1	11	1
DPB2: Listed Buildings and Other Heritage Assets	Minor Update	3	2	1	0
DPB3: Conservation Areas	No Update	3	0	3	0
DPT1: Placemaking and Connectivity	Major Update	29	4	21	4
DPT2: Rights of Way and Other Recreational Routes	No Update	8	3	5	0
DPT3: Active Travel	New Policy	18	3	11	4
DPT4: Parking and Electric Vehicle Charging Infrastructure	New Policy	11	2	4	5
DPT5: Off-Airport Car Parking	New Policy	5	2	3	0
DPE1: Sustainable Economic Development	Major Update	6	1	4	1
DPE2: Existing Employment Sites	Minor Update	6	0	6	0
DPE3: Employment Allocations	New Policy	7	1	5	1
DPE4: Town and Village Centre Development	Major Update	6	2	3	1
DPE5: Within Town and Village Centre Boundaries	Major Update	2	0	1	1
DPE6: Development within Primary Shopping Areas	Major Update	0	0	0	0
DPE7: Smaller Village and Neighbourhood Centres	Major Update	3	0	2	1
DPE8: Sustainable Rural Development and the Rural Economy	Minor Update	4	0	3	1
DPE9: Sustainable Tourism and the Visitor Economy	Minor Update	7	1	6	0
DPH2: Sustainable Development - Outside the Built-up Area	New Policy	25	4	20	1
DPH3: Sustainable Development - Inside the Built-up Area	New Policy	12	4	8	0
DPH4: General Principles for Housing Allocations	New Policy	29	5	23	1
DPH26: Older Persons' Housing and Specialist Accommodation	New Policy	14	4	9	1
DPH29: Gypsies, Travellers and Travelling Showpeople	Major Update	7	2	4	1
DPH30: Self and Custom Build Housing	New Policy	12	1	10	1
DPH31: Housing Mix	Major Update	26	3	22	1
DPH32: Affordable Housing	Minor Update	27	2	22	3
DPH33: First Homes	New Policy	14	3	10	1

Policy	Status	Comments received			
		Total	Sup	Obj	Neu
DPH34: Rural Exception Sites	Minor Update	8	2	4	2
DPH35: Dwelling Space Standards	No Update	5	2	3	0
DPH36: Accessibility	Minor Update	9	1	8	0
DPI1: Securing Infrastructure	Major Update	33	4	23	6
DPI2: Planning Obligations	New Policy	8	2	3	3
DPI3: Major Infrastructure Projects	New Policy	3	1	1	1
DPI4: Communications Infrastructure	Minor Update	1	1	0	0
DPI5: Open Space, Sport and Recreational Facilities	Minor Update	10	4	4	2
DPI6: Community and Cultural Facilities and Local Services	Minor Update	7	3	2	2
DPI7: Viability	Minor Update	6	2	3	1

21. Of the Policies, 30 were either new or were subject to major changes compared to the adopted District Plan policy. 18 of these policies received 10 or less objections, including two policies (DPE6: Development in Primary Shopping Areas and DPI4: Communications Infrastructure) which received no objections. 12 received over 10 objections.
22. The Sustainability chapter contains four updated and two new policies focusing on the delivery of sustainable growth. 40 objections were received in respect of the two new policies: DPS1: Climate Change and DPS6: Health and Wellbeing. Whilst the principles of both policies were generally supported, many respondents suggested that the wording could be strengthened. Others raised concerns regarding the blanket application of the policies' requirements.
23. Policies DPT1: Placemaking and Connectivity and DPT3: Active Travel together received 32 objections. Objections were mainly related to the location of proposed development, insufficient infrastructure and the need to amend wording to strengthen policy.
24. It is worth noting that whilst Policy DPN4: Trees, Woodland and Hedgerows received a total of 82 comments, 64 of these were specifically seeking additional protection to Worth Forest in light of concerns regarding a potential holiday park development in that location. A local campaign group against the (then) proposed Center Parcs development encouraged its supporters to make representations to the consultation.

Housing

Policy	Comments received			
	Total	Sup	Obj	Neu
DPH1: Housing	395	180	208	7

25. The 395 comments received in respect of Policy DPH1: Housing includes submissions on a range of matters not specifically directed at the Policy but related to wider housing matters including:
 - **Sites not included in the Plan (Omission sites):** 79 comments
 - **Housing requirement:** 96 comments
 - **Exclusion of the significant site at Ansty:** 180 comments in support, alongside an objection submitted by the site promoter
 - The remainder relate to commitments, windfall, unmet need and overall supply.

26. **Sites not included in the Plan (Omission sites):** A total of 79 comments were received in relation to omission sites. These are sites that were either already in the Strategic Housing and Employment Land Availability Assessment (SHELAA) (56 sites) and assessed through the Site Selection process but not taken forward as proposed allocations, or new sites (nine sites) that have been submitted to the Council through the consultation. The new sites will be included in an updated SHELAA and assessed through the Site Section process using the same methodology used at Regulation 18 stage. The conclusions of this work will inform the preparation of the Regulation 19 Plan.
27. **Housing requirement:** 96 comments were received objecting to the housing requirement figure predominately from site promoters of sites not included in the draft District Plan. They argue that the proposed over-supply was not high enough, the draft District Plan did not address the unmet housing need from neighbouring authorities, or the updated spatial strategy had not been applied correctly. Other comments received in relation to the housing need figure were generally supportive in the use of the Standard Method stating that it is compliant with the NPPF.
28. **Exclusion of the significant site at Ansty:** 180 comments were received in support of the draft District Plan exclusion of the significant site at Ansty. The site promoter submitted a representation objecting to the draft District Plan.

Significant Sites

29. 615 comments were submitted in relation to the significant sites. The table below summaries the number of comments received against each of the draft policies and whether these comments were generally supporting, objecting or neutral.

Housing Site	No of Homes	Comments received			
		Total	Sup	Obj	Neu
DPSC1: Land to the west of Burgess Hill	1,400	145	2	136	7
DPSC2: Land to the south of Reeds Lane, Sayers Common	2,000	417	7	402	8
DPSC3: Land at Crabbet Park, Copthorne	2,300	53	4	43	6

30. The number of comments and objections received to each of the proposed significant sites was noticeably varied. The most objections were received in respect of DPSC2: Land to the South of Reeds Lane (402 objections). DPSC1: Land west of Burgess Hill and DPSC3: Land at Crabbet Park received significantly fewer objections, 136 and 43 respectively.

Housing sites

31. There were over 800 comments to the proposed housing allocations. The table below summarises the number of comments received against each of the proposed housing allocations and whether these comments were generally supporting, objecting or neutral.

Housing Site	No of Homes	Comments received			
		Total	Sup	Obj	Neu
DPH5: Batchelors Farm, Keymer Road, Burgess Hill	33	10	1	8	1
DPH6: Land at Hillbrow, Janes Lane, Burgess Hill	25	10	0	9	1

Housing Site	No of Homes	Comments received			
		Total	Sup	Obj	Neu
DPH7: Burgess Hill Station, Burgess Hill	300	94	0	94	0
DPH8: Land off West Hoathly Road, East Grinstead	45	6	1	4	1
DPH9: Land at Hurstwood Lane, Haywards Heath	45	4	1	3	0
DPH10: Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath	30	4	1	3	0
DPH11: Land east of Borde Hill Lane Haywards Heath	60	134	1	129	4
DPH12: Orchards Shopping Centre, Haywards Heath	100	6	0	5	1
DPH13: Land to west of Turners Hill Road, Crawley Down	350	59	0	57	2
DPH14: Hurst Farm, Turners Hill Road, Crawley Down	37	16	1	14	1
DPH15: Land rear of 2 Hurst Road, Hassocks	25	6	2	3	1
DPH16: Land west of Kemps, Hurstpierpoint	90	73	1	70	2
DPH17: The Paddocks, Lewes Road, Ashurst Wood	8-12	5	0	3	2
DPH18: Land at Foxhole Farm, Bolney	200	271	2	268	1
DPH19: Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common	33	17	3	14	0
DPH20: Land at Coombe Farm, London Road, Sayers Common	210	25	1	22	2
DPH21: Land to the West of Kings Business Centre, Reeds Lane, Sayers Common	100	15	1	14	0
DPH22: Land at LVS Hassocks, London Road, Sayers Common.	200	14	0	14	0
DPH23: Ham Lane Farm House, Ham Lane, Scaynes Hill	30	25	0	22	3
DPH24: Challoners, Cuckfield Road, Ansty	37	31	0	30	1
DPH25: Land to the west of Marwick Close, Bolney Road, Ansty	45	25	1	22	2
DPH27: Land at Byanda, Hassocks	TBC	5	1	3	1
DPH28: Land at Hyde Lodge, Handcross	TBC	6	0	4	2

32. The two significant sites (DPSC1: Land to the west of Burgess Hill and DPSC2: Land to the south of Reeds Lane), together with DPH7 Burgess Hill Station, DPH11 Land east of Borde Hill Lane, DPH16 Land west of Kemps, and DPH18 Land at Foxhole received the vast majority of the responses (around 75% of comments received on all sites).
33. By comparison, a lower level of response was received on the remaining 20 housing sites. The following proposed sites received 10 objections or less:
- **DPH5:** Batchelors Farm, Keymer Road, Burgess Hill
 - **DPH6:** Land at Hillbrow, Janes Lane, Burgess Hill
 - **DPH8:** Land off West Hoathly Road, East Grinstead
 - **DPH9:** Land at Hurstwood Lane, Haywards Heath
 - **DPH10:** Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath
 - **DPH12:** Orchards Shopping Centre, Haywards Heath
 - **DPH15:** Land rear of 2 Hurst Road, Hassocks
 - **DPH17:** The Paddocks, Lewes Road, Ashurst Wood
 - **DPH27:** Land at Byanda, Hassocks
 - **DPH28:** Land at Hyde Lodge, Handcross

34. Officers will continue to liaise with the site promoters and review the comments received, including those from statutory consultees and infrastructure providers to ensure they remain the most suitable sites for allocation.
35. Non-site-specific comments were also received in relation to potential impacts of the draft District Plan proposals on wider areas:
 - Sayers Common village: 101 comments
 - Burgess Hill: 16 comments
 - Hurstpierpoint: 47 comments
 - Crawley Down: 4 comments
36. Many of the issues raised will require additional work ahead of the Regulation 19 consultation. This includes further assessment and evidence work as set out in the Next Steps section of this report.

Other Comments

37. Whilst the majority of comments received were related to the proposed sites or policies, a number of respondents also raised other issues:
 - **Evidence base:** 187 comments
 - **Consultation Arrangements:** 48 comments
38. **Evidence base:** There were 108 comments regarding the assessment and site selection process of the proposed housing allocations. For example, site promoters of sites which were not progressed submitted additional evidence/justification for why their site should have been allocated. Updated evidence submitted by respondents will be reviewed ahead of Regulation 19.
39. 16 comments were received regarding the Transport Study. Comments from statutory transport consultees (National Highways and local highways authorities) provided technical feedback and sought an ongoing dialogue to understand any potential cross boundary impacts.
40. 34 comments were received in relation to the infrastructure evidence base. The publication of the draft Infrastructure Delivery Plan (IDP) alongside the draft District Plan was generally supported. The IDP will be updated prior to Regulation 19 in view of the comments provided by key infrastructure consultees, and ongoing discussions between providers, the Council and site promoters.
41. The remaining comments were spread between other evidence base documents.
42. **Consultation:** 48 comments specifically related to the consultation arrangements, in particular to the length and timing of the consultation. However, as these matters are prescribed within regulations, Members can be confident that the consultation on the draft District Plan was legally compliant in this respect.
43. In accordance with the regulations, the Council consulted the 'Specific Consultation Bodies'. Comments were also received from a number of key respondents.
 - **Neighbouring Authorities:** The recurring themes of the representations from neighbouring authorities relate to transport impacts and unmet housing need.

- **West Sussex County Council:** Suggests policy wording amendments for clarity but also to reflect latest agreed positions; work will be ongoing as the Plan progresses towards submission. The County Council highways authority recognise that the transport modelling is an iterative process and therefore will not be finalised until nearer submission, so until this evidence has matured, they maintain a holding objection. However, it is important to note that the highways authority is fully engaged with the work and this is progressing as planned.
- **Infrastructure providers:** Nine infrastructure providers, including West Sussex County Council, provided comments. Amendments have been suggested to strengthen the plan. Of note:
 - **NHS:** Support the draft District Plan in that it will enable NHS infrastructure delivery alongside new homes. They state they will continue to work with this Council to review proposed locations for growth.
 - **South East Water:** No objection in relation to water availability to serve proposed housing allocations.
 - **Southern Water:** No objection in relation to wastewater; suggest wording amendments to ensure protection and timely delivery of infrastructure.
 - **WSCC (Education):** No objection. Suggests wording for consistency. Will continue to work with the Council on provision of a Special Educational Needs school to meet need.
- **Natural England:** Suggests various policy wording amendments to strengthen proposed policies. Natural England has requested that significant sites within the setting of a protected landscape should be informed by a Landscape and Visual Impact (LVIA) or a landscape capacity study ahead of the Regulation 19 stage. No objections were raised on the Habitat Regulations Assessment, although minor additional work will be needed to acquire full support from Natural England as the plan progresses.
- **Historic England:** Generally supportive of the Council's approach but have requested additional policy criteria for sites which may have impact on listed buildings.
- **Environment Agency:** Recommends amendments to policy wording, in particular for DPS4: Flood Risk and Sustainable Drainage, to strengthen and ensure policies reflect recently updated Guidance. No objection raised against proposed housing allocations with Flood Zone 2 and 3 within the site boundary but supports the Council approach to avoid development within those area. They suggest that the Council should ensure that the Strategic Flood Risk Assessment (SFRA) is up-to-date.
- **Town and Parish Councils:** The responses from Town and Parish Councils are predominantly objections or comments on the proposed site allocations within their respective town / parish. Concerns were also raised in relation to the status of Neighbourhood Plans.

Infrastructure

44. The delivery of the right level and type of infrastructure is key to supporting the creation of sustainable communities.
45. Infrastructure and services are provided by a range of organisations, outside the function of the District Council. It is therefore key to clearly set out where those responsibilities lie in relation to infrastructure provision, and how the Council is working to ensure that the relevant providers effectively inform the plan preparation process.

46. The Infrastructure Delivery Plan (IDP), produced alongside the draft District Plan, sets out the infrastructure position at the time the Plan was published. It is the result of partnership working with a variety of agencies and supports integration between housing and infrastructure planning. It specifies the infrastructure requirements to support new development within the Plan area and, where relevant, across the district boundary.
47. Infrastructure providers were consulted and their support for the draft Plan and the approach taken by the Council is set out in paragraph 43 above. The IDP is a live document and it will directly feed into the District Plan as work progresses. The Council is committed to securing and overseeing the delivery of infrastructure required to support future development across the district. This will be best achieved by continued dialogue with infrastructure providers throughout the preparation of the District Plan.

Duty to Co-operate

48. In accordance with legislation and national policy, the Council has a duty to co-operate with neighbouring authorities and other prescribed bodies; this means working constructively and actively on an ongoing basis for strategic planning matters.
49. Cross-boundary strategic issues arising from the preparation of the draft District Plan are well established and include, but are not limited to, the protection of internationally designated sites, transport matters and seeking options to addressing unmet housing need arising from neighbouring authorities. The Council positively engaged with its neighbouring authorities during the preparation of the draft District Plan on strategic cross-boundary matters and will continue to engage ahead of the next formal stages. All neighbouring authorities responding to the consultation, including Horsham District Council and Crawley Borough Council, noted that the Council had engaged positively and were therefore not objecting to the principle (legal element) of the duty to co-operate. There is a joint understanding of each other's current position and which areas will require further liaison and engagement. This work is iterative and is ongoing. In accordance with the NPPF, as the draft Plan progresses toward submission, Statements of Common Ground will be prepared to capture cross-boundary matters and progress made to address them.

Next steps

50. The following are the priority areas of work required before publication of the next version of the District Plan:
 - **Proposed Site Allocations:** Officers are working through the comments received on the proposed site allocations. Following which we will work with the site promoters to ensure there is sufficient information/evidence to address any issues raised. All allocations will be reviewed to ensure they can continue to be proposed for allocation, based on evidence.
 - **Sites not included in the Plan (Omission sites):** New sites submitted will be added to the Strategic Housing and Employment Land Availability Assessment and assessed through the Site Selection Methodology. Information received on existing omission sites will be reviewed and reflected in updated assessments if justified by satisfactory evidence. An updated SHELAA and Site Selection Paper will be published to inform the Regulation 19 Plan. If appropriate it may be necessary to reconvene the Members Working Group previously set up by

this Committee to discuss the outcomes of any revised Site Selection Paper ahead of Regulation 19 stage.

- **General Policies:** Officers will assess any proposed amendments and progress work on the policies, including further liaison and supporting evidence if required.
- **Evidence base:** Further transport modelling will be carried out, along with an updated Sustainability Appraisal and Habitats Regulation Assessment in accordance with the regulations. Other updates to the evidence base may be required to reflect changes to the planning system.

51. Officers will continue discussions with neighbouring authorities and key stakeholders and will work on preparing Statements of Common Ground as required by the NPPF. These will be completed and published at Regulation 19 stage.
52. The next formal stage of the process is the publication of the Proposed Submission District Plan (Regulation 19). The Council's adopted Local Development Scheme indicates this stage will take place in Summer/Autumn 2023 to allow sufficient time for the work outlined in this report to be completed. Following Regulation 19 consultation the District Plan, evidence base, and all consultation responses are submitted to the Secretary of State for examination. The Secretary of State will appoint an independent Inspector to conduct the Examination in Public of the District Plan. The examination is scheduled for early 2024.

Changes to the Planning System

53. In December 2022 the Government published a consultation document "Levelling-up and Regeneration Bill: Reforms to national planning policy". A number of respondents made reference to this consultation in their response, suggesting that this should lead to reduced housing numbers or that work on the Plan should stop or be paused.
54. The Government sought comments on a revised NPPF and changes to future planning policy to reflect the Levelling-up and Regeneration Bill (LURB). The Council submitted its response on 2nd March and this is a background paper to this report.
55. There are no proposed changes to the Standard Method calculation which is how the housing need for the district is calculated. The Standard Method will remain the starting point and an alternative approach can continue to be used, where justified by exceptional circumstances. In its response to the Government's consultation the Council has argued that the following local characteristics should be considered as exceptional circumstances when assessing local housing needs:
 - **Demographic Characteristics – household projections.** Due to specific local demographic circumstances which impact on the household projections used to identify housing need, the Council should be supported to use the most recent household projections which more appropriately reflect local needs. Currently, Councils must use out-dated 2014-based household projections, which do not reflect the current need despite more recent projections being available.

- **Economic Characteristics – adjustment for affordability.** The adjustment for affordability requires Councils to use workplace affordability ratios. Evidence shows that residence-based affordability ratios, which account for earnings potential from those that out-commute, is a more accurate way of reflecting affordability in our district. This is because 44 per cent of our residents out commute and can secure higher income levels.
 - **Environmental Characteristics** such as the presence of designated landscapes. Mid Sussex is 50% Area of Outstanding Natural Beauty, only 12% of our land areas is within a designated built-up area with the remainder set in countryside.
 - **Prevailing Rural Character.** The district is characterised by villages and market towns, therefore landscape sensitivity and implications for heights and density should be a consideration.
56. The proposed changes to the data sets will better reflect the housing need in this district which suggests a lower housing requirement. However, the use of these datasets will be dependent on the NPPF providing flexibility to allow their use when the revisions come into force.
57. As part of Government's aim to incentivise Plan making, changes to the operation of the 5-year housing land supply requirements are proposed. Subject to the proposed changes coming in to force as proposed, Mid Sussex will benefit from a reduced housing land supply requirement of 4 years and not 5 because the Council has published a Regulation 18 Plan with a policies map and proposed allocations. This would apply for a period of 2 years from the point that the changes to the Framework take effect.
58. The Government is clear that Plan making should continue and propose transition arrangements, with plans submitted for examination before 30 June 2025 being examined under the existing legal requirements. Government advises that changes to the NPPF are likely to be made in Spring 2023 with the enactment of the Bill following later estimated to be the end of 2024. The changes to the NPPF will impact on the preparation of the District Plan and will need to be reflected in the Regulation 19 Plan. In our response to the recent consultation on changes to the planning system, the Council has asked the Government to reconsider the transitional arrangements in respect to Plan reviews that may wish to take advantage of the new system.
59. As noted above, the Council's adopted Local Development Scheme estimates that the Proposed Submission Plan (Regulation 19) will be published in Summer/Autumn 2023. Therefore, the current planned timetable for the District Plan allows time to consider any implications arising, and to take advantage of, the proposed changes to the planning system before this Committee and Council considers the next iteration of the Plan.

Policy Context

60. The review of the District Plan is a corporate priority identified in the Corporate Plan and Budget 2023/2024 (March 2023) and Service Plan for Planning and Economy. It aligns with the Council's priorities for Sustainable Economic Growth and Strong Resilient Communities.

Other Options Considered

61. There is a legal and national policy requirement to review the Plan and update where necessary. Whilst the Council could decide not to review or update the Plan, this would significantly impact on its ability to apply full weight to its existing policies when determining planning applications and would lead to speculative unplanned development.

Financial Implications

62. Preparation of the District Plan review and update is funded by a specific reserve, as agreed in the Corporate Plan and Budget 2023/24 (March 2023). This reserve has funded evidence base studies to support the work and will continue to be required to fund future evidence, legal advice and examination costs. The work carried out so far is within the identified budget.
63. If an up-to-date District Plan is not in place significant costs could arise from defending against speculative development. During a 7-year period without an up-to-date Local Plan the Council incurred costs of £720,000 defending speculative development.

Risk Management Implications

64. The Government introduced a Levelling Up and Regeneration Bill to Parliament in May 2022. This proposes changes to the planning system, however as the Bill has not yet received Royal Assent it is difficult to predict the impacts that any future changes and/or transition periods will have on the progress of the District Plan. In the meantime, as noted in paragraph 53 onwards, a consultation on short-term changes to the Planning System has recently completed, with changes to the NPPF likely to come in to force in Spring 2023. The Council will consider these changes before publishing its Regulation 19 version of the Plan to ensure it is policy and legally compliant ahead of submission to the Secretary of State for examination.
65. The Government has urged local authorities to continue plan-making, and currently Local Planning Authorities must continue to comply with current legislation, which requires Local Plans to be updated where required every 5 years. The same punishments for not complying, including the consequences of not meeting housing need or maintaining a 5-year housing land supply are still in force. This position will be kept under review as the work on the preparation of the District Plan progresses.

Equality and Customer Service Implications

66. An Equality Impact Assessment has been prepared to ensure opportunities to promote equality and/or barriers to service are considered and addressed. This was published alongside the Draft District Plan and will be updated for the Proposed Submission District Plan (Regulation 19)

Other Material Implications

67. There are no other material implications.

Sustainability Implications

68. The updated District Plan includes a range of sustainability policies as described above. The National Planning Policy Framework recognises the role that planning can have in addressing and mitigating future impacts of climate change – the draft policies within the updated District Plan reflect national policy and ambitions.
69. It is a legal requirement for the District Plan to be accompanied by a Sustainability Appraisal (incorporating Strategic Environmental Assessment) at each formal stage of the plan-making process which documents the impacts of proposed policies, strategy and sites against the sustainability criteria and informs the plan-making process by ensuring the plan is the most sustainable given all reasonable alternatives. A Sustainability Appraisal was published alongside the draft District Plan and will be updated for the Proposed Submission District Plan (Regulation 19). Appendices

Appendix 1: Summary of Consultation Responses

Background Papers

Consultation Responses in full can be viewed here:

www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/district-plan-review

Response to the Reforms to the Planning System Consultation:

Covering Letter from the Cabinet Member -

<https://midsussex.moderngov.co.uk/documents/s15495/MIS 9a - Cllr RS Letter NPPF Consultation Response.pdf>

Technical Response - <https://midsussex.moderngov.co.uk/documents/s15496/MIS 9a - NPPF Technical Response.pdf>

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Appendix 1: Summary of Consultation Responses

Chapter 1. District Plan - Introduction			
Number of Comments Received			
Total: 54	Support: 3	Object: 42	Neutral: 9
Comments Received			
<p>Statutory consultees: None</p> <p>MPs/ Local Authorities: None</p> <p>Other consultee bodies: Sussex Wildlife Trust</p> <ul style="list-style-type: none"> Draft District Plan should be withdrawn until outcome of planning changes are announced. <p>Other comments:</p> <ul style="list-style-type: none"> Consultation period should be 12 weeks. The Public Exhibitions were limited to 2 hours on a single date for each locality. Didn't like the timescale of the exhibition with only 10 days to respond before Christmas. There is a need within MSDC to have management plans for monitoring planning approvals that include conditions that the applicant needs to fulfil. Unacceptable lack of open, transparent consultation and publicity by MSDC to alert and brief all householders about the very important implications for the future and character of villages like Crawley Down. So far, the process has been undemocratic and rather elitist. Lack of community engagement in Plan's 2 years' preparation, up to this consultation. Documents referred to in Appendix 2 fact checking exercise, in relation to site 688, are not available to residents, to see the data that some of the responses are based on. Mid Sussex should restart the process for identifying sites to be able to demonstrate 5 years supply up to 2038. Shouldn't progress a District Plan in times of political uncertainty. The three-year housing delivery test for Mid Sussex is currently 125% (500 homes); must ensure that existing allocations are delivered sustainably before adding new sites. Plan should be put on hold while the proposed amendments to the relevant legislation are being debated and look set to result in some major alterations to the requirements placed on MSDC? MSDC did not (save for one meeting just before the Plan went out) satisfactorily engage with the Parish prior to the Reg 18 consultation; nor did it hold an exhibition in Albourne Parish. The online questionnaire and feedback mechanism is over complicated and hard to navigate unless you have at least a few hours to spare. It is not sufficient to involve communities only at the Regulation 18 Stage after the decisions have been made on which sites to include. 			

Chapter 2. Background			
Number of Comments Received			
Total: 1	Support: 0	Object: 1	Neutral: 0
Comments Received			
<p>Statutory consultees: None</p> <p>MPs/ Local Authorities: South Downs National Park</p> <ul style="list-style-type: none"> Suggested change to the text about the South Downs National Park. <p>Other consultee bodies: None</p>			

Chapter 3. Achieving Sustainable Development			
Number of Comments Received			
Total: 52	Support: 10	Object: 33	Neutral: 9
Comments Received			
Statutory Consultees:			
East Sussex County Council			
<ul style="list-style-type: none"> Public or community transport probably needs to be provided for the rural communities for the 20-minute neighbourhoods to work. 			
Homes England			
<ul style="list-style-type: none"> Supports 20-minute neighbourhoods as key for Brookleigh. 			
MPs/ Local Authorities:			
Brighton and Hove City Council			
<ul style="list-style-type: none"> Supports 20-minute neighbourhood principle. 			
Other consultee bodies:			
CPRE Sussex			
<ul style="list-style-type: none"> 20-minute neighbourhood is not environmentally sustainable if using greenfield sites, need to use brownfield. 			
Sussex Wildlife Trust			
<ul style="list-style-type: none"> Welcomes the plan acknowledging the environment challenges 			
Others:			
<ul style="list-style-type: none"> Support actions that lead to additional cycleways and footpaths Need to link DPSC1: Land at Crabbet Park and DPSC2: Land to the South of Reeds Lane to public transport so Crawley and Brighton can be easily reached The 20-minute neighbourhood principle restricts freedom of movement and prevents privacy. Mid Sussex too rural in main for 20-minute neighbourhoods to work. Will only work in urban areas. Better public transport or community transport needed to get people living in rural areas into sustainable town centres. Presumptuous to presume people will not drive to a cheaper supermarket out of town. Funding for 20-min neighbourhoods needs to be explored. Cycle paths and footpaths need to be improved/more designated. Sustainable Development needs to be entwined within vision, objectives, policies and allocations chapters. 			

Chapter 4. District Plan - Supporting Evidence			
Number of Comments Received			
Total: 126	Support: 12	Object: 105	Neutral: 9
Comments Received			
Statutory Consultees:			
East Sussex County Council			
<ul style="list-style-type: none"> Essential that mitigation measures implemented to avoid diverted trips across border, into adjacent networks (B2112 through Ditchling). 			
Historic England			
<ul style="list-style-type: none"> A Heritage topic paper, assets register or heritage survey could be a useful tool to present evidence and delivery a positive heritage strategy 			
Surrey County Council			
<ul style="list-style-type: none"> Concerned about cumulative cross-boundary impacts (into Surrey). Consider the Local Model Validation Report to be an acceptable base model but would like some clarity on some points. 			
West Sussex County Council			

- Transport evidence base work is not yet complete, further iterations ahead of Regulation 19. Require evidence of how appropriate transport strategy or highway measures can be delivered ahead of submission.

MPs/ Local Authorities:

None

Other consultee bodies:

Sussex Wildlife Trust

- Preliminary Ecological Appraisals and Green Infrastructure Mapping/ Ecological Network Mapping should be used in supporting the Plan.

Others:

- MSDC too reliant on external providers to provide infrastructure. MSDC powerless to control this.
- Site 677 (Land south of Burleigh Lane, Crawley Down) should not be omitted from the plan.
- Promoting land off Silver Birches in Haywards Heath for development.
- Ambiguities and inconsistencies about DPSC2: Land to the South of Reeds Lane.
- Further clarity is needed with regards to infrastructure delivery of DPSC2: Land to the South of Reeds Lane.
- The options selected for comparison are inconsistent qualitative and too restricted in number.
- Transport modelling has proved virtually useless, at best misleading.
- Brownfield sites should be developed as a priority and build higher-density developments.
- Water facilities at maximum. Flooding an issue.
- Parking at all three stations needs to be increased significantly.
- Lack of information provided on Sustainable Communities' sites
- Traffic won't cope in the proposed locations.
- Inaccuracies in text relating to Sayers Common.
- Site Selection methodology and conclusions are wrong; criteria are fundamentally flawed.
- Plan needs to consider aerodrome safeguarding (air safety).
- Sustainability Appraisal based on out of date info.
- Insufficient waste management to cope with new housing volumes.
- The Plan shouldn't rely on Census data 2021 which was taken during the pandemic.
- The site selection process lacks a quantitative assessment of different options to demonstrate that the proposed allocations represent the most sustainable solution.
- Evidence base should be renewed and under constant review.
- Incorrect references in the HRA.
- No evidence of the Duty to Co-operate.
- Need to consider Crawley's unmet housing need.
- Unfortunate factual errors have now been incorporated into the evidence base.
- No Statement of Common Ground published.

Chapter 5. Vision and Objectives

Number of Comments Received

Total: 26	Support: 7	Object: 14	Neutral: 5
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Comments Received

Statutory Consultees:

Natural England

- Suggested additional wording regarding biodiversity, net gain and nature recovery to reflect Environment Act 2021, Environment Plan and Environmental Improvement Plan.

Homes England

- 24 strategic development principles for Brookleigh align with the 3 priority themes and 15 objectives

MPs/ Local Authorities:

Crawley Borough Council

- Support but "Environment" should include recognition of the need to mitigate and adapt to climate change, net zero economy

South Downs National Park Authority

- Suggested wording to objective 3 to broaden reference to the range of special qualities of protected and valued landscapes.

Other consultee bodies:

Sussex Wildlife Trust

- Environmental objectives fail to reflect the ambition and urgency needed to restore the natural environment. Suggested wording to objective 3 or new objective provided.

Others

- Objectives haven't been uniformly applied in the housing developments
- Social element of building and maintaining communities has been ignored
- Housing demand methodology is not helpful
- Objectives not applied through the plan

Chapter 6. District Plan Strategy

Number of Comments Received

Total: 209	Support: 7	Object: 184	Neutral: 18
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Comments Received

Statutory Consultees:

West Sussex County Council

- Change "good public transport" to "relatively good public transport" to better describe category 1 towns.

MPs/ Local Authorities:

Brighton and Hove City Council

- Support approach for identifying development potential

Crawley Borough Council

- Support "making effective use of land"
- Supports allowing extensions of existing settlements

South Downs National Park Authority

- Support protection of designated landscapes, but concerned if the NP and its setting have been considered
- Pages 33 and 34 fail to consider South Downs National Park

Other consultee bodies:

Sussex Wildlife Trust

- Will housing targets be reconsidered after government housing target changes?
- Is the environmental evidence base supporting the local plan sufficient to confidently ensure this housing need can be delivered sustainably?
- Consider other national ecological assets alongside AONBs and High Weald - map needed

The Woodland Trust

- Recommends guidance on: *Residential development and trees – the importance of trees and green spaces*

Others

- Levelling up bill updates re non-mandatory targets should be taken at face value
- Needs calculation not realistic as 60% of MSDC is National Park or AONB
- Affordable housing targets not likely to be achieved
- Decrease development in countryside
- Site allocation doesn't consider the impacts of infrastructure needs
- Overloaded water supply and serious impact on highways A23, A2300 and A272

- Growth is not the only way to support provision of local services – strategy needed to retain and support existing services in rural communities
- New strategy for service provision where further development is not suitable
- limited growth potential at East Grinstead noted
- Not positively prepared, justified or consistent with National planning policy
- Amend to allocate developments in AONBs – developments should be limited but not excluded
- Emphasise the potential for urban renewal and redevelopment to contribute to housing supply needed
- Distribute areas of growth in and around HH and EG – areas of growth are not balanced between main towns
- Ansty is not considered an appropriate settlement for expansion but supports DPH24: Challoners, Cuckfield Road and DPH25: Land to the West of Marwick Close, Bolney Road if the development is proportional to the scale of the village
- Supports development at sustainable settlements BH, EG and HH
- More investment in infrastructure needed
- AONB and SDNP cannot be immune from development
- New developments must have infrastructure provisions - no capacity in existing towns
- Ansty is not considered an appropriate settlement for expansion
- Supports proportionate development at Cuckfield in line with the Neighbourhood Plan
- Fairer distribution of development needed
- Mention other ecological assets
- Sustainability of allocated sites
- More development on brownfield sites. Effective use of land – increasing supply in Turners Hill

Chapter 7. Policies

Number of Comments Received

Total: 7	Support: 1	Object: 6	Neutral: 0
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Comments Received

Statutory Consultees:

Historic England

- Standalone policies are not sufficient in relation to heritage risk.
- Policies should be tested against the potential risks they might have on heritage.

MPs/ Local Authorities:

None

Other consultee bodies:

Sussex Wildlife Trust

- Welcomes the approach that MSDC have taken to give clarity to the policies and their status within the plan.

Others

- First paragraph top of page 43, change from “Mandatory” to “Advisory”.
- Non-strategic policies in the NPs must remain valid.
- Will residents be expected to fund the writing of a new Parish Plan to make it fit with the new District Plan, at a time when there are severe financial constraints?
- MSDC should have made clear what the changes were to existing policies.
- A longer plan period may be appropriate.

Chapter 8. Sustainability

Number of Comments Received

Total: 157	Support: 16	Object: 130	Neutral: 11
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Comments Received

Statutory Consultees:

Environment Agency:

- Consider updating Strategic Flood Risk Assessment (SFRA) and take account of other sources of flooding
- Support natural flood management and nature-based solutions
- DPS4 Flood Risk and Drainage: Suggested wording for consistency with recently updated PPG.

East Sussex County Council:

- Health Impact Assessments (HIA) or screening for HIA should be supported by separate guidance and a template to provide clarity on the council's expectations. Potential to specify HIA triggers.

Historic England

- DPS1 Climate Change: Specific reference to protection of heritage assets should be included
- DPS3 Renewable and Low Carbon Energy Schemes: Specific reference to heritage assets in bullet (i) should be included

Homes England

- DPS2 Sustainable Design and Construction: Support

Southern Water

- DPS4 Flood Risk and Drainage: SuDs should be encouraged in minor developments (1-9 dwellings) too.

Southeast Water

- The Plan must do its part in addressing root causes of climate change.
- DPS2 Sustainable Design and Construction: Suggest the council could be more ambitious in relation to water use, grey/rainwater harvesting.
- Supports DPS3: Renewable and Low Carbon Energy Schemes and DPS4: Flood Risk and Drainage
- DPS5 Water Infrastructure and Water Environment: should reference specific water target – recommend council be ambitious.

National Grid

- Suggest additional criteria to DPS2: Sustainable Design and Construction to reference the presence of existing infrastructure in design

Natural England

- DPS1 Climate Change: Support
- DPS2 Sustainable Design and Construction: Clarity needed on water efficiency standards are being set
- DPS4 Flood Risk and Drainage: Suggested wording to strengthen use of natural flood management solutions
- DPS6 Health and Wellbeing: Reference could be made to NE's Green Infrastructure Framework

Thames Water:

- DPS2 Sustainable Design and Construction: suggest amendment to ensure water efficiency and reduction of water consumption in the design of developments
- DPS4 Flood Risk and Drainage: suggest amendment to ensure surface water does not drain to the foul sewer.

MPs/ Local Authorities:

Crawley Borough Council

- DPS2 Sustainable Design and Construction: Plan should require development in Southern Water's Sussex North Water Resource Zone (WRZ) to be water neutral.

Wealden District Council

- Supports inclusion of sustainability chapter

Other consultee bodies:

CPRE Sussex:

- The Plan/policies needs to go further to emphasis the context and importance of taking action to address climate change and securing sustainable development.
- Robust and transparent monitoring is required to support the ambition in the policies.
- Economic and social value to the countryside needs to be given more weight.

- Will the ambition in the Sustainable Economic Strategy (SES) for net zero-carbon ready homes be achieved.

Gatwick Airport:

- DPS3 Renewable and Low Carbon Energy Schemes: Suggested wording to reference early engagement with Gatwick Airport
- DPS4 Flood Risk and Drainage: suggest additional wording to ensure SuDS do not give rise to increased bird strikes.

The Woodland Trust:

- DPS4 Flood Risk and Drainage: suggest additional wording in support of natural flood management.

Sussex Wildlife Trust:

- DPS3 Renewable and Low Carbon Energy Schemes: seeks clarity that impacts extend to connection to the grid.
- DPS4 Flood Risk and Drainage: suggest additional wording in support of natural flood management.
- DPS5 Water Infrastructure and Water Environment: wording should be strengthened to include reference to biodiversity, climate change, maintenance and management commitments.

Others:

- Needs to align with the Sustainable Economic Strategy to build ‘net zero-ready homes’ and set out how the Plan will support achieving net zero targets and address scope 3 emissions
- Higher standards are not necessary or justified, goes against the NPPG and Written Ministerial Statement – should not go beyond national standards in Building Regulations
- Viability impacts need to be fully understood
- Lack of transparency – what the HQM standards actually mean for the development needs to be clearer – will it be net zero housing, what renewables will be integrated, will gas boilers be allowed and how water will be managed?
- Standards are not ambitious enough in water and energy – below net zero ready standard
- Require design to optimise orientation for maximising solar gain, avoid overheating and minimise heat loss
- Needs to be seeking higher standards for retrofitting existing buildings – LETI standard
- DPS3 Renewable and Low Carbon Energy Schemes: Renewable energy policy should set specific measurable 5 yearly fossil fuel reduction targets and limit the scale of infrastructure in single locations

Chapter 9. Natural Environment and Green Infrastructure

Number of Comments Received

Total: 195	Support: 19	Object: 169	Neutral: 7
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Comments Received

Statutory Consultees:

Environment Agency

- DPN3 Green Infrastructure: ‘Green infrastructure’ should be changed to ‘green and blue infrastructure’.

DPN1 Biodiversity, Geodiversity and Nature Recovery:

- Areas identified as opportunities for nature recovery should be safeguarded from development.
- Watercourses should have an 8m ecological buffer zone
- Policy should include reference to river restoration opportunities
- Provide cross reference to DPN2: Biodiversity Net Gain
- DPN6 Pollution: Amend policy to include suggested statement on pollution prevention practices
- DPN10 Land Stability and Contaminated Land: Amend policy to reference “potential pathways for identified risk to receptors”

Historic England

- DPN4 Trees, Woodland and Hedgerows: Support

Natural England

- DPN1 Biodiversity, Geodiversity and Nature Recovery: amend wording suggested to provide clarification and strengthen policy
- DPN2 Biodiversity Net Gain: Amend wording suggested to strengthen policy
- DPN3 Green Infrastructure: amend wording suggested to strengthen policy via inclusion of other blue/ green infrastructure (see NE's GI Framework)
- DPN7 Noise Impacts: Amend wording suggested to include reference to natural solutions

Southeast Water

- Query the justification for the higher 20% BNG threshold for the identified significant sites. Higher BNG targets would create contradiction and complexity

Southern Water

- DPN6 Pollution: amend wording to include 'Development should not result in or be adversely affected by pollution or hazards, including air, noise, vibration, light, water, soil, odour, dust or other pollutants...'

MPs/ Local Authorities:

South Downs National Park Authority

- DPN8 Light Impacts and Dark Skies: Suggested wording to reference Park's designation as Moore's Reserve and guidance.

Wealden District Council

- Could include reference to cross boundary opportunities to connect habitats and create wider ecological networks.

Other consultee bodies:

CPRE Sussex

- New policy: Development should only be permitted when demonstrated that water and sewerage infrastructure is sufficient to avoid exacerbating unauthorised releases into water courses.
- If water pollution is continued to be dealt with in DPS5: Water Infrastructure and Water Environment, then cross reference to DPN6: Pollution is needed.
- DPN1 Biodiversity, Geodiversity and Nature Recovery: amend wording to include Council's Ecological Network and Green Infrastructure mapping work
- Plan should set out express target for new woodland and hedgerows
- DPN6 Pollution: should be a strategic policy
- DPN7 Noise Impacts: amend wording to provide clarification
- DPN8 Light Impacts and Dark Skies: - The light pollution map could valuably be used at the site allocation stage.
- DPN9 Air Quality: amend wording to reference the hierarchy principle of avoidance *then* mitigation

Gatwick Airport

- DPN3 Green Infrastructure: Suggested to wording to reference design of infrastructure and risk of bird strike

Sussex Ornithological Society

- Would like to see a map of the ecological networks; proposed development sites should not impinge on these networks.
- Bird nest boxes should be provided on all development sites, and for Wakehams Green to require the provision of Swift bricks on a proportion of the new dwellings.
- Pet and human free areas which are set aside for nature should be included in Significant Sites (DPSC1-3).

Sussex Wildlife Trust

- DPC1: Protection and Enhancement of the Countryside, needs to be consistent with DPN1: Biodiversity, Geodiversity and Nature Recovery, DPN2: Biodiversity Net Gain, DPN3: Green Infrastructure, and DPN4: Trees, Woodland and Hedgerows.
- DPN2 Biodiversity Net Gain: Amend policy to reference that BNG is in addition to requirements of Mitigation Hierarchy
- DPN4 Trees, Woodland and Hedgerows: amend policy to include reference to "soils"

The Woodland Trust

- Supports UK's Committee in Climate Change (CCC) proposed rapid increase rate of woodland creation in tackling biodiversity and climate crisis.

- Strengthen wording with explicit reference to ancient woodland pasture and historic parkland as habitats that should be given same consideration as ancient woodland.
- Support setting greater than 10% target for BNG
- Encourage the consideration of developing a local metric for urban/ brownfield sites
- Offsite BNG should be part of a comprehensive Nature Recovery network approach.
- DPN3 Green Infrastructure: Amend wording to include reference to Local Nature Recovery Network
- DPN4 Trees, Woodland and Hedgerows: Amend wording to strengthen reference to: the protection of Ancient Woodland; integration of trees into development (including minimum canopy); source of new trees; replacement trees and buffer zones.

Others:

- Many of the policies are supported, but text is suggested to strength the policy.
- DPN4 Trees, Woodland and Hedgerows: lack of recognition of Worth Forest. Mainly mentions the Ashdown Forest in the policies.
- Worth Forest should be designated as a Special Area of Conservation and Special Protection Zone.
- Worth Forest will be destroyed by Center Parcs.
- Insufficient recognition of Oldhouse Warren and Tilgate, High Beeches, Brantridge, Balcombe and Monks Forests as well. St.Leonard's (Plummers Plain, Newells, Leonards Lee, & Free Chase are under designated for wildlife interest at both national & local levels.
- Wider geographical recognition of important green infrastructure sites needed, particularly those in the Hassocks Neighbourhood Plan.
- Protected species (identified by Woodland Flora and Fauna Group) are at risk from housing developments.
- Long time periods (10-20 years) are required for nature recovery on new sites
- increased pollution will be concentrated in narrow village centre streets such as Hurstpierpoint High Street
- For BNG, a management plan must be made together with enough money for long term funding before development proceeds.
- The policy should include provision for the replacement on a 1:1 basis of ash trees or other trees that are felled due to ash die-back or other disease with alternative natural species.
- The plan should set out quantitative values for “unacceptable levels of noise”
- The policy should specify warm yellow (i.e. temperature of 3000K or less) for outdoor lighting adjacent to sensitive habitats such as ancient woodland.
- DPN10 Land Stability and Contaminated Land: should prevent developments from raising the ground level if could result in reduced or blocked water flow from or into adjacent properties.
- Nature recovery and enhancement should be given further priority within DPN1: Biodiversity, Geodiversity and Nature Recovery.
- Electric vehicles won't solve everything.
- 'off-site net gain' needs defining
- Reduce bird strike risk near Gatwick by a policy covering green and blue infrastructure.
- Add wording to DPN3: Green Infrastructure, to cover aerodrome safeguarding.
- DPN9 Air Quality: Pollution - should create emission-free zones for streets around schools.
- Protecting the Green spaces Is welcomed but it is felt this could have gone further.
- Strongly urge the Council to identify additional areas of existing green infrastructure and opportunities for enhancing and creating new green infrastructure within the plan.
- Interactive map/ DPN3 Green Infrastructure: boundary of DPSC1: Land to the West of Burgess Hill should be amended to remove the “Green Circle”.
- To achieve the objective of policy DPN1: Biodiversity, Geodiversity and Nature Recovery, Land at Ansty Farm should be reinstated

Chapter 10. Countryside

Number of Comments Received

Total: 82

Support: 14

Object: 52

Neutral: 16

Comments Received

Statutory Consultees:

Environment Agency:

- DPC3 New Homes in the Countryside: Needs to clarify that this will not be permitted if it conflicts with other policies or planning guidance

Historic England

- Supports, DPC2: Preventing Coalescence, DPC3: New Homes in the Countryside, DPC4: High Weald Area of Outstanding Natural Beauty and DPC5: Setting of the South Downs National Park

Southern Water

- DPC1 Protection and Enhancement of the Countryside: barrier to statutory utility providers - amend wording to permit development for essential utilities infrastructure

Natural England

- DPC4 High Weald Area of Outstanding Natural Beauty: Wording should be strengthened in line with paragraph 176 NPPF.
- DPC6 Ashdown Forest SPA and SAC: suggested wording for clarification purposes

MPs/ Local Authorities:

South Downs National Park Authority

- DPC5 Setting of the South Downs National Park: Support but amend for clarity and to reflect NPPF and include responsibilities MSDC have as per the section 62 duty of regard.

Other consultee bodies:

The Woodland Trust

- DPC6 Ashdown Forest SPA and SAC: Supports protection of Ashdown Forest buffer zone and SANG requirements
- DPC4 High Weald Area of Outstanding Natural Beauty: Support but add wording explicitly referring to ancient woodlands

Sussex Wildlife Trust

- DPC1 Protection and Enhancement of the Countryside: scope of this policy should go beyond intrinsic character and beauty. Ensure it doesn't conflict with DPN1: Biodiversity, Geodiversity and Nature Recovery, DPN2: Biodiversity Net Gain, DPN3: Green Infrastructure, and DPN4: Trees, Woodland and Hedgerows
- DPC4 High Weald Area of Outstanding Natural Beauty: large scale housing, industrial and leisure within AONB shouldn't be supported
- DPC6 Ashdown Forest SPA and SAC: explain process being undertaken to determine whether MSDC will be providing SANGs

Sussex Ornithological Society

- DPC4 High Weald Area of Outstanding Natural Beauty: Add that large-scale housing, industrial and leisure developments within the AONB will not be supported.
- DPC6 Ashdown Forest SPA and SAC: Further explanation of the process undertaken to determine provision of SANGS is required.

Others:

DPC1 Protection and Enhancement of the Countryside:

- Needs and sustainability of farming and forestry must be given strong weight
- More incentives for footpaths and right of way
- A map is needed to show areas being covered
- Needs strengthening
- Reference the need to use *The Cuckfield Landscape Character Assessment 2012*
- Should go further and include stronger preservation of ancient hedgerows
- Support, but agricultural development should be allowed

DPC2 Preventing Coalescence:

- Restrict development in local gaps

- More evidence required at planning stage
- Include a list of areas where coalescence is to be resisted
- Identification of local gaps should include land between Hurstpierpoint and settlements of Hassocks, BH and Albourne and Sayers Common
- Supports Policy DPC2: Preventing Coalescence. Should include a Local Gap between Cuckfield and Haywards Heath.
- Supports DPC2: Preventing Coalescence, but the wording of the policy impacts more on large scale developments, small scale should be included

DPC3 New Homes in the Countryside:

- Less restrictions on replacement dwellings
- Restrict replacement agricultural buildings
- Rural buildings should not be converted for at least 15 years from construction

DPC4 High Weald Area of Outstanding Natural Beauty:

- Restrict major developments
- Specific local housing needs and infrastructure
- More clarity is needed to demonstrate the interaction of this policy with others through the plan

DPC5 Setting of the South Downs National Park:

- NPPF coherence – amend wording

Chapter 11. Built Environment

Number of Comments Received

Total: 22	Support: 4	Object: 17	Neutral: 1
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Comments Received

Statutory Consultees:

Historic England

- Chapter omits reference to archaeology
- DPB3 Conservation Areas: Support but would like further clarity on: How the plan will address heritage at risk, how the archaeology in the plan area will be managed, how environmental records and local list might assist, How Article 4 Directions may be employed to provide an additional conservation mechanism, What opportunities are there for heritage-led regeneration, What potential is there for new heritage-led tourism initiatives.

MPs/ Local Authorities:

Crawley Borough Council

- DPB1 Character and Design: Recommend that quantitative density standards for different types of location are set out as part of this approach in order to ensure that development sites make efficient use of land.

Other consultee bodies:

Gatwick Airport

- DPB1 Character and Design: Ensure appropriate wording is used to support Aerodrome Safeguarding requirements.

The Woodland Trust

- DPB3 Conservation Areas: Suggest adding reference to trees

Others

DPB1 Character and Design

- Include specific reference in the policies for the LCWiP to show how this is integral to allow walking and cycling routes in and around the town.

DPB2 Listed Buildings and Other Heritage Assets

- Enhance wording about trees being incorporated in new development.
- DPSC3: Crabbet Park and DPH11: Land east of Borde Hill Lane, HH fail to meet the requirements on setting of Listed Buildings in this policy.
- set out more clearly how higher densities and compact forms of development may be appropriate.

General

- Stronger requirements for dark sky implementation with recognition and wider public support identified from local groups of historic and notable buildings.
- This proposal contradicts 20-minute policy.
- Policy DPB1: Character and Design needs amending.
- The chapter omits reference to archaeology.
- Will developments of 500+ expect to have a 'mixed use element'.

Chapter 12. Transport

Number of Comments Received

Total: 74	Support: 15	Object: 42	Neutral: 17
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Comments Received

Statutory Consultees:

East Sussex County Council

- DPT1 Placemaking and Connectivity: pg 88. Update to reflect TfSE and mention WSCC Local Cycling and Walking Infrastructure Plan (LCWIP)

DPT3 Active Travel:

- Explanation on what the LCWIP is is needed.
- Reference should be made to West Sussex's Bus Service Improvement Plan (BSIP)

National Highways

- Measures to reduce trips and reliance on private vehicles are welcomed

South East Water

- Support

West Sussex County Council

DPT1 Placemaking and Connectivity:

- Reference to the WSTP text (paragraph 1.10)
- p88 fourth paragraph refers to "county boundaries". This should refer to "local authority boundaries" or more generally to "administrative boundaries"
- revision of text on page 88 third paragraph to "The WSTP seeks to move away from traditional 'predict and provide' approach which historically has focused on large capital investment for building capacity in the transport network to cater for forecast unconstrained traffic growth which has often led to exacerbate other impacts, such as increased car ownership, reduced public transport use and service viability, high investment in infrastructure assets which could be utilised for other services, health and well-being and achieving climate change mitigation."
- Add requirement to undertake and report regular monitoring of travel movements in and out of sites.
- Add objective to demonstrate how needs for external travel will be minimised. i.e provision of facilities and services.

DPT3 Active Travel:

- Not described strongly enough. Statement should acknowledge that users have different abilities. Cycling 5 miles and walking 10 minutes to better sell the concept

DPT4 Parking and Electric Vehicle Charging Infrastructure:

- Typo Ref third paragraph on p92 suggested amendment: "*Where feasible, higher standards for non-residential development will apply in line with Policy DPT4 below, unless or until higher standards are required nationally.*"
- Section c) non-residential requirements for EV charging differs to the standards in WSCC Guidance on Parking which do not specify a minimum charging speed, nor do they include a minimum threshold for parking where the policy applies.
- Suggest policy amended to ensure DPT4: Parking and Electric Vehicle Charging Infrastructure captures schemes with less than 10 parking spaces and/or footnote 10 is amended to clarify where the policy differs to the guidance.

MPs/ Local Authorities:

Crawley Borough Council

- Support, but should refer to link to and support to Crawley's LCWIP in relation to Crabbet Park development.

South Downs National Park Authority

- Additional criteria to address impacts on roads in the setting or within the National Park.

Other consultee bodies:

CPRE Sussex

- DPT2 Rights of Way and Other Recreational Routes: Suggested wording to ensure accessibility
- DPT3 Active Travel: Policy should reference provision of facilities and infrastructure that facilitate accessibility to open spaces and countryside for the disabled.

Gatwick Airport

- DPT1 Placemaking and Connectivity: a proportionate approach that is locationally specific is required.

DPT5 Off-Airport Car Parking:

- Policy should reference Airports existing Surface Access Strategy (ASAS)
- Amend as follows: *“Controlling the extent of **off** airport parking, on and off airport helps encourage the use of alternatives **sustainable transport modes** whilst ensuring sufficient parking is available to passengers and staff who have no other option.”*

The Woodland Trust

DPT1 Placemaking and Connectivity:

- Encourage policies for wildlife bridges, green corridors restoration of damaged ancient woodlands
- Strengthen to say highway improvements will be delivered before housing occupation
- Acknowledge need of improvements to A22/A264
- Add wording to encourage green infrastructure networks

Others:

DPT1 Placemaking and Connectivity:

- Lack of power supply for vehicle charging
- Highway improvements are needed
- Prioritise developments in areas with rail access
- Incentives for developers to provide walkability and cycling routes

DPT2 Rights of Way and Other Recreational Routes:

- Replace “encourage” with “required”
- New point to be inclusive of people with disabilities

DPT3 Active Travel:

- Cycle-hire schemes
- Include the words “safe”, “convenient” and “direct”
- Provide wheelchair accessible footpaths
- Not enough incentives for developers to comply
- BH to HH cycle path must be built prior to completion of Brookleigh secondary school
- Anticipate new forms of micro-mobility
- Financial incentive funds should contribute to bus services and cycling infrastructure.
- Upgrade rural footpaths
- “Where appropriate” open to interpretation, needs strengthening

DPT4 Parking and Electric Vehicle Charging Infrastructure:

- Ducting for future use could be extended to cover developments where parking of less than 10 spaces is required to 100% of spaces or require in all developments regardless of size
- Doesn't comply with West Sussex Guidance on Parking in New Developments

DPT5 Off-Airport Car Parking:

- Encourage non-road travel, improving rail and bus links to airport.
- Support but should go hand in hand with improvements to train, bus and tram links to airport

General

- Supports actions that lead to additional cycle and footpaths
- Support, but concerns over the capacity of A264

Chapter 13. Economy			
Number of Comments Received			
Total: 45	Support: 5	Object: 34	Neutral: 6
Comments Received			
Statutory Consultees:			
West Sussex County Council			
<ul style="list-style-type: none"> No reference to quantum of development is made. 			
MPs/ Local Authorities:			
Wealden District Council			
<ul style="list-style-type: none"> Policy should reference that a small stretch of the Bluebell Railway is within Wealden district. 			
Other consultee bodies:			
Gatwick Airport			
<ul style="list-style-type: none"> Support that Gatwick is recognised as a major employment location and its role in economy 			
Sussex Wildlife Trust			
<ul style="list-style-type: none"> Suggested wording change to DPE9: Sustainable Tourism and Visitor Economy. 			
The Woodland Trust			
<ul style="list-style-type: none"> <u>DPE9 Sustainable Tourism and Visitor Economy</u>: Suggested inclusion of wording to include reference biodiversity 			
Other comments:			
<ul style="list-style-type: none"> Don't build on land prone to flooding What's happened with the NRR proposal for developing Burgess Hill town centre? Concern about lack of local employment opportunities. A car required to reach most employment options. Concern about traffic through Hurstpierpoint. Little employment opportunities planned for areas gaining most housing, particularly Sayers Common. Concern East Grinstead is not connected to Haywards Heath or Burgess Hill by rail. More detail needed on employment opportunities created by the Science & Technology Park. What sort of skills are needed for the area? Need to ensure the rural landscape and natural environment are not adversely affected. Actively support and assist start up companies by allowing them to have access to unused shops for a nominal rent. Balcombe has a defined village centre. This should be shown. Development proposals for new tourism accommodation and attractions should be supported if not in conflict of DPC4: High Weald Area of Outstanding Natural Beauty. New neighbourhood centres should be created where lots of new housing is proposed. Support for the extension of the Bluebell Railway. A site specific policy requested for Wakehurst Place. Large industrial warehouse units at Brighton Road, Pease Pottage (in AONB) and Bolney junction on M23 (setting of AONB) were not in accordance with this policy. Suggested changes to Land West of Burgess Hill to improve it. West Hoathly Brickworks, Sharpthorne should be looked at for employment site. 			

Chapter 14. Sustainable Communities (General)			
Number of Comments Received (numbers do not include comments made against individual DPSC allocations)			
Total: 12	Support: 1	Object: 10	Neutral: 1
Comments Received			
Statutory consultees:			
National Highways			

- Where developments have long timescales, the Plan needs to be clear on what mitigation is needed and how it will be delivered
- 2039 future modelling assessments will be needed ahead of Regulation 19 consultation.
- Any strategic road network schemes need to be deliverable within highway land or land controlled by the promoter, ensure that the traffic generated by the development is accommodated, meets standards within DMRB and fully funded by confirmed sources.

West Sussex County Council

- Need for a special school site on one of the significant sites, or elsewhere in the district for circa 120 places.
- Holding objection until next stages of transport work are completed (acknowledge these are in progress)

MPs/ Local Authorities:

None

Other consultation bodies:

CPRE

- Sites are incompatible with Plan's Vision

Sussex Wildlife Trust

- Has the delivery of a cohesive ecological framework been considered?
- No mention of BNG within the policy requirements

Others:

- Two of the proposed allocations would help fulfil the housing need from the Coastal Sussex HMA
- Lack of ecological evidence
- Overreliance of the plan on the delivery of significant sites and lack of information with regard to delivery programme/trajectory

DPSC1: Land to the west of Burgess Hill

Number of Comments Received

Total: 145	Support: 2	Object: 136	Neutral: 7
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Comments Received

Statutory Consultees:

Environment Agency

- Areas of Flood Zones 2 and 3 within the site – Strategic Flood Risk Assessment needs consulting to understand future flood risk and the extent in these areas.
- Opportunities for river restoration which could contribute to Biodiversity Net Gain.

Historic England

- Potential to impact the setting of Grade II listed Sportman's Inn and North End Farm.
- Suggest policy amended to include retention and enhancement of historic landscape character

Homes England

- Proposals should be coordinated with consented Brookleigh scheme

Southern Water

- Wastewater network has limited capacity and needs reinforcement. Amend wording to ensure occupation is phased with delivery of wastewater infrastructure
- Reinforcement of network to be funded through New Infrastructure charge; site promoters and SW will need to work together to understand development program.
- Easement required; must be factored into layout and landscaping

West Sussex County Council

- Reference needed to Brick Clay (Weald) safeguarding area
- Metal recycling consultation area
- Suggested amendment to policy to include reference to Early Years and SEND at the primary school

- Location of primary school needs further consideration to avoid area of flood risk

MPs/ Local Authorities:

None

Other consultee bodies:

Gatwick Airport

- Suggested wording added to reference the need for early engagement with Gatwick Airport

Sussex Wildlife Trust

- Important biodiversity elements on the site should be referenced in the policy
- Policy (or DPH4: General Development Principles for Housing Allocation) should reflect the need to contribute towards Local Nature Recovery.

Woodland Trust

- Object to the inclusion of areas of ancient woodland in the development sites.
- Insufficient buffer to ancient woodland, recommend 50m- Ancient Tree Inventory (ATI) should be completed
- Suggested amendment to refer to protection of ancient woodland
- Northend Copse should be excluded from development

Other comments:

Character/landscape:

- Out of scale - harmful landscape impacts, Coalescence with Hurstpierpoint
- Loss of green field development/ agricultural land - should prioritise brownfield
- Harmful impact on historic and rural character
- Site needs to be fully masterplanned - vision document is inadequate
- Development land parcels are isolated from the main settlement of Burgess Hill
- Site area is insufficient to accommodate 1400 and associated mitigation and infrastructure

Infrastructure:

- Traffic impacts and highway safety concerns - Lack of alternative transport - occupants will be reliant on car
- Lack of infrastructure
- Insufficient affordable housing provision
- Flood risk

Biodiversity/Sustainability:

- Harmful impact on biodiversity, ancient woodland, natural environment, loss of green infrastructure and wildlife
- New housing must be built to be climate resilient and low/zero carbon
- Community energy generation and community heat networks should be planned for
- No evidence to support 20% biodiversity net gain achievable
- Ecological reports are required to assess the quality of the habitats, especially the grasslands

General:

- Query need and housing numbers - LURB implications
- Contrary to Neighbourhood Plan
- Harmful impact on air quality
- Lack of community engagement - consultation period too short and close to Christmas
- Query the development will be viable
- No information on trajectory. Question speed of housing delivery - oversaturation of Burgess Hill

DPSC2: Land to the south of Reeds Lane

Number of Comments Received

Total: 417	Support: 7	Object: 402	Neutral: 8
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Comments Received

Statutory Consultees:

Historic England

- Policy should note potential impact on nearby protected listed buildings and setting.

West Sussex County Council

- Add reference to Brick clay (Weald) safeguarding area within policy.
- Policy wording amendment; 'retain and enhance the existing PRow'
- Policy wording amendment; inclusion of secondary school provision (consistency with infrastructure requirement). Also, may need expansion land.

MPs/ Local Authorities:

Andrew Griffith MP

- Overdevelopment
- Long history of flooding due to inadequate sewage and waste systems.
- Reliant on cars for retail.
- Inadequate provision and access to public transport
- Local schools at capacity
- Rural lanes cannot support increased traffic
- Already pressure on GPs. Policy requirement of 'health provision' unclear.

Mims Davies MP

- Overdevelopment and would exceed needed housing numbers for area.
- Out of character and outweighs size of local communities. Potential to become a dormitory town.
- Lack of and/or poor-quality infrastructure to support scale of development.
- Flood risk
- High water stress area.

Other consultee bodies:

Gatwick Airport

- Suggested wording added to reference the need for early engagement with Gatwick Airport

Sussex Ornithological Society

- DPSC2: Land to the South of Reeds Lane, should include a strong statement emphasising importance of land west of site for birds

Sussex Wildlife Trust

- Cannot support allocation without ecological surveys.
- Drains and hedgerows provide corridors and connectivity, particularly to Ancient Woodland.
- Not immediately obvious proximity of other sites to establish cumulative impacts.

Woodland Trust

- Completion of an Ancient Tree Inventory (ATI) is recommended.

Other comments:

Character/ Landscape

- Overdevelopment.
- Coalescence with Albourne and Henfield
- Impact on the South Downs National Park
- If DPSC2: Land to the South of Reeds Lane goes ahead it should include a Green Circle like Burgess Hill (amend DPN3: Green Infrastructure)
- Loss of rural living
- This is not an urban extension.
- SW part of site ('hamlet') disconnected, isolated from rest of site; should be considered and assessed separately. Should be removed. Land has had multiple 'refusals' for development.
- Development will lead to loss enjoyment of countryside by walkers, cyclists and horse riders.

Biodiversity

- Loss of wildlife; including protected species and red-listed species.
- Loss of habitats and ecological networks. No indication of consultation with Woodland Flora and Fauna Group, SWT, British Trust for Ornithology, or Ecology faculty of University of Sussex.
- Fields currently provide irreplaceable hunting areas for owls

Sustainability/ Infrastructure

- Development should include artificial grass for an all-year round sports facility and a gym.
- Sewage systems already cannot cope
- Lack of bus services and poor connectivity to train stations (Hassocks and Burgess Hill).

- B2118 is a rat run for lorries and speeding traffic
- Increased flood risk and drainage; impermeable clay. B2118 in Albourne floods causing hazardous driving conditions.
- Proposed access onto B2118 is high surface flood risk area
- Rural roads cannot cope with additional traffic (B2116); multiple sharp, blind corners.
- No local employment for new residents
- Lack of public transport
- GP surgeries already overstretched. Is provision realistic; can they be staffed, is a convalescent home more useful?
- Insufficient digital infrastructure
- No local school; children bussed into schools. What will happen to existing primary schools? When will the school be delivered?
- New primary school not needed; already undersubscribed.
- Nearest primary and secondary schools full
- New secondary school will bring additional congestion
- Infrastructure needs to include childcare (included in Levelling Up and Regeneration Bill)
- Size of site unlikely to support a sixth form; students will have to travel out of village
- Lack of capacity on railway network and lack of parking at stations.
- Already a water stressed area. Insufficient water supply. No reference to water neutrality.

General

- Access point: potential for comprehensive access scheme with DPH20: Land at Coombe Farm, London Road
- No assessment of traffic impacts locally. No proper assessment of additional traffic onto A23 (north and south bound slip roads (A2300 and Muddleswood).
- Worsening of air pollution
- Site name should be changed to 'Land to the north and south of the B2116 Henfield Road Albourne'
- Council's transport studies and models don't consider smaller surrounding roads
- Area should be made safer for horse riders with routes across site and parallel with London Road
- Increased congestion through Hurstpierpoint and at Stonepound Crossroads (an AQMA), as well as Cowfold to the west
- Proposed development is contrary to the Visions and other policies within draft District Plan (i.e. 20 minute neighbourhood)
- Will contribute to climate change
- Ignores the neighbourhood plans (strategic gaps)
- Government has changed position on housing need; site not needed. Shouldn't be building beyond the local need; should be planning for 7/800 not 1,100dpa. Mid Sussex is accommodating a wholly disproportionate number of new builds.
- Site should be removed and the need spread more evenly across the District. Development should be concentrated in Burgess Hill and Haywards Heath, and other urban areas.
- Why is a spine road running parallel with Reeds Lane and a new junction proposed?
- Housing must reflect local needs; smaller properties.
- Why not incorporate employment element between established Avtrade and Kings business centre and increase housing on site
- Policy requirements and promoter's Vision Document not aligned. Masterplan provided is insufficient.
- Loss of dark skies
- Gypsy and Traveller accommodation provision should be removed; not needed

DPSC3: Land at Crabbet Park

Number of Comments Received

Total: 53	Support: 4	Object: 43	Neutral: 6
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Comments Received

Statutory Consultees:**Historic England**

- Policy should note potential to impact on nearby listed buildings and their setting.

Natural England

- Clarity sought on what work has been done regarding potential impacts on AONB.

Surrey County Council

- Series of Ordinary Watercourses on site. Development should seek opportunities to reduce causes and impacts of flooding.

West Sussex County Council

- Policy wording amendment; inclusion of secondary school provision (consistency with infrastructure requirement). May also need expansion land.

MPs/ Local Authorities:**Crawley Borough Council**

- Would welcome discussions on self-build; opportunities to help meet Crawley's demand
- Suggested inclusion of wording to reflect that the site is an urban extension to Crawley
- Clarity sought on infrastructure provision and proposals; consistency with other significant sites and cross boundary

Other consultee bodies:**Sussex Wildlife Trust**

- Cannot support allocation without ecological surveys.
- Watercourses, hedgerows and linear woodlands provide corridors and connectivity.
- Policy requirements fail to reflect aforementioned biodiversity elements

Sussex Ornithological Society

- Importance of area east of M23 for Red Listed, Schedule 1 and Section 41 species. Database of bird records provided.

Woodland Trust

- Completion of an Ancient Tree Inventory (ATI) is recommended. A minimum 50m buffer to Ancient Woodland should be incorporated.
- Suggested wording to include protection of ancient woodland

Other comments:**Landscape**

- Increase in density of the area, no longer countryside
- Lower housing numbers
- Conflicts with Natural Environment and green infrastructure policies

Flood Risk

- Flood risk around Burstow stream – drainage issues

Biodiversity

- Within AONB – to be saved and improved, not developed.

Heritage

- Potential impact on listed adjacent listed buildings

Developability

- Affordable housing should be 40%
- Unsuitable location

Accessibility

- Connectivity with Copthorne
- One road in private property
- Policy requirement to retain and enhance the existing PRow that cross this site

Infrastructure

- Provision of secondary school needed
- Transport infrastructure required to reduce car dependency
- Provision of retail and leisure space
- Onsite provision of sports facilities

General

- Include description of “urban extension” as done on DPSC1: Land to the West of Burgess Hill and DPSC2: Land to the South of Reeds Lane
- Need for allotments on site
- On site gypsy and traveller provision
- Increased noise and air pollution

Chapter 15. Housing

Policy DPH1: Housing			
Number of Comments Received			
Total: 395	Support: 180	Object: 209	Neutral: 6
Comments Received			
<p>Statutory consultees: None</p> <p>MPs/Local Authorities: Mims Davies MP:</p> <ul style="list-style-type: none"> • Overall housing numbers need to be robustly looked at with the forthcoming new NPPF • Housing should avoid creating dormitory towns • Need to balance housing growth and employment opportunities with delicate environment and keeping Mid Sussex special • Ensure brownfield sites are utilised first to protect ecosystems, biodiversity, landscapes and farming land in rural communities. • Mid Sussex is Serious Stress Water Area; need to joint working with water companies in relation to water supply and flooding. <p>Brighton and Hove City Council</p> <ul style="list-style-type: none"> • Current provision should not be a ceiling; should plan positively for further opportunities to help meet unmet needs of neighbours. <p>Crawley Borough Council</p> <ul style="list-style-type: none"> • Wider context of the Northern West Sussex HMA and unmet needs should be acknowledged in this section. <p>Other consultee bodies: CPRE Sussex</p> <ul style="list-style-type: none"> • Plan sets excessive housing target with unnecessary and inappropriate significant rural allocations. <p>Sussex Wildlife Trust</p> <ul style="list-style-type: none"> • Is the proposed housing need supported by necessary environmental evidence; question ability of MSDC’s natural capital to absorb level of development. <p>Other comments: General</p> <ul style="list-style-type: none"> • Harmful landscape and heritage impact • Traffic and highway safety issues • Insufficient infrastructure/ local services • Not enough affordable housing • Loss of biodiversity/ habitat • Contrary to Neighbourhood Plan • Overall number is excessive and should be challenged in line with Levelling Up and Regeneration Bill • Spatial strategy results in disproportionate growth • Brownfield first • Insufficient buffer • No detailed trajectory • SHMA needs to be reviewed to explicitly address social housing deficit in Mid Sussex • Standard method is flawed - based on outdated targets and inappropriate assumptions • Windfall allowance is underestimated 			

- Where relevant allocations should include reference to retaining and enhancing PRow (see individual allocations)
- Plan period should be extended to 2041

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

Number of Comments Received

Total: 25	Support: 4	Object: 20	Neutral: 1
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Comments Received

Statutory Consultees:

National Trust

- Conflicts with DPC3: Land at Crabbet Park

Others:

- Prevent Coalescence
- Policy is unclear
- Omit developments of “fewer than 10 dwellings”
- Too restrictive – Increase “fewer than 10 dwellings” to 30
- Conflicts with DPC3: Land at Crabbet Park, DPC1: Protection and Enhancement of the Countryside and DPH34: Rural Exception Sites
- Add point: And/or where the council can’t prove a 5-year housing supply
- Amend to restrict development within High Weald and AONB. i.e., not conflict with DPC4: High Weald Area of Outstanding Natural Beauty.
- Amend to only allow development proportionate in site with the existing settlement
- Remove “local need” to allow developments that meet district wide needs
- Include “or where the side is previously developed land”

Policy DPH3: Sustainable Development – Inside the Built-up Area

Number of Comments Received

Total: 12	Support: 4	Object: 8	Neutral: 0
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Comments Received

Statutory Consultees:

CPRE Sussex

- Prioritise redevelopment of the Martlets centre in BH
- Development of brownfield sites should be a priority

Others:

- Amend wording to prevent loss of existing community facilities and services.
- Plan focuses on development outside the built-up area – contrary to NPPF

Policy DPH4: General Development Principles for Housing Allocations

Number of Comments Received

Total: 29	Support: 5	Object: 23	Neutral: 1
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Comments Received

Statutory Consultees:

Environment Agency

- Include additional bullet points referring the sequential and exception tests of paragraphs 023 and 037 of the NPPF
- Amend to read: “Provide a site-specific Flood Risk Assessment (FRA) / surface water drainage strategy in areas at risk from (delete - fluvial or surface water flooding from) any source (such as fluvial or surface water flooding) to inform the site layout and any appropriate mitigation, resilience and resistance measures that may be necessary. (Delete - Areas at risk of flooding should be

avoided in the first instance.) Any proposal must demonstrate that it does not increase flood risk elsewhere, and provides a betterment wherever possible (i.e. a net flood risk benefit)."

- Consider greywater recycling
- Refer to the Catchment Abstraction Management Strategies (CAMS).
- Developments should connect to public foul sewer as a priority

Historic England

- Rewrite: "Undertake pre-determination evaluation of potential archaeological features on the site prior to any planning application being submitted, unless it can be demonstrated that such an evaluation is not appropriate for this site"
- Add: "Respect Listed buildings, conservations areas..." including those that are undesignated
- Settings or LB and CA need to and should be conserved and enhanced

Natural England

- Consider applying same standards to other housing allocation sites, not just significant sites

West Sussex County Council

- Reference to Joint Minerals Local Plan should read: West Sussex Joint Minerals Local Plan (July 2018, Partial Review March 2021) (JMLP).
- Make reference to Waste Local Plan
- New homes should provide suitable space for home working to reduce external travel
- Requirement to undertake and report travel plan monitoring of movements in and out of sites.

MPs/ Local Authorities:

None

Other consultee bodies:

Gatwick Airport

- Requirement to engage with Gatwick Airport at an early stage on housing proposals
- Add Aerodrome Safeguarding Policy as per policy DD5 in Crawley's Local Plan
- Under Aerodrome Safeguarding Requirements add the following:
 - Impact of buildings, structures and construction equipment on Communication, Navigation & Surveillance (CNS) equipment & Instrument Flight Procedures (IFPs).
 - Impacts of buildings, structures and construction equipment on Obstacle Limitation Surfaces (OLS)
 - Lighting schemes that could dazzle pilots or ATC or could be confused with aeronautical ground lighting
 - Buildings/structures in proximity to the airport that could create induced turbulence or thermal uplift from vapour plumes from flues/cooling towers.

Sussex Wildlife Trust

- Clearer inclusion of BNG - minimum 10-20%

Other comments:

- Bullet point 3, delete "identify how the development will..."
- Include requirement of Passivhaus principles
- Repetition with other policies, needs to be simplified
- No justification for the 4* BRE HQM
- Water consumption of 85 litres p/p against NPPG – evidence needed.
- Council should adopted requirements 85 litres per person (l/p/p) to 80 l/p/p for strategic developments, inline with Gatwick's Sub Regional Water Cycle Study.
- All new developments should achieve 100 l/p/p
- Require 11 HQM credits as a minimum for water efficiency.
- Delete policy and incorporate in specific allocation site policies instead.
- Include reference to DPH5: Batchelors Farm, Keymer Road, DPH6: Land at Brow Hill, Janes Lane, DPH7: Burgess Hill Station and DPH8: Land off West Hoathly Road, East Grinstead and delete reference to DPH29: Gypsies, Travellers and Travelling Showpeople
- Biodiversity and Green Infrastructure: make clear the need to delivery BNG on each allocation
- 20% biodiversity net gain is excessive

- Make reference to DPH30: Self and Custom Build Housing, DPH31: Housing Mix and DPH32: Affordable Housing under "Significant Sites"

Site DPH5: Batchelors Farm, Keymer Road, Burgess Hill

Number of Comments Received

Total: 10	Support: 1	Object: 8	Neutral: 1
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Comments Received

Statutory Consultees:

Environment Agency

- Suggested policy wording to refine policy requirement in relation to flood risk.

Historic England

- Suggested amended wording to strengthen and provide clarification

Natural England

- Ask that the water standards set for significant sites are set for all housing allocations.

West Sussex County Council

- Include reference to Keymer Road Brick Clay safeguarding area
- Suggest policy requirement added here, or to DPT1: Placemaking and Connectivity, for monitoring travel movements to enforce travel plan targets.
- Reference should be made to the Waste Local Plan

MPs/ Local Authority:

South Downs National Park Authority

- Additional criteria to ensure harm is avoided to the transitional landscape character of this area as part of the setting of the SDNP
- Adjacent to SA13 (site allocation DPD) – concerns over erosion of the transitional landscape character

Other consultee bodies:

Gatwick Airport

- Suggested policy wording regarding need for early engagement with Gatwick Airport.
- Amended wording suggested for bullet points under Aerodrome Safeguarding Requirements section.

Sussex Wildlife Trust

- No ecological surveys have been submitted
- Consider how nature reserve will be managed

Other comments:

Landscape

- Landscape implications - close proximity to South Downs National Park
- Coalescence

General

- Unsuitable number of dwellings

Site DPH6: Land at Hillbrow, Janes Lane, Burgess Hill

Number of Comments Received

Total: 10	Support: 0	Object: 9	Neutral: 1
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Comments Received

Statutory Consultees:

West Sussex County Council

- Amend wording to include reference to Janes Lane Brick Clay safeguarding area

MPs/ Local Authorities:

None

Other consultee bodies:**Sussex Wildlife Trust**

- No ecological surveys have been submitted
- Number of established trees and hedgerows

Others:**Landscape**

- Density of development not suitable for the area

Biodiversity

- Against the removal of established trees
- Detrimental to the Biodiversity of the site

Flood Risk

- Flood Risk area

Developability

- Unsuitable number of dwellings

Accessibility

- Dangerous access- unsuitable

Infrastructure

- No infrastructure in place

General

- Name of allocation to be revised as to not be associated with Hillbrow House
- Amend boundary to incorporate of land to the east

Site DPH7: Burgess Hill Station, Burgess Hill**Number of Comments Received****Total:** 94**Support:** 0**Object:** 94**Neutral:** 0**Comments Received****Statutory Consultees:****Southern Water**

- Suggested amendment to ensure development is phased to align with delivery of sewerage infrastructure and to ensure access to the infrastructure is maintained

MPs/ Local Authorities:**Mims Davies MP**

- Loss of vital and scarce allotment space.
- Loss of green spaces in town centre.
- There is insufficient infrastructure, including public transport links, medical services, civic amenities and schools.
- Impact on the wide biodiversity and animal habitats.
- Area prone to flooding.
- Water constraints in area.

Other consultee bodies:**CPRE Sussex**

- Allotment requirement should be a precondition to the grant of any future planning application.

Sussex Wildlife Trust:

- No ecological surveys have been submitted
- Accessibility of new allotments should avoid the need to travel by car
- Policy wording needs strengthening to reflect the loss of habitat and address need to retain features of importance such as mature trees

Others:**Biodiversity/green space/allotments:**

- Loss of allotments which are a vital community facility - impact on wellbeing, health, food growing
- Will increase the existing deficit in allotment space in the town

- No opportunities to re-provide allotments within walking distance and plan does not include sufficient provision overall
- Allotments are not brownfield, they do not appear on the council's brownfield register
- The allotment are/ should be designated a Local Green Space
- Loss of open space
- Loss of biodiversity/ wildlife
- Impacts ancient woodland abut southern boundary

Infrastructure:

- Traffic and highway safety concerns
- Loss of parking
- Lack of infrastructure

General:

- Site Selection and Sustainability Appraisal are flawed
- Flood risk issues and subsidence likely
- Contrary to Burgess Hill Neighbourhood Plan policy G5.
- Housing should be allocated on the Martlets site instead
- Housing numbers no longer need to be met at planned levels

Site DPH8: Land off West Hoathly Road, East Grinstead

Number of Comments Received

Total: 6	Support: 1	Object: 4	Neutral: 1
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Comments Received

Statutory Consultees:

West Sussex County Council

- Add reference to Brick clay (Wadhurst) safeguarding area

MPs/ Local Authorities:

None

Other consultee bodies:

Sussex Ornithological Society

- Object to site; creates a significant and isolated peninsula of development

Sussex Wildlife Trust

- No ecological surveys provided. Data shows priority habitats onsite, Ancient Woodland adjacent

The Woodland Trust

- Areas of ancient woodland should be removed from allocation. Cautionary minimum 50m buffer should be included. New habitat should be created around ancient woodland to reverse fragmentation.
- Recommend completion of an Ancient Tree Inventory (ATI)

Other comments:

General

- Should not be allowed until solution to increased congestion in East Grinstead is found

Site DPH9: Land at Hurstwood Lane, Haywards Heath

Number of Comments Received

Total: 4	Support: 1	Object: 3	Neutral: 0
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Comments Received

Statutory Consultees:

None

MPs/ Local Authorities:

None

Other consultee bodies:**Sussex Wildlife Trust**

- No ecological surveys provided.

Other comments:**Landscape**

- May encourage further incursion into the countryside

Infrastructure

- Additional pressure on town's infrastructure; financial contributions will go to Lewes District Council
- Road safety of Fox Hill significant concern

General

- Fails to meet the 20-minute neighbourhood principles
- Site should be removed in favour of alternative site: Land at Colwell Farm

Site DPH10: Land at Junction of Hurstwood Lane and Colwell Lane**Number of Comments Received**

Total: 4	Support: 1	Object: 3	Neutral: 0
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Comments Received**Statutory consultees:**

None

MPs/ Local Authorities:

None

Other consultee bodies:**Sussex Wildlife Trust**

- No ecological surveys provided.

Others comments:**Infrastructure**

- Additional pressure on town's infrastructure; financial contributions will go to Lewes District Council
- Road safety of Fox Hill significant concern

General

- Fails to meet the 20-minute neighbourhood principles
- Site should be removed in favour of alternative site: Land at Colwell Farm

Site DPH11: Land east of Borde Hill Lane Haywards Heath**Number of Comments Received**

Total: 134	Support: 1	Object: 129	Neutral: 4
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Comments Received**Statutory consultees:****Environment Agency**

- Amend wording to avoid developing in flood risk areas; consistent with other allocations.
- May be opportunities for restoration/ enhancement of northern watercourse; could add to BNG

West Sussex County Council

- Amend wording to include reference to mineral safeguarding and consultation areas

MPs/ Local Authorities:**Mims Davies MP**

- Already taken houses at Penlands Farm
- Impact on biodiversity and habitats. Adjacent to ancient woodland and semi-natural woodland.
- Greenfield site, part of the Haywards Heath – Cuckfield strategic gap.
- High water stress area

- Insufficient infrastructure. Access roads are narrow lanes. Area prone to flooding.

Other consultee bodies:

Sussex Ornithological Society

- Concern with northward extension, proximity to AONB

Sussex Wildlife Trust

- No ecological surveys provided. Data shows presence of priority habitat

General

- Erosion of rural setting
- Erosion of green barriers between Haywards Heath, Cuckfield, Lindfield and the High Weald AONB
- Impact on the AONB
- Impact on infrastructure (traffic, health, education, utilities)
- Archaeological value of the site
- Flooding
- Contrary to adopted Neighbourhood Plan
- The proposal does not accord with the 20-minute neighbourhood principles
- Promise that the land would not be developed for a period of 15 years
- Fails to meet the objectives identified in the sustainability appraisal
- SA DPD suggested no further development was required for Haywards Heath; already taken its share of development
- The plan is oversupplying housing and therefore the site is not needed
- Proposed development within Ansty & Staplefield Parish but will impact on Haywards Heath, Cuckfield and Balcombe
- Impact of biodiversity. The proposal is in contradiction with the recent money awarded to Borde Hill Gardens to promote biodiversity
- Impact of construction on neighbouring properties.
- Loss of greenfield whereas development should be directed to brownfield land

Site DPH12: Orchards Shopping Centre, Haywards Heath

Number of Comments Received

Total: 6	Support: 0	Object: 5	Neutral: 1
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Comments Received

Statutory Consultees:

Southern Water

- Amend wording to ensure occupation is phased with delivery of wastewater infrastructure
- Reinforcement of network to be funded through New Infrastructure charge; site promoters and SW will need to work together to understand development program.
- Easement required; must be factored into layout and landscaping

West Sussex County Council

- Greater emphasis should be given to sustainable transport access

MPs/ Local Authorities:

None

Other consultee bodies:

Sussex Wildlife Trust

- Amend policy to include positive delivery of green infrastructure

Other comments:

General

- No need for a multistorey carpark
- Site should be used for affordable housing
- Increased parking density at Orchard Shopping Centre may release other smaller car parks

Site DPH13: Land to west of Turners Hill Road, Crawley Down

Number of Comments Received

Total: 59

Support: 0

Object: 57

Neutral: 2

Comments Received

Statutory Consultees:

Thames Water

- Appropriate sustainable surface water strategy needs to be agreed with Lead Local Flood Authority
- Scale of development doesn't materially affect sewer network. Careful design of new network needed to avoid surcharge.
- Upgrades to wastewater network likely to be needed; joint working with promoter and MSDC needed on an infrastructure phasing plan to ensure timely delivery

West Sussex County Council

- Direct pedestrian and cycle access to Worth Way should be provided
- Improvements to footway on Turner's Hill Road needed, notably to the bus stop
- Severe impact at Wallage Lane and A2028 junction

MPs/ Local Authorities:

None

Other consultee bodies:

Sussex Wildlife Trust

- No ecological survey has been provided. Question whether development is suitable or viable without affecting connectivity of habitat to wider landscape

Sussex Ornithological Society

- Within Ancient Woodlands – Full ecological assessment needed
- Increase density of houses elsewhere instead

The Woodland Trust

- Areas of ancient woodland should be removed from allocation. Cautionary minimum 50m buffer should be included. New habitat should be created around ancient woodland to reverse fragmentation.
- Recommend completion of an Ancient Tree Inventory (ATI)

Other comments:

Infrastructure/ Sustainability

- Lack of infrastructure
- No space in local schools
- Power cuts
- Need for developers to contribute towards The Haven Sportsfield area
- Increased traffic
- Need for walking routes

Flood Risk

- Incorporation of grey infrastructure – flooding risk
- Drainage issues

Landscape

- Loss of landscape
- Dangerous access to site
- Adjacent to ancient woodland
- Not build on local gaps
- Destruction of farmland and woodlands

Accessibility

- Dangerous access to site

General

- Density does not match demand

- Lack of community involvement in the site selection process
- Noise Pollution
- Adverse impact on economy and community
- Too many houses in Crawley Down

Site DPH14: Hurst Farm, Turners Hill Road, Crawley Down

Number of Comments Received

Total: 16	Support: 1	Object: 14	Neutral: 1
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Comments Received

Statutory Consultees:

Thames Water

- Appropriate sustainable surface water strategy needs to be agreed with Lead Local Flood Authority
- Scale of development doesn't materially affect sewer network. Careful design of new network needed to avoid surcharge.
- Need for engagement between developers and Thames Water to understand drainage requirements and anticipated loading/flow
- Upgrade delivery time shouldn't be underestimated, can be 18 months – 3 years
- Include information provided with planning application to provide assurance that water and waste matters are being addressed.

West Sussex County Council

- Bus waiting facilities at stops outside site need improving.

MPs/ Local authorities:

None

Other consultee bodies:

Sussex Wildlife Trust

- No comment – ecological information needed
- Status of the site unclear, aerial photographs show construction underway

The Woodland Trust

- Ancient Woodland – keep as buffer and create new native woodland habitats in its surroundings
- Complete ATI to comply with NPPF

Other comments:

Landscape

- Greater need for agricultural land
- Need for a 50m buffer to be maintained between development and ancient woodlands

Accessibility

- Schools are full
- Traffic pressures

Infrastructure

- Insufficient provision of infrastructure
- Need for a road traffic solution prior to delivery
- Lack of public transport

General

- No demand for more housing

Site DPH15: Land rear of 2 Hurst Road, Hassocks

Number of Comments Received

Total: 6	Support: 2	Object: 3	Neutral: 1
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Comments Received

Statutory Consultees:

West Sussex County Council

- Amend wording to reference Soft sand safeguarding area

MPs/ Local Authorities:

None

Other consultee bodies:**Sussex Wildlife Trust**

- No comment – ecological information needed

Other comments:**Landscape**

- Keep green space buffer – danger of coalescence

Accessibility

- Unsuitable for development – access concerns

Site DPH16: Land west of Kemps, Hurstpierpoint**Number of Comments Received****Total:** 73**Support:** 1**Object:** 70**Neutral:** 2**Comments Received****Statutory Consultees:****Southern Water**

- Amend wording to ensure occupation is phased with delivery of wastewater infrastructure
- Reinforcement of network to be funded through New Infrastructure charge; site promoters and SW will need to work together to understand development program.
- Easement required; must be factored into layout and landscaping
- Remove policy requirement referring to wastewater treatment upgrades; not needed for this site specifically

West Sussex County Council

- Amend wording to include reference to mineral safeguarding area

MPs/ Local Authorities:

None

Other consultee bodies:**Sussex Wildlife Trust**

- No ecological surveys provided. Onsite habitat: trees, hedgerows and waterways; should not be compromised by development.

Other comments:**Landscape/ Character**

- Development of the land will result in coalescence
- Overdevelopment of the site
- Loss of public open land

Infrastructure/ Sustainability

- Lack of appropriate infrastructure
- Site prone to flooding
- Land subject to sewage contamination
- Inadequate proposed access
- Propose access incompatible with current use the road

General

- Loss of biodiversity
- Insufficient affordable housing provision
- Submission from site proponent

Site DPH17: The Paddocks, Lewes Road, Ashurst Wood			
Number of Comments Received			
Total: 5	Support: 0	Object: 3	Neutral: 2
Comments Received			
Statutory Consultees:			
Southern Water			
<ul style="list-style-type: none"> Southern Water infrastructure crosses the site – access to be preserved Add a policy requirement to ensure the layout of the development be planned to ensure future access to underground infrastructure 			
Wealden District Council			
<ul style="list-style-type: none"> Any potential cross boundary impacts should be fully explored with Wealden DC and ESCC. Within 7km Ashdown Forest buffer zone – mitigation measures required 			
West Sussex County Council			
<ul style="list-style-type: none"> Amend wording to include reference to Ashurst Wood Brick Clay consultation area 			
MPs/ Local Authorities:			
Other consultee bodies:			
Sussex Ornithological Society			
<ul style="list-style-type: none"> Site within AONB Consider 100% affordable housing or increase density in developments elsewhere 			
Sussex Wildlife Trust			
<ul style="list-style-type: none"> No comment – ecological information needed – within High Weald AONB 			
Other comments:			
None			

Site DPH18: Land at Foxhole Farm, Bolney			
Number of Comments Received			
Total: 271	Support: 2	Object: 268	Neutral: 1
Comments Received			
Statutory Consultees:			
Southern Water			
<ul style="list-style-type: none"> Amend wording to ensure occupation is phased with delivery of wastewater infrastructure Reinforcement of network to be funded through New Infrastructure charge; site promoters and SW will need to work together to understand development program. 			
West Sussex County Council			
<ul style="list-style-type: none"> Amend wording to reference brick clay safeguarding area Will continue to monitor position re: education provision, not currently required. 			
MPs/ Local Authorities:			
Mims Davies MP			
<ul style="list-style-type: none"> Greenfield site. Would double size of Bolney. New builds out of character. Insufficient infrastructure, including reliability. Poor sustainable transport links. Potential impacts on biodiversity. A272 already extremely busy. Are prone to flooding 			
Other consultee bodies:			
Sussex Wildlife Trust			
<ul style="list-style-type: none"> No ecological surveys provided; unable to provide comments at this stage. Clarification sought on location of country park; will there be a minimum size in policy? 			

Other comments:**Landscape/ Character**

- Impacts on the village setting
- Impact on landscape and biodiversity
- Impact on heritage
- Overdevelopment/ disproportionate growth of the village
- Loss of local amenity
- Loss of historic settlement pattern
- Coalescence with the hamlet of Crosspost

Infrastructure/ Sustainability

- Poor public transport
- Pedestrian and cycle infrastructure is not suitable or safe to access services
- The road network in and around Bolney is at capacity and unsafe
- A272 junctions already suffer from delays and further development will add to these
- Additional development will increase traffic and car accidents on the A272
- Further development will impact on traffic through the village
- Local infrastructure such as education and health are already under pressure
- Utility companies are already unable to provide their service
- The infrastructure promoted alongside the development is not necessary in a rural location
- The site floods and development is likely to result in an overflow on existing properties
- Increased air pollution which is already high in Bolney
- Affordability issues which include affordable home

Site DPH19: Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common**Number of Comments Received**

Total: 17	Support: 3	Object: 14	Neutral: 0
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Comments Received**Statutory Consultees:****Environment Agency**

- Amend wording to avoid developing in flood risk areas; consistent with other allocations, and to include reference to integrate of SuDS.

West Sussex County Council

- Amend wording to reference brick clay safeguarding area

MPs/ Local Authorities:

None

Other consultee bodies:**Sussex Wildlife Trust**

- No ecological surveys provided; unable to provide comments at this stage.
- Site should be considered in conjunction with other sites in Sayers Common

Other comments:**General**

- Flood risk
- The sewage infrastructure is deficient
- Impact of additional traffic on the local area

Site DPH20: Land at Coombe Farm, London Road, Sayers Common**Number of Comments Received**

Total: 25	Support: 1	Object: 22	Neutral: 2
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Comments Received**Statutory Consultees:****Environment Agency**

- Amend wording to avoid developing in flood risk areas; consistent with other allocations, and to include reference to integrate of SuDS.

Southern Water

- Amend wording to ensure occupation is phased with delivery of wastewater infrastructure
- Reinforcement of network to be funded through New Infrastructure charge; site promoters and SW will need to work together to understand development program.
- Remove policy requirement referring to wastewater treatment upgrades; not needed for this site specifically

West Sussex County Council

- Amend wording to reference brick clay safeguarding area
- Sustainable transport provision; coordinated approach across Sayers Common sites needed

MPs/ Local Authorities:

None

Other consultee bodies:

Sussex Wildlife Trust

- No ecological surveys provided; unable to provide comments at this stage.
- Site should be considered in conjunction with other sites in Sayers Common

The Woodland Trust

- Cautionary minimum 50m buffer to Ancient Woodland should be included. New habitat should be created around ancient woodland to reverse fragmentation.
- Recommend completion of an Ancient Tree Inventory (ATI)

Other comments:

General

- Impacts on ancient woodland
- Detrimental to biodiversity
- Flood risk
- Lack of suitable infrastructure

Site DPH21: Land to the West of Kings Business Centre, Reeds Lane

Number of Comments Received

Total: 15	Support: 1	Object: 14	Neutral: 0
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Comments Received

Statutory Consultees:

Environment Agency

- Amend wording to avoid developing in flood risk areas; consistent with other allocations, and to include reference to integrate of SuDS.

Southern Water

- Amend wording to ensure occupation is phased with delivery of wastewater infrastructure
- Reinforcement of network to be funded through New Infrastructure charge; site promoters and SW will need to work together to understand development program.
- Remove policy requirement referring to wastewater treatment upgrades; not needed for this site specifically

West Sussex County Council

- Amend wording to reference brick clay safeguarding area
- Sustainable transport provision; coordinated approach across Sayers Common sites needed

MPs/ Local Authorities:

None

Other consultee bodies:

Sussex Wildlife Trust

- No ecological surveys provided; unable to provide comments at this stage.
- Site should be considered in conjunction with other sites in Sayers Common

Other comments:**Landscape/ Character**

- Loss of identity as the proposed developments would merge several villages together.

Infrastructure/ Sustainability

- Inadequate infrastructure.
- The increase of traffic would particularly be a problem for Hurstpierpoint High Street and Cowfold that already has an Air Quality Control area.
- Water security; need for a reservoir?
- Limited capacity for the wastewater network.
- Flooding issues. Reeds Lane often floods.
- Poor transport links in the area.
- No employment opportunities in the area.

Biodiversity

- Impact on wildlife habitats with rare species; onsite and Downland.

General

- Questions the Housing Need number.
- Contrary to the Neighbourhood Plan policies.
- No pavements or street lighting pushes people towards using a car.
- Disproportionate number of new homes proposed in local area. Too much for a tier 3 settlement.
- Welcomes the inclusion of Land to the West of King Business Centre as a proposed allocation.

Site DPH22: Land at LVS Hassocks, London Road, Sayers Common.**Number of Comments Received**

Total: 14	Support: 0	Object: 14	Neutral: 0
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Comments Received**Statutory Consultees:****Environment Agency**

- Amend wording to avoid developing in flood risk areas; consistent with other allocations, and to include reference to integrate of SuDS.

Southern Water

- Amend wording to ensure occupation is phased with delivery of wastewater infrastructure
- Reinforcement of network to be funded through New Infrastructure charge; site promoters and SW will need to work together to understand development program.
- Remove policy requirement referring to wastewater treatment upgrades; not needed for this site specifically

West Sussex County Council

- Amend wording to reference brick clay safeguarding area
- Sustainable transport provision; coordinated approach across Sayers Common sites needed

MPs/ Local Authorities:

None

Other consultee bodies:**Sussex Wildlife Trust**

- No ecological surveys provided; unable to provide comments at this stage.
- Site should be considered in conjunction with other sites in Sayers Common

Other comments:**Landscape/ Character**

- Over development.
- Too much development for a Category 3 settlement.
- Poor public transport.

Infrastructure/ Sustainability

- Lack of infrastructure in area.
- Flooding issues already in the area.

- Traffic issues and Cowfold is already has an Air Quality Control area.
- The wastewater and sewerage system need reinforcements or improvements made.
- Healthcare system already struggling with the number of people

Biodiversity

- Damage to habitat of Roe deer and large mature oak trees.
- Impacts on ecosystem

General

- Government policy is changing; housing number could change.

Site DPH23: Ham Lane Farm House, Ham Lane, Scaynes Hill

Number of Comments Received

Total: 25	Support: 0	Object: 22	Neutral: 3
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Comments Received

Statutory Consultees:

West Sussex County Council

- CDE Waste and Aggregate Recycling Facility consultation area and close to Eastlands Farm aggregate recycling.
- Amend wording to reference Building Stone consultation area

MPs/ Local Authorities:

None

Other consultee bodies:

Sussex Wildlife Trust

- No comment – ecological information needed

The Woodland Trust

- Objects to inclusion of ancient woodlands within development sites – need for a 50m buffer
- The Ancient Tree Inventory (ATI) for the area may be incomplete. Complete to comply with NPPF

Other comments:

Landscape

- Breaching of green gap between Haywards Heath and Scaynes Hill
- Overdevelopment in the area

Heritage

- Negative impact on character

Developability.

- Lack of demand

Accessibility

- Ham Lane is a private road – alternative access required.
- No cycling routes and public transport in place
- Heavy traffic

Infrastructure

- Water and sewage issues
- Flood risk
- Lack of public infrastructure and facilities
- Lack of streetlights

Site DPH24: Challoners, Cuckfield Road, Ansty

Number of Comments Received

Total: 31	Support: 0	Object: 30	Neutral: 1
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Comments Received

Statutory Consultees:

Southern Water

- Add a policy requirement to ensure the layout of the development be planned to ensure future access to underground infrastructure

MPs/ Local Authorities:

None

Other consultee bodies:

Sussex Wildlife Trust

- No comment – ecological information needed

Other comments:

Landscape

- Overdevelopment

Biodiversity

- Ecologically sensitive area

Heritage

- Detrimental to the character of Ansty

Developability

- Uncertainty over requirement for more housing – reference to the levelling up bill
- Contrary to neighbourhood plan

Accessibility

- Inadequate access at Marwick Close with no footpath or streetlights

Infrastructure

- Lack of public transport
- Lack of infrastructure and facilities – Doctors and shops, school
- Lack of public infrastructure - water and electricity
- Traffic issues

General

- Loss of privacy for Marwick Drive residents

Site DPH25: Land to the west of Marwick Close, Bolney Road, Ansty

Number of Comments Received

Total: 25

Support: 1

Object: 22

Neutral: 2

Comments Received

Statutory Consultees:

None

MPs/ Local Authorities:

None

Other consultee bodies:

Sussex Wildlife Trust

- No comment – ecological information needed

Other comments:

Landscape

- Overdevelopment

Biodiversity

- Ecologically sensitive area

Heritage

- Detrimental to the character of Ansty
- Design and layout should reflect the rural character of the settlement

Developability

- Contrary to neighbourhood plan
- Unsustainable location

Accessibility

- Traffic issues
- Bolney road access A272 is dangerous

Infrastructure

- Lack of public transport
- Lack of infrastructure and facilities; health facilities, school

General

- Number of dwellings incompatible with policy requirements – DPH4: General Development Principles for Housing Allocations
- Lower density to 20dph

Policy DPH26: Older Persons' Housing and Specialist Accommodation**Number of Comments Received**

Total: 14	Support: 4	Object: 9	Neutral: 1
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Comments Received**Statutory Consultees:**

None

MPs/ Local Authorities:

None

Other consultee bodies:

None

Other comments:

- Clarify the 3 items under loss of older persons accommodation to describe what will happen if xii applies
- Prevent loss of older people accommodation
- Affordable older persons accommodation is required and social housing
- Provide older care accommodation within or contiguous to existing built development on a sustainable location
- Change 'contiguous' to 'adjacent' under criterion iii, iv and v
- Unable to provide affordable elder care accommodation at 30%, reduce to 25%

Site DPH27: Land at Byanda, Hassocks**Number of Comments Received**

Total: 5	Support: 1	Object: 3	Neutral: 1
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Comments Received**Statutory Consultees:****West Sussex County Council**

- Amend wording to reference Soft Sand safeguarding area

MPs/ Local Authorities:

None

Other consultee bodies:**Sussex Wildlife Trust**

- No comment – needs ecological information

Other comments:**Developability**

- Approx. number of units required
- Unsuitable location for care home
- No guarantee site will deliver sufficient housing

Landscape

- Amend Built-up area to include Byanda

General

- Development on site previously refused on committee

Site DPH28: Land at Hyde Lodge, Handcross			
Number of Comments Received			
Total: 6	Support: 0	Object: 4	Neutral: 2
Comments Received			
Statutory Consultees: Environment Agency <ul style="list-style-type: none"> Culvert partially located within site (southeast of site). Opportunities to open up/daylight some of the culvert could be explored MPs/ Local Authorities: None			
Other consultee bodies: Sussex Wildlife Trust <ul style="list-style-type: none"> No comment – needs ecological information Sussex Ornithological Society <ul style="list-style-type: none"> Within High Weald AONB Extends built-up area of Handcross Increase density of houses elsewhere instead 			
Other comments: <ul style="list-style-type: none"> Approx. number of units required Ecological impact Additional land is needed to meet market/affordable home needs in the area and older persons' accommodation 			

Policy DPH29: Gypsies, Travellers and Travelling Showpeople			
Number of Comments Received			
Total: 7	Support: 2	Object: 4	Neutral: 1
Comments Received			
Statutory Consultees: Environment Agency <ul style="list-style-type: none"> Policy amendment suggested re connection to main foul sewer MPs/ Local Authorities: South Downs National Park Authority <ul style="list-style-type: none"> Policy amendment suggested re setting of SDNP Wealden District Council <ul style="list-style-type: none"> Support for identifying provision – will continue to work collaboratively on strategic issue 			
Other consultee bodies: None			
Other comments: <ul style="list-style-type: none"> Clarification wanted re. existing sites 			

Policy DPH30: Self and Custom Build Housing			
Number of Comments Received			
Total: 12	Support: 1	Object: 10	Neutral: 1
Comments Received			
Statutory Consultees: None			
MPs/ Local Authorities: None			
Other consultee bodies:			

Other comments:

- Support the inclusion of such a policy
- Requirement too high; further evidence needed
- Other sources of demand show higher need
- Greater flexibility needed

Policy DPH31: Housing Mix**Number of Comments Received**

Total: 26	Support: 3	Object: 22	Neutral: 1
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Comments Received**Statutory Consultees:**

None

MPs/ Local Authorities:**Wealden District Council**

- Supports and welcomes the opportunity to engage further with MSDC regarding the most appropriate dwelling mix for Crabbet Park

Other consultee bodies:

None

Other comments:

- Proposed mix of housing across district do not reflect needs in some rural settlements
- Strengthening needed by providing requirements for different mix, when supported by evidence.
- Housing mix should include policies on older people and disabled accommodation
- Add section to say parishes may retain specific mix requirements in neighbourhood plan
- Older people's housing requirements to not only apply to larger developments
- Guidance should be adhered to on all developments
- Should be incorporated in every development
- *Specialist housing* should be exempt from meeting requirements
- Incorporate co-living projects
- Detailed housing needs surveys are needed
- Not sufficient provision for smaller affordable homes
- Lack of low cost rest and small starter homes through the district
- Housing mix should reflect local needs at the time
- Should not be applied to dev under 10 units
- Include reference to the SHMA

Policy DPH32: Affordable Housing**Number of Comments Received**

Total: 27	Support: 2	Object: 22	Neutral: 3
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Comments Received**Statutory Consultees:**

None

MPs/ Local Authorities:

None

Other consultee bodies:**CPRE Sussex**

- Consider a higher target through viability tests –50%
- 30% affordable housing for all sites of more than 6 units within the AONB – provision onsite
- Amend wording suggested in reference to financial contributions and delivery of *affordable* housing.

Other comments:

- Should be incorporated in every development
- Amend the use of “a couple” for clarity
- Policy does not provide circumstances where on-site provision is inappropriate i.e. less than 10 units
- Need for 50% affordable housing within AONB
- Provide exceptions for older care accommodation
- Allow for flexibility in forms/models of delivery
- Reduce requirements on brownfield sites
- Include provision of shared ownership
- Part iv is too vague – evidence-based specification required.
- Financial contributions prior to commencement may not be possible, flexibility required.

Policy DPH33: First Homes

Number of Comments Received

Total: 14	Support: 3	Object: 10	Neutral: 1
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Comments Received

Statutory Consultees:

None

MPs/ Local Authorities:

None

Other consultee bodies:

None

Other comments:

- Should be incorporated in every development
- What criteria was used to establish £250,000 as a threshold – it is unaffordable
- Clarification needed as to why 3 and 4 beds are included
- Provide evidence to support the viability of this approach
- 30% discount is still unaffordable for many – minimum should be 40-50%
- No demand for 1 bed first homes
- Contradictions within policy’s subtext
- Provide definition for “first home exception sites”

Policy DPH34: Rural Exception Sites

Number of Comments Received

Total: 8	Support: 2	Object: 4	Neutral: 2
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Comments Received

Statutory Consultees:

None

MPs/ Local Authorities:

None

Other consultee bodies:

CPRE Sussex

- Should consider if policy is effective in delivering developments

Other comments:

- Suggest a minimum threshold is applied for when mix is required.
- Policy should include allowance for updated evidence on needs and supply to be provided and considered.
- First Homes and homes for social rent needed
- More should be done to encourage small affordable sites (less than 10 affordable homes) - including within AONB
- The role of Parish Councils in the identifying people entitled to apply for this housing is unclear

Policy DPH35: Dwelling Space Standards			
Number of Comments Received			
Total: 5	Support: 2	Object: 3	Neutral: 0
Comments Received			
Statutory consultees: None MPs/ Local Authorities: None Other consultee bodies: None Other comments: <ul style="list-style-type: none"> • Governments' internal space standards are optional – evidence needed to justify inclusion of standards in policy 			

Policy DPH36: Accessibility			
Number of Comments Received			
Total: 9	Support: 1	Object: 8	Neutral: 0
Comments Received			
Statutory Consultees: None MPs/ Local Authorities: None Other consultee bodies: None Other comments: <ul style="list-style-type: none"> • Adaptable houses do not provide on-site support, care and companionship offered by specialist developments. • Delete: <i>The Requirement will also apply to private extra care, assisted living or other such schemes designed for frailer older people or others with disabilities and those in need of care or support services.</i> • Not enough evidence for new dwellings to comply with Building Regulations Part M4 (3). Requirement should only apply to 10 dwellings or more. Should make clear that it is subject to viability. • Viability concerns in increasing M4(2) requirement from 20% to 100%. • Repetition with DPH32: Affordable Housing – should be made more concise • Housing mix should include policies on older people and disabled accommodation • Limitation of fewer than 10 dwellings disadvantages small villages; should be applied to all developments • Further evidence needed to justify that all new dwellings meet Part M4(2) 			

Sayers Common Village – General Comments			
Number of Comments Received			
Total: 101	Support: 0	Object: 99	Neutral: 2
Comments Received			
Statutory Consultees: None MPs/ Local Authorities: Andrew Griffith MP			

- Overdevelopment
- Long history of flooding due to inadequate sewage and waste systems.
- Reliant on cars for retail.
- Inadequate provision and access to public transport
- Local schools at capacity
- Rural lanes cannot support increased traffic
- Already pressure on GPs. Policy requirement of 'health provision' unclear.

Horsham District Council

- Impacts from development on infrastructure across the border should be considered

Other consultee bodies:

Sussex Ornithological Society

- Area west of Sayers Common has an ecological importance due to the presence of Nightingales, Turtle Doves and Barn Owls
- Huge expansion of village; urban sprawl.

Sussex Wildlife Trust

- No ecological surveys undertaken for allocations
- How are allocations taking account of other Local Plans and strategic documents i.e. Southern Water's Draft Water Resources Management Plan and potential new reservoir

Other comments:

Landscape

- Overdevelopment of Sayers Village
- Coalescence of Sayers Common, Albourne and Hurstpierpoint
- Detrimental effect on views from Devils Dyke and SDNP
- Light pollution

Flood Risk

- High Flood Risk on the area (specially Reeds Lane and London Road)
- Maintenance of streams/ponds/drainage channels – danger of flooding
- Historic groundwater flooding

Biodiversity

- Impact on wildlife
- Loss of Countryside
- Consider the advice of RSPB, SWT, CPRE and SOS to preserve the countryside

Accessibility

- Traffic along B2118 and A23 – accident prone
- Roads are too narrow to support further traffic
- Need for a comprehensive traffic study

Developability

- No mention of development in brownfield sites
- There already are a number of unsold dwellings on new housing developments
- Local need for more affordable housing
- Proposals segregated from community services and infrastructure
- Category 3 – not suitable for large developments.

Infrastructure

- Lack of Infrastructure and public transport
- Developments in Sayers Common need to provide additional infrastructure i.e medical centres and commercial facilities
- Wastewater and Sewage system issues - inadequate
- Schools are full
- Need for a bus route to Burgess Hill station

General

- Sale of arable land should not be encouraged
- Housing targets are now advisory
- Village status needs to be preserved
- Albourne Neighbourhood Plan has been ignored in particular policies ALC2 and ALC3

- Unbalanced growth, mainly concentrated in Hurstpierpoint and Sayers common
- Premature review process, wait for stability in planning processes and demographics
- Developments in Sayers Common are not consistent with National Policy
- Massive negative impact on character of village and rural lifestyle; will be turned into a town.
- Disproportionate growth
- Contrary to neighbourhood plans. Loss of local democracy.
- Requires more infrastructure and affects more rural nature than other two significant sites.
- No more capacity on rural roads through village. Development would increase congestion at High Street / B2117 junction.
- Houses may not be needed following Government's propose policy changes
- Areas regularly floods due to clay and insufficient drainage systems
- Negative impacts on biodiversity. Fragmentation of natural environment due to development. No meaningful options to realise BNG due to proximity to other settlements and neighbouring authority.
- No assurance on required and timely delivery of infrastructure needed.
- Will worsen air quality at Stonepound Crossroads with people accessing Hassocks train station.
- Need to add childcare to list of infrastructure required from new builds
- Is the 20 minute neighbourhood concept achievable or fundable in this area?
- Detrimental to the setting of the South Downs National Park
- Boundary of DPSC2: Land to the south of Reeds Lane need checking, includes private gardens.

Burgess Hill – General Comments

Number of Comments Received

Total: 16	Support: 0	Object: 15	Neutral: 1
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Comments Received

Statutory Consultees:

None

MPs/ Local Authorities:

None

Other consultee bodies:

None

Other comments:

Landscape:

- Detrimental to the landscape and rural character of the area
- Coalescence of Burgess Hill with surrounding villages and towns
- The proposals will reduce green spaces within and around burgess hill

Biodiversity

- Wildlife habitats must be protected

Developability

- Disproportionate housing allocated to Burgess Hill
- Prioritise brownfield sites within Burgess Hill
- Revitalise the town centre with 4-5 storey housing/apartments

Accessibility

- Need for a plan to improve movement around Burgess Hill
- Severe traffic congestion and roadworks

Infrastructure

- Sewage treatment facility does not have capacity for new developments
- Inadequate public transport
- Lack of infrastructure (shops, medical centres and facilities)
- One new school is not enough
- Severe pressure on fresh water supply during summer
- Insufficient parking for local residents

General

- Long waiting lists for allotments in the area (240), disbelief that an alternative allotment will be provided
- Need for redevelopment of the town centre of Burgess Hill (unused retail buildings and demolition sites)
- Advisory housing targets – Levelling up and regeneration bill
- Air pollution caused by traffic congestions

Hurstpierpoint Village – General Comments

Number of Comments Received

Total: 48	Support: 0	Object: 45	Neutral: 3
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Comments Received

Statutory Consultees:

None

MPs/ Local Authorities:

None

Other consultee bodies:

None

Other comments:

Landscape

- Detrimental impact on views from the countryside and SDNP
- Overdevelopment of Hurstpierpoint with 633 further homes
- Coalescence with Burgess Hill and Hassocks

Flood Risk

- Surface water flooding
- College Lane, Malthouse Lane and Danworth Lane flood regularly

Biodiversity

- Destruction of wildlife habitats
- Current developments proposals will destroy efforts of The Woodland, Flora and Fauna Group to preserve the biodiversity of the countryside

Heritage

- Area of historical and archaeological importance
- Character of the village will be lost
- Traffic congestions along Conservation Area
- Need to preserve the village status

Accessibility

- Traffic congestions at High Street
- Increase in car travel as most of the allocated sites are in areas with lack of public transport
- Lack of public footpaths and cycle routes for children travelling to school
- B2116 is a dangerous road for pedestrians and cyclists

Developability

- Hurstpierpoint borders the SDNP – leaving a small area which cannot take any further development
- Lack of affordable housing in the area
- Disproportional allocation for growth – half concentrated around Hurstpierpoint

Infrastructure

- Lack of healthcare services
- Inadequate infrastructure to facilitate the developments
- Sewage back up during heavy rain – drainage issues
- Insufficient parking around high street
- Lack of sixth form education
- No planned cycle routes
- No post office or appropriate retail

- Inappropriate timing of provisions of new schools and healthcare facilities – these need to be provided before housing completions
- Inadequate transport links

General

- Housing targets will no longer be mandatory
- District Plan seems to be led by demands of developers whose motivation is profit
- Overestimation of housing figures
- Local air pollution will be exacerbated
- Request for a Q&A meeting at Hurstpierpoint Village Hall
- Negative impact on High Street with further congestions

Crawley Down – General Comments

Number of Comments Received

Total: 4	Support: 0	Object: 4	Neutral: 0
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Comments Received

Statutory Consultees:

None

MPs/ Local Authorities:

None

Other consultee bodies:

None

Other comments:

Landscape

- Developments in the area creating coalescence with Copthorne

Biodiversity

- Importance of maintaining open spaces and protecting the countryside due to a range of natural species that inhabit these spaces (i.e., deer's and bee's)

Flood Risk

- Surface water flooding issues - low permeability of clay soil

Developability

- Need for different types of accommodation, according to local demand
- Brownfield sites should be allocated before greenfield sites

Heritage

- New houses are being designed with disregard for the local character

Infrastructure

- Housing allocations of the last 13 years do not coincide with infrastructure provision
- Need for more GPs, schools and public transport – services overcrowded
- Local roads are in poor condition
- Restricted access to water provided by South East Water
- Recurrent power cuts
- Lack of local shops
- Sewage system needs to be improved

Chapter 16. Infrastructure

Number of Comments Received

Total: 61	Support: 11	Object: 35	Neutral: 15
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Comments Received

Statutory Consultees:

Southern Water

- DPI1 Securing Infrastructure: Support early engagement to help with timely delivery

Sport England

- DPI5 Open Space, Sport and Recreational Facilities: Support.
- DPI1 Securing Infrastructure: No reference given to natural environment

West Sussex County Council

- DPI1 Securing Infrastructure: Support. Cross reference to site allocations could be made

MPs/ Local Authorities:

Horsham District Council

- Impacts from development on infrastructure across the border should be considered

Other consultee bodies:

Sussex Wildlife Trust

- DPI1 Securing Infrastructure: No reference given to natural environment
- How are allocations taking account of other Local Plans and strategic documents i.e. Southern Water's Draft Water Resources Management Plan and potential new reservoir

Other comments:

General

- Planned infrastructure provision is inadequate for additional growth
- Infrastructure should precede housing developments
- No more houses in river catchment areas until water companies resolve and repair damage
- Transport system is not integrated and public transport is generally poor. Railway network constrained by Balcombe tunnel, Viaduct and platform lengths
- Insufficient fresh water, water storage and water treatment to sustain new homes
- More allotments needed as new houses have small gardens
- Further details on "Financial contributions" against site allocations would be welcomed

DPI1: Securing Infrastructure

- Concerns over publishing viability appraisals; could prejudice more complex sites coming forward. Council should review position.
- Clarity sought on "timing of improvements".
- Should be made clear what infrastructure developers are expected to contribute towards. Mechanism for apportioning costs, such as CIL Regulation 122, could be used.
- Wording amendment: standard of replacement facilities include; same floorspace, volume, functionality and purpose.
- Wording regarding early engagement should be strengthened

DPI2: Planning Obligations

- Should only include "reasonable" costs and these should be agreed prior to Agreement
- Appendix 3 does not set out infrastructure quantity and accessibility standards as policy states.
- Should be increased annually according to inflation rate on a fixed day of the year

DPI3: Major Infrastructure Projects

- Policy should be split in 2 to reflect MSDC's role as decision maker and statutory consultee.
- Clarity needed for terms: "reasonably foreseeable future". "Delivery Plans" should be removed as not statutory
- Needs to take account the Gatwick Airport DCO and impacts in north of district.

DPI5: Open Space, Sport and Recreational Facilities

- Include flexibility for dual use of open space, sport and recreation facilities between schools and public.
- Support principle; Wakehurst as a major centre for science education/research also appropriate exception.
- Play studies cited in policy not found in evidence base. Policy wording should be amended to reflect that studies don't cover all types of sport (climbing).
- Countryside has its own recreational value; should be balanced when considered for new facilities.
- Should include engagement with Town/ Parish Councils (same with DPI6: Community and Cultural Facilities and Local Services)

DPI6: Community and Cultural Facilities and Local Services

- Community centres must be provided with larger areas of housing to avoid cultural deserts

DPI7: Viability

- Support open book viability assessment
- Concern over second viability review; could hinder delivery

Chapter 17. Implementation and Monitoring

Number of Comments Received

Total: 11	Support: 0	Object: 9	Neutral: 2
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Comments Received

Statutory consultees:

South East Water

- How will water efficiency be policed / monitored / measured?

MPs/ Local Authorities:

Horsham District Council

None

Other consultee bodies:

Sussex Wildlife Trust

- Would benefit from including an additional column to the table, which indicates management actions that would be taken if the target for the monitoring were not being met.
- Saved policies not marked on the interactive policies map.

Other comments:

General

- It is essential that the Council has a robust delivery plan for properly allocating the Section 106 contributions from developers.
- Saved policies in the Neighbourhood Plans could be mentioned here by a simple line to say; 'All allocations set out in the districts Neighbourhood Plans' are saved.
- Targets needs numerals defined. Don't just say 'increase'.
- A robust delivery plan needs to be included.
- 'Management actions' should be added as a table column.

Chapter 18. Saved Policies

Number of Comments Received

Total: 2	Support: 0	Object: 2	Neutral: 0
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Comments Received

- Saved policies in the Neighbourhood Plans should be mentioned by adding a sentence.
- The saved allocations need to be mentioned in the plan and added to interactive map.

Chapter 19. Glossary

Comments Received

No comments

Appendix 1: District Plan Policies - Review Status

Comments Received

No comments

Appendix 2: Town Centres and Primary Shopping Area Boundaries

Number of Comments Received

Total: 2	Support: 0	Object: 2	Neutral: 0
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Comments Received

- The Haywards Heath Town Centre boundary excludes estate agents and 2 car parks. Why is this?
- Why has the town centre boundary changed?

Appendix 3: Policy DPI7: Viability supporting tables

Number of Comments Received

Total: 1	Support: 0	Object: 0	Neutral: 1
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Comments Received

Appendix 3 does not set out infrastructure quantity and accessibility standards as policy DPI2: Planning Obligations states.

Annex 1: Overview of Policy Requirements for Housing Allocations

Comments Received

No comments

District Plan - Other

Comments Received

- Support all comments made by Twineham Parish Council.
- The plan is too non-specific.
- MSDC isn't leading on many aspects; consequently, developers are not building houses suitable for future needs.
- Fully support CPRE's response.
- This is in general, a well researched and presented, carefully compiled document, which seeks to address the many conflicting demands and issues facing Mid Sussex.
- Stand-alone policies are not sufficient; there are areas of omission, including heritage at risk.
- The draft Local Plan is unsound.
- The Plan is not deliverable over the plan period because there is no evidence to demonstrate how the strategic allocations will be achieved.