

728 Mr D Stewart Organisation: Jones Homes 96 Folders Lane BH Behalf Of:  Promoter

Reference: Reg18/728/3 Type: Support

A Transport Statement supported by up to date traffic surveys supported the planning application. This demonstrated that the access from Folders Lane could accommodate the additional traffic volumes generated without any adverse impact on highway safety.

728 Mr D Stewart Organisation: Jones Homes 96 Folders Lane BH Behalf Of:  Promoter

Reference: Reg18/728/4 Type: Support

In terms of volume the maximum flow recorded in our traffic surveys was between 08.00 – 09.00 with a flow of 564 vehicles from west to east dropping to 382 between 09.00 – 10.00 and 436 vehicles from east to west dropping to 356 during the same time periods. The highway impact was assessed using raw vehicle flows growthed to 2024. The results of the junction capacity analysis for the Site Access / Folders Lane junction show that in the 2024 with and without proposed development scenarios, the junction is forecast to operate well within capacity on all arms. The addition of the development proposals has no material impact with regards to the capacity of the junction and as such it is considered that no ‘severe’ residual impacts will result, in line with the NPPF requirement.

728 Mr D Stewart Organisation: Jones Homes 96 Folders Lane BH Behalf Of:  Promoter

Reference: Reg18/728/5 Type: Support

On the wider issue of travel, we are prepared to pay for a Total Access Demand to improve the frequency of public transport services and facilities for users as part of this proposal.

728 Mr D Stewart Organisation: Jones Homes 96 Folders Lane BH Behalf Of:  Promoter

Reference: Reg18/728/6 Type: Support

The site is located in flood zone 1 where there is less than a 1 in 1000-year chance of flooding from the sea or rivers. However, we are aware of the ground conditions. The site is underlain by Weald Clay formation which could result in the pooling of rainwater on site.

Our drainage strategy will be developed in accordance with the strategy developed for the adjoining site which includes a combination of swales, ponds and a below ground tank with an outfall to the existing ditch serving the site. The rate of drainage into the ditch will be no greater than greenfield run off.

728 Mr D Stewart

Organisation: Jones Homes 96 Folders Lane BH

Behalf Of:

Promoter

Reference: Reg18/728/1

Type: Support

The application drew extensive third-party responses principally relating to the following key matters:

- Impact on the Landscape
- Impact on Residential Amenity
- Impact on Highway Safety
- Flooding Concerns

In addition, a number of matters were raised by statutory consultees, principally landscape, urban design and inclusiveness issues.

We would suggest that, in view of the changes brought about by a number of planning decisions in the area and the draft allocation of this site, the LPA should revise the settlement boundary to Burgess Hill in a forthcoming review of the District Plan.

It is JHS intention to satisfactorily address all of the matters raised in a redesign of the scheme and in the manner described below.

The intention of the development proposal is to retain the wooded setting of the footpath as far as possible with appropriate improvements to its surface along its length. Development will be set back away from the woodland boundary edge and this tree belt strengthened by additional planting.

Detailed discussions over the design of the road as it crosses the footpath will be held with the PROW authority with the intention of ensuring the road crosses the footpath with the pedestrian having priority. Measures to slow vehicular traffic on the road and cyclists using the footpath about to cross the road will be proposed with the designs based on the use of traditional materials appropriate for this semi-rural location.

- Use of traditional materials
- Change in surface material for crossing
- Raising the road surface to visually identify the crossing point
- Introducing design feature to ensure that cyclists slow down when approaching the road crossing

The constraints imposed by meeting the landscape and design requirements will result in a changed layout and reduced area available for development. This in turn will reduce the housing numbers on the site. The layout currently being drawn up will develop the perimeter block approach, incorporating the added landscaping requirements.

JHS also supports policy SA11 that identifies the land allocations to satisfy this residual requirement. However, we do highlight the need to reduce the housing figure for land to the south of 96 Folders Lane from 43 to 40 in order to take account of changes brought about by the urban design and landscape comments arising from the application (now withdrawn).

8.3 The figure in policy SA12 should also be revised accordingly. On a matter to note the actual gross development area of the land is 1.72 ha, not 1.8ha.

728 Mr D Stewart

Organisation: Jones Homes 96 Folders Lane BH

Behalf Of:

Promoter

Reference: Reg18/728/2

Type: Support

The landscape principles to be adopted in the development of the site are:

- Retain and strengthen the existing tree belts on the east and west sides of the site
- Develop planting to offer screening from the existing housing to the north and south
- Offer internal areas of open amenity space for residents
- Minimize adverse landscape impacts
- Accord with landscape policies in the adopted plan

A revised landscaping strategy is currently being prepared which will guide and shape the revised proposal for the site. This will be submitted separately prior to the beginning of December.

A full assessment of their comments is made in the landscape strategy. However, it is sufficient here to note that the scheme does propose the retention of the tree belts and strengthening on both the east and western boundaries. Moreover, we propose to amend the submitted layout to ensure that neither tree belts are compromised by the location and juxtaposition of the trees and the houses. We are keen to ensure that the eastern tree belt remains as a defensible settlement boundary to the town.

The existing tree screen to the west is to be retained and strengthened.

A detailed landscape character assessment is set out in the accompanying report prepared by Lizard Landscapes. Their findings are supported by the LVIA prepared to support the appeal for the development on the adjoining site. Both LVIA's find that the site and its immediate surrounds have a medium landscape quality. This is because the landscape is generally pleasant but has no particularly distinctive qualities, and any detractors (such as the partially screened urban edge to the north and the adjacent winery buildings to the south west) are not dominant, and are balanced by adjacent attractive features such as the tree belts around the site.

The wider landscape of the South Downs to the south of the site, within the National Park, is obviously of very high quality and is designated accordingly, but the part of the National Park adjoining the south western part of the adjoining site is an enclosed field used for growing vines, with the winery buildings to its east and a poplar plantation to its west. The site is of no more than medium to high landscape quality, and its value (and presumably the reason for its designation) is that it is part of the northernmost context and setting for the iconic chalk Downland landscape to the south.

JHS expresses surprise at the nature of the response from the SDNPA which clearly fails to consider or take any account of previously examined landscape issues. Moreover, the SDNPA has failed to reassess the landscape character of the site and wider surroundings in the light of the ongoing development of the adjoining site for 73 dwellings. The responses show a complete lack of objective assessment of the changing landscape character of the area, the landscape features of the application site and appears to relate to an in-principle objection to any development in the vicinity of the SDNP rather than a response based on factual evidence.

**748** **Ms J Price** **Organisation:** Sussex Wildlife Trust

**Behalf Of:**

**Statutory Consultee**

**Reference:** Reg18/748/12 **Type:** Object

Whilst we object to this allocation, if MSDC are minded to retain it, the requirements under Biodiversity and Green Infrastructure should be strengthened to make it clear that avoidance is always the first requirement as per the mitigation hierarchy:  
'Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity. Avoid any loss to biodiversity through ecological protection and good design.  
Where this is not possible, mitigate and as a last resort compensate loss through ecological enhancement and mitigation measures'

**716** **Mr R King** **Organisation:** Lewes and Eastbourne BC

**Behalf Of:**

**Local Authority**

**Reference:** Reg18/716/1 **Type:** Object

However, in relation to Policies SA12, SA13 and SA21, the District Council wishes to have the confidence that the transport impacts arising from the proposed housing growth can be satisfactorily accommodated by the highway network within Lewes District. In particular, the timing, funding and feasibility of any necessary mitigation measures need to be fully understood before we are convinced that Policies SA12, SA13 and SA21 are sound. Our expectation is that Mid Sussex District Council will work in close partnership with East Sussex County Council, as the local highway authority for Lewes District, in this respect.

**777** **Mrs L Howard** **Organisation:** South Downs National Park

**Behalf Of:**

**Local Authority**

**Reference:** Reg18/777/9 **Type:** Object

The adjacent footpath on the western edge of the site forms part of the gateway for pedestrian access from Burgess Hill to the SDNP. The route is largely within the existing adjacent development site, however, should this allocation proceed, there is an opportunity to secure in policy requirements to prevent negative impacts upon users of this route and seek enhancements to the route.

**777** **Mrs L Howard** **Organisation:** South Downs National Park **Behalf Of:**  **Local Authority**

**Reference:** Reg18/777/3 **Type:** Object

Overarching comments on SA12 (Land South of 96 Folders Lane, Burgess Hill) and SA13 (Land East of Keymer Road and South of Folders Lane, Burgess Hill)  
The objective for development for these sites to be informed by a landscape-led masterplan which respects the setting of the SDNP is noted and recognised. However, below we raise some concerns regarding achieving this element of the objective.  
Concern is raised that the proposed allocations would erode the rural buffer between Burgess Hill and the SDNP. This is likely to be harmful to the special qualities and landscape character of the setting of the SDNP. Landscape evidence is required to inform site capacity, which responds to the character and sensitivities of the sites. Under 'Landscape Considerations' for these two policies, the requirement for Landscape and Visual Impact Assessment to inform capacity and mitigation in order to minimise impacts on wider countryside and any potential views from the SDNP to the south is recognised and welcomed. It is important to note that it is not just views, which are relevant when considering impacts on the SDNP. For example, setting, tranquillity and dark night skies are all important relevant landscape considerations which should be understood and negative impacts avoided.  
In May 2016 the SDNP became an International Dark Sky Reserve (IDSR). Lighting as part of development of these sites has the potential for significant effects on the dark skies of the Reserve, particularly as a result of increases in light spill/ambient lighting. We refer you to our Dark Skies Technical Advice Note, which includes guidance on how development can avoid, minimise and mitigate to protect dark night skies.

**777** **Mrs L Howard** **Organisation:** South Downs National Park **Behalf Of:**  **Local Authority**

**Reference:** Reg18/777/5 **Type:** Object

We are also concerned about the potential for increased traffic in and through the village of Ditchling, and other parts of the SDNP, and its impact on tranquillity.

**777** **Mrs L Howard** **Organisation:** South Downs National Park **Behalf Of:**  **Local Authority**

**Reference:** Reg18/777/8 **Type:** Object

SA12 – Land South of 96 Folders Lane, Burgess Hill  
This site forms part of a surviving post-medieval landscape and is within 200m of the SDNP, glimpsed from the Downland ridge in the SDNP. This site would form an extension to adjacent development, allowed on appeal, of 73 dwellings within the area shown as 'Built Up Area Additions' on the map on page 34 of the consultation document. Notwithstanding this development, concern is raised that the proposed allocation would erode the rural buffer between Burgess Hill and the SDNP. This concern was raised in response to a planning application for 43 dwellings on this site; the planning application (DM/19/0276) was submitted and then withdrawn earlier this year.

**792** **Mrs T Flitcroft** **Organisation:** West Sussex County Council **Behalf Of:**  **Local Authority**  
**Reference:** Reg18/792/23 **Type:** Neutral

SA 12 Land South of 96 Folders Lane, Burgess Hill

- Provide on-site passenger information including RTI display(s) for bus and rail services
- Contribute to the improvements to the bus and rail interchange at Burgess Hill station
- Provide new bus stopping facilities on Folders Lane adjacent to the site
- Bus stop facilities to include bus shelters and passenger information such as RTI displays, electronic bus timetables and route information
- Contribute towards enhancement of cycle parking provision at Burgess Hill station
- Contribute towards improvements in cycling facilities to Burgess Hill station

**792** **Mrs T Flitcroft** **Organisation:** West Sussex County Council **Behalf Of:**  **Local Authority**  
**Reference:** Reg18/792/50 **Type:** Neutral

The site lies within the brick clay (Weald clay) Minerals Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with policy M9 of the West Sussex Joint Minerals Local Plan (2018) and the associated Safeguarding Guidance.

**667** **Mr S Cridland** **Organisation:** Burgess Hill Town Council **Behalf Of:**  **Town & Parish Council**  
**Reference:** Reg18/667/7 **Type:** Object

There are a significant number of problems with this site which make it unsustainable.

There should not be any significant development until the impact of the existing major developments has been fully absorbed and understood. When looking at future housing sites it should be done in a more strategic manner, rather than looking at individual sites in isolation.

**667** **Mr S Cridland** **Organisation:** Burgess Hill Town Council **Behalf Of:**  **Town & Parish Council**  
**Reference:** Reg18/667/5 **Type:** Object

There is concern about the loss of an important green corridor and development of these sites would be in contravention of the Neighbourhood plan.

The sites contravene District Plan policies DP7, DP12, DP13, DP18, DP20, DP21, DP26, DP37, DP38, and Neighbourhood Plan core objective 5, and policy H3.

667 Mr S Cridland Organisation: Burgess Hill Town Council

Behalf Of:

Town & Parish Council

Reference: Reg18/667/3 Type: Object

SA 12 and 13

Of great concern to both the Council and residents is the amount of traffic congestion which will result from developing this area to the degree anticipated. The mini roundabout at the junction of Keymer Road and Junction road is already congested and previous developments of the area south of Folders Lane have identified roundabouts at Folders lane and Keymer road as at or near capacity. The traffic consultants have not considered this junction as part of their assessment on the impact of the proposals. The only mention of east Burgess Hill was their suggestion to convert Hoadleys Corner roundabout to a set of traffic lights, which would result in a reduced traffic flow and increased pollution.

1223 Cllr J Foster Organisation: Burgess Hill Town Council

Behalf Of:

Town & Parish Council

Reference: Reg18/1223/1 Type: Object

These sites sit in an area of Burgess Hill with poor transport access, particularly roads. It would appear that no recent onsite traffic study has been conducted; local residents know that these roads are already over maximum capacity; indeed in previous planning processes this has been highlighted.

Additionally, the SYSTRA transport study provides no clear mitigation, apart from suggesting unspecified Public Transport Interchange improvements; this isn't good enough, its clear there is no suitable mitigation on the B2113 or Folders lane, or Keymer Road, which would mitigate the through traffic; Those who are planning to take public transport (E.g. to London) will walk to Burgess Hill station, the remainder will use their cars, through these overloaded junctions.

SA15 - Land South of Southway

This site represents a rare area of non-built up land within the town bounds which provides an ideal wildlife habitat. This area of the town has a poor number of such spaces, and there are reports of a number of important protected species such as Nightingales. We should be looking to protect and enhance such spaces, but I do not feel that the proposed site allocation will achieve this in any practical way.

Further, the land is clearly designated in the neighbourhood plan as public green space; it makes some mockery of the process of deciding upon, and having a referendum for, a neighbourhood plan, if at the next juncture it can be immediately be reversed. A waste of money, and breaking the trust of residents.

It would also appear that there has been no in-context strategic review of the town, its needs and transport options in light of the significant recent development on Kingsway, and other areas, combined with the very large site of 3,000 homes proposed for the northern arc; there is no additional transport infrastructure proposed as far as can be determined which would mitigate the effect of these existing proposed developments with regards to their access to the town; for example residents of Kingsway wanting to visit the Tesco Superstore on the other side of the town. This means there will be a greater and greater loading upon the existing infrastructure in a non-sustainable fashion.

I therefore do not think that the proposed sites are in alignment with the plan objectives, nor represent sustainable development sites with the town. Instead I feel the terms of reference should be reviewed and altered to consider different sites, for example removal of the somewhat arbitrary 150m objection

**678** **Ms S Mamoany** **Organisation:** Ditchling Parish Council

**Behalf Of:**

Town & Parish Council

**Reference:** Reg18/678/1 **Type:** Object

The sites contravene Core Objective 1 in the Burgess Hill Neighbourhood Plan - Promote sustainable and well-designed development in the right location taking into account the character and amenity of the local area. Preserve and enhance existing residential neighbourhoods. (2.19 Taking into account existing comments (1639 units), proposed sites emerging through Neighbourhood Plan policies (indicative 240 units) and the strategic development proposed in the emerging Mid Sussex District Plan (3500 units), a total of approximately 5379 units will be built within the town over the plan period. The objectively assessed housing needs of Burgess Hill (2378 units) will therefore be met and the Neighbourhood Plan does not formally allocate additional housing sites.) Sites SA12 and SA13 are not listed on the proposed sites in the Neighbourhood Plan and therefore do not form part of the housing needs.

The sites contravenes Policy CONS 7 of the Ditchling, Streat & Westmeston Neighbourhood Plan — Protect important gaps between settlements — proposals for new development in the gap separating Ditchling and Hassocks/Keymer and Burgess Hill, either individually or cumulatively, will only be supported where they conserve and where possible enhance the open landscape character of the gap, and do not reduce the physical gap between settlements. This will be informed by the South Downs Integrated Landscape Character Assessment and relevant local landscape character assessments.

**678** **Ms S Mamoany** **Organisation:** Ditchling Parish Council

**Behalf Of:**

Town & Parish Council

**Reference:** Reg18/678/6 **Type:** Object

The development would cause further traffic implications into an already struggling road infrastructure system.

**678** **Ms S Mamoany** **Organisation:** Ditchling Parish Council

**Behalf Of:**

Town & Parish Council

**Reference:** Reg18/678/4 **Type:** Object

Development on these sites would cause irreparable harm to the setting of the South Downs National Park, including destroying habitats for many protected wildlife species such as adders, bats, cuckoos, barn owls 1 great crested newts and slow worms.

639 Mr A Sturgeon

Organisation: Haywards Heath Town Council

Behalf Of:

Town & Parish Council

Reference: Reg18/639/5

Type: Object

Impact of Burgess Hill sites SA 12 to SA 17  
 With the development sites SA 12 to SA 17 being proximate to Haywards Heath, it will have a significant impact on Haywards Heath.  
 \*\*\*note; there are already 15,000 car movements a day up and down Isaacs Lane with 1,500 in the rush hour. It is anticipated another 3,000 movements based on employment moves, another 2,000 from the 4000 homes developed plus 4,000 desire travel line car movements resulting from the new road network. We have considerable ongoing concerns relating to road safety and the impact for residents using Isaacs Lane and the Bolnore Roundabouts. In addition,  
 Valebridge Road to Wivelsfield Station there are no transport links between HH and BH. Contract needed with Metrobus reference sustainable transport between BH/HH.  
 Driving tendencies/consequences relating SA12-17 on HH. HHTC has considerable ongoing concerns relating to through traffic moving through the town on a north/south basis, to/from BH. HHTC further notes the constraints confirmed in 3.9 of the site allocations DPD "HH is particularly effected by the A272 passing around the Town and high car dependency. Drivers detouring through the town centre further exacerbate the problem.  
 HH to BH cycle path must be delivered promised in 18/5114 Northern Arc application.  
 Due to increased traffic through HH, HHTC needs additional financial support to mitigate the adverse effects on the Town, by provision of section 106 contributions. We note this may not be appropriate and that direct provision of infrastructure improvements would be more practical such as improving major arterial roundabouts.

1190 P Richardson

Organisation: Connells Land and New Homes

Behalf Of: Mr and Mrs Marsh Land Owners

Organisation

Reference: Reg18/1190/1

Type: Object

Within the adopted District Plan policies, page 37 of the Plan the district listed the Settlement cat. and settlement names. The minimum housing requirement was detailed by settlement and shortfall in numbers was listed per settlement. The spread of unit numbers across the district was clearly defined. The current proposed Site Allocations list policies 12 to 34 has ignored obvious housing delivery sites in a number of the cat 2 and cat 3 settlements that were being promoted, in favour of several large sites in excess of 100 units. It is suggested that the Proposed Draft Allocations of large sites will likely fail to deliver the required numbers during the plan period. The previous northern arc allocation meant that Burgess Hill did not have a projected shortfall. The Proposed site allocations have suggested a further 600 units in Burgess Hill. It is unlikely that the number of units proposed will be built and completed within the plan period due to absorption rates for a town the size of Burgess Hill. in that respect the delivery numbers element of the plan will fail.  
 The Small sites draft allocation document has 6 sites in excess of 100 units and this brings into question the ability to deliver the unit numbers at the rate required to satisfy the plan numbers year on year. The proposed site numbers in the draft allocations document do not account fully for the Adopted Plan shortfall in numbers.

**689** **Mr M Brown** **Organisation:** CPRE Sussex **Behalf Of:**  **Organisation**

**Reference:**  **Type:**

Our concerns re allocation of this site and the SP13 site are as to their potential impact on the setting of the South Downs National Park, loss of high quality biodiverse countryside that currently represents a clear boundary edge to Burgess Hill's southern flank, and the cumulative potential for severe local traffic congestion.

**689** **Mr M Brown** **Organisation:** CPRE Sussex **Behalf Of:**  **Organisation**

**Reference:**  **Type:**

Our concerns re allocation of this site and the SP13 site are as to their potential impact on the setting of the South Downs National Park, loss of high quality biodiverse countryside that currently represents a clear boundary edge to Burgess Hill's southern flank, and the cumulative potential for severe local traffic congestion.

**689** **Mr M Brown** **Organisation:** CPRE Sussex **Behalf Of:**  **Organisation**

**Reference:**  **Type:**

Our concerns re allocation of this site and the SP13 site are as to their potential impact on the setting of the South Downs National Park, loss of high quality biodiverse countryside that currently represents a clear boundary edge to Burgess Hill's southern flank, and the cumulative potential for severe local traffic congestion.

**336** **Mr C Lake** **Organisation:** Integrated Development **Behalf Of:**  **Organisation**

**Reference:**  **Type:**

The need for additional housing stock is undeniable in the the country in general and the SE of England in particular. My organisation supports this proposal.

**342** **Ms L Geddes** **Organisation:** Paxos Animal Welfare Society **Behalf Of:**  **Organisation**

**Reference:**  **Type:**

It is important to preserve the green fields space on the edge of the South Downs National Park. This area of Sussex is already densely populated and further developments are NOT welcome. There has been no relevant traffic study carried out and the proposed site is a haven for many protected wildlife species. A development so close the SDNP would cause irreparable harm to the setting of the National Park so I strongly oppose the development in this area.

**1163** Mrs A Green **Organisation:** South of Folders Lane Action Group **Behalf Of:** South of Folders Lane Action Group **Organisation**

**Reference:** Reg18/1163/1 **Type:** Object

Please find attached the objection submission from the South of Folders Lane Action Group to the selection of Sites SA12 and SA13 (pages 34-37 of Site Allocations DPD) for development

**615** **Organisation:** South of Folders Lane Action Group (SOFLAG) **Behalf Of:** **Organisation**

**Reference:** Reg18/615/12 **Type:**

Evidence of potential harm to SDNP

The detrimental effect the development of these two sites would have on the SDNP is best and most potently described by the SDNP itself.

A planning application 19/0276 (now withdrawn), was made earlier this year for 43 houses to be built on Site SA12. The SDNP submitted a strong representation (copied in full below) for refusal of that application. It is exactly the same proposal - 43 houses in the same field - that has now been put forward by MSDC as site SA12.

This representation could not be clearer. The SDNP state unequivocally that development at Site SA12 would be harmful to the setting of the National Park and should be refused.

While the above representation refers to Site SA12, the comments made are unquestionably directly relevant to the nearby Site SA13, and arguably even more so. This site, for 300 homes, is significantly nearer to the boundary of the National Park and is much more visible from it. Its development would be even more harmful to the setting of the National Park than Site SA12.

**615** **Organisation:** South of Folders Lane Action Group (SOFLAG) **Behalf Of:** **Organisation**

**Reference:** Reg18/615/14 **Type:**

Development of Sites SA12 & SA13 would be harmful to the setting of the South Downs National Park in contravention of Policy DP19 of the MSDC District Plan. These sites should be removed from the list of sites proposed as suitable for development.

The Haywards Heath Golf Club Site, ID 503, has no such detrimental effect on the SDNP.

615  Organisation: South of Folders Lane Action Group (SOFLAG) Behalf Of:  Organisation

Reference: Reg18/615/16 Type:

The District Plan seeks to prevent coalescence and in Policy DP13 states that it will only permit development where “it does not result in the coalescence of settlements which harms the separate identity and amenity of settlements, and would not have an unacceptably urbanising effect on the area between settlements.” It is reasonable to conclude that the building of two housing estates, one with 300 homes, would have an urbanising effect. It would certainly result in coalescence as the gap would be more than halved. Development in these fields would be in contravention of Policy DP13 of the MSDC District Plan

The strategic gaps identified in the District and Neighbourhood Plans form what is in effect Burgess Hill’s Green Belt. Protection of such land is identified in the NPPF under section 13, which states:

“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” 18

The NPPF states that the purposes of green belts include:  
• to prevent neighbouring towns merging into one another;  
• to assist in safeguarding the countryside from encroachment;19

Selection of Sites SA12 and SA13 would be in conflict with this part of the NPPF.  
In contrast, selection of Haywards Heath Golf Course, Site ID 503, would not affect the strategic gap.

615  Organisation: South of Folders Lane Action Group (SOFLAG) Behalf Of:  Organisation

Reference: Reg18/615/18 Type:

The infrastructure that caters for this area of South-East Burgess Hill (east of the railway and from the Kingsway estates to the south), is stretched to breaking point - in particular the schools and the doctor’s surgery. In the last 12 years an additional 600 homes have been built and are now occupied. Alarminglly however, there are a further 800+ houses currently under construction in this area that have yet to be occupied with no definite plans in place to build any schools or surgeries. In the proposals for Sites SA12 & SA13 there is no mention of the provision of either of these vital services. Any suggestion that these facilities could be added later should not be given any credence as history clearly indicated that such things never happen. All the previous large sites proposed for development in Mid Sussex have always included the provision of surgeries and schools where these have been deemed necessary. The records show that if they are not included in the proposals, none are added subsequently, and unfortunately there have been instances where they were not built.

615

Organisation: South of Folders Lane Action Group  
(SOFLAG)

Behalf Of:

Organisation

Reference: Reg18/615/9

Type:

This section has outlined a number of individual factors that each preclude Sites SA12 & SA13 from ever being selected as suitable for development. The cumulative effect of all of these put together present an overwhelming case that this site is unsuitable for development from an ecological and environmental point of view.

It is not necessary to lose this natural resource. The man-made Haywards Heath Golf Club (Site ID 503) would provide enough houses to meet the required housing number. It would also meet some of the next round of required allocations. It is being actively promoted by its owners and is available to be developed by the end of this consultation process.

To allow development on sites SA12 & SA13 would contravene planning legislation and environmental protection laws, and cause a devastating and irreversible loss of habitat.

This area of countryside should be made a conservation area to protect the ecological balance of this precious Sussex landscape, leaving the site undisturbed and as it has been for centuries.

Sites SA12 & SA13 should be removed from the list of sites selected for future development.

615

Organisation: South of Folders Lane Action Group (SOFLAG)

Behalf Of:

Organisation

Reference: Reg18/615/6

Type:

For example, while Site 557 was put forward, site 573 was not. This could be because, despite the proposed entrances to the sites being opposite each other on Keymer Road, and therefore equidistant from all facilities, and in fact most of site 557 being further away than the whole of 573, 2 out of 3 walking distances were assessed by MSDC rather differently. Putting together the information from the two site proformas clearly illustrates this error:

COMPARISON WITH HH GOLF CLUB

As mentioned in section 2.7 above, Sites SA12 and SA13 are not the most suitable, sustainable or deliverable options available to Mid Sussex District Council. It is difficult to see why they have been selected in preference to Haywards Heath Golf Club, Site ID 503.

If you put sites 557 and 738 together to create SA13, it is possible to make a direct comparison between the 3 sites, using the information given in the Site Selection Proformas. For clarity if the "score" in a category is the same the boxes are yellow, with "winners" green and "losers" red.

Category			
Golf Club ID 503			
SA13			
SA12			
AONB N/A N/A N/A			
Flood Risk None None None			
Ancient Woodland Partial None None			
SSSI/SNCI/LNR Mitigation None None			
Listed buildings None Yes None			
Conservation area None None None			
Archeology Moderate Moderate Moderate			
Landscape Medium Medium Medium			
Trees / TPO None Low / Medium Low / Medium			
HIGHWAYS			
NO RESULT			
NO RESULT			
NO RESULT			
Local road access Moderate Moderate Moderate			
Deliverability Developable Developable Developable			
Infrastructure Potential to improve Capacity Capacity			
Education Onsite < 10 mins 10 – 15 mins			
Health Onsite 10 – 15 mins > 20 mins			
Services < 10 mins 10 – 15 mins > 20 mins			
Public Transport Poor Good Good			

Not only is the Golf Club (ID 503) the "winner" in more categories, but the critical "highways" category is left blank – when even SYSTRA with their flawed study suggest that the impact of developing Sites SA12 and SA13 will be severe.

Developing the man-made Haywards Heath Golf Club site ID 503 will also bring much greater and long-term benefits for Mid Sussex than destroying the valuable biodiversity of the historic field system south of Folders Lane.

In the words of MSDC's own assessment of the golf club:

"The site offers an opportunity to deliver sustainable growth at scale, potentially incorporating new services and facilities such as a new local centre, new school and additional healthcare facilities. Traffic and air quality modelling indicates that the site is unlikely to cause adverse effects on the road network... The SA finds that major positive effects are anticipated in relation to the social and economic SA objectives."9 [1]

The most positive thing to be said about Sites SA12 and SA13 on the other hand, is that there would be "an opportunity for development of the site to contribute towards improvements to the bus and rail interchange at Burgess Hill."10

There is no comparison. Sites SA12 and SA13 should be removed from the allocations and replaced with Haywards Heath Golf Club, Site ID 503.

The individual arguments as presented in this submission and summarised below against the selection of Sites SA12 & SA13 as suitable for development are all valid and compelling. When taken together, they present an overwhelming case for these sites being declared as unsuitable and unsustainable for development now and in the future. There are clearly other more suitable sites available, most notably Haywards Heath Golf Club (ID 503).

#### Summary of Conclusions

Sites SA12 & SA13 are unsuitable and unsustainable for development because:

- In all their many previous assessments MSDC have always come to the conclusion that the fields to the South of Folders Lane are unsuitable for development.
- In the one assessment of the sites by a Government appointed Inspector the sites were clearly stated as being unsuitable for development.
- Development of these sites would be in clear contravention of several policies in the adopted Mid Sussex District and Burgess Hill Neighbourhood Plans.
- The assessment process carried out by MSDC was inaccurate and flawed.
- There are other much more suitable sites available including the Haywards Heath Golf Course (ID 503).
- The overall ecological importance of the sites makes them unsuitable for development.
- The sites are known to contain many internationally protected species, including seven different varieties of bats, the habitats for which would be irreparably harmed.
- To allow development on sites SA12 & SA13 would contravene environmental protection laws, and cause a devastating and irreversible loss of habitat.
- The traffic study commissioned by MSDC to examine the sites selected by them is grossly flawed as it does not address the problem roundabout at the Junction between Folders Lane and Keymer Road

615

Organisation: South of Folders Lane Action Group (SOFLAG)

Behalf Of:

Organisation

Reference: Reg18/615/3

Type:

Conflict with Mid Sussex District Plan

To select these sites for development would contravene policies DP12, DP13, DP36 and DP37 of the District Plan. Policies 37 (trees, woodland and hedgerows) and 38 (biodiversity) concern the ecology of the sites and are dealt with in Section 3.

Policy DP6 At page 38 it is stated: "Some settlements (Burgess Hill, Hassocks, Hurstpierpoint, Ashurst Wood, Handcross, Pease Pottage, Scaynes Hill, Ansty, Staplefield, Slaugham and Warninglid) have already identified sufficient commitments / completions to meet their minimum housing requirement for the full plan period and will not be expected to identify further sites within their Neighbourhood Plans."

Policy DP12 concerns protection and enhancement of the countryside and states: "The primary objective of the District Plan with respect to the countryside is to secure its protection by minimising the amount of land taken for development and preventing development that does not need to be there."

This precious area of countryside to the south of Burgess Hill, explicitly identified for protection in the Burgess Hill Neighbourhood plan, does not need to be developed. There is sufficient already developed land available to accommodate the housing requirement – Haywards Heath Golf Club.

Policy DP13 concerns coalescence and states: "Provided it is not in conflict with Policy DP12: Protection and Enhancement of the Countryside, development will be permitted if it does not result in the coalescence of settlements which harms the separate identity and amenity of settlements, and would not have an unacceptably urbanising effect on the area between settlements."

With the strategic allocation for 500 homes at Clayton Mills already eating in to the gap between Burgess Hill and the villages to the south, development at Site SA13 would lead to unacceptable coalescence (and is in any case in conflict with Policy DP12).

615  Organisation: South of Folders Lane Action Group (SOFLAG) Behalf Of:  Organisation

Reference: Reg18/615/10 Type:

Sites SA12 and SA13 are unsuitable for inclusion in the Draft Site Allocations DPD as to develop them would lead to further and unacceptable traffic gridlock in the Folders Lane and Keymer Road area. This in turn will cause dangerous (and possibly unlawful) increases in pollution and have a serious affect on the amenity of existing and proposed residents of this area and beyond. There would also be a significant economic loss caused by the increased traffic congestion.

This means that these sites are unsustainable under the terms of the NPPF and should be removed from the list of sites proposed as suitable for development.

The SYSTRA traffic study commissioned by MSDC and being used to justify the sites' inclusion contains significant errors, ignores the junction that is of greatest relevance and importance to these sites and makes totally unsustainable assumptions. The study is, unquestionably, seriously flawed.

Unfortunately, in the limited time allowed for this consultation by MSDC, it has not been possible to produce SOFLAG's own independent traffic assessment to counter the self-serving report from SYSTRA. However it is our intention to have such a report prepared if necessary for the second round of consultation and the Government Inspector's review. We believe this report will fully rebut the unbelievable conclusions in the SYSTRA report that the "severe" problems at Hoadleys Roundabout will be solved by removing the roundabout and replacing it with a set of traffic lights.

SYSTRA Study / Mitigation

It is hard to understand how the mitigation proposed by the SYSTRA study for Hoadleys Corner, and discussed in all previous studies for the Folders Lane / Keymer Road Junction (which the SYSTRA study views as no longer a relevant junction), will solve the "severe" congestion SYSTRA describe.

The proposed mitigation is to change a roundabout to traffic signals. This contradicts the evidence of many academic studies across the world demonstrating that roundabouts consistently outperform traffic signals at multi-arm junctions in terms of both pollution control and travel times.

Examples include: "at a roundabout replacing a signalised junction, CO emissions decreased by 29%, NOx emissions by 21% and fuel consumption by 28%."16

"... replacing the traffic signal with the roundabout has produced a significant improvement in terms of traffic operational performance (20% reduction of total travel time)... The main finding of the study is that the roundabout generally outperformed the fixed-time traffic signal in terms of vehicle emissions"17

As these examples show, much of the research has been done on the benefits of replacing signal controlled junctions with roundabouts, so it is concerning to see MSDC apparently moving in the opposite direction, thereby risking significant increases in delays and harmful pollution.

615  Organisation: South of Folders Lane Action Group (SOFLAG) Behalf Of:  Organisation

Reference: Reg18/615/1 Type:

MSDC have always previously assessed the fields to the South of Folders Lane as unsuitable for development. While there is now a need for more sites to come forward, other proposed sites elsewhere in the District are more suitable, and greenfield Sites SA12 and SA13 should remain protected from urbanisation, as an important part of the Strategic Gap between Burgess Hill and the villages to the south.

396

Ms S Crowther

Organisation: The Ditchling Society

Behalf Of:

Organisation

Reference: Reg18/396/1

Type: Object

I write on behalf of The Ditchling Society to object to site allocations SA12 and SA13 to the south of Folders Lane.

Density of Development

Together these two sites will contribute 343 new houses to an already densely populated town, on green field sites on the borders of the Mid-Sussex District and abutting Ditchling Parish and the South Downs National Park. There is already a development site approved to the immediate west of SA12 and north of Ridgeview which, with SA13, will leave only one green field undeveloped along the whole south/north District border. This density of development is unacceptable in this sensitive location and has the potential to do irreparable harm to natural diversity and the wider landscape.

Highways and Access

The Plan states that “A Sustainable transport strategy will be required identifying how the development will integrate with the existing network, providing safe and convenient routes for walking, cycling and public transport through the development and linking with existing networks.”

What assessment will be undertaken to assess the impact not only on the east-west routes but also on the north-south route between Haywards Heath and, in particular, Ditchling village on the B2112? Over many years this road has become dangerously busy and the volume, speed and pollution in an area of natural importance and through the conservation village of Ditchling is a cause for deep concern.

Housing assessments in 2007, 2013 and 2016 all pointed to the same problem as regards South of Folders Lane saying each time: “There are potential significant transport impacts on the road network as a result of developing this site. It is currently assumed that this will severely limit the ability of this site to be delivered unless detailed transport assessment evidence suggests otherwise.” (source Site Selections Consultation – Frequently Asked Questions)

Relevant study of the impact of these proposed developments on the existing network of local ‘B’ roads must be undertaken before recommending these sites, and the findings published publicly so that the communities on whom the impact falls are given the opportunity to respond.

**725** **Mr A Black** **Organisation:** Andrew Black Consulting

**Behalf Of:** Village Developments Floran Farm

**Developer**

**Reference:** Reg18/725/8 **Type:** Object

Finally, whilst the priority for sites higher in the settlement hierarchy is acknowledged, this is site is very remote from the services offered by Burgess Hill. This is highlighted with the sustainability appraisal for the site which states that it is more than a 20 minute walk from the site to schools, GP and shops.

**723** **Mr A Black** **Organisation:** Andrew Black Consulting

**Behalf Of:** Manoir Properties

**Developer**

**Reference:** Reg18/723/5 **Type:** Object

Appendix B sets out that this site has moderate landscape sensitivity and moderate landscape value. This site could be visible from the South Downs National Park. The SA states that an LVIA is required to determine any impact on the national park. Given the weight that the NPPF requires to be placed on the protection of the national park, any impact must be measured prior to allocation. If it is deemed that mitigation would not minimise the harm caused, then the proposed allocation must fall away.

**725** **Mr A Black** **Organisation:** Andrew Black Consulting

**Behalf Of:** Village Developments Floran Farm

**Developer**

**Reference:** Reg18/725/6 **Type:** Object

Appendix B sets out that this site has moderate landscape sensitivity and moderate landscape value. This site could be visible from the South Downs National Park. The SA states that an LVIA is required to determine any impact on the national park. Given the weight that the NPPF requires to be placed on the protection of the national park, any impact must be measured prior to allocation. If it is deemed that mitigation would not minimise the harm caused, then the proposed allocation must fall away.

**725** **Mr A Black** **Organisation:** Andrew Black Consulting

**Behalf Of:** Village Developments Floran Farm

**Developer**

**Reference:** Reg18/725/7 **Type:** Object

Appendix B also sets out that a TPO area lines the norther border and potential access route. It should be noted that an application was submitted in 2019 for the erection of 43 dwellings and associated works (DM/19/0276) but was withdrawn in September 2019 due to concerns over highways. The deliverability of this site is therefore not considered to be in accordance with the guidance set out in the framework.

**723** **Mr A Black** **Organisation:** Andrew Black Consulting

**Behalf Of:** Manoir Properties

**Developer**

**Reference:** Reg18/723/7 **Type:** Object

Finally, whilst the priority for sites higher in the settlement hierarchy is acknowledged, this is site is very remote from the services offered by Burgess Hill. This is highlighted with the sustainability appraisal for the site which states that it is more than a 20 minute walk from the site to schools, GP and shops.

**723** **Mr A Black** **Organisation:** Andrew Black Consulting

**Behalf Of:** Manoir Properties

**Developer**

**Reference:** Reg18/723/6 **Type:** Object

Appendix B also sets out that a TPO area lines the norther border and potential access route. It should be noted that an application was submitted in 2019 for the erection of 43 dwellings and associated works (DM/19/0276) but was withdrawn in September 2019 due to concerns over highways. The deliverability of this site is therefore not considered to be in accordance with the guidance set out in the framework.

1184 Mr B Dempsey

Organisation:

Behalf Of:

District Councillor

Reference: Reg18/1184/1

Type: Object

I write as District Councillor for Hassocks to object to Sites SA12 and SA13 of the Site Allocation DPD (Land South of 96 Folders Lane, Burgess Hill, and Land East of Keymer Road and South of Folders Lane, Burgess Hill).

This objection is on the grounds that more than 300 dwellings on these sites will have an unacceptable negative impact on traffic flow and safety in both Burgess Hill and Hassocks.

There is already significant traffic pressure on the small roundabout at the junction between Keymer Road and Folders lane. This would be greatly exacerbated.

It is proposed that site SA13 would be accessed from Keymer Road/Ockley Lane. The development would therefore add significantly to traffic on Ockley Lane, particularly heading south towards Hassocks, the A23 and Brighton.

The most direct route from site SA13 to the A23 and Brighton is south down Ockley Lane, to Lodge Lane, New Road, and the A273. This route includes roads and junctions that are unsuitable for this increased volume of traffic. No adequate traffic survey has been conducted to assess the risks that this presents.

Ockley Lane and Lodge Lane are rural and semi-rural, width-restricted roads. The Ockley Lane/Keymer Road junction and the Lodge Lane/New Road junction in Keymer, as well as the New Road/A273 junction in Clayton, all have pre-existing safety concerns.

The proposal for 300 houses at SA13 is particularly unsuitable because the District Plan already allocates an additional 500 houses off Ockley Lane, north of Clayton Mills in Hassocks, less than a mile south of site SA13. The likely development of the Clayton Mills site will already add significantly to traffic on Ockley Lane and nearby roads.

The proposed sites will overload the local road network and present a significant risk for traffic safety. On this basis I do not believe they should be considered for development.

581 Mr G Bennett

Organisation:

Behalf Of:

Resident

Reference: Reg18/581/1

Type: Support

You can walk to the station from this site  
I support it wholeheartedly

**1270** **Mr & Mrs C Gowlett** **Organisation:**  **Behalf Of:**  Resident

**Reference:**  **Type:**

We live in Shearing Drive Burgess Hill. Folders Lane and the Keymer Road are already extremely busy with traffic and additional housing will just produce more

We are objecting to site allocations SA12 and SA13 (pages 34 - 37), the fields south of Folders Lane, because there is a better, more suitable and more sustainable site available at Hayward's Heath Heath Golf Course, the site known as ID 503.

The site ID503 is available and the owners of the land would like to make it available for housing

The developer promoting the site is ready to start

The current users of the site, the Golf Club, want to move.

The site will provide more housing than MSDC are currently proposing, creating a larger "buffer" which will reduce the pressure for more greenfield sites to be developed during the life of the District Plan.

The developers are planning on site infrastructure, including a school and doctor's surgery, in their proposals for site ID 503. These are not included in the proposals for sites SA 12 and SA 13, despite these being desperately needed

**509** **Mr C Lake** **Organisation:**  **Behalf Of:**  Resident

**Reference:**  **Type:**

I am writing to SUPPORT the site allocations SA12 and SA13 (pages 34-37) in the fields South of Folders Lane, Burgess Hill. Our region needs more housing, and our town offers the potential to support this growth.

I would meanwhile like to see a step up in the development of the town centre and ancillary services to support the expansion in population.