

691

Mr M Ruddock

Organisation: Pegasus Group

Behalf Of: Persimmon - South Folders Lane

Promoter

Reference: Reg18/691/6

Type: Support

Although it is acknowledged that there would be an increase in traffic as a result of the development, initial work has indicated that there is sufficient capacity in the highway network and at relevant nearby junctions to ensure the scheme will have an appropriate impact on the surrounding highways. It is recognised that traffic movements are often an issue of concern to residents in the vicinity of a new housing scheme and that SA13 is no different in this respect. Our client will work alongside the highway authority to ensure such concerns are taken account of in subsequent detailed designs for on and off site proposed works.

691

Mr M Ruddock

Organisation: Pegasus Group

Behalf Of: Persimmon - South Folders Lane

Promoter

Reference: Reg18/691/5

Type: Support

The site will have two vehicular access points, both via Keymer Road to the west. Any forthcoming planning application will be accompanied by a full Transport Assessment which will demonstrate the acceptability of these access points in terms of capacity and visibility to ensure that there would not be an adverse impact on highway safety as a result.

691

Mr M Ruddock

Organisation: Pegasus Group

Behalf Of: Persimmon - South Folders Lane

Promoter

Reference: Reg18/691/7

Type: Support

The site is not located within an area identified by the Environment Agency as being at risk of surface water flooding. The existing watercourse and pond are shown on the masterplan and will be integrated into the soft landscaped areas along with SuDS basins. The development will therefore ensure that measures will be incorporated to ensure that the risk of flooding would not be increased as a result of the proposals. Whilst it is noted that Policy SA13 states that development should avoid areas at high risk of surface water flooding to the north west, there do not appear to be any areas at risk of surface water flooding within the site, and the built development would avoid the existing watercourse. The development would be delivered in compliance with Policy SA13 in terms of minimising flood risk.

691

Mr M Ruddock

Organisation: Pegasus Group

Behalf Of: Persimmon - South Folders Lane

Promoter

Reference: Reg18/691/2

Type: Support

Policy SA13 covers the whole of the site, and as acknowledged by the Policy it is under the control of housebuilders, however separate parts of the site are owned by separate housebuilders and a landowner who are working collaboratively to deliver the site. As the policy covers the site as a whole, this representation will cover the site as a whole where possible however there are instances where it has been necessary to focus on the extent of our client's control only.

As demonstrated by the Masterplan, the development would be landscape-led with substantial amounts of soft landscaping ensuring that the development would be sympathetic to the semi-rural character of the surrounding area in particular Folders Lane. The layout will ensure that existing landscape features and established trees can be integrated into the development with the main area of open space central to the development and providing a focus as required by Policy SA13. The trees and landscaping will be integrated into the development as a whole, providing visual separation between residential areas and creating a sense of place through an attractive setting and high-quality design. In addition to providing an appropriate development within the site for future users, the retention and strengthening of established landscape features will help ensure the scheme sits comfortably within its surroundings.

The Masterplan demonstrates that the layout will minimise the impact of the most visible parts of the site on the wider countryside to the east and the south through retaining and reinforcing the tree cover on these boundaries. This will also serve to protect the character and amenity of the public footpath to the south.

The Masterplan demonstrates that large areas of public open space would be provided within any eventual scheme that would include children's play areas and could include space for formal sport.

691 **Mr M Ruddock** **Organisation:** Pegasus Group

Behalf Of: Persimmon - South Folders Lane

Promoter

Reference: Reg18/691/4 **Type:** Support

A full suite of detailed ecological surveys are being carried out and appropriate mitigation measures will be provided. The existing features will be an integral part of the design process and all boundaries will be incorporated within the development, so any suitable habitat will be safeguarded. We can confirm the applicant's agreement and commitment to ensuring that there is a net gain in biodiversity as a result of the development.

691 **Mr M Ruddock** **Organisation:** Pegasus Group

Behalf Of: Persimmon - South Folders Lane

Promoter

Reference: Reg18/691/3 **Type:** Support

Policy SA13 of the draft Allocations DPD therefore correctly notes that there are Grade II Listed Buildings in the vicinity of the site, the closest being High Chimneys which is located to the west. As such the representation is accompanied by a Significance Assessment prepared by Pegasus Group.

As set out above the site is well contained by existing housing including High Chimneys, and boundary trees and hedgerows that would be retained. However, it is acknowledged that the land to the east of High Chimneys reflects the historic setting of the Listed Building, and although views of this land are now limited due to the presence of mature trees, it contributes to its setting by virtue of it being evidence of the Listed Building's once rural surroundings.

As set out on the Masterplan, dense tree cover would be provided and maintained on the boundary with High Chimneys. This will ensure that the development would not be visually dominant when viewed from that site, to ensure that it would not result in an adverse impact on its setting.

691 **Mr M Ruddock** **Organisation:** Pegasus Group

Behalf Of: Persimmon - South Folders Lane

Promoter

Reference: Reg18/691/1 **Type:** Support

The representation is accompanied by a Landscape Statement from CSA Environmental dated May 2019 which is included as an appendix. The statement sets out that the site is very well contained in views from the surrounding area by virtue of the adjoining built development that borders the site from the north, south and west, and by dense treed boundaries that border the site to the east. As such the development would not be apparent from the surrounding public highways, or from the farmland within the South Downs National Park to the south.

The site is not covered by any designations relating to landscape character and quality, and due to its physical containment, it does not provide an important setting for the adjacent housing areas and is not an important component for the setting of the South Downs National Park. As has been noted in the published capacity assessments it does not provide separation between Burgess Hill and the nearby settlements to the south. As such it is not considered a valued landscape which are offered protection by Paragraph 170 of the NPPF.

The Landscape Statement has identified a number of principles which should be taken into consideration in respect of landscape capacity and mitigation, for example locating housing within internal field boundaries in order to maintain the existing landscape structure and small field pattern, and minimising impact on neighbouring properties. It is concluded that the site has a medium / medium to high capacity to accommodate a medium density development which respects and retains the established landscape structure and thereby follows such principles.

668 **Mr A Byrne** **Organisation:** Historic England

Behalf Of:

Statutory Consultee

Reference: Reg18/668/2 **Type:** Object

Based upon the evidence gathered, an assessment of impacts on heritage significance should be undertaken as a basis for the selection of each site for allocation. This should identify where impacts may be harmful and set out the avoidance or mitigation measures that would be necessary to eliminate or reduce the harm arising from the allocation of the site. We are unable to identify the evidence that supported such assessments in the draft Site Allocation DPD, and cannot discern the measures that may be necessary to conserve and enhance heritage assets that may be affected within the draft DPD beyond generic statements on protection setting or assessing archaeology. This may lead to potential harm to the significance of heritage assets by development, for instance by visual encroachment into their settings or severance from their historical landscape context.

This concern can be directed at a number of proposed site allocations where heritage assets are noted but no qualitative assessment has been carried out (e.g. SA13, SA18, SA21, SA22, SA25, SA28, SA32, SA33)

13 **Mr P Santos** **Organisation:** South East Water

Behalf Of:

Statutory Consultee

Reference: Reg18/13/2 **Type:** Neutral

Regarding the site allocations facilitated on Appendix 1 MSDC Site Allocations DPD (Consultation Draft October 2019) site specific policy requirements for proposed site allocations relating to utilities South East Water thinks that there are some areas to look at such as:

SA13 - 300 C1 KM reinforcement - Keymer Road

620 **Ms C Mayall** **Organisation:** Southern Water

Behalf Of:

Statutory Consultee

Reference: Reg18/620/1 **Type:** Neutral

The assessment reveals that existing local sewerage infrastructure has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure. Proposals for 300 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development to the sewer network at this site ahead of reinforcement could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2019).

In consideration of the above, we recommend the following criterion is added to Utilities under Policy SA13

Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.

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

Behalf Of:

Statutory Consultee

Reference: Reg18/748/13 **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’.

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

Behalf Of:

Statutory Consultee

Reference: Reg18/748/14 **Type:** Object

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

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

Behalf Of:

Local Authority

Reference: Reg18/716/2 **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: Reg18/777/11 **Type:** Object

As set out in the 'Urban Design Principles', the draft allocation proposes a central open space. Notwithstanding any in-principle concerns we may have, if the allocation is progressed, it is suggested that it may be appropriate to move the open space to the southern part of the site in order to acknowledge its greater sensitivity, to better respect settlement form, and to add a landscape/ecological buffer between the development and the SDNP.

777 **Mrs L Howard** **Organisation:** South Downs National Park **Behalf Of:** **Local Authority**
Reference: Reg18/777/10 **Type:** Object

SA13 – Land East of Keymer Road and South of Folders Lane, Burgess Hill
This site is a proposed extension to Burgess Hill of 300 dwellings and it is located approximately 100 metres from the SDNP at the nearest point, with glimpsed views from/to the high ground of the Downland ridge approximately 4.3km to the south. Concern is raised that the proposed allocation would erode the rural buffer between Burgess Hill and the SDNP, which is likely to be harmful to the special qualities and landscape character of the setting of the SDNP. This is a highly sensitive site likely to have high ecological value and whose character is shared with land in the SDNP. The site contributes to the setting of the National Park. We advise that evidence is necessary to inform the capacity of the site which would reflect its role as part of the setting and the sensitivities of the site.
This site is part of a larger landscape whose character experienced today survives from the medieval period. This historic character is shared with parts of the SDNP and this coherence in historic character suggests the site contributes positively to the setting of the SDNP. This coherence historically and across a wider area makes this site highly sensitive to change. The long history of these assart fields makes them much more likely to be ecologically rich. The multiple hedgerows, trees including large mature trees, geology/landform and relatively undisturbed nature of the site all means that it is likely to have high ecological value. Given the proximity, any ecological value will have cross boundary importance for the SDNP, and this biodiversity impact is of particular concern. Water quality and quantity have the potential to be negatively affected here and we note that watercourses from the site, noted running through the southern part of the site, although initially heading north, eventually drain into rivers passing through the SDNP, for example the River Adur. We note that the southern part of the site is the most sensitive as it is here that the surviving landscape is the oldest, and aerial photography indicates high ecological sensitivity too.

777 **Mrs L Howard** **Organisation:** South Downs National Park **Behalf Of:** **Local Authority**
Reference: Reg18/777/6 **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: Reg18/777/4 **Type:** Neutral

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.

792 Mrs T Flitcroft Organisation: West Sussex County Council Behalf Of: Local Authority

Reference: Reg18/792/51 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.

792 Mrs T Flitcroft Organisation: West Sussex County Council Behalf Of: Local Authority

Reference: Reg18/792/24 Type: Neutral

SA 13 Land East of Keymer Road and South of 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 the Keymer Road south of Keymer Gardens
- Provide enhanced bus stop facilities including bus shelters and passenger information improvements on Folders Lane
- Contribute towards enhancement of cycle parking provision at Burgess Hill station
- Contribute towards improvements in cycling facilities to Burgess Hill station

667 Mr S Cridland Organisation: Burgess Hill Town Council Behalf Of: Town & Parish Council

Reference: Reg18/667/6 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: Reg18/667/8 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: **Type:**

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.

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

This site allocation would contradict the Town Council's Environmental Charter, and any significant loss of trees would impact the aim to be carbon neutral by 2050. It was noted that we were now in a climate emergency.

1223 Cllr J Foster

Organisation: Burgess Hill Town Council

Behalf Of:

Town & Parish Council

Reference: Reg18/1223/2

Type: Object

Dear Mid Sussex Planning,

I would like to make the following comments regarding the site allocations:

SA12 and SA13 (Land South of Folders Lane, Burgess Hill)

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

Thanks for your attention to these concerns.

678 Ms S Mamoany

Organisation: Ditchling Parish Council

Behalf Of:

Town & Parish Council

Reference: Reg18/678/7

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: Reg18/678/3 Type: Object

Site SA13 is on the boundary of Lewes District Council, South Downs National Park and Ditchling Parish and therefore Mid Sussex District Council should have consulted them directly before this site was added to the DPD.

678 Ms S Mamoany Organisation: Ditchling Parish Council Behalf Of: Town & Parish Council

Reference: Reg18/678/5 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.

678 Ms S Mamoany Organisation: Ditchling Parish Council Behalf Of: Town & Parish Council

Reference: Reg18/678/2 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.

600 Ms T Ford Organisation: Hassocks Parish Council Behalf Of: Town & Parish Council

Reference: Reg18/600/2 Type: Object

HPC has significant concerns over SA13, Land South of Folders Lane and East of Keymer Road, Burgess Hill which proposes 300 dwellings all of which will be accessed via Ockley Lane. There has been no traffic study to assess the impact of this development on the traffic flow on Ockley Lane, Lodge Lane, Brighton Road and the associated junctions. Based on extensive local knowledge of the area, it is considered that the traffic generated by a further 300 dwellings on Ockley Lane, in addition to the 500 dwellings already planned on the site North of Clayton Mills, will result in the aforementioned road networks and junctions being heavily overloaded. Noting in particular that Ockley Lane and Lodge Lane already have width restrictions in place and are semi-rural roads. Furthermore the junctions between Lodge Lane/Brighton Road and Brighton Road/A273 are notoriously hazardous and a significant increase in traffic will only serve to exacerbate this.

639 Mr A Sturgeon

Organisation: Haywards Heath Town Council

Behalf Of:

Town & Parish Council

Reference: Reg18/639/6

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: Reg18/1190/2

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 SP12 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 SP12 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 SP12 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.

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

Reference: **Type:**

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: Reg18/615/7

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: Reg18/615/19

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: Reg18/615/17

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: Reg18/615/15

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: Reg18/615/13

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: Reg18/615/8

Type:

Site SA13 forms the last remaining part of a historic field system, bounded by ancient hedgerows and directly adjacent to the South Downs National Park. Untouched by modern farming methods, it has become an incredibly bio-diverse area containing many important species that must be protected from future development.

The report provided by the Sussex Biodiversity Records Centre for this submission is unequivocal. It clearly demonstrates that Site SA13 is of great ecological importance. It is most unlikely that there is anywhere within miles, or possibly even within Sussex, where such an ancient field pattern containing such important flora and fauna currently exist in peaceful harmony.

The site itself is also environmentally unsuited to development as it is relatively low lying and the heavy clay weald leaves many parts of it prone to flooding.

This section provides comprehensive expert evidence that any benefits from the addition to the housing supply in Mid Sussex are far outweighed by the environmental and ecological damage caused by development. To select this site for development is in direct contravention of planning law including the NPPF.

There is indisputable evidence that many protected and highly valued species inhabit Site SA13 either throughout the year or during their particular migratory season. It is known that some private ecological surveys have been made on this land over the last 20 years. Whilst the detailed results of these have not been made publicly available, conversations with those carrying out the surveys as well as people living directly adjacent to the site have confirmed that the protected species listed below have been found to inhabit the area.

However, of much greater importance (and providing much more 'weight' to this submission) is the list of species detailed below and verified by the Sussex Biodiversity Records Centre as being found within the Site. SOFLAG is very grateful to the Sussex Biodiversity Records Centre for providing their report on Site SA13 (Report No. SxBRC/19/633) from which the following information has been taken. It should also be noted that the non-inclusion of any species does not actually mean they are not present in the site. For example, it is known that there are adders present within the site but these have yet to be recorded formally.

Every one of the following species has been shown to be present at Site SA13 by the Sussex Biodiversity Records Centre. Each of the species listed is either protected under International or National legislation as described.

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: Reg18/615/4 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: Reg18/615/2 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.

615

Organisation: South of Folders Lane Action Group (SOFLAG)

Behalf Of:

Organisation

Reference: Reg18/615/11

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.

760 **Mr M Nailard** **Organisation:** Woodland Flora and Fauna Group

Behalf Of: The Woodland, Flora and Fauna Group

Organisation

Reference: Reg18/760/1 **Type:** Object

Following a meeting and examination of the site with local public representatives, the countryside issues resulting from this proposed development have been illustrated to us. This has prompted us to write to voice our strong objections to this proposal for the reasons given below.

The natural environment and its dependent wildlife are under severe threat from continuing development and having examined the detrimental impact the proposals for Site SA13 will have we have some major concerns.

From site observation and with reference to the submission from SOFLAG together with the evidence from the Sussex Biodiversity Records Centre, we fully support their submitted arguments against development.

We spend the majority of our lives as a group trying to repair the natural environmental damage inflicted by new development in Southern Mid Sussex and help the indigenous wildlife

species to survive, so the announcement of a further loss of valuable countryside fills us with despair. We realise, and you will surely too in years to come, that each reduction of such valuable natural habitat will impact badly on the future well-being of us all and not only the flora and fauna.

From the Sussex Biodiversity Record Centre evidence, there are many protected species (including barn owls, bats, dormice, great crested newts etc.) inhabiting the site and to rob them of this breeding and hunting terrain would impact their survival prospects considerably. We have projects currently underway in southern Mid Sussex to drag these species back from virtual extinction caused by the loss of nesting, roosting and hunting terrain that development sites like this one are inflicting upon them.

The site is also on the south facing slope of an east-west ridge at a relatively raised elevation in this landscape which has views which offer a high degree of comprehension of the southerly landscape. Its boundary of ancient hedgerow and distinctive mature tree features have a very special significance which should be enhanced and not visually overwhelmed by the presence of housing development. However many compensatory measures like wildlife corridors etc. the development includes, our experience is that the close proximity of human habitation renders them mostly ineffective and offers very few long-term survival prospects for indigenous wildlife and flora due to human recreational activities.

There must be numerous alternative sites where such development can be located without inflicting such severe detrimental repercussions on this valuable local natural environment.

Could you therefore, please reject this inappropriate site allocation proposal?

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

Behalf Of: Manoir Properties

Developer

Reference: Reg18/723/8 **Type:** Object

The SA sets out that this is the only site within Burgess Hill to have any impact on listed buildings where it is stated that development of this site would cause less than substantial harm (medium) on High Chimneys (Grade II listed). This is not mentioned within appendix B and this therefore calls into question the consistency of assessment of the sites in this regard.

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

Behalf Of: Village Developments Floran Farm

Developer

Reference: Reg18/725/10 **Type:** Object

Given that site SA12 and SA13 are in close proximity to one another it is notable that the cumulative impact of the development of both of these sites has not been assessed for a number of 'in-combination' impacts such as highways and landscape impact.

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

Behalf Of: Village Developments Floran Farm

Developer

Reference: Reg18/725/9 **Type:** Object

The SA sets out that this is the only site within Burgess Hill to have any impact on listed buildings where it is stated that development of this site would cause less than substantial harm (medium) on High Chimneys (Grade II listed). This is not mentioned within appendix B and this therefore calls into question the consistency of assessment of the sites in this regard.

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

Behalf Of: Manoir Properties

Developer

Reference: Reg18/723/9 **Type:** Object

Given that site SA12 and SA13 are in close proximity to one another it is notable that the cumulative impact of the development of both of these sites has not been assessed for a number of 'in-combination' impacts such as highways and landscape impact.

692 **Mr M Ruddock** **Organisation:** Pegasus Group

Behalf Of: Thakeham - South Folders Lane

Developer

Reference: Reg18/692/1 **Type:** Support

The site as a whole will have two vehicular access points, both via Keymer Road to the west. This representation is accompanied by a Technical Note which sets out that the approved site access junction from Greenacres onto Keymer Road was designed to cater for future development within the Policy SA13 site and would not present any highway concerns with regard to design, capacity or safety.

Any forthcoming planning application will be accompanied by a full Transport Assessment which will demonstrate the acceptability of these access points in terms of capacity and visibility to ensure that there would not be an adverse impact on highway safety as a result.

692 **Mr M Ruddock**

Organisation: Pegasus Group

Behalf Of: Thakeham - South Folders Lane

Developer

Reference: Reg18/692/2

Type: Support

The scheme is deliverable and will be implemented within the next three years.

The following documents have been requested by the Local Planning Authority and will be submitted in early December:

- Landscape Principle Plan
- Archaeology and Heritage Note
- Drainage Note
- Utilities Note.

744 **Mr T Rodaway**

Organisation: Rodway Planning

Behalf Of: Fairfax - HHGolf Course

Developer

Reference: Reg18/744/4

Type: Object

The detailed site assessment for the larger Policy SA13 site sets out a number of concerns, which indicate that the site may not be suitable for allocation.

1184 Mr B Dempsey Organisation:

Behalf Of:

District Councillor

Reference: Reg18/1184/2 Type: Object

Objection to Site SA13 of the Site Allocation DPD:

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.

649 Mrs M Bennett Organisation:

Behalf Of:

Resident

Reference: Reg18/649/1 Type: Support

In light of the desperate shortage of housing and bearing in mind the current development in this area of Burgess Hill, it is my opinion that the Council is doing an excellent job in promoting this development and I wholeheartedly give it my support having resided in this area for many years

Please add my support to the weight of those in favour.

951 Mr P Bennett Organisation:

Behalf Of:

Resident

Reference: Reg18/951/1 Type: Support

With an immense shortage of housing in the south. I am strongly in favor of this development especially as it abuts previous developments. It also utilizes land that is unfarmable and is ideal for housing.

1270 Mr & Mrs C Gowlett

Organisation:

Behalf Of:

Resident

Reference: Reg18/1270/2

Type: Object

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

733

Mrs K Olejniczak

Organisation:

Behalf Of:

Resident

Reference: Reg18/733/1

Type: Object

1) Poor Road Infrastructure and Traffic Congestion

The site has been previously considered for development in 2007, 2013 and 2016. Every time it was rejected due to the same problem "There are potential significant transport impacts on the road network as a result of developing this site (in particular the east-west link issued in Burgess Hill). It is currently assumed that this will severely limit the ability of this site to be delivered unless detailed transport assessment evidence suggests otherwise"

MSDC commissioned and received a traffic report dated 4th September 2019 from Systra and scenario 5 relates. Page 36 of the report clearly shows the impacts on the two east-west crossings over the railway line, S6 and S22. The alternate route via Hassocks, S8, is also severely impacted. Whilst the A2300 is being upgraded there is no proposal to sort out the issues of east-west traffic movement over

the railway line as identified in the Systra report. A proposed mitigation of set of traffic lights at S6 isn't going to solve anything – anybody who come to the site will be able to see that. With only two single carriageway roads over the railway line, both constrained by necessary pedestrian crossings, there is already severe congestion at rush hours. The below is typical. Red means traffic at a stop. This is real time data derived from the traffic itself - and is accurate. See Appendix A for day-by-day levels, which can be witnessed by simply trying to use these roads at rush hour. The image below for October 17th shows around two miles of queues. Public transport would also be adversely impacted by increased traffic as there are no dedicated bus lanes or space to accommodate them. Buses are trapped just as much as cars.

There is a principle that development follows infrastructure - there is no infrastructure planned to the east of Burgess Hill. Kingsway, Jones' homes and the 500 north of Hassocks, well over 1000 new homes, all feed into the same roads east of the railway line in Burgess Hill that are already a bottleneck and overcapacity.

On the grounds of traffic and road infrastructure alone these two sites should not proceed, as was previously the case when considered before. Today the position is worse due to other housing completions.

2) Contravention of adopted MSDC District Plan Policy DP12: Protection and Enhancement of Countryside

The area south of Folder's Lane and east of Keymer Road is covered in the adopted MSDC District Plan by DP12: Protection and Enhancement of Countryside. (<https://www.midsussex.gov.uk/media/3406/mid-sussex-districtplan.pdf>). The proposed development totally conflicts with this policy.

The cumulative impact of the development when considered alongside other developments already approved north of Hassock, at Kingsway Jones's homes off Folders Lane will have an adverse impact on the area. With SA13 going as far south as Wellhouse Lane and the northern development at Hassocks the gap Burgess Hill and Hassocks will be greatly reduced. The traffic on Ockley Lane/Keymer Road, with its 6'6" width restriction, which is basically a track that was tarmacked, will be immense overall.

3) Safety and access issues - access for Persimmon to their 20-acre portion of the SA13 site

We have been informed by MSDC that Persimmon wish to use Broadlands as the sole access to their portion of the SA13 site. This raises serious and significant safety and access issues. Broadlands is a narrow cul-de-sac which serves just seven homes, there are no pavements and the road ends in a five-bar gate to a track which is the proposed access to the SA13 site which is countryside. It was initially built to service just three houses (Dormers, Timbers and Hurdles) and was not designed to service 200+. Broadlands joins the Keymer Road at a poor junction where there have been at least two accidents. At this junction, there are no pavements on either road and Keymer Road is narrow with a 6'6" width restriction. To the south there is the brow of a hill less than 100 yards away. Opposite is the boundary to Batchelor's Farm nature reserve. The junction is dangerous due to appalling visibility splays. Visibility to cars travelling south is marginal and good visibility can only be obtained by edging out onto Keymer Road itself. Visibility to cars travelling northbound is even more constrained due to the high brick wall which is the boundary to The Lees which is less than a metre from the edge of the roadway.

It is inconceivable that this junction is suitable for the several hundred car movements per day that would result from it being the access point to this site, and hard to see how it could be improved with such limited space available.

Despite what we were told at the public event in October at St Wilfrid's, we have been advised by WSCC Highways Senior Planner (Jamie Brown) that MSDC have not made any request for pre-

planning advice with respect to SA13 and WSCC have not made a site visit.

We spoke with Persimmon staff, including Mr Lee Farmer, Head of Land as Persimmon Homes, during a site visit made in June when they stated that they would reach an agreement with Thakeham to use Willowhurst for access, with that road having been designed and built with proper visibility onto Keymer Road. They agreed with us that Broadlands was suitable only for foot/cycle and emergency access. Presumably they are trying to use Broadlands as they are being asked for lots of money by Thakeham for that access.

4) Damage to Broadlands and harm to the residents

Broadlands is a narrow cul-de-sac which serves just seven homes. There are no pavements and the road ends in a five-bar gate to a track which is the proposed access to the SA13 site. The site is countryside populated by horses, deer, birds of prey and other wildlife. It is a peaceful semi-rural location which will be greatly harmed by it being turned into access for 200+ homes.

1. Conversion of the road into access to 200+ homes will completely change the character of the road from a quiet lane to busy thoroughfare, making it a considerably less desirable place to live. With the site being remote from the town centre and station, most journeys will be by car. Most likely several hundred every day.
2. Access for existing properties onto Broadlands will be compromised creating a safety issue. At the end of Broadlands are the driveways of four properties, two on each side. As there is no access beyond these driveways, they are aligned in such a way to be able to drive in/out and along Broadlands as it exists today and not along the track, compromising the safety of existing residents and the 10 children that live along the road. The gate leads to the track that is the proposed access.
3. Broadlands is too narrow to carry construction traffic and its use for this purpose would create safety issues. A standard 6 wheeled lorry of the size typically used for transportation of building materials/soil etc is 2.5m wide with at least 3m needed for passing when mirrors are included. These vehicles will not be able to pass each other on Broadlands, and with most cars now being 2m wide (mine in 2.1m) it would be difficult to pass without driving on and wrecking the grass verges. Even if widened passing will be tight with lorries shaving or worse other traffic.
4. Duration of Persimmon's proposed build, from their Developer Questionnaire shows the duration of build to be from Q1 2022 to Q1 2026. This is ridiculous – four years of lorries, dirt and danger along Broadlands. The danger can be seen today with the lorries to the Jones' homes site who seem keen on "playing chicken" with oncoming cars; this photo outside Burgess Hill School for Girls.

5) Loss of amenity

Further to the points in item 3) above, the proposal of SA12 and SA13 if built would result in a loss of amenity for both the residents of Broadlands and more widely in south-east Burgess Hill. The HS2 London-West Midlands Environmental Statement published by the Department for Transport in November 2013, defines 'amenity' as:

'The benefits of enjoyment and well-being which are gained from a resource in line with its intended function.

Amenity may be affected by a combination of factors such as: sound, noise and vibration; dust/air quality; traffic/congestion; and visual impacts.'

The SuDS Manual (2015) defines amenity as 'a useful or pleasant facility or service', which includes both the tangible and the less tangible. It also suggests amenity '...covers liveability, which is associated with factors that improve the quality of life for inhabitants. Liveability encompasses the well-being of a community and of individuals and comprises the many characteristics that make a location a place where people want to live and work.'

It is almost certain that the proposed SA12 and SA13 development in particular will result in a loss of amenity due to the inevitable increases in traffic/congestion, the visual impact of such a large development in sight of the South Down National Park, and the liveability for those living nearby, especially in Broadlands that will be changed forever for the worse.

6) The Principle of the NPPF (National Planning Policy Framework) - 'Tilted Balance'

The NPPF published February 2019 has the presumption in favour of sustainable development, not development at the expense of everything else. The adverse impacts of SA12 and SA13 will negatively and demonstrably impact the daily lives of hundreds of people in Burgess Hill through increased traffic congestion and loss of amenity to those in and around Broadlands.

729

Mr A Olejniczak

Organisation:

Behalf Of: Broadlands Residents Association

Resident

Reference: Reg18/729/1

Type: Object

1) Poor Road Infrastructure and Traffic Congestion

The site has been previously considered for development in 2007, 2013 and 2016. Every time it was rejected due to the same problem "There are potential significant transport impacts on the road network as a result of developing this site (in particular the east-west link issued in Burgess Hill). It is currently assumed that this will severely limit the ability of this site to be delivered unless detailed transport assessment evidence suggests otherwise"

MSDC commissioned and received a traffic report dated 4th September 2019 from Systra and scenario 5 relates. Page 36 of the report clearly shows the impacts on the two east-west crossings over the railway line, S6 and S22. The alternate route via Hassocks, S8, is also severely impacted. Whilst the A2300 is being upgraded there is no proposal to sort out the issues of east-west traffic movement over

the railway line as identified in the Systra report. A proposed mitigation of set of traffic lights at S6 isn't going to solve anything – anybody who come to the site will be able to see that. With only two single carriageway roads over the railway line, both constrained by necessary pedestrian crossings, there is already severe congestion at rush hours. The below is typical. Red means traffic at a stop. This is real time data derived from the traffic itself - and is accurate. See Appendix A for day-by-day levels, which can be witnessed by simply trying to use these roads at rush hour. The image below for October 17th shows around two miles of queues. Public transport would also be adversely impacted by increased traffic as there are no dedicated bus lanes or space to accommodate them. Buses are trapped just as much as cars.

There is a principle that development follows infrastructure - there is no infrastructure planned to the east of Burgess Hill. Kingsway, Jones' homes and the 500 north of Hassocks, well over 1000 new homes, all feed into the same roads east of the railway line in Burgess Hill that are already a bottleneck and overcapacity.

On the grounds of traffic and road infrastructure alone these two sites should not proceed, as was previously the case when considered before. Today the position is worse due to other housing completions.

2) Contravention of adopted MSDC District Plan Policy DP12: Protection and Enhancement of Countryside

The area south of Folder's Lane and east of Keymer Road is covered in the adopted MSDC District Plan by DP12: Protection and Enhancement of Countryside. (<https://www.midsussex.gov.uk/media/3406/mid-sussex-districtplan.pdf>). The proposed development totally conflicts with this policy.

The cumulative impact of the development when considered alongside other developments already approved north of Hassock, at Kingsway Jones's homes off Folders Lane will have an adverse impact on the area. With SA13 going as far south as Wellhouse Lane and the northern development at Hassocks the gap Burgess Hill and Hassocks will be greatly reduced. The traffic on Ockley Lane/Keymer Road, with its 6'6" width restriction, which is basically a track that was tarmacked, will be immense overall.

3) Safety and access issues - access for Persimmon to their 20-acre portion of the SA13 site

We have been informed by MSDC that Persimmon wish to use Broadlands as the sole access to their portion of the SA13 site. This raises serious and significant safety and access issues. Broadlands is a narrow cul-de-sac which serves just seven homes, there are no pavements and the road ends in a five-bar gate to a track which is the proposed access to the SA13 site which is countryside. It was initially built to service just three houses (Dormers, Timbers and Hurdles) and was not designed to service 200+. Broadlands joins the Keymer Road at a poor junction where there have been at least two accidents. At this junction, there are no pavements on either road and Keymer Road is narrow with a 6'6" width restriction. To the south there is the brow of a hill less than 100 yards away. Opposite is the boundary to Batchelor's Farm nature reserve. The junction is dangerous due to appalling visibility splays. Visibility to cars travelling south is marginal and good visibility can only be obtained by edging out onto Keymer Road itself. Visibility to cars travelling northbound is even more constrained due to the high brick wall which is the boundary to The Lees which is less than a metre from the edge of the roadway.

It is inconceivable that this junction is suitable for the several hundred car movements per day that would result from it being the access point to this site, and hard to see how it could be improved with such limited space available.

Despite what we were told at the public event in October at St Wilfrid's, we have been advised by WSCC Highways Senior Planner (Jamie Brown) that MSDC have not made any request for pre-

planning advice with respect to SA13 and WSCC have not made a site visit.

We spoke with Persimmon staff, including Mr Lee Farmer, Head of Land as Persimmon Homes, during a site visit made in June when they stated that they would reach an agreement with Thakeham to use Willowhurst for access, with that road having been designed and built with proper visibility onto Keymer Road. They agreed with us that Broadlands was suitable only for foot/cycle and emergency access. Presumably they are trying to use Broadlands as they are being asked for lots of money by Thakeham for that access.

4) Damage to Broadlands and harm to the residents

Broadlands is a narrow cul-de-sac which serves just seven homes. There are no pavements and the road ends in a five-bar gate to a track which is the proposed access to the SA13 site. The site is countryside populated by horses, deer, birds of prey and other wildlife. It is a peaceful semi-rural location which will be greatly harmed by it being turned into access for 200+ homes.

1. Conversion of the road into access to 200+ homes will completely change the character of the road from a quiet lane to busy thoroughfare, making it a considerably less desirable place to live. With the site being remote from the town centre and station, most journeys will be by car. Most likely several hundred every day.
2. Access for existing properties onto Broadlands will be compromised creating a safety issue. At the end of Broadlands are the driveways of four properties, two on each side. As there is no access beyond these driveways, they are aligned in such a way to be able to drive in/out and along Broadlands as it exists today and not along the track, compromising the safety of existing residents and the 10 children that live along the road. The gate leads to the track that is the proposed access.
3. Broadlands is too narrow to carry construction traffic and its use for this purpose would create safety issues. A standard 6 wheeled lorry of the size typically used for transportation of building materials/soil etc is 2.5m wide with at least 3m needed for passing when mirrors are included. These vehicles will not be able to pass each other on Broadlands, and with most cars now being 2m wide (mine in 2.1m) it would be difficult to pass without driving on and wrecking the grass verges. Even if widened passing will be tight with lorries shaving or worse other traffic.
4. Duration of Persimmon's proposed build, from their Developer Questionnaire shows the duration of build to be from Q1 2022 to Q1 2026. This is ridiculous – four years of lorries, dirt and danger along Broadlands. The danger can be seen today with the lorries to the Jones' homes site who seem keen on "playing chicken" with oncoming cars; this photo outside Burgess Hill School for Girls.

5) Loss of amenity

Further to the points in item 3) above, the proposal of SA12 and SA13 if built would result in a loss of amenity for both the residents of Broadlands and more widely in south-east Burgess Hill. The HS2 London-West Midlands Environmental Statement published by the Department for Transport in November 2013, defines 'amenity' as:

'The benefits of enjoyment and well-being which are gained from a resource in line with its intended function.

Amenity may be affected by a combination of factors such as: sound, noise and vibration; dust/air quality; traffic/congestion; and visual impacts.'

The SuDS Manual (2015) defines amenity as 'a useful or pleasant facility or service', which includes both the tangible and the less tangible. It also suggests amenity '...covers liveability, which is associated with factors that improve the quality of life for inhabitants. Liveability encompasses the well-being of a community and of individuals and comprises the many characteristics that make a location a place where people want to live and work.'

It is almost certain that the proposed SA12 and SA13 development in particular will result in a loss of amenity due to the inevitable increases in traffic/congestion, the visual impact of such a large development in sight of the South Down National Park, and the liveability for those living nearby, especially in Broadlands that will be changed forever for the worse.

6) The Principle of the NPPF (National Planning Policy Framework) - 'Tilted Balance'

The NPPF published February 2019 has the presumption in favour of sustainable development, not development at the expense of everything else. The adverse impacts of SA12 and SA13 will negatively and demonstrably impact the daily lives of hundreds of people in Burgess Hill through increased traffic congestion and loss of amenity to those in and around Broadlands.

673

Mr A Olejniczak

Organisation:

Behalf Of:

Resident

Reference: Reg18/673/1

Type: Object

1) Poor Road Infrastructure and Traffic Congestion

The site has been previously considered for development in 2007, 2013 and 2016. Every time it was rejected due to the same problem "There are potential significant transport impacts on the road network as a result of developing this site (in particular the east-west link issued in Burgess Hill). It is currently assumed that this will severely limit the ability of this site to be delivered unless detailed transport assessment evidence suggests otherwise"

MSDC commissioned and received a traffic report dated 4th September 2019 from Systra and scenario 5 relates. Page 36 of the report clearly shows the impacts on the two east-west crossings over the railway line, S6 and S22. The alternate route via Hassocks, S8, is also severely impacted. Whilst the A2300 is being upgraded there is no proposal to sort out the issues of east-west traffic movement over

the railway line as identified in the Systra report. A proposed mitigation of set of traffic lights at S6 isn't going to solve anything – anybody who come to the site will be able to see that. With only two single carriageway roads over the railway line, both constrained by necessary pedestrian crossings, there is already severe congestion at rush hours. The below is typical. Red means traffic at a stop. This is real time data derived from the traffic itself - and is accurate. See Appendix A for day-by-day levels, which can be witnessed by simply trying to use these roads at rush hour. The image below for October 17th shows around two miles of queues. Public transport would also be adversely impacted by increased traffic as there are no dedicated bus lanes or space to accommodate them. Buses are trapped just as much as cars.

There is a principle that development follows infrastructure - there is no infrastructure planned to the east of Burgess Hill. Kingsway, Jones' homes and the 500 north of Hassocks, well over 1000 new homes, all feed into the same roads east of the railway line in Burgess Hill that are already a bottleneck and overcapacity.

On the grounds of traffic and road infrastructure alone these two sites should not proceed, as was previously the case when considered before. Today the position is worse due to other housing completions.

2) Contravention of adopted MSDC District Plan Policy DP12: Protection and Enhancement of Countryside

The area south of Folder's Lane and east of Keymer Road is covered in the adopted MSDC District Plan by DP12: Protection and Enhancement of Countryside. (<https://www.midsussex.gov.uk/media/3406/mid-sussex-districtplan.pdf>). The proposed development totally conflicts with this policy.

The cumulative impact of the development when considered alongside other developments already approved north of Hassock, at Kingsway Jones's homes off Folders Lane will have an adverse impact on the area. With SA13 going as far south as Wellhouse Lane and the northern development at Hassocks the gap Burgess Hill and Hassocks will be greatly reduced. The traffic on Ockley Lane/Keymer Road, with its 6'6" width restriction, which is basically a track that was tarmacked, will be immense overall.

3) Safety and access issues - access for Persimmon to their 20-acre portion of the SA13 site

We have been informed by MSDC that Persimmon wish to use Broadlands as the sole access to their portion of the SA13 site. This raises serious and significant safety and access issues. Broadlands is a narrow cul-de-sac which serves just seven homes, there are no pavements and the road ends in a five-bar gate to a track which is the proposed access to the SA13 site which is countryside. It was initially built to service just three houses (Dormers, Timbers and Hurdles) and was not designed to service 200+. Broadlands joins the Keymer Road at a poor junction where there have been at least two accidents. At this junction, there are no pavements on either road and Keymer Road is narrow with a 6'6" width restriction. To the south there is the brow of a hill less than 100 yards away. Opposite is the boundary to Batchelor's Farm nature reserve. The junction is dangerous due to appalling visibility splays. Visibility to cars travelling south is marginal and good visibility can only be obtained by edging out onto Keymer Road itself. Visibility to cars travelling northbound is even more constrained due to the high brick wall which is the boundary to The Lees which is less than a metre from the edge of the roadway.

It is inconceivable that this junction is suitable for the several hundred car movements per day that would result from it being the access point to this site, and hard to see how it could be improved with such limited space available.

Despite what we were told at the public event in October at St Wilfrid's, we have been advised by WSCC Highways Senior Planner (Jamie Brown) that MSDC have not made any request for pre-

planning advice with respect to SA13 and WSCC have not made a site visit.

We spoke with Persimmon staff, including Mr Lee Farmer, Head of Land as Persimmon Homes, during a site visit made in June when they stated that they would reach an agreement with Thakeham to use Willowhurst for access, with that road having been designed and built with proper visibility onto Keymer Road. They agreed with us that Broadlands was suitable only for foot/cycle and emergency access. Presumably they are trying to use Broadlands as they are being asked for lots of money by Thakeham for that access.

4) Damage to Broadlands and harm to the residents

Broadlands is a narrow cul-de-sac which serves just seven homes. There are no pavements and the road ends in a five-bar gate to a track which is the proposed access to the SA13 site. The site is countryside populated by horses, deer, birds of prey and other wildlife. It is a peaceful semi-rural location which will be greatly harmed by it being turned into access for 200+ homes.

1. Conversion of the road into access to 200+ homes will completely change the character of the road from a quiet lane to busy thoroughfare, making it a considerably less desirable place to live. With the site being remote from the town centre and station, most journeys will be by car. Most likely several hundred every day.
2. Access for existing properties onto Broadlands will be compromised creating a safety issue. At the end of Broadlands are the driveways of four properties, two on each side. As there is no access beyond these driveways, they are aligned in such a way to be able to drive in/out and along Broadlands as it exists today and not along the track, compromising the safety of existing residents and the 10 children that live along the road. The gate leads to the track that is the proposed access.
3. Broadlands is too narrow to carry construction traffic and its use for this purpose would create safety issues. A standard 6 wheeled lorry of the size typically used for transportation of building materials/soil etc is 2.5m wide with at least 3m needed for passing when mirrors are included. These vehicles will not be able to pass each other on Broadlands, and with most cars now being 2m wide (mine in 2.1m) it would be difficult to pass without driving on and wrecking the grass verges. Even if widened passing will be tight with lorries shaving or worse other traffic.
4. Duration of Persimmon's proposed build, from their Developer Questionnaire shows the duration of build to be from Q1 2022 to Q1 2026. This is ridiculous – four years of lorries, dirt and danger along Broadlands. The danger can be seen today with the lorries to the Jones' homes site who seem keen on "playing chicken" with oncoming cars; this photo outside Burgess Hill School for Girls.

5) Loss of amenity

Further to the points in item 3) above, the proposal of SA12 and SA13 if built would result in a loss of amenity for both the residents of Broadlands and more widely in south-east Burgess Hill. The HS2 London-West Midlands Environmental Statement published by the Department for Transport in November 2013, defines 'amenity' as:

'The benefits of enjoyment and well-being which are gained from a resource in line with its intended function.

Amenity may be affected by a combination of factors such as: sound, noise and vibration; dust/air quality; traffic/congestion; and visual impacts.'

The SuDS Manual (2015) defines amenity as 'a useful or pleasant facility or service', which includes both the tangible and the less tangible. It also suggests amenity '...covers liveability, which is associated with factors that improve the quality of life for inhabitants. Liveability encompasses the well-being of a community and of individuals and comprises the many characteristics that make a location a place where people want to live and work.'

It is almost certain that the proposed SA12 and SA13 development in particular will result in a loss of amenity due to the inevitable increases in traffic/congestion, the visual impact of such a large development in sight of the South Down National Park, and the liveability for those living nearby, especially in Broadlands that will be changed forever for the worse.

6) The Principle of the NPPF (National Planning Policy Framework) - 'Tilted Balance'

The NPPF published February 2019 has the presumption in favour of sustainable development, not development at the expense of everything else. The adverse impacts of SA12 and SA13 will negatively and demonstrably impact the daily lives of hundreds of people in Burgess Hill through increased traffic congestion and loss of amenity to those in and around Broadlands.