

BRIEFING NOTE FOR NPWG - MAIN MODIFICATIONS TO DISTRICT PLAN STRATEGIC SITE ALLOCATION TO THE NORTH OF CLAYTON MILLS – POLICY DP9b.

1 Purpose of Note

To provide an objective overview of Modification Policy DP9b and to summarise the options open to the Council. Policy DP9b proposes.

Approximately 500 new homes

Land for a new primary school

A gypsy and travellers site.

2 Background Papers

Members have already been provided with an email together with a link from MSDC setting out the main documents covering the Modifications. They are:-

BP1b Schedule of Main Modifications

EP23a Strategic Site Selection Paper

MSDC 22 Options for 5 Year Land Supply

MSDC 24 Implications of Modifications on Ashdown Forest

Main Modification Sustainability Appraisal

Air Quality Assessment.

3 Status of Modifications

It is very important to note the following points regarding the Modifications.

MSDC are putting forward numerous modifications to the submitted policies. HPC is free, of course, to comment on any, or all of these, should it wish to do so. This note, however, deals only with what is arguably the most significant modification to the entire plan, certainly as far as HPC is concerned, which is the proposal to allocate a strategic site for 500 homes to the north of Clayton Mills.

Although the Modifications cover the fundamental aspects of the District Plan some of the submitted policies remain unchanged from those set out in the Submission District Plan 2016. The modification document lists those which the Inspector, Mr J Bore, ruled needed to be changed before the Plan could be deemed to be sound. The Inspector has stated that he will only accept comments on the amended policies set out in the Modifications. No comments will be accepted on the rest of the Plan.

MSDC will not be considering comments on these Modifications. They approved all of them at their Full Council Meeting on the 27th of September 2017. They cannot alter or amend them in any way. They are simply running the consultation process and will be collating the responses. They will then pass them on to the Inspector. The matter is therefore out of their hands and into those of the Inspector. He will decide whether or not to accept the Modifications after he has considered all the comments received during the consultation period, which commenced on the 3rd October and will run until the 13th November.

He has said he will deliver his verdict in December.

4 Summary of Modification Housing Proposals

Policy DP9b, the proposal to allocate 500 homes north of Clayton Mills emerged in July 2017. The site covers part of the land allocated in the Hassocks Neighbourhood Plan (HNP) for 140 homes. The possibility of a strategic site coming forward was mentioned at the Examination in July but no detail was given. HPC had no knowledge of this proposal until informed of it by MSDC in late August. MSDC 22 Options for 5 Year Land Supply and EP23a Strategic Site selection Paper both clearly show that, running up to the Examination, 16 major sites throughout Mid Sussex had been evaluated but this site had not featured in any of these assessments. It was not a SHLAA site until this August when it was added to the SHLAA. At the Examination three strategic sites, of the 16, were put forward as deliverable. These were, in order of priority:-

- 1 Northern Arc Burgess Hill
- 2 Kingsway, Burgess Hill
- 3 Hardriding Farm Pease Pottage

Since July the position has changed to the extent that in EP23a the Overall Assessment and Ranking Summary shows the following sites as deliverable, in order of priority:-

- 1 Land North of Clayton Mills
- 2 Hardriding Farm Pease Pottage
- 3 Northern Arc
- 4 Kingsway

Paragraph 31 of MSDC 22 states that “overall there are a number of significant positives associated with this site which outweigh any negatives related to its landscape setting and potential highway impacts”

5 Supply of Housing Land

MSDC has a 5.2 year housing land supply, that is to say slightly more than the 5 year supply required by the Government. Nevertheless the Inspector noted, in his concluding remarks at the Examination, that the housing land supply is “not hugely comfortable” (sic) and that MSDC should consider how its 5 year supply could be strengthened.

MSDC therefore committed to start work on a Site Allocation Development Plan Document (DPD) immediately. This DPD to be completed by 2020. The aims of this DPD are to secure land supply for the rest of the period and to maintain a 5 year land supply.

In the light of this MSDC 22 has been prepared to examine the options open to MSDC to augment the land supply in the next two years before the adoption of the Site Allocations DPD in 2020. The paper examines 2 Options:-

Option 1 Amend Policy DP6 – Settlement Hierarchy.

This amendment would enable larger sites adjoining settlement boundaries to be released without previously being identified in an NP or DPD. The current limit is 10. Extending it to 25 could increase land supply.

Option 2 Allocate a further Strategic Site.

The paper goes on to list the previous strategic sites examined and states that, in the intervening period a new, deliverable, site has been put forward on land north of Clayton Mills.

MSDC 22 concludes that Option 1 is unworkable and that Option 2, that is to say the strategic site comprising the Land to the North of Clayton Mills should be selected. This document was written after MSDC had been approached by those promoting this site in July.

Finally, in the matter of land supply, MSDC 22 states that this site would deliver 150 homes in the first 5 years of the plan period, the remainder in the following 5 years.

6 The Impact of a Strategic Site on Hassocks

EP23a- Strategic Site Selection Paper was updated in September to take account of the Clayton Mills proposal. It deals, inter alia, with the impact of an increase of 500 homes on the various settlements in Mid Sussex. The settlement hierarchy in Mid Sussex has 5 categories with the three main towns as Category 1 settlements. Hassocks, along with Hurstpierpoint and 4 other large villages, is in Category 2.

Para 1.16 quotes Strategic Objective 2 of the District plan which seeks to :-

“ ensure development reflects the Districts distinctive towns and villages and retains their separate identity and character”

Para 1.18 states:-

“ In context with Category 2 settlements a site of 500 homes could represent a large increase (20 -30%) in terms of overall growth of the settlement and would affect the character of the settlement”

The ensuing table then sets out the % increase 500 homes would bring to the various settlements. The increase for Hassocks is 15% which is said to be acceptable within the parameters of Objective 2. Whilst this is mathematically correct it takes no account of the other Neighbourhood Plan sites and the approval by the Secretary of State of 97 homes at Ham Fields which will account for at least 230 additional homes. This would rise to 360 if the Friars Oak Appeal is allowed and would produce a 26% increase. (This figure assumes the 140 homes proposed at Clayton Mills will be included in the 500)

7 Hassocks Neighbourhood Plan (HNP)

In considering this matter regard must be had to the HNP which was prepared after huge public consultation and in collaboration with MSDC. It proposes 290 new homes .This amount meets the Objectively Assessed Need (OAN) for the Parish and was also consistent with the very detailed Sustainability Appraisal which concluded that growth beyond this level would be unsustainable and could not be absorbed without damage to the character and environment of the village.

8 Process Issues

The proposal to locate a strategic site in Hassocks has emerged at the very last minute in the progress of the District Plan and well over a year since the Regulation 16 Neighbourhood Plan was submitted to MSDC. Although information meetings have been held with MSDC since the end of August HPC has not

been in a position to make a considered comment on it because the consultation documents setting out the reasons for proposal were not made available until the 2nd October. The reason for the elevation of this site to pole position in the Overall Assessment and Ranking in EP23a, para 1.38 is that it can be delivered quickly and, in MSDC's view, relatively unconstrained. However MSDC have, as mentioned in 3 above, taken the decision to propose the development of this site to the Inspector without proper consultation with either HPC or the wider community.

9 Assessment

The purpose of this short paper is, as stated in 1 above, to provide Members with a balanced overview. The predicament in which MSDC finds itself is appreciated, including issues related to Ashdown Forest, (which for purposes of clarity and brevity are not tackled here). The need to have an adopted District Plan to protect all the towns and villages in Mid Sussex is fully supported. Nevertheless, it is the duty of the Parish Council to represent the best interests of the residents of Hassocks and to respond to the consultation accordingly. The following Table attempts to set out the advantages and disadvantages of Policy DP9b from both a local and wider point of view.

POSITIVE	NEGATIVE
<p>1 Assist MSDC to comply with the housing requirements of the National Planning Policy Framework (NPPF) and secure the adoption of the District Plan.</p> <p>2 Satisfy housing need for village and for other parts of Mid Sussex.</p> <p>3 Provide a site for a new primary school.</p> <p>4 Provide a travellers site.</p> <p>5 Boost the local economy.</p> <p>6 Provide very substantial Community Infrastructure Levy (CIL) payments which could be used to improve village infrastructure</p>	<p>1 Proposes a disproportionately large amount of development that would have a most adverse effect on the character and identity of Hassocks.</p> <p>2 Would place a huge strain on the infrastructure of the village in terms of health and education (there is very little likelihood of the new school being provided before the first homes).</p> <p>3 Destroy a very significant part of the countryside gap between Hassocks and Burgess Hill.</p> <p>4 Would have a most adverse effect on the landscape and countryside setting of the village and on the adjoining National Park.</p> <p>5 Generate a n unacceptable amount of traffic on to Ockley Lane which is narrow and could not be improved without great environmental damage.</p> <p>6 Will only provide 150 homes in the first 5 year period so will do little to help housing delivery in the next 2 years over the whole Mid Sussex District as requested by Mr Bore.</p>

	<p>7 Will preclude the possibility of the release of more suitable sites elsewhere in Mid Sussex as proposed in Option 1. MSDC 22</p> <p>8 Is located too far from the village centre. Residents would not walk there but would either drive and cause congestion there or drive to Burgess Hill.</p> <p>9 Would increase traffic using the Stonepound Crossroads Air Quality management Area (AQMA).</p>
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The process and consultation points referred to in Section 8 above have not been factored in to the assessment as it is suggested the proposal should stand or fall on its planning merits. The selection of Option 2 is, however, suggested as a negative factor as it precludes the possibility of more housing sites being found elsewhere in the District in the early part of the Plan period.

WJHH 10/10/17