

Response to Regulation 14 Pre-Submission Representations in Respect of Housing Matters

Hassocks Neighbourhood Plan

Prepared for
Hassocks Parish Council

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Version - FINAL

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1. INTRODUCTION

- 1.1. This document has been prepared for Hassocks Parish Council (HPC) following a review of representations received in response to the Regulation 14 Pre-Submission Consultation.
- 1.2. The purpose of the document is to provide a summary of representations received in respect of housing matters; to set out DOWSETTMAYHEW Planning Partnership's (DMP) comments on representations received; and to set out any recommended changes to Chapter 6: Housing of the HNP, including planning policies and/or aims in light of representations received.
- 1.3. The recommended changes are to be considered in due course by the Neighbourhood Plan Working Group (NPWG) prior to the preparation of the Submission HNP.

2. HASSOCKS NEIGHBOURHOOD PLAN REGULATION 14 PRE-SUBMISSION CONSULTATION

- 2.1. The Hassocks Neighbourhood Plan (HNP), and accompanying Sustainability Appraisal (SA) underwent Regulation 14 Pre-Submission Consultation for a six week period commencing 7th January 2019.
- 2.2. The consultation documents were available to view online on the dedicated HNP webpage. A hard copy of the documents were made available for inspection at the Parish Centre. Comments were invited by email and/or by post.
- 2.3. Stakeholders were alerted to the consultation via email alerts. Locally in the Parish, notices alerting residents and stakeholders to the consultation were placed on Parish notice boards. In addition, a notice was placed on the Parish Council website.
- 2.4. The consultation closed on the 18th February 2019.

3. SUMMARY OF REPRESENTATIONS RECEIVED

- 3.1. A total of 63 representations were received in response to the Regulation 14 Pre-Submission Consultation.
- 3.2. A summary of representations received has been prepared, and comprises a background document in support of this, and other reports.
- 3.3. Representations were received from a variety of stakeholders. These can be summarised as follows:
 - 41 representations from local residents;
 - 8 representations from statutory consultees; and
 - 14 representations from developers/agents acting on behalf of landowners.

- 3.4. The majority of representations received were in respect of Policy 2: Local Green Space which set out support for the proposed designation of Local Green Space and in particular, Land to the north of Shepherds Walk (LGS1). A number of these representations considered that no further housing was needed in Hassocks.
- 3.5. The remaining representations received were primarily in respect of:
- Policy 1: Local Gaps;
 - Policy 7: Development in Conservation Areas;
 - Policy 14: Residential Development Within, and Adjoining, the Built-Up Area Boundary of Hassocks;
 - Policy 18: Affordable Housing; and
 - Chapter 8: Transport.
- 3.6. Following a review of representations received in respect of housing matters, representations have been summarised under the following key themes:
- Policy 2: Local Green Spaces - Proposed Designation of Land to the North of Shepherds Walk (LGS1);
 - Policy 14: Residential Development Within and Adjoining the Built-Up Area Boundary of Hassocks;
 - Absence of housing allocation(s);
 - Promotion of additional housing site(s);
 - Other Housing Policies: Policy 17: Land to the West of London Road and Policy 18: Affordable Housing; and
 - Sustainability Appraisal.
- 3.7. Set out below is a summary of representations received; DMP comments on these representations; and recommended changes to the Submission version HNP to be considered by the NPWG.

4. REPRESENTATIONS RECEIVED IN RESPECT OF POLICY 2: LOCAL GREEN SPACES - PROPOSED DESIGNATION OF LAND TO THE NORTH OF SHEPHERDS WALK (LGS1)

- 4.1. A total of 41 representations were received from local residents; 2 representations were received from statutory consultees; and 2 representations were received from developers/agents acting on behalf of landowners in relation to land to the north of Shepherds Walk (LGS1).

- 4.2. The Regulation 14 Pre-submission HNP is supported by a Local Green Space (LGS) Background Paper. The Paper was prepared in support of the proposed LGS allocations to provide the evidence base for sites proposed for designation.
- 4.3. In light of feedback received from the Regulation 14 Pre-Submission Consultation, the LGS Background Paper has been reviewed prior to the preparation of the Submission HNP.
- 4.4. Please see the “Revised Hassocks Neighbourhood Plan, Local Green Space Policy 2 Review, Regulation 14 Consultation Response, April 2019” for further information on representations received with respect to Policy 2: Local Green Spaces; DMP comments; and recommended changes to the Submission HNP.

5. REPRESENTATIONS RECEIVED IN RESPECT OF POLICY 14: RESIDENTIAL DEVELOPMENT WITHIN AND ADJOINING THE BUILT-UP AREA BOUNDARY OF HASSOCKS

- 5.1. No representations were received from local residents and/or statutory consultees in respect of Policy 14: Residential Development Within and Adjoining the Built-Up Area Boundary of Hassocks. A total of 4 representations were received from developers/agents acting on behalf of landowners in respect of this policy.
- 5.2. Representations were received from: Evison & Company; Gladman; Lewis & Co Planning; and Savills.

Evison & Company

- 5.3. The principle of Policy 14, which shares some criteria with Policy DP6 of the District Plan welcomed. Consider the HNP has missed the opportunity to allocate small sites to contribute to housing need, add to the diversity of development, and to contrast with the relative uniformity of large estate development on the three allocated sites.

Gladman

- 5.4. Do not consider the use of built-up boundaries is an effective response to future development proposals if it would act to preclude the delivery of otherwise sustainable development opportunities, as indicated in the policy.
- 5.5. Consider the use of settlement limits to arbitrarily restrict suitable development, or applying a limit to the number of dwellings coming forward on the edge of settlements, does not accord with the positive approach to growth required by the NPPF, and is contrary to ‘basic condition (a).’

Lewis & Co Planning

- 5.6. Consider Policy 14 does not preclude residential development of land to the rear of 2 Hurst Road, (which is being promoted) provided the development is for fewer than 10 dwellings.
- 5.7. Consider that a windfall-type development of nine homes or fewer would be a less efficient use of a sustainably located, unconstrained, site.

Savills

- 5.8. Consider Policy 14 should be amended to enable windfall sites to come forward that are not limited to only 10 new homes, to ensure that the HNP positively plans for the future of the area throughout the Plan period.

Response to: Evison & Company; Gladman; Lewis & Co Planning; and Savills

- 5.9. The Basic Conditions are set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to Neighbourhood Plans by Section 38A of the Planning and Compulsory Purchase Act 2004. The Basic Conditions are:

- Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order (or Neighbourhood Plan).
- Having special regard to the desirability of preserving any listed building, or its setting, or any features of special architectural or historic interest, that it possesses, it is appropriate to make the order. This applies only to Orders.
- Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.
- The making of the order (or Neighbourhood Plan) contributes to the achievement of sustainable development.
- The making of the order (or Neighbourhood Plan) is in general conformity with the strategic policies contained in the Development Plan for the area of the Authority (or any part of that area).

- 5.10. In light of the requirement for the HNP to be in general conformity with the strategic policies of the Mid Sussex District Plan (MSDP), and in considering Policy 14: Residential Development Within and Adjoining the Built-Up Area Boundary of Hassocks, particular regard has been had to MSDP Policy DP6.

- 5.11. MSDP Policy DP6: Settlement Hierarchy, sets out support for development within towns and villages with defined built-up area boundaries. The Policy states that outside of the defined built-up area boundaries, the expansion of settlements will be supported where:

- The site is allocated in the District Plan, a Neighbourhood Plan, or subsequent Development Plan Document, or where the proposed development is for fewer than 10 dwellings; and
- The site is contiguous with an existing built-up area of the settlement; and
- The development is demonstrated to be sustainable, including by reference to the settlement hierarchy.

- 5.12. Policy 14: Residential Development Within and Adjoining the Built-Up Area Boundary of Hassocks is reflective of this higher tier policy. HPC seek to plan positively for the future of the Parish over the

Plan period and, therefore, in line with the MSDP Policy DP6, support further windfall development within the built-up area boundary; and outside of the built-up area boundary, where this is on land that lies outside of the South Downs National Park, and subject to a number of criteria.

- 5.13. Given the historic supply of windfall development within the Parish, and the positive approach to limited development outside of, but contiguous with, the built-up area boundary, it is anticipated this will facilitate the delivery of further residential development over the Plan period, in excess of the minimum housing requirement figure set out in the District Plan.
- 5.14. It is therefore considered the policy balances the delivery of housing with the protection of the setting of Hassocks and its rural hinterland and represents sustainable development.

Recommended changes to Submission HNP:

- 5.15. No changes are recommended for consideration by the NPWG.

6. REPRESENTATIONS RECEIVED IN RESPECT OF ABSENCE OF HOUSING ALLOCATION(S)

- 6.1. No representations were received from local residents in respect of the absence of housing allocation(s) in the HNP.
- 6.2. Highways England consider that, on the basis that the existing commitments and completions in Hassocks, including the strategic site, this meets the MSDP requirement of 882 dwellings, and Highways England have no concerns with the quantum of development facilitated by the HNP.
- 6.3. A total of 5 representations received from developers/agents acting on behalf of landowners in respect of the absence of housing allocations in the HNP.
- 6.4. Representations were received from: Evision & Company; Gladman; Lewis & Co Planning; Savills; and Sigma on behalf of Rydon.

Evision & Company

- 6.5. Object to the failure of the HNP to allocate any smaller additional sites in a Plan with an end date as far away as 2031 and, in particular, the allocation of land promoted by Evision & Company and adjoining land, for housing development.
- 6.6. Consider that to complement the type of new development over the next decade, there is a strong case that further site allocations should be made, and that they should be for small sites of less than 50 dwellings.

Gladman

- 6.7. Raise concerns with the HNP as currently presented and its relationship with national and local planning policy.
- 6.8. Consider the HNP should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan. Noting this, Hassocks' place in the settlement hierarchy, and the

MSDP Inspector's Report which requires the Council to commence a Local Plan Review by 2021, they consider the HNP should contain sufficient flexibility to ensure that it is not rendered out of date upon the adoption of any Local Plan Review.

Lewis & Co Planning

- 6.9. Promote land to the rear of 2 Hurst Road; and consider the HNP in its current form, does not sufficiently consider, evaluate, or support, other opportunities for sustainable development within the Parish and fails to take a positive approach in considering these opportunities.

Savills

- 6.10. Consider that the HNP should be more positive and seek to make some housing allocations. The housing figures provided by MSDC, not only in Hassocks, but in the District more generally, are a minimum requirement. Hassocks is a tier 2 settlement and consider it can therefore be regarded as one of the more sustainable locations in the District.
- 6.11. Consider that assisting the delivery of much needed new homes in a sustainable location such as Hassocks, over and above the minimum required for the area, would help to ensure that MSDC does not fall below its 5 year housing land supply requirements, or below the minimum housing delivery test requirements. Consider this would assist in safeguarding the area from future speculative applications, whilst ensuring that suitable development can come forward.
- 6.12. Consider that whilst the HNP does not seek to promote less development than the District Plan, it does only seek to provide the minimum requirement. Consider there is no contingency and this is likely to be a more risky approach. Consider the HNP would become more robust in the longer term if a higher number of homes were allocated.

Sigma on Behalf of Rydons

- 6.13. Consider that the HNP is anticipating that Hassocks will not be required to release any further land, either to assist Mid Sussex in delivering the remaining 2,500 which is to be distributed across the whole of the District in the emerging Site Allocation DPD, or any additional land required through the review; and that these are not reasonable assumptions because:
- The Housing figures presented in DP6 are minimum residual amounts, and by its very definition these are not a cap on development; and
 - It is likely that Hassocks will continue to play an important role to help meet the remaining 2,500 units that the District need to allocate in its emerging Site Allocation DPD, and in the future beyond the current Local Plan period.
- 6.14. Consider the policies contained within the HNP should be modified to allow for a significant degree of flexibility to allow for the delivery of future sustainable growth opportunities at Hassocks, in order to assist Mid Sussex District Council in maintaining a flexible, responsive, and continuously rolling 5 year housing land supply.

Response to: Evison & Company; Gladman; Lewis & Co Planning; Savills; and Sigma on behalf of Rydons

- 6.15. A Submission Version of the MSDP (incorporating Focussed Amendments and Further Proposed Modifications) was published and submitted to the Secretary of State on 17th August 2016.
- 6.16. Examination into the MSDP commenced with a number of Hearings at the end of November 2016, continuing until February 2017. These principally focussed on housing requirements for the District. This culminated in a letter from the MSDP Inspector to the District Council dated 20th February 2017 setting out the Inspector's 'Interim Conclusions' on the housing requirement for the District over the Plan period.
- 6.17. In response to matters raised, MSDC proposed to allocate a further strategic site allocation on land within the Parish of Hassocks, identified to the north of Clayton Mills, in order to strengthen the Council's 5-year housing land supply position.
- 6.18. The MSDP was subsequently adopted in March 2018. Policy DP4 relates to housing. It states that the District's objectively assessed need is 14,890 dwellings over the Plan period. It notes that provision is also made for 1,498 dwellings to ensure need is addressed in the Northern West Sussex Housing Market Area. This thus provides a minimum district housing requirement of 16,390 dwellings between 2014-2031.
- 6.19. A significant number comprise completions and commitments that predate the adoption of the District Plan. In addition to this, the Plan allocates a strategic development north and northwest of Burgess Hill for 3,500 dwellings; a strategic development of 500 dwellings on land to the north of Clayton Mills (falling within the Parish of Hassocks); and a windfall allowance of 450 dwellings over the Plan period. This leaves a residual need to find a further 2,439 dwellings in the District over the remainder of the Plan period. These are to be identified through future Neighbourhood Plans, and a district level prepared Site Allocations Document.
- 6.20. Policy DP4: Housing, also sets out the proposed spatial distribution of the housing requirement. This is by reference to both the overall housing requirement over the Plan period, and the residual housing requirement of 2,439 dwellings from 2017 onwards. This distribution is by reference to a settlement hierarchy which identifies five settlement categories. The three large towns within the District are defined as settlement Category 1. A total of six settlements are identified within settlement Category 2, and this includes Hassocks and Keymer. Within this category of settlements, the policy notes the minimum housing required over the Plan period is the delivery of 3,005 dwellings, with a minimum residual from 2017 onwards of 838 dwellings.
- 6.21. The distribution of the 2,439 dwellings (and the 838 that comprises part of that figure) is set out in the table that follows Policy DP6: Settlement Hierarchy of the MSDP. The pretext to this states that the table seeks to provide 'clarity between the district housing requirements and the role of individual Neighbourhood Plans in meeting this.' It shows the minimum residual amount of development for each settlement over the rest of the Plan period, as at April 2017.
- 6.22. For each settlement, the table sets out the minimum number of dwellings required over the Plan period; the minimum requirement to be delivered up to 2023/24; the number of dwellings

already identified through completions and commitments as at April 2017; and the residual minimum requirement from 2017 onwards (i.e. accounting for completions and commitments).

- 6.23. The table details that Hassocks is required to deliver significantly more dwellings than other Category 2 settlements,. It is required to deliver a minimum number of 882 dwellings over the Plan period. The next largest quantum of housing within a Category 2 settlement is 571 dwellings, which are required to be delivered at Lindfield.
- 6.24. The table details that of the 882 dwellings for Hassocks, all have been identified through commitments and completions as at 1st April 2017. This includes the housing developments approved on land to the west of London Road ¹ and land at Hassocks Golf Club. ² It also includes the allocation of 500 dwellings on land to the north of Clayton Mills in Policy DP11 of the MSDP.
- 6.25. As a result, the Plan makes clear that there is no obligation for the Parish of Hassocks to deliver additional housing over the remainder of the Plan period. It states that amongst others, Hassocks has 'already identified sufficient commitments/completions to meet [its] minimum housing requirement for the full Plan period and will not be expected to identify further sites within their Neighbourhood Plan.'
- 6.26. On this basis, the HNP does not propose to allocate additional housing site(s) in the Parish. Nonetheless, and reflecting positive planning, the HNP supports additional housing coming forward within the Parish, where it comprises windfall development that is in accordance with both the Development Plan, and the emerging policies of the HNP. This includes residential development within the built-up area, and residential development that adjoins the built-up area boundary subject to a number of criteria, including that it is limited to fewer than 10 dwellings.
- 6.27. It is therefore considered that the quantum of housing in the Parish facilitated to be delivered through the NP over the Plan period is in accordance with the Development Plan and National Planning Guidance. It represents sustainable development.

Recommended changes to Submission HNP

- 6.28. No changes are recommended for consideration by the NPWG.

7. REPRESENTATIONS RECEIVED IN RESPECT OF THE PROMOTION OF HOUSING SITE(S)

- 7.1. No representations were received from local residents and/or statutory consultees in respect of the promotion of additional housing site(s).
- 7.2. A total of 3 representations were received from developers/agents acting on behalf of landowners in respect of the promotion of housing sites.

¹ See Planning Application DM/17/4307

² See Planning Application DM/18/2616

7.3. Representations were received from: Evison & Company; Gladman; and Lewis & Co Planning.

Evison & Company

- 7.4. Representations are on behalf of Clayton with Keymer Parochial Church Council (PCC), owner of land at London Road, Hassocks. Chichester Diocese acts as custodian trustee for the PCC and representations are also on behalf of the Diocese.
- 7.5. The representations advise that the PCC is in discussions with the adjoining landowner to the south. This site was subject to a planning application of 25 dwellings on the joint PCC and adjoining land. The planning application was refused (Ref: DM/18/0010). Consider the reasons for refusal can be overcome.
- 7.6. Consider the land is suitable for development; is contiguous with the built-up area boundary in the MSDP; satisfactory access can be provided; no overriding environmental or other known constraints to development; and the site could make a positive contribution to additional housing supply.
- 7.7. Consider HPC will contribute to meeting Basic Conditions if it embraces the opportunity to go further to meeting housing need by allocating one or more small additional sites. Consider the PCC land, and the adjoining land, is a sustainable and suitable site for such allocation.

Lewis & Co Planning

- 7.8. Representations on behalf of Globe Homes who are promoting land to the rear of 2 Hurst Road. The site lies to the west of land at London Road, Hassocks, which is being promoted by Evison & Company.
- 7.9. Consider site at 2 Hurst Road provides a more sustainable location for residential development than the three sites allocated within the Draft Neighbourhood Plan.
- 7.10. Consider the site offers excellent access to local shops, services and facilities (including the railway station), and provides an opportunity to deliver a complementary development.
- 7.11. Consider the site is well located, contiguous with the existing built-up area boundary, and has no significant development constraints. The SHELAA (Site Ref. 210) assessment finds the site to be suitable, available and achievable. The Site has progressed to a Stage 2 assessment in the preparation of a District-Wide Site Allocations Document.
- 7.12. Proposals for 25 new homes on the site were refused in 2018 due to its location outside of the defined built-up area boundary. Consider that when compared to the allocated sites to the north, the site has a less significant impact on the wider countryside. Support through a specific Plan policy would allow the development to proceed in principle.
- 7.13. Consider the site is unaffected by flood risk, would not affect any Designated Heritage Assets, Ancient Woodland, SSSIs, local nature reserves, or other notable constraints. Further work is being undertaken to fully assess the site's archaeological potential, to ensure any impacts on any identified Archaeological Assets are appropriately mitigated. Consider experts have concluded that

any adverse impacts on TPO trees within, and surrounding the site, can be avoided, or appropriately mitigated. Consider development of the site would not result in severe impacts to the highway network.

- 7.14. Request that further consideration is given to the potential allocation of the site as the Neighbourhood Plan progresses.

R.reside

- 7.15. Representations on behalf of landowners Mr and Mrs Hudson, in respect of Land to the east of Lodge Lane. The site has previously been submitted as a proposed allocation and assessed as part of the preparation of the previous HNP.
- 7.16. The Parish Housing Land Availability Assessment assesses the site area (all of Site 12) as 4.7ha. The site being promoted is 2.3ha. Representations advise it is considered a development of between 20 and 30 homes is appropriate for this site and for the village
- 7.17. Representations advise of disagreement with the landscape assessment of the site. It is considered whilst the site is within the SDNP, the site is heavily influenced by its surrounding built form, where there are only small/limited views of the wider SDNP. Views into the site from the SDNP are considered few and far between and are all with the backdrop of the existing built form of Hassock/Keymer.
- 7.18. Representations advise it is unclear why the site has been assessed as being within a Local Gap, when no formal designation exists.
- 7.19. It is considered the site is a modest sized site and certainly would not be considered 'major development' by the NPPF. Representations advise from the SDNP perspective, a development on this site would deliver much needed market and affordable housing. It would also deliver on one of two key aims, namely access and education to the SDNP via a new area of woodland/open space. The woodland and planting will also help enhance and protect enhance the national park, as required by the NPPF, by repairing and restoring the historic landscape. In addition, it is considered the scheme will deliver biodiversity enhancements.
- 7.20. Representations confirm the site abuts the settlement boundary along most of its northern and southern boundary and all of its western boundary. It is considered the existing built form of Hassocks all but wraps around this site.
- 7.21. It is considered the development of the site would not, and could not, adversely affect the proposed Local Gap and SDNP nor does it perform the requirements of a gap, due to the surrounding development.
- 7.22. It is considered the site will provide opportunities for landscape improvements. Consider development would go some way to repairing the historic canvas of hedgerow, trees and woodland. It is considered the scheme would provide a softer edge to the Green Gap and therefore strengthen its purposes. The allocation of the land in the SDNP would also help protect the parish from further future allocations from others.

- 7.23. Representations advise, on respect of HNP, the site will strengthen the proposed local gap, where the planting of a woodland will act a physical boundary to Hassocks as well as delivering a high-quality housing scheme and other local benefits. The site provides the opportunity for a small, high quality and sustainable development for circa 20-30 dwellings, close to the village centre and well-integrated within its landscape context.

Response to Evison & Company, Lewis & Co Planning and R.Reside

- 7.24. Land at London Road, Hassocks is contiguous with the defined built-up area boundary. In addition, it is in an area identified in the Regulation 14 HNP as a Local Gap.
- 7.25. Policy 14: Residential Development Within and Adjoining the Built-Up Area Boundary of Hassocks, is reflective of higher tier policy in the MSDP
- 7.26. HPC seek to plan positively for the future of the Parish and therefore, and in line with the MSDP Policy DP6, HPC support further windfall development within the built-up area boundary; and outside of the built-up area boundary, where this is on land that lies outside of the identified Local Gap and the South Downs National Park, and subject to a number of criteria.
- 7.27. In light of the requirements of MSDP Policy 13: Preventing Coalescence, the HNP is underpinned by a Background Paper on Local Gaps. The Background Paper sets out the reasoning for, and the justification for, the inclusion of Local Gaps. It includes a Landscape and Visual Assessment which considers that: land within the gaps retain a strong rural character which reflects key characteristics described in the HNP Landscape Character Assessment; and the land within the gaps is of importance in maintaining the setting and identity of individual settlements.
- 7.28. The Background Paper has been updated in response to representations submitted as part of the Regulation 14 Consultation in relation to Policy 1 – Local Gaps in the Hassocks Neighbourhood Plan.
- 7.29. The review does identify some land parcels proposed for removal from the area covered by Policy 1 Local Gap. However, the area covering Land at London Road and Land to the east of Lodge Lane is not proposed for removal.
- 7.30. The “Revised Hassocks Neighbourhood Plan, Review of Local Gaps Policy 1, Regulation 14 Consultation Response, April 2019” contain further information on representations received with respect to Policy 1: Local Gaps; DMP comments; and recommended changes to the Submission HNP.
- 7.31. In light of conclusions regarding overall housing need in the Parish over the Plan period; the positive approach to support for windfall development subject to certain criteria; and the importance of undeveloped land around the edge of the settlement, it is not considered appropriate to allocate the promoted sites for housing development. The Plan as drafted with respect to overall housing need and proposed site allocations is considered to represent sustainable development.

Recommended changes to Submission HNP

7.32. No changes are recommended for consideration by the NPWG.

8. REPRESENTATIONS RECEIVED IN RESPECT OF OTHER HOUSING POLICIES

Mid Sussex District Council

- 8.1. MSDC have provided comments on: Policy 15: Hassocks Golf Club; Policy 17: Land to the West of London Road, and Policy 18: Affordable Housing.
- 8.2. With respect to Policy 15: Hassocks Golf Club, MSDC note the residential application is promoted in conjunction with the relocation of some of the golf facilities. MSDC note that criterion 1 states that the proposal should not extend into land in the Local Gap. MSDC recommend for clarity, that this criterion specifically refers to the residential development not extending into the Gap.
- 8.3. With respect to Policy 17: Land to the West of London Road, MSDC advise planning permission for this site has been granted and development has already commenced. MSDC consider Policy 18 is not required as it has no statutory planning control over this site. MSDC consider the identification of this area should also be deleted from the Proposals Map.
- 8.4. With respect to Policy 18: Affordable Housing, MSDC acknowledge the policy has been revised to take into account the Mid Sussex Housing Allocation Scheme. MSDC consider there are inconsistencies as the local connection criteria on the Council's Allocation Scheme only relate to first lettings, and also they do not apply to strategic allocations.
- 8.5. MSDC recommend the following changes to the policy: The second paragraph should be amended to say:

“When allocating the first letting of a home within a new development of general needs housing, priority will be given to bids from applicants who have a Local Connection to the Parish of Hassocks. In order to establish a local connection, the applicant(s) must meet one of the following criteria:

After the fourth criterion, the following sentence should be added:

“Larger new developments containing 250 homes or more in total are intended to meet the housing needs of the whole District and are therefore exempt from the local connection criteria above.”

- 8.6. Comments received from MSDC in respect of these policies were discussed at the NPWG meeting on 14th March 2019.
- 8.7. In response to comments made with regard to Policy 15: Hassocks Golf Club, Members agreed to consider clarification of the wording of Policy 15 to address the comments of MSDC.

- 8.8. In response to comments made with regard to Policy 17: Land to the West of London Road, Members resolved to agree to delete the policy. It was agreed that the Plan should retain amended text that relates to the land allocation, in the interest of completeness.
- 8.9. In response to comments made with regard to Policy 18: Affordable Housing, Members agreed to amend the policy in accordance with MSDC's recommendations.

West Sussex County Council

- 8.10. In responding to the Regulation 14 Pre-submission HNP, West Sussex County Council have provided comments on: Policy 15: Hassocks Golf Club; Policy 16: Land to the North of Clayton Mills and Mackie Avenue; and Policy 17: Land to the West of London Road
- 8.11. With respect to Policy 15: Hassocks Golf Club, WSCC note the proposed allocation already benefits from a current planning permission. WSCC recommends policy could further recognise the existing public bridleways around the golf course and the value these could have to achieve the Plan's ambition through their improvement – safe and convenient links into Hurstpierpoint and towards Burgess Hill could be realised.
- 8.12. With respect to Policy 16: Land to the North of Clayton Mills and Mackie Avenue, WSCC consider the policy supports protection of existing PRoW, but does not explicitly seek to enhance/expand local PRoW. Consider there are opportunities to deliver safe connections to Burgess Hill, into Hassocks Village, to link to existing bridleways east of Ockley Lane, and to provide a bridleway connection through to the Friar's Oak development west of the railway.
- 8.13. With respect to Policy 17: Land to the West of London Road, WSCC note the proposed allocation already benefits from a current planning permission. Consider improving the surface of the public footpath through the site and to Belmont Lane, could deliver a safe and convenient year-round useable route. Consider if the existing footpath was upgraded for cycling then potentially more people would use it as an alternative to vehicle use.
- 8.14. Comments received from WSCC in respect of these policies were discussed at the NPWG meeting on 14th March 2019.
- 8.15. In response to comments made with regard to Policy 15: Hassocks Golf Club, Members considered the wording of the HNP should not be amended. Attention was drawn to the wording of Aim 5: Non-Car Routeways, which it was considered satisfactorily addressed this comment.
- 8.16. In response to comments made with regard to Policy 16: Land to the North of Clayton Mills and Mackie Avenue, Members considered the merits of amending the policy in order to more clearly highlight the desire and benefits of improving non-car routes north and south of the proposed development site, between Burgess Hill and Hassocks village. Members agreed to support amended wording.
- 8.17. Members also considered the merits of amended wording to support the provision of an east-west bridleway. In considering the necessity and relationship of this enhancement in relation to the proposed development, it was considered that this change was not justified.

9. REPRESENTATIONS RECEIVED IN RESPECT OF THE SUSTAINABILITY APPRAISAL

- 9.1. No representations were received from local residents and/or statutory consultees in respect of the Sustainability Appraisal.
- 9.2. A total of 2 representations were received from developers/agents acting on behalf of landowners in respect of the Sustainability Appraisal.

Evison & Company

- 9.3. Consider the Sustainability Appraisal (SA) fails to consider reasonable alternatives to the allocated sites; the alternatives comprise three broad options, one of which would be a strategy to allocate additional sites.
- 9.4. The reference to the SHELAA sites in the SA is noted including by reference to the plan at the end of the report, but consider there is no assessment of the individual merits of these sites.
- 9.5. Land at London Road, Hassocks is adjacent to land allocated for housing (Policy 17) and consider both sites have the same environmental characteristics. Consider that, had land been assessed according to the same criteria as those used for this adjacent site, it appears likely that it too would have been assessed favourably. The failure to undertake this assessment is a fundamental flaw in the NP's site selection procedure.

Response to Evison & Company

- 9.6. At the time of preparing the Regulation 14 Pre-Submission HNP (January 2019), the higher tier MSDP had been adopted, and amongst other things, planning permission had been granted for residential development on land to the west of London Road, initially for 97 dwellings via a planning appeal³ and subsequently for an increase to 129 dwellings under an application approved by Mid Sussex District Council in July 2018⁴.
- 9.7. The SA undertook an appraisal of reasonable alternatives of the overall housing strategy of the HNP. It concluded that a strategy that supports small scale growth/windfall development within and adjoining the built-up area boundary subject to criterion in line with Policy MSDP 6: Settlement Hierarchy, scored most favourably against the SA objectives. The SA thus complied with the statutory requirements of considering reasonable alternatives for the housing strategy of the Plan.
- 9.8. The chosen strategy would facilitate delivery of an overall housing number in the parish over the plan period, that is beyond the minimum requirement set out within the District Plan (882 dwellings over the Plan period).
- 9.9. The housing allocation in the Regulation 14 Plan referred to as Policy 17: Land to the West of London Road, located adjoining the site being promoted by Evison & Company benefits from extant planning permission with development commenced, prior to the preparation of the Regulation 14

³ reference APP/D3830/W/14/2226987

⁴ Reference DM/17/4307

Plan and completion of the SA. The merits of the allocation of this site and its suitability for housing as a matter of principle, was therefore not considered within the SA. The SA considered the merits of a policy within the HNP which supports development on the site that is in line with the vision and objectives of the HNP, set against an alternative option of a Plan that did not contain such a policy.

- 9.10. The submissions by Evison & Company that argue that the site promoted by them should have been assessed under the same criteria as the land allocated under Policy 17, is not considered appropriate. The former does not benefit from planning permission for residential development, whilst the latter does. It is not considered there is a fundamental flaw in the SA process as a result of the absence of assessing the two sites within the SA on a like for like basis.

Recommended Changes to Submission Sustainability Appraisal

- 9.11. No changes are recommended for consideration by the NPWG.

Lewis & Co Planning

- 9.12. Consider there are significant shortcomings in the SA that accompanies the Regulation 14 HNP; it does not identify how reasonable alternatives to the allocated sites were considered.
- 9.13. Consider that the Plan in its current form, does not meet the requirements of European Directive 2001/42/EC and therefore, fails to meet the basic conditions.
- 9.14. Consider the SA 'vaguely' refers to consideration of sites within the Mid Sussex Strategic Housing and Economic Land Availability Assessment, but contains no assessment of these sites. Consider the SA therefore fails to meet the requirements of the SEA Directive.
- 9.15. Consider a number of Neighbourhood Plans have failed on this basis. Local examples include Slaugham Neighbourhood Plan and Storrington, Sullington and Washington Parish Council Neighbourhood Plan. Consider that in both these cases, the site selection process was more robust than that undertaken for the HNP.
- 9.16. Consider there are no descriptions of the site selection process for allocations within the Draft Neighbourhood Plan, or the methodology used when considering reasonable development sites, such as the land promoted for housing development at 2 Hurst Road.

Response to Lewis & Co

- 9.17. At the time of preparing the Regulation 14 Pre-Submission HNP (January 2019), the higher tier MSDP had been adopted, and amongst other things, planning permission had been granted for residential development on land to the west of London Road, initially for 97 dwellings via a planning appeal (reference APP/D3830/W/14/2226987) and subsequently for an increase to 129 dwellings under an application approved by Mid Sussex District Council in July 2018 (application reference DM/17/4307).
- 9.18. Planning permission had also been granted in respect of residential development on Land at Hassocks Golf Course; initially for 130 dwellings under application DM/16/1775, (and subsequently for 165 dwellings, under application DM/18/2616); and land had been allocated to the north of Clayton Mills and Mackie Avenue for 500 dwellings as detailed in Policy DP11 of the MSDP.

- 9.19. The SA undertook an appraisal of reasonable alternatives of the overall housing strategy of the HNP. It concluded that a strategy that supports small scale growth/windfall development within and adjoining the built-up area boundary subject to criterion in line with Policy MSDP 6: Settlement Hierarchy, scored most favourably against the SA objectives. The SA thus complied with the statutory requirements of considering reasonable alternatives for the housing strategy of the Plan.
- 9.20. In acknowledging the housing requirements set out in the District Plan, and that this quantum of development would be facilitated through a mix of existing planning permissions, and a strategic allocation, the SA concluded that the most appropriate strategy for the HNP, did not include the need to make further housing land allocations within the Neighbourhood Plan. The SA considered the delivery of additional further development through “windfall” would be most favourable when assessed against the objectives.
- 9.21. The sites allocated for housing development within the HNP either benefit from planning permission or are allocated for development within a higher tier document (i.e. Policy 15, 16 and 17 of the Regulation 14 HNP January 2019). The SA assessed the merit of policies which support these developments in line with the vision and objectives of the HNP, against the reasonable alternative of not having such policies. This approach reflects the SA procedural requirements.
- 9.22. The comparison of the HNP SA to two other SA's that accompanied Neighbourhood Plans in Mid Sussex and Horsham District are not considered appropriate. The individual circumstances of those cases are fundamentally different. In both those cases, the Plan's were seeking to allocate housing sites, for which there was no Development Plan confirming that sufficient housing sites had already been identified to meet the minimum requirements for the parish through completions and commitments; and sites were being proposed for allocation for which no planning permission had yet been granted or strategic allocations made in a Development Plan.
- 9.23. The submissions seek for the promotor's preferred site to be assessed against the allocated sites. This is not a statutory requirement of the SA process. It is a requirement that reasonable alternatives are assessed, and it is considered that this has evidentially been undertaken.

Recommended changes to Submission Sustainability Appraisal

- 9.24. No changes are recommended for consideration by the NPWG in respect of these submissions.
- 9.25. Detailed comments made with respect to a number of other matters with the SA will be considered further in the preparation of the Regulation 16 Neighbourhood Plan and its accompanying SA.

10. HOUSING CHAPTER: SUMMARY OF RECOMMENDED CHANGES TO POLICIES/AIMS

- 10.1. In light of representations received, set out below is a summary of recommended changes to the Housing Chapter by reference to each policy and aim.

Submission HNP Policy	Recommended Changes	Submission Versions Policy Wording
Policy 14: Residential Development Within and Adjoining the Built-Up Area Boundary of Hassocks	No changes recommended.	No changes recommended.
Policy 15: Hassocks Golf Club	No changes recommended.	No changes recommended.
Policy 16: Land to the North of Clayton Mills and Mackie Avenue	No changes recommended.	No changes recommended.
Policy 17: Land to the West of London Road	Recommend policy is deleted.	Policy recommended for deletion.
Aim 4: Housing Mix	No changes recommended.	No changes recommended.

Submission HNP Policy	Recommended Changes	Submission Versions Policy Wording
<p>Policy 18: Affordable Housing</p>	<p>Recommend MSDC suggestions are incorporated into Submission version HNP.</p>	<p>Recommend policy is updated to read:</p> <p>Policy 18: Affordable Housing</p> <p>Residential development proposals should provide a mix of affordable housing sizes, types and tenures aligned to meet the needs of the Parish.</p> <p>When allocating the first letting of a home within a new development of general needs housing, priority will be given to bids from applicants who have a Local Connection to the parish of Hassocks.</p> <p>In order to establish a local connection, the applicant(s) must meet one of the following criteria:</p> <ol style="list-style-type: none"> 1. Resides the Parish of Hassocks as their only or principal home and has done so for the previous 2 years; or 2. Has resided in the Parish of Hassocks as their only or principal home for a period of at least 3 years in aggregate out of the preceding 5 years; or 3. Is in paid employment in the Parish of Hassocks (working 16 hours or more a week) and has been for the previous 2 years; or 4. Has close relatives who reside in the Parish of Hassocks as their only or principal home and have done so for at least the previous 5 years, or the previous 2 years if the Applicant is aged 65 or over. <p>Larger new developments containing 250 homes or more in total are intended to meet the housing needs of the whole District and are therefore exempt from the local connection criteria above.</p>