

Response to Mid Sussex District Council's consultation on modifications to its Site Allocations Development Plan Document

Planning Policy Committee – Wednesday, 5th January 2022 (Agenda Item 6)

Report of: Chief Planning Officer

Purpose: For Decision

Publication status: Open

Wards affected: All

Executive summary:

Mid Sussex District Council (MSDC) is preparing a Site Allocations Development Plan Document (Sites DPD) which, among other objectives, will seek to identify sufficient housing sites to provide a five-year housing land supply to 2031. MSDC is now consulting on proposed main modifications to its Sites DPD following consideration by the Planning Inspector.

This report supports the Council's priority of: Creating the homes, infrastructure and environment we need.

Contact officer Marie Killip - Strategy Specialist mkillip@tandridge.gov.uk

Recommendation to Committee:

That the Council's response, attached at Appendix A, be agreed.

Reason for recommendation:

The significance of issues around the Felbridge Junction require that the committee be informed of the emerging Site Allocations Development Plan Document which has been prepared by Mid-Sussex District Council and which is undergoing examination.

The current consultation, closes on the 24 January 2022 and focuses on the main modifications to the plan being examined. The remit of the consultation is limited to the proposed modifications only and a draft response from TDC has been prepared accordingly. The Committee is asked to agree these comments.

Introduction and background

1. As part of its Local Plan process, Mid Sussex District Council (MSDC) is committed to preparing a Site Allocations Development Plan Document (Sites DPD) the stated aims of which are to:
 - (i) allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan;
 - (ii) allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development;
 - (iii) allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development, and
 - (iv) set out additional strategic policies necessary to deliver sustainable development.
2. Following hearing sessions in June 2021 regarding MSDC's emerging Local Plan, the Inspector provided suggested modifications to the Sites DPD. MSDC is now consulting on those modifications, the deadline for responses to which is 23:59 on 24th January 2022. All representations made will be taken into account by the Inspector.
3. The consultation documents can be accessed via the following link to MSDC's website:

[Development Plan Documents - Mid Sussex District Council](#)
4. Once the consultation has closed, MSDC will collate and send responses to the Inspector to inform his final report. Should the Inspector conclude that the Sites DPD meets legal and soundness requirements, it will be considered by the MSDC for adoption in the Spring.
5. The proposed response from this Council to the consultation is attached at Appendix A.

Remit of the Consultation

6. Mid Sussex has run various rounds of consultation prior to submitting their DPD to the Planning Inspector for examination in December 2020, the last of which was between August and September 2020, to which TDC responded. Our response was added to the Delegated Action List, and this addressed the highway issues that impact on our District, including at the Felbridge junction.
7. This current consultation is known as a Main Modifications consultation and has the specific remit of only consulting on the modifications being proposed. The consultation does not extend to any other aspect of the Plan which the Inspector will have addressed during the examination. This approach is in accordance with Local Plan procedure and is set out clearly at paragraph 6.9 of the Planning Inspectorate's [Procedure Guide for Local Plan Examinations](#).
8. The Council's attached comments are generally in accordance with the remit of the consultation and no new comments are included. However, Officers have sought to reiterate previous comments where relevant as these are part of the examination material in front of the Inspector already.

Equality

There are no significant equality implications associated with this report.

Climate change

Measures to address the implications of climate change have been factored into the Sites DPD, e.g. within various flood risk and sustainability assessments.

Appendices

Appendix A – draft response to Mid Sussex District Council's consultation regarding proposed modifications to its Site Allocations Development Plan Document

Background papers

None

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APPENDIX A

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**Draft Tandridge District Council response to proposed modifications to
Mid Sussex District Council's Site Allocations Development Plan Document**

We refer to our comments made at Reg 19 in relation to policy SA35 and continue to support the thrust of the policy on joint working over the future identification of safeguarded land for improvements at junctions in the A22 and A264 corridors, and that development should not prejudice the delivery of these proposals. However, we note that in the proposed Modifications no mention is made of our request in our Reg 19 response that:

" We would expect a mitigation option to have been agreed by all parties before the commencement of any development in the vicinity, so that we can be ensured that the impact will be mitigated and contributions towards the highways improvements are sought. As such, that wording to this effect is included within the policies (SA19 and SA20) as a main modification. "

SA 19 Land South of Crawley Down Road, Felbridge

We reiterate our previous Reg 19 comments regarding the identification of this site as part of East Grinstead settlement but its description as an extension to Felbridge:

"Tandridge notes that site SA19 has been identified as being within the proposed built-up boundary of East Grinstead and as such has the same settlement category (Category 1). However, it is also being described as an extension to Felbridge, with its vehicular access off Crawley Down Road and policy requirements setting out that the any proposals maximise connectivity with Felbridge. It is also noted that, at present, the built-up boundary narrows to a thin line between the main built up area of East Grinstead and development to the south of Crawley Down Road but this boundary is being amended to include an area of land located between this site allocation and the main built-up area of East Grinstead. Notwithstanding this it is noted that policy DP13 of the Mid Sussex Development Plan 2014-2031 seeks to prevent the coalescence of settlements which harms the separate identity and amenity of settlements and the maintenance of this undeveloped gap reinforces the fact that they are separate settlements.

Our Settlement Hierarchy (2015 and 2018 Addendum) identifies Felbridge as a Tier 3 Rural Settlement which demonstrates a basic level of provision. However, it also recognises the relationship with out-of-district settlements, noting that residents rely on East Grinstead for services such as healthcare facilities, secondary schools and a train station. In arriving at our Preferred Strategy we considered a number of different approaches, including an approach with development focused on our Tier 3 settlements. Our Sustainability Appraisal concluded that such an approach would be unsustainable, with limited gains when compared to the impact on the environment and the settlements themselves. Tandridge's approach therefore does not include directing development towards this settlement."

Highways and Access – see comment above regarding the inclusion of wording that a mitigation scheme should be agreed before the commencement of any development on the site. We regard this as extremely important and its current omission as deeply regrettable in terms of impact on communities within Tandridge District.

We welcome the inclusion of the Minor Modification which makes it clear that development impacts should be mitigated “to the satisfaction of both” Surrey and West Sussex County Council Highway Authorities.

SA20 Land south and west of Imberhorne Upper School, Imberhorne Lane, East Grinstead

We continue to support proposals for health and education provision related to this site as set out in our Reg 19 representations.

We also support the proposed Minor Modification regarding monitoring of the use and management of the proposed SANG.

Highways and Access – see comment above regarding the inclusion of wording that a mitigation scheme should be agreed before the commencement of any development on the site. We regard this as extremely important and its current omission as deeply regrettable in terms of impact on communities within Tandridge District.

We welcome the inclusion of the proposed Minor Modification which makes it clear that development impacts should be mitigated “to the satisfaction of both” Surrey and West Sussex County Council Highway Authorities.