

Mid Sussex Liberal Democrats, Local Plan Response to further modifications as set out in Doc BP1b. 6th November 2017.

Before attempting to unravel this consultation document, we wish to place formally on record our objections to how this process is being dealt with by MSDC.

Our objections are listed below, and we feel this consultation has been done with the utmost disdain, and disregard to those who are expected to comment on them by the Councils Executive Cabinet.

1) Page 1 sets out in the paragraph preceding the sub-heading 'Consultation'

A full 'tracked change' version and 'clean' version of the District Plan incorporating all modifications (both minor and main) can be downloaded from the District Plan web page at xxx.

It is unclear what these documents are and where they are located on the Councils website. We presume it is referring to the (this) document that page one is attached to. This is misleading and should have been either reworded to clarify if this is the document or the appropriate link to the documents embedded in the pdf.

2) We are not clear who thought it was a good idea to condense the pages of a A4 portrait orientation to a landscape view when printed. This has produced a document with barely legible text which has blurred print and as stated before, a condensed print font. Not all residents have 20/20 vision, and we can only assume this is an attempt to dissuade people from commenting. Many residents have problems relating to text on a monitor and print to read more clearly. It is either that or officers are so overstretched that they haven't the time to carry out a legitimate consultation or check what is being put online complies with accessibility criteria as set out under RNIB guidance, which is being forced on them by a Planning Inspector who is attempting, yet again to get Mid Sussex District Council Executive to meet its planning obligations to the area it serves.

We have utilised the services of our members who not only have local knowledge, but also professional and formal life experience in relevant planning policy areas. We have also called on the knowledge of many people who are experienced and educated to post graduate level in some policy areas when writing this submission.

In setting out our response we have used the 'MM' numbers as the reference rather than the Policy number referred to in some sections as we feel this is more relevant in this consultation.

We would ask also if the consultation documents as set out, in the inspectors' opinion meets a minimum standard for public consultation due to its poor and confusing referencing as well as printable text.

Our view on what is required in a District Plan.

We have set out in our detailed responses to this consultation which are supported by our earlier submission to the 2014/15 consultation.

As a Planning Authority we find that the situation Mid Sussex which has been allowed to develop where only around 40% of the requirement of future development land supply is known, to say the least lamentable.

It is important at this stage to reiterate what our key tests are in the development of a 'sound' plan which will take us up to 2032 and lay the foundations for the time after this plan has expired.

- 1) Since 1999 in Mid Sussex, house prices on average were 5 times average earnings the situation has deteriorated and now stands at 12.5 times average earnings. This is unsustainable and needs positive action rather than hand wringing piecemeal development which does not serve the Mid Sussex Community, now or in the future. (1)
- 2) The plan must be deliverable, sustainable and economically viable for the community it serves. With values on new homes at an all-time high in Mid Sussex, there can be no reason to back track on producing 30% of new homes as affordable and social rented accommodation which must be built to a high standard.
- 3) The Townscape is as, if not more, important than the countryside in delivering a healthy and well-balanced community for all its population. Delivering the infrastructure necessary in respect of education, clinical services and recreational leisure. A sense of space and the provision of recreational opportunities as well as aesthetical features must be integral to all developments.
- 4) Mid Sussex has many unique communities, these must be preserved to retain their individual and collective character which is Mid Sussex and not suffer from unnecessary urban sprawl and coalescence.
- 5) With this plan the foundations for the future must start to be laid which include transport infrastructure that works for everyone and is developed around emerging sustainable technologies. Key to achieving a sustainable standard of development in Mid Sussex is the starting to assemble land for a new strategic settlement. The Crabbet Park area, in the North of Mid Sussex would support the formation of a new settlement and facilitate all aspects of initiative and sustainable design.
- 6) The physical and mental health and wellbeing of our communities must be the first consideration and not something which has to be managed through meagre resources in the future. Our towns and communities deserve better not worse than they currently have.

(1) Source: ONS Housing Needs Consultation Data Table 2017

Roger Cartwright

Chair, Mid Sussex Liberal Democrat Local Party.

Mod Ref.#:	Comments
<p>MM01 (Sustainable Development in Mid Sussex) and MM02 (Sustainable Economic Development)</p>	<p>We welcome this modification to the origin flawed policies. We have long advocated the necessity to produce a plan which builds an economy base on skills and high educational achievement. Which will lead to:</p> <p>Social: Growth, wellbeing, strengthen commitment to the local community.</p> <p>Economic: Building a more sustainable local economy where people choose to work with clearly defined and adaptable career pathways. Which also generates a local well balanced supporting economy.</p> <p>Environmental: Reduction in travel time and the environmental benefits associated with a lowered travel carbon footprint and costs. Enabling the retention of more value to the local economy. In part this can then be reapplied to enhance and protect ecologically sensitive areas. In addition, it will also open-up areas and increase opportunity for more residents to interact with their locality.</p> <p>Much of this is set out in the councils Employment Land Study document which the Liberal Democrat Council Group of the time spent considerable time helping officers develop. It seems to have been overall disregarded throughout this plan process. The ELSD was not perfect, but seems to in recent years been a starting point to work backwards from!</p> <p>It is a shame a Planning Inspector has had to defer, yet again a decision on where the Local Plan meets its tests, and has had to insist on a rewording on something so basic and fundamental.</p>
<p>MM03 (Town Centre Development)</p>	<p>We feel that overall the comments and modifications relating to Haywards Heath and East Grinstead are correct. However there does need to be an oversight view of the purposes Town Centres have in serving their communities and leveraging in the surrounding villages and smaller towns populations and how it also serves them going forward and a regular review of their 'offer'. This may need some seeding ideas to regenerate and refresh some locations during the plans lifetime from what is meant to be the community authority in control of the areas wellbeing, Mid Sussex District Council.</p> <p>That said we find it extremely difficult to relate DP3 rewording in relation to Burgess Hill Town Centre. The mix of retail provision is being decimated by the redevelopment plan which has already been passed. The community facilities are being bulldozed to make way for a large and yet to be proven concept for a 10-screen cinema as well as the introduction of fast food, drinking establishments and restaurant chain (Use Classes A3, A4 & A5) dominated centre which dislocates itself from the Market Place Centre in the Town. The District Council used specifically flawed data to justify its decision and has actively withdrawn from replacement provision of much needed community facilities. The abandonment of any community benefit down to</p>

	<p>the exclusion of any social affordable homes in this development belies any lip service this plan seeks to achieve. Furthermore, the relocation of a major food retailer from the town centre to an out of town centre location designated in the Neighbourhood plan for socially affordable housing, beggar's belief and further reduces the stated aim of 30% affordable homes within the plan (within a month of it being voted on in a referendum, this was actively being promoted by the Town Council as its preferred option). No sites have been identified to make up this shortfall and it means other developers will have to pick up the bill to achieve the 30% target. The excuse given for this town centre plan was it wasn't economically viable without the exclusion of socially affordable homes. Our view is this wasn't the right plan in the first place due to its shortcomings and should have been rejected as not meeting the Councils Planning Policies objectives.</p> <p>The relocation of the Food Retailer to a 'significant out of town centre site' which fails the sequential test, in our view, even at the margins set out in the housing allocation document. That is within 20 minutes walking distance, we have an aging population which moves slower, and we can find no reference to speed walking in these papers. There is a significant hill between the site and the town centre, it has narrow footpaths in places and is now best suited to a cycle route, having a moderately narrow road and poor sightlines in places. It is not well served by public transport, insufficient to make the outlet commercially viable, and there, as far as we have seen on any plans, a controlled pedestrian crossing to assist crossing an, at times, busy road.</p> <p>Once breached it is extremely difficult to re-establish a planning policy.</p> <p>This doesn't bode well for the rest of the plan. The District Council must stop being a friend to some developers and start doing its job as a planning authority.</p> <p>Our original comments regarding this section, Jan 15 submission, still stand and we feel are relevant in setting out our response to this consultation.</p> <p>We are assuming MSDC still has those comments, but are happy to resubmit them if needed.</p>
<p>MM04 (Housing)</p>	<p>The opening statement in this section states:</p> <p>Amended in accordance with MSDC20. Neighbourhood Plan Strategy and housing distribution to Parishes moved to DP6: Settlement Hierarchy to improve readability.</p> <p>NOTE: Due to the number of changes to this policy as a result of the examination, the supporting text and policy wording is shown 'clean' (i.e. with no track changes) for ease of reading.</p> <p>All the text below is subject to Main Modifications consultation.</p> <p>It then goes on to show all changes, score throughs and underlined text.</p> <p>We are unclear if this has been done on purpose to further confuse the consultees, the community invited to comment, or just laziness or lack of time to read through what is published. It demonstrates again a level of</p>

incompetence which leaves a further impression of doubt and mistrust in setting a plan fit for use, and one that has more than just lip service paid to it for a few weeks.

This section is extremely worrying in respect of its content and context.

We feel the total number of dwellings is in line with our estimations of a few years ago, which we promoted and were pilloried over at the time for being too many and unrealistic in its number. We remain sceptical that this is the final number and that other windfall sites will increase these numbers significantly.

Our specific concerns are set out below:

- 1) The number of dwellings identified as in respect of the three main towns of Burgess Hill, East Grinstead and Haywards Heath, which are stated in the Housing Site Allocation document as being completed in respect of consents granted and built to 2017 will all fall outside of this plan. The significant 'North of Burgess Hill' allocation has a strong possibility of coming for planning permission before the local plan is signed off.

As with the other sites and builds, this means the Community Infrastructure Levy (CIL) cannot be factored in as helping to mitigate the infrastructure deficit in their respective plans. It cannot be applied retrospectively. The wording around Clinical and Educational provision is so weak it leaves the development prospects of these coming to fruition in a great deal of doubt.

It is worrying that under the proposals the vision of developers not wanting to come forward with other plans before the plan period to 2031 in and around the three towns, leaves a further doubt of the plans serious intent to deliver a structured community. It tends to favour and promote piecemeal development.

- 2) It also talks about sustainable communities, yet fails to set out how an open and recreational environment will be achieved. Policy on this is very weak if it exists at all. There is a growing body of evidence that shows that when communities and people are restricted into tight packed developments with little or no outside casual recreation space or restricted access to it (connectivity links for all, including those with disabilities, the stresses and impact on mental health are profound. It is all very well to possibly provide clinical services, but when the developments promote mental ill health. It must be a major concern. Mental health in many respects has a far greater potential to limit economic performance as well as the social and physical health negative impacts. None of this is addressed in this section. The wording also promotes greater dwelling densities in smaller footprints to preserve low grade agricultural land. We feel this is short sighted, if to be taken as a serious policy.
- 3) Windfall sites: If windfall sites can be restricted to 45 we would be very surprised. The issue of a windfall site on land North of Clayton

	<p>Mills, Hassocks delivering 500 dwelling being accepted to make up a shortfall in numbers speaks volumes for the disparity in this paragraph. As this was not a site identified for housing it cannot be described as anything less than 'windfall'. The carrot of a primary school being delivered within the development without a fully costed proposal leads us to believe there will be an element of cake today and cake tomorrow scenario. Little or no thought has been given to the sustainability and environmental impact of this application and its adherence to the councils own stated criteria. We can see no projections which factor in incremental impact of this additional large development on either Hassocks or Burgess Hill and further erosion of the council's earlier commitment of not exacerbating the problems of community identification and restriction of coalescence. Set out in earlier versions of this plan. We may be prepared to modify our view if the council can point to any published statement or document which abandons these earlier commitments in the Local Plan process.</p> <p>We note also that the current district plan minimum requirement for dwellings built within the period of the plan is 16,390. No upper limit is expressed. This tends to reinforce our belief that windfall sites will deliver a far higher figure.</p>
<p>MM05 Planning to meet Future Need</p>	<p>We can find no objections to planning to meet future need, providing it is done in a sustainable way and isn't just a knee jerk reaction where the council is dragged to the table. It will need, not only a firm commitment from the council, but also adequate funding to produce a viable options scenario.</p> <p>That said, we feel that the necessity of the establishment of a new settlement in Mid Sussex moves closer and the planning for that to take place is the strategic location of Crabbet Park, South of Crawley, but within Mid Sussex, becomes a reality rather than something to be disregarded.</p> <p>The wording around the Brighton & Hove and Crawley overspill (our wording) in respect of planning for the future should also be referring to the situation of Lewes, which is building up to the Mid Sussex boarder, but with no apparent funding to meet the needs in facilitating the increased population we have no control over. The situation where access to facilities in Mid Sussex from these developments is leading to further overstretch on already limited resources. Both in Burgess Hill and Haywards Heath. It does need addressing urgently. This situation is going to get worse if nothing is done to address the developing problem.</p>
<p>MM06 Settlement Hierarchy</p>	<p>We understand the stated aims regarding the 'Plan Text' section of this item, but fail to see the relevance when talking to the Neighbourhood Plan Strategy section.</p> <p>For example, in Burgess Hill the Neighbourhood Plan focuses almost exclusively on the Martlets redevelopment. One site outside of the town centre, the former gas holder site on Leylands Road in Burgess Hill was designated for Affordable Social Housing. Within a few weeks of the NP being 'made' the Town Council actively promoted the site for out of town centre food retail. To date we are unaware of any proposal from the Town Council to redress this, now, deficient, shortfall in the housing numbers. This</p>

	<p>may have also been the case in many other locations across the district where NP's have also been 'made'. As they also promoted the Martlets redevelopment knowing it had removed the Affordable Housing element from the plan it is difficult to see that the BHTC has any wish to engage with the need to provide any Affordable Homes in its NP or promote the need to provide any.</p> <p>It does need investigating as to the validity of any NP currently in existence in Mid Sussex.</p> <p>About the published figures in this section, it is impossible to say whether they are relevant or not due to the ambiguity.</p> <p>We also feel strongly that any further development which compromises and promotes coalescence of Communities and an erosion of their unique identities must be resisted.</p>
<p>MM07 General Principals for Strategic Development at Burgess Hill</p>	<p>We find the deletion of a 30% minimum provision of affordable housing unacceptable. 30% was a very poor level of provision in the first place and to remove the number indicates to developers the lack of commitment expected from them to build diverse communities. It does however reflect the poor decision of the council's planning committee when allowing the town centre development consent in the first place and seems to let not only the developers, but the council off the hook when making planning decisions. We ask if this is to become the norm. We also ask how the council plans to mitigate the now shortfall in affordable home to meet the overall 30% target figure.</p> <p>The rewording which excludes the improvements to the Goddards Green Waste Water Treatment site addresses the issue we had previously where the council was putting up barriers to any development on the presumption of another statutory organisations forward planning. We know the issue for the Water Treatment Works capacity was being held back due to the lack of commitment with the council planning policy. We welcome this change of position.</p> <p>Please cross reference to our comments in MM10 'Strategic Allocation to the East of Pease Pottage'.</p>
<p>MM08 Strategic Allocation to the North and North West of Burgess Hill</p>	<p>We note this section and the rewording which better reflects what has and is happening in this Strategic Allocation. We raise concerns that there is a need to emphasize the necessary provision of informal open space as it was a key factor in determining the original outline application of the Keymer Tile site and the reasons it was such a key factor. It suggests that there is developer pressure to walk retrospectively away from this key commitment and aspect of the development. This must be resisted in the strongest possible way.</p>
<p>MM09 Strategic Allocation to the North and North</p>	<p>The deletion of a number of permanent pitches for settled Gypsies and Travellers should not be allowed to lead to not providing the necessary number needed, which must be assessed to the current criteria of the day. The revised wording round 'equivalent financial contribution' requires</p>

<p>West of Burgess Hill</p>	<p>additional clarification as to whether it will be ring fenced or hypothecated funding contributions'. Our concerns are if this is not done the moneys will be expended on other projects which show a shortfall in funding. These should be addressed in other ways rather than have a convenient pot to dip into, which has sometimes happened or perceived to have happened in the past. The wording in this section needs strengthening.</p> <p>The second paragraph under 'Strategic mixed-use development in this allocation will: Delete the wording 'unless otherwise agreed by the local planning authority'. There is either a planning policy or there isn't. You cannot cherry pick a policy for the convenience of a developer and retain a semblance of control over planning.</p>
<p>MM10 Strategic Allocation to the East of Pease Pottage</p>	<p>The issue of the Gypsy and Travellers pitches needs further work. The location must be granted the same accessibility regarding connectivity to Neighbourhood centres, medical and educational facilities as any other settlement areas and not stuck out as far from other areas as possible, which could be seen to be the silent proposal in this section.</p> <p>This is also the case for any other G & T site allocations across the district.</p> <p>We fail to see how the issue of CWWTW can be used as a barrier to development in this area when it has been disregarded in the Burgess Hill North, North West proposals? We understand the must be negotiations and CWWTW made aware of the situation in the strongest terms, but this is far different to it blocking the development and would lead to other unallocated sites having to be found to make up the shortfall of some 600 units.</p> <p>Please cross-reference back to our comments in MM07 'General Principals for Strategic Development at Burgess Hill'.</p> <p>From discussions regarding Burgess Hill Water Treatment Works in previous years the lack of planned capacity from the utility provider is down to the lack of commitment from Mid Sussex District Council when deciding where to put development.</p>
<p>MM11 Strategic Allocation to the North of Clayton Mills, Hassocks</p>	<p>We have previously tried to address the issues with this site earlier in our response. However, it must be stated we see this as an opportunistic windfall site by a developer rather than a well-researched site which benefits our district and Hassocks in terms of sustainability criteria as set out in the council's assessments for other sites. We judge this as a windfall site as it was brought to council by a developer as a complete scheme without negotiation as a 'fait accompli', and without satisfactorily mitigation of transport access and safe pedestrian connectivity to the rest of Hassocks.</p> <p>Furthermore, we fail to see how a site can be consulted on in any meaningful way when the site has already been voted on and agreed by the clear majority of councillors, with the notable exception of a new ward councillor. To then say it is being included in a consultation is beyond patronising.</p> <p>Hassocks and Hurstpierpoint Liberal Democrat Local Party Branch has submitted a more comprehensive document on this issue (Clayton Mills). Please accept it as part of our overall response to the consultation. It has</p>

	already been forwarded to the Inspector. However, we have reattached it to this broader response in case there is a problem in locating it.
MM12 New Homes in the countryside	There is little to comment on in this section which has not been addresses in the past and we see this as only a small clarification of existing policy.
MM13 Securing infrastructure	We feel this is stepping back from previous published schedule due to the council's inability, to date, in delivering a Local Plan, and a reversal of the policy on Neighbourhood plans and how they were presented to their respective communities by the Town and Parish Councils. It is we feel, incumbent on the council to issue an indicative chart setting out in broad terms the amount of money which comes with the approximate dwelling size. Also, there is no reference as to how much of the CIL will be passed to the Town and Parish Councils where and when the homes are built. Which is potentially a large amount of money for them to provide community infrastructure. Neither is there a document setting out what the charging scale will be under these revised proposals. Is it to be the same as before or different? Is there to be an inflationary charging schedule based on RPI or CPI? This is critical as the amount otherwise brings a diminishing return to the community the further into the Plan period we get. It also encourages developers not to develop too early in the plans lifetime as it would be a diminishing fix cost and affect their bottom line on a balance sheet. It can also potentially lead to the failure to deliver on the stated figures in the plan to 2024/25.
MM14 Transport	<p>We see these alterations as a positive move forward in respect of environmental impact, but would draw the inspector's attention to our comments regarding the Clayton Mills site, which seems to be counter to these alterations in many aspects.</p> <p>Our concerns remain regarding assess to public transport and its provision. Currently there has been a reduction in services across Mid Sussex due to the removal of some subsidies. For example, the Triangle leisure centre in Burgess Hill has seen an issue developing where some clients, particularly, but not exclusively, older users, being unable to attend fitness courses due to the removal and cutting back of Public Transport Services. We know this is being looked at currently, but have no knowledge of the outcomes of any discussions to make further comment here. It does however run contra to parts of this policy as the Planning Authority has little say in the provision and we know does not, from historic knowledge, provide ongoing funding.</p>
MM15 Communication Infrastructure	No further comments as it has already been set out in other central government papers.
MM16 Character and Design	We welcome these proposals, but hope it does not indicate a return to the past where poor design encouraged anti-social behaviour to go unreported by having poor visibility to the side and rear of properties.
MM17 Housing Density	We are unclear on what this means in practical terms. Is it saying build to whatever density you feel like and don't worry about the social consequences in our towns. Or is it saying the densities before were set to high/just right?

	<p>We campaign to retain our countryside and landscape, but there is a balance to be struck with the needs of people to live in a sustainable environment as well. Where their mental and physical health is not jeopardised by cramming. A major and as important part of the character of Mid Sussex is also our clean and pleasant town and village landscapes. Not exclusively what is outside of the built area. Neither must be compromised at the expense of the other. There is already a growing body of evidence of this taking place in Mid Sussex as well as nationally and a full environmental impact study of our built areas needs undertaking before the deletion of any of the wording covered in MM17 takes place.</p>
MM18 Accessibility	<p>We have no issues with this section as it stands, but would challenge any application which fails to meet these requirements.</p>
MM19 Noise, Air and light pollution	<p>We note this section, but question the lack of vision when addressing the light pollution issue. Many new developments do not fall under local authority highways jurisdiction and to address the problem of developers installing, as in the past, below highways standard lighting, needs a planning policy to enforce a minimum standard of street lighting in respect of light pollution. Non-conforming street lighting has a major environmental impact on many levels.</p>
MM20 Housing mix	<p>We find no substantial issues with these wording updates which in many ways reflect fact rather than assumption. We would caution that this mix tends to be fluid over a given period and the mix may need adjusting during the life of the plan.</p> <p>Our concern is around the presumption of older people not using personal transport and therefore reduction in carparking requirements. Anecdotally we see a higher usage of personal transport amongst the over 75 age group. Who need their cars to access shorter journeys due to reduced mobility.</p> <p>Organisations such as the RAC and AA should be consulted to see if their research supports the councils stated perception of lower vehicle use by the over 75 age group as compared to other age groups.</p> <p>Where we agree there will be an increased need for more care homes. There is also the fact that people are living healthy active lives for far longer than ever before. Many choose to move to assisted and sheltered accommodation, but retain their active, independent lives. With that increase comes the additional requirement to facilitate the pluses of their increased active life expectancy.</p> <p>Many remain in their family homes. It makes a nonsense to suggest due to moving to assisted living accommodation, intermittent public transport is the only way they would wish to travel outside of their homes.</p>
MM21 Affordable Housing	<p>The figure of 44.2% of newly forming households is roughly in line with our view of several years ago. The situation has deteriorated since then and we understand the 44.2% is based on a far better resourced data set than we have access to.</p>

	<p>Our concerns with the drafting of the rest of this section is the ambiguity around whether 30% can be provided in Mid Sussex and the way it would be assessed as being viable. It must be remembered that for every 1 unit which a developer can avoid building, then another would be expected to pick up the cost.</p> <p>It should also be considered that every Affordable and Social Affordable unit not built in Mid Sussex will, if the situation is to be improved, have to be built elsewhere and Mid Sussex has not taken this into consideration when writing this plan.</p> <p>Our principal concern is around the nondisclosure of how an application is assessed, and the parameters use to judge who can afford and who can't to provide the 30%, which is already nearly 33% below the identified need.</p> <p>We note that the policy states it will have a supporting Supplementary Planning Document where the details for reducing the 30% exceptions to occur will be published later, but we find it difficult to understand why this does not already exist after many years and many failures of producing a Local Plan and cannot make judgement comments on information which is not available. Our questions on this are: When will the SSPD be produced and will the SSPD be open for consultation or will it just be produced without external scrutiny?</p> <p>We feel that a policy which states 30% must mean 30%. It is all too easy to present a case which fails to meet this figure and then back it up with supportive arguments. It is equally easy to work to a design brief where the imperative is to meet the obligation to provide. It is easy to back away from a cost centre in a development where the policy has a get out clause. The choices to households who depend on Socially Affordable rented housing are limited anyway and the situation is already chronic. As a local authority which has responsibility to all its residents, it is incumbent on them to do their best for all rather than, in fairness, the majority. However, that majority, on the 44.2% figure may soon exceed the 50% tipping point. It is time for a robust defence of all the community which currently supports, through policy, the better off. At 30% Affordable Home Provision Mid Sussex falls even further behind year on year.</p> <p>In support of the comments above we point to the Governments most recent figures which show the scale of under provision in the Social Affordable Housing sector. Mid Sussex falls woefully below the median.</p> <p>Much of this position may seem idealistic or cynical, but local experience shows that the residents in Mid Sussex have been failed by the council on planning for many years. The problem will become worse if nothing is done to address it. Housing is not a quick fix, but something which lasts for many decades.</p>
<p>MM22 Rural Exception Sites</p>	<p>This re-enforces our view regarding all Socially Affordable Homes. It is curious that this policy states it is necessary to demonstrate where the shortfall would be made up if the 100% target is not to be met, but fails to have a similar clause in MM21</p>

<p>MM23 Gypsies, Travellers and Travelling Showpeople.</p>	<p>We have already commented earlier on in this submission to the consultation regarding Gypsies, Travellers and Travelling Showpeople. We do however welcome the recognition of Traveling Showpeople in a policy, it is long overdue. Albeit that currently it seems there is no identified need to provide for any groups in this policy area if they cannot demonstrate a current permanency of residency. Which seems to be counter intuitive and somewhat prejudicial to a recognised ethnic population, which has roots in this country reaching back many hundreds of years. The test would be 'is this be acceptable to any other ethnic group' – the answer would come back - NO!</p> <p>The constraints to be applied in this policy if it goes forward are draconian when balance against any other population settlements.</p> <p>We point out that Travelling Showpeople can have a background of very different social traditions than other Gypsies and Travellers which must be a major consideration in any strategy which has to start at the planning stage. We do wish to re-enforce our earlier comments regarding pitches having connectivity to Town and Neighbourhood centres as well as education, social and health services which are equal to other population centres.</p>
<p>MM24 Listed buildings and Other Heritage Assets.</p>	<p>We welcome changes to text which recognises the independent assessment of assets.</p>
<p>MM25 Conservation Areas</p>	<p>We feel the strengthening of the wording in this section is beneficial in that it actively promotes economic activity and tourism.</p>
<p>MM26 Archaeological Sites</p>	<p>We agree this is a logical deletion with respect of now being included in MM25.</p>
<p>MM27 Biodiversity</p>	<p>We see the logic in this, but fail to see the logic in a policy and document which sets out to expand priority habitats and yet constrains the urban areas, which has been stated earlier in this document. Nature is critical, but so equally are people, their health and wellbeing. There is nothing in here, which is disappointing, which sets out a necessity to increase access to these areas for all.</p>
<p>MM28 Green Infrastructure</p>	<p>We agree this is a logical deletion with respect of now being included in MM26.</p>
<p>MM29 Sustainable Design and Construction</p>	<p>We agree with the rewording, but would expect a reference to a nationally agreed Strategy and Standard. The council has not the resources to police all the latest technological advances and developers without a reference can come up with their own in many cases, which are cost based rather than the best available.</p> <p>We are unclear with the wording in this section if it is the intent to retain the Architects Panel as a consultee. We would recommend that the Panel is included in this section as a mandatory consultee. They have served the council well in the past and to include them within the planning policy is</p>

	<p>logical. It must be bore in mind this is a new District Plan and what is not specified can be done away with without reference back to scrutiny.</p> <p>We can see there is a reason for discussion with developers but there must be a reference point, which will evolve during the lifetime of the plan as technology evolves.</p> <p>We welcome the deletion of the specific wording regarding ‘biomass boilers, biomass/gas CHP or heat pumps’ for the reasons and demonstration of our views as set out above.</p>
<p>MM30 Renewable Energy Schemes</p>	<p>We agree with the view as set out under ‘Supporting text’. We find the additional wording regarding wind energy and its location. We believe this to be to be counter to the NPPF however.</p> <p>We are unclear if any Neighbourhood plans so far ‘made’ in Mid Sussex broached the topic. To revisit this specific area regarding Neighbourhood plans would mean further consultation and another referendum per plan. If NP’s are to be based on single individual topics we fail to see how a cohesive approach can be adopted. The plans would have to be voted on in every instance of change, or has that myth been laid to rest with the Burgess Hill Town Council promoting a site for out of town centre retail when it was designated under its ‘made’ NP for Affordable Housing?</p>
<p>MM31 Flood Risk and Drainage</p>	<p>This seems somewhat bazaar. We feel all sites, regardless of size should have an assessment for risk of flooding and drainage management. It seems prudent to have a policy in place which calls on a development, even of one unit, to address the issue, even if the outcome is ‘no scheme of mitigation is found to be necessary’.</p>
<p>MM32 Implementation and Monitoring of the District Plan</p>	<p>Many of our comments are supported in this section.</p> <p>We wish it to be put on record that we strongly recommend in the establishment of a ‘Developer Panel’ the terms of reference are published and advertised and that a high, but not majority percentage of representation from outside of the Developer network are integral to the Panel. A ‘Job Specification’ and terms of reference must be advertised locally, and an independent recruitment panel/agency is enlisted to make the appointment to prevent any accusations of collusion being made. This is in line with other consultee panels and similar bodies in other public forums. The terms of reference must not however fetter outside appointees with unnecessary and erroneous confidentiality clauses.</p> <p>We note that the issue of further Neighbourhood Plans is broached in this section, Paragraph 5.2, 3rd bullet point. We would seek a clarification statement regarding the existing NP’s which are already ‘made’. Will, for instance, the existing plans, which have been found ‘sound’ be remodelled and if so and as the first ones were ‘made’ following a (Town and) Parish referendum, be subject to further referenda until they fit what the Planning Authority wishes them to do. This seems a waste of local tax payer’s money and resources if so and a diminishing of local democracy in its most basic form, or put another way, a pointless Public Relations exercise.</p>

Ends.