

## Summary

Lindfield Parish Council strongly objects to this proposal which attempts to ride a coach and horses through the Lindfield and Lindfield Rural Neighbourhood Plan, Mid Sussex District Council's District Plan and its Strategic Housing and Economic Land Availability Assessment.

As well as failing to meet many of the District and Neighbourhood Plan Policies, it would place untenable levels of pressure on existing struggling infrastructure (including *inter alia* Doctor's surgeries, hospital, railway station, local roads, schools and leisure facilities). As the current crisis has shown, space for walking and similar exercise near to existing residential accommodation is at a premium; this proposal would significantly reduce the limited local green space which is available.

Accordingly, Lindfield Parish Council asks that the Planning Authority rejects this attempt to totally undermine the credibility of local and district plans by a developer who, on the evidence of this proposal, seems to consider that planning policy does not fit their ambitions.

## Current Coronavirus impact

Lindfield Parish Council is extremely concerned at MSDC's decision not to delay consideration of this substantial and environment changing application, notwithstanding the current Coronavirus pandemic restricting resident's movements. Its decision deprives members of the public from being able to air their views clearly, in an open and democratic forum, and for both Parish and District Councillors to hear and respond to those views. Their denial of the request for a delay assumes that all have access to the appropriate technology to access MSDC's Planning Portal and respond accordingly. A fundamentally disturbing approach.

## Development proposals

The application itself appears to be both a stalking horse and a trojan horse. The former as it seeks to draw out potential objections and establish the principle of development at this site and the latter as its apparent magnitude, as unwelcome as that is, hides the underlying scale of potential development on adjoining land which would be unlocked by this proposal. It is also noted that the developer has been working on achieving planning permission for this site for some while and that this attempt is being rushed through ahead of the expiry of its agreement to act for the landowners.

## Planning Policy

Turning to the application and planning policy, a number of key policies and assessments are set against this proposal.

### 1. Strategic Housing and Economic Land Availability Assessment (SHELAA)

In February 2020's Site Allocation Plan Document, the site was considered by MSDC to be unnecessary to meet their spatial strategy and was not considered further. Accordingly, to give permission for planning at this site now would undermine the credibility of MSDC's planning approach and the adopted District Plan.

### 2. District Plan Policy 6: Settlement Hierarchy

This requires "...well located and designed development that reflects the District's distinctive towns and villages, retains their separate identity and character and prevents coalescence..." As proposed, the development would dramatically increase the population of Lindfield Rural Parish in a location which is totally apart from other settlements in the Parish, leading to increased coalescence with both Lindfield Parish and Haywards Heath Town.

This policy also states “...*To provide opportunities for people to live and work within their communities, reducing the need for commuting...*” This proposal appears to be the antithesis of this policy and would be expected to significantly increase commuting increasing pressures on inadequate local roads and the railway station, which despite its recent parking expansion and Thameslink’s increased services, remains over utilised with a full car park and standing room only on many services. It is noted that the most obvious potential space for further expansion of the station car park currently has flats being built upon it by the same developer.

Amongst a number of factors, MSDC’s Policy allows for the growth of existing settlements where “*the site is allocated in the District Plan...Neighbourhood Plan... or where the proposed development is for fewer than 10 dwellings...The development is demonstrated to be sustainable...*” and “...*The developer will need to satisfy the Council that: ...A large site is not brought forward in phases that individually meet the threshold but cumulatively does not.*”

Initial proposals for this site identified approximately 1100 houses; however, this appears to have been scaled down in an attempt to belie its true intent, given the land that would be unlocked for development. At such a scale, proper, strategically planned developments would be required to incorporate purpose built and fit for purpose medical centres, schools, sports facilities, community centres and sustainable transport links, all completed before an agreed percentage of the site was built out. Section 106 and similar contributions for facilities which might or might not be built elsewhere at some point in the future are simply inadequate for a development of this nature.

In summary, the proposed development is completely unsustainable both in terms of its inherent flaws and inability to meet Policy 6.

### **3. District Plan Policy 12: Protection and Enhancement of Countryside**

This application is completely set against the main thrusts of this policy “...*The countryside will be protected in recognition of its intrinsic character and beauty. Development will be permitted in the countryside...provided it maintains or where possible enhances the quality of the rural and landscape character of the District, and: it is necessary for the purposes of agriculture; or it is supported by a specific policy reference either elsewhere in the Plan, a Development Plan Document or relevant Neighbourhood Plan.*”

The proposal seeks the destruction of a greenfield site (it is noted that the developer describes it as a brownfield site) outside built up area boundaries and which the Council’s Landscape Advisor suggests the quality of the site and the magnitude of change have been underestimated and that the creation of a high-density housing estate on a greenfield site “...*would be major adverse in perpetuity.*”

It seems clear that the proposed development at this site is unable to address Policy 12.

### **4. District Plan Policy 15: New Homes in the Countryside**

Policy allows for certain development in the countryside including “...*to enable agricultural, forestry and certain other full time rural workers to live at, or in the immediate vicinity of, their place of work...Affordable housing in accordance with Policy DP32: Rural Exception Sites; or...The proposed development meets the requirements of Policy DP6: Settlement Hierarchy.*”

The proposal fails to meet any of the required criteria for Policy 15.

## 5. District Plan Policy 21: Transport

*"...The District Plan aims to create sustainable communities and this includes a sustainable local transport network and ease of access to local services and facilities..."*

The walking distance from the south-eastern entrance of the site at High Beech Lane to Haywards Heath Railway Station is 1.1 miles and to South Road in Haywards Heath 1.6 miles; this is the closest point to usable footways and significant parts of the site will be much further away. It is highly unlikely that the majority of residents in the proposed development would be prepared to walk such distances for commuting or shopping purposes and cycling is relatively unattractive given the narrow nature of the heavily trafficked local roads, absent dedicated and protected cycle routes. The application suggests enhanced bus services could be made available; however, local experience suggests that this is unable to be guaranteed.

Lindfield Parish Council is extremely concerned at the impact of increased traffic volumes, likely to be significantly in excess of 1000 resident's vehicles alone, which would be generated by this proposal and considers that the analysis provided to date is perfunctory at best. In addition to the pressures southbound on unsuitable roads towards Lindfield and Haywards Heath, the proposed development would add significant pressures on the route north through Ardingly, an already congested village, and the suggestion that Copyhold Lane could provide a meaningful route is derisory. This is an extremely narrow road with blind bends making passing difficult or impossible when vans or larger vehicles are travelling upon it. Further, at its western end is a railway bridge effectively restricting traffic to one vehicle at a time.

It does not appear that the proposal can meet Policy 21.

## 6. District Plan Policy 24: Leisure and Cultural Facilities and Activities

This policy seeks to avoid the loss of such venues, to facilitate healthy lifestyles. HHGC in addition to providing a good quality and well used outdoor sporting facility catering to all ages also provides a venue for social events and for societies to meet.

*The Policy allows for progress by incorporating a replacement approach whereby " the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss..."*

Lindfield Parish Council notes that HHGC is shortly due to celebrate its centenary and recognises the important historical and ongoing value of the sports and social facilities it provides to the surrounding communities. It considers that the destruction of these facilities would be irreplaceable loss to the community.

The developer had been in negotiations with HHGC to provide a suitable alternative facility; however, such agreement was not reached and there is no proposal to replace the facility with an equivalent or better alternative. Consequently, the requirements of Policy 24 are not met.

## 7. District Plan Policy 26: Character and Design

The policy notes that *"... Mid Sussex has a high quality built and natural environment and this requires the design of new development to respect the character of towns and villages as well as the character of the buildings."* and seeks to promote *"...new development that contributes positively to the private and public realm (including streets and open spaces), protects valued townscapes, and creates accessible environments."*

As proposed, the development has a density out of all context with its location and would reduce access to open spaces currently enjoyed by residents across local towns and parishes. It therefore fails to meet Policy 26.

**8. District Plan Policy 37: Trees, Woodland and Hedgerows**

*“...Development that will damage or lead to the loss of trees, woodland or hedgerows that contribute, either individually or as part of a group, to the visual amenity value or character of an area, and/ or that have landscape, historic or wildlife importance, will not normally be permitted...”*

The proposal suggests that ~294 trees and 12 partial groups of trees will be removed. An analysis of the underlying appendices concludes that at least 645 identified trees, 19 groups of trees and two woods will be partly or fully destroyed. Tying this together with the Council Landscape Advisor’s comments under 3 above, suggests that the proposal, even in its outline form, falls significantly short of the requirements of Policy 37, with substantial negative impact on the visual amenity value and character of the area.

**9. District Plan Policy 38: Biodiversity**

*“Avoids damage to, protects and enhances the special characteristics of internationally designated Special Protection Areas, Special Areas of Conservation; nationally designated Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty; and locally designated Sites of Nature Conservation Importance, Local Nature Reserves and Ancient Woodland or to other areas identified as being of nature conservation or geological interest, including wildlife corridors, aged or veteran trees, Biodiversity Opportunity Areas, and Nature Improvement Areas.”*

The site provides a substantial wildlife corridor which would be substantially compromised, if not closed, by the density of the proposed development. Adjoining land is designated as Ancient Semi-natural and replanted woodland and the application acknowledges that it would not be possible to mitigate the increased traffic likely to use the public footpath into the woodlands from the proposed development, with potential detrimental effect on such irreplaceable habitats.

Absent a suitable biodiversity compensation strategy, there would appear to be no reason to allow this development contrary to Policy 38.

**10. Lindfield and Lindfield Rural Neighbourhood Plan**

It is worth highlighting the significant work put into completing this plan by the parishes, encouraged by Mid Sussex District Council to support its Neighbourhood Plan. Accordingly, Councillors consider it to be critical that all applications are fully considered against the Neighbourhood Plan to underpin its efficacy.

**Policy 1: A Spatial Plan for the Parishes**

*“Only development proposals within\* the built up area boundaries of Lindfield and Scaynes Hill, as shown on the Proposals Map, will be supported and the re-use of previously-developed sites will be encouraged, provided that the development is appropriate in scale, massing, and character, and that the proposals for development have had due regard to the policies contained elsewhere in this Plan and the Local Development Plan.”*

\*Finalisation of the District Plan saw the phrase ‘contiguous with’ supersede Neighbourhood Plan wording of ‘within’ the boundary. However, the proposed development is far from any other within the Rural Parish and as such cannot meet this policy.

## **Wider Considerations**

### **11. Geological & Flooding Concerns**

The potential for flooding and subsidence are considered to be significant risks at this location; with the nearby site off High Beech Lane (DM/20/1182) requiring a land stability study which raised some geological concerns. It is well known locally that there are a significant number of underground streams and moving springs across this area which are likely to make construction, effective drainage and ongoing asset maintenance challenging.

Such matters are commonly addressed as building control issues however, the size of the currently proposed (and potentially much larger) development makes these critical matters, well beyond the scope of a 'one size fits all' approach.