

Mid Sussex Liberal Democrats, Local Plan Response.

16th January 2015

Please see our detailed responses below to the Mid Sussex Local Plan consultation document. We have spent some time considering our responses and consulted widely across the Mid Sussex community to produce this document. Our methodology has been to deal with each policy area separately and that is reflected in the format we are presenting in this reply. 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.

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Policy Area	Comments
<p>DP1 Sustainable Development</p>	<p>The wording in this section is ambiguous. It sets out in the preamble that local businesses, employment etc, retains more local spend and develops stronger, sustainable communities. The bullet points then omit any of this regarding policy with the exception of the last one which states ‘support the local economy’.</p> <p>The aims in the preamble must be woven through policies of the plan. They are set out in ‘Strategic Objectives: 4.’ Currently in the consultation document they fail to do that. Particularly regarding access to community facilities. These must be enshrined in the plan as NOT reducing the current provision, particularly The Martlets Hall in Burgess Hill and Clair Hall in Haywards Heath. It must also, accept that ‘no facility is removed until the re-provision of the facility is built and operational.</p> <p>There is a need to preserve and enhance open recreational spaces, formal and informal, in our towns. This is paramount, little or nothing states this requirement in this policy, and fly’s in the face of all urban studies.</p> <p>The town centre policies need to be reviewed – what actually is the town centre in respect of where are the different non-residential zones and what are the local town plans for them integrating into the commercial growth of our district and the integration of local employment, retail and other services with the growth in housing.</p> <p>Business use should provide local jobs. Not a warehousing and distribution activity which provides few job and many lorry movements.</p>

	<p>There should be specific local targets for job generation that would support this policy. Without these specifics it is almost impossible to judge and take remedial action to sustain the plan over its lifetime.</p>
<p>DP2 Sustainable Economic Development</p>	<p>In the preamble to the policy the second to last paragraph sets out support for a business park and proposals by the University of Brighton for a high quality Science and Technology Park – two separate areas or entities.</p> <p>In the Policy it only refers to one area for a Business Park, it offers the Science Park as a ‘maybe’ add-on. This may be an oversight, but one that needs urgent clarification and rectification to include the Science Park as a definite aim which would enhance the intention to actively promote the development. It would also, through a clear career development path, add to the sustainability criteria of retention of the brightest and best graduates, academic and vocational, to stay in the Mid Sussex area.</p> <p>The last paragraph in the policy section negates a clear vision for employment opportunities driven by an evidence base approach from the District Council and should be more robust and strategic.</p> <p>Currently the district’s plan seems more like do nothing will suffice rather than active local engagement to determine best proactive approach in each local community – there are different challenges in each community – local small businesses and independent retailers etc actually do need customers and want to grow! This needs flexibility and imagination – for example of neglecting this see the current Coop vs Cuckfield mess...</p> <p>Specific targets for environmental sustainability should be included as part of the plans for any new industrial/business/science parks or estates which should be required to reduce CO2 admissions with on-site renewable energy generation.</p>
<p>DP3 Town Centre Dev</p>	<p>The preamble to the policy section sets out clearly the need for ‘Community Facilities’ to be a major part of the town centre mix. Although it also states the need for the maintenance of A1 – A5 class usages to be upheld with a resistance to office and residential usage at ground level.</p> <p>That said there is no mention of retention of community facilities in the town centres in the policy section, other than what could well be interpreted as ‘private commercial’ provision only. This is not acceptable and the policy must make a clear commitment to continue public sector provision – Martlets Hall, Clair Hall, Orion Cinema (Burgess Hill) etc at least at their current level and enhancement as and when is required and possible. The policy should also set out this is not a negotiable position (in respect of Civic amenity). A clear commitment should also be enshrined in the policy to the principals as set out in the ‘<i>The Portas Review An independent review into the future of our high streets</i>’ report of 2011 and to which the</p>

	<p>Government signed up to implementing in full.</p> <p>It is also noted that although planning officers are playing down the viability of the 2006 Town Centre Masterplans in various current correspondence, they are an integral part of the proposed policy.</p>
<p>DP4 Village & Neighbourhood Centre Dev</p>	<p>We can see no contradictions in this preamble that Liberal Democrats would object to or wish to change.</p> <p>However, there does appear to be contradictions with the change of use criteria set out in the policy section under the header 'Small Village Centre, Neighbourhood Centre (in the towns). In policy terms we would suggest the addition of the wording as set out in our response to DP3 'Sequential Test for Town Centre Uses' obviously with a tweak to the wording to make it relevant to the Village Centre setting and as an added level of protection.</p> <p>It should also reinforce the current policy of free car parking in villages, and balance this with strict enforcement of illegal parking and parking on footways. Improved traffic management and safety for pedestrians. Continue to promote reduced business rates for small shops. Resist change of use to residential for ground floor premises in High Streets and shopping parades.</p>
<p>DP5 Housing</p>	<p>It is difficult to comment on this policy area as in the consultation it doesn't exist. We fail to see how a plan, based of household numbers expansion, can be published where the only information is based on "The council's proposed housing figure will be set out in this policy pre-submission of the plan once ongoing work on the housing land supply.....etc etc etc!!!"</p> <p>All the merit of the other policies is wasted without the consultee's knowing what this policy proposal is and how it is expected to fulfil the other aspirations and at what scale it can be expected to deliver.</p> <p>The housing numbers are core to the strategy. There also appears to be no forward thinking regarding the possible, some feel, likely, expansion of Gatwick Airport in the plan! Where is the contingency thinking??</p> <p>Comment is made in other sections regarding the level of provision of 'Social Affordable homes'. This section sets out only provision of 30%, we feel it should be set at 40% as a minimum, and makes, again, no reference to disability accessible provision of housing stock, reiterate here it should be minimum 45% provision bearing or to the 'Habinteg' organisations 'Lifetime Homes Guide' standard, whichever has the greater provision, bearing in mind we are an aging population and the need to provide adaptations will grow rather than diminish over the Plans period to 2031. This comment is repeated in DP6</p> <p>There also needs to be a strong statement regarding sufficient social housing for rent and affordable market housing with reflects local average income levels, to satisfy local need.</p>

<p>DP6 General principles for Strategic Dev at Burgess Hill</p>	<p>The preamble sets out clearly the provision and need to create a Business and Science Park in or near the Burgess Hill locality. There should be cross referencing or signposting to this in DP2 above. It is appreciated that this consultation document is a draft, but by omitting some references it is highlighting how fragmented and inconsistent it is in its approach.</p> <p>In the policy section it leans heavily on the need to provide outdoor facilities, but is light on the cultural needs of any community, let alone the complex requirements of the largest town in the district. This needs addressing and should cover all aspects of the towns developments including educational (only mentioned once) requirements, mainstream and higher, as well as the general ones listed repeatedly in the policy. The note in bullet point 8 should be moved to a footnote or included in the Strategic objectives header notes and expressed in the normal way (*) on all relevant bullet points as it also applies to bullet point 9.</p> <p>Comment is made by others regarding the level of provision of ‘Social Affordable homes’. This section sets out only provision of 30%, we feel it should be set at 40% as a minimum, and makes, again, no reference to disability accessible provision of housing stock, reiterate here it should be minimum 45% provision or to the ‘Habinteg’ organisations ‘Lifetime Homes Guide’ standard, whichever has the greater provision bearing in mind we are an aging population and the need to provide adaptations will grow rather than diminish over the Plans period to 2031.</p> <p>The final bullet point referencing ‘community energy systems’. Should insert the wording after ‘wherever possible’ ‘and practical for the transportation of fuel and residual waste’.</p> <p>A clear commitment should be made that land to be used only for commercial and leisure south of the A2300</p> <p>General Principles for Strategic Development at Burgess Hill page 28 – last bullet point – ‘Wherever possible’, incorporate on-site community energy systems. In the previous plan it was stated that for every block of 100 houses, on-site community energy systems would be mandatory, no explanation has been offered for this change ?</p> <p>Given that Burgess Hill, along with other parts of the Mid Sussex area, will be having large blocks of housing, it is essential that the District Council plans for future generations and it is only by these means that sustainable development will be created.</p>
<p>DP7 Strategic allocation to the East of BH at Kingsway</p>	<p>This site already has outline planning consent. Therefore this policy is already open to public scrutiny via the planning system. However at a recent planning meeting approval of a partial area of the site for ‘Reserved Matters’ was deferred by the planning committee. The reasons for the Reserved Matters being deferred were due to a poor quality of design, sustainability and materials proposed to be used.</p>

	<p>The evidence of the deferral was via the Mid Sussex District Councils own Architect Panel and the MSDC Urban Designer's full report contradicting the recommendation for Approval.</p> <p>This is worrying as it indicates that although MSDC commits council tax payer's money to resource professional opinion, as it should. There seems to be a disregard of that opinion when it comes to a suggestion of challenging developer's poor quality applications (as set out by MSDC planning professionals). The Liberal Democrats wish the inspector to examine the prospect of only lip service being paid by the authority to any of its planning policies; and further; to question the councils commitment to any sort of cohesive planning of the district. Also ensuring that undue pressure is not brought to bear on Planning Officers to 'deliver' approval on unsuitable applications.</p> <p>Strategic allocation to the east of Burgess Hill at Kings Way - page 30 – third bullet point "provide additional informal open space on site". This allocation should not include any designated footpaths as they come under 'Highways' and can be used as a barrier by developers if included in proposals to provide adequate 'informal' provision.</p> <p>It is well documented that East Burgess Hill has the greatest deficit of recreational facilities in Mid Sussex. Therefore, there should be included in this policy allocation for formal recreational facilities in East Burgess Hill at Kings Way.</p>
<p>DP8 Strategic allocation to the North and North-West of BH</p>	<p>Area is a greenfield site.</p> <p>Policy envisages integrated expansion of Burgess Hill (already the largest town in district with 29,000 + population per 3.13) – essential that communication links especially public transport and pedestrians to Wivelsfield station. Includes Maple Drive and Northern Arc in the plan because of this. Off street Car Parking provision and mobility based access has to be provided if Wivelsfield station, the least accessible station on the rail network, has to take further development. Safe and pedestrian friendly access to and from the station needs substantial upgrading to easy one of the most congested traffic areas in the town.</p> <p>Aligns with Burgess Hill town wide strategy (2011)</p> <p>Plan needs coordination if there are multiple applications to ensure community needs met.</p> <p>Some concerns exist about flooding risks and ancient woodland</p> <p>Allocate 3,500 homes, two neighbourhood areas inc Retail, Education, health, employment, leisure and community uses. 2 primary and 1 secondary school.</p> <p>Land for formal sport.</p> <p>Expansion of Bedelands Farm Nature reserve</p> <p>Area inc Business park up to 50ksqm</p> <p>Travellers / Gypsy site – 24 places</p> <p>Need to deal with adjacent Goddards Green Waste Water Plant</p> <p>Strategic allocation to the north and north-west of Burgess Hill page</p>

	<p>33 - “A centre for Community Sport in the vicinity of the Triangle Leisure Centre and...”</p> <p>Having such a facility in the north and north-west of Burgess Hill does not negate the chronic need provision for such facilities in east Burgess Hill.</p>
<p>DP9 Protection and Enhancement of Countryside</p>	<p>Policy is to protect land to minimise the amount taken for development. There are insufficient areas in existing towns that can be allocated to housing use to meet demand. New developments will impact on high grade land and wildlife corridors.</p> <p>Policy seeks to “maintain and enhance the intrinsic beauty and tranquillity of the countryside”</p> <p>Difficult to see how this is going to be achieved.</p> <p>Need to consider whether there are commercially extractable mineral deposits on development sites.</p>
<p>DP10 Preventing Coalescence</p>	<p>Policy seeks to maintain distinctive towns and villages, separate identity and character and prevent coalescence.</p> <p>Concern about how gaps will be protected as subject to demonstrating that existing local or national policy is not sufficient.</p> <p>The comment ‘smaller villages and settlements not being lost in growth of towns is just words – how is the protection of gaps going to be achieved. The only ones that have been protected include the HH to Cuckfield ones but even here HH expands westwards in the north and south. Economic coalescence is inevitable – people travel to the local supermarkets, train stations and amenities...</p> <p>Policy needs to state categorically: to strongly support the prevention of coalescence of smaller villages and settlements being incorporation into the large towns by a local gaps policy. Which needs defining and does not mean – ‘the A23 is a strategic gap’ for example?</p>
<p>DP11 Sustainable Rural Dev and the Rural Economy</p>	<p>Agriculture only accounts for 5% of all business in Mid Sussex.</p> <p>Policy covers allowing the development of small scale enterprises processing, distribution and local retailing of local produce. Allows for growth of tourism and diversification from agricultural usage</p> <p>Note this doesn’t apply in the High Weald AONB where a more restrictive policy will apply. A more specific definition is required.</p>
<p>DP12 New Homes in the Countryside</p>	<p>Essentially this is looking to stop agricultural land being developed for housing. The criteria to allow development are defined tightly to stop large scale developments and restrict to supporting agricultural businesses</p>
<p>DP13 High Weald Area of Outstanding Natural Beauty</p>	<p>High Weald AONB is protected by a specific management plan. Per para 2.3 this is 50% of Mid Sussex District – 10% is in the South Downs National Park)</p> <p>Only small scale developments will be allowed and must be in keeping with the AONB</p>
<p>DP14 Ashdown Forest Special Area of Conservation and Special Protection Area</p>	<p>The conservation of wildlife habitat requirements mainly relate to protecting the area against too many visitors – numbers would be increased by the expansion of local towns and villages – especially those near to the Ashdown Forest. Management also affects other neighbouring authorities.</p> <p>Policy envisages a 400m buffer zone around the Ashdown Forest and</p>

	<p>7km zone of influence which would involve mitigation strategies. These strategies need more definition and must extend to the management of the inevitable increased visitor number within the Ashdown Forest area.</p>
<p>DP15 Setting of the South Downs National Park</p>	<p>Retaining where possible the landscape and wild life of the Downs. Allowing any necessary development of the rural economy and tourist facilities in a sensitive way. Policy should reflect the need for joint working with the National Park Authority to achieve this.</p>
<p>DP16 Sustainable Tourism</p>	<p>We are supportive of this policy both in its broad thrust and the specific Bluebell section. However the opening paragraph does not (as it should) give the background to the general policy which follows. It is merely a list of related policies.</p> <p>On the Bluebell policy, given the recent planning permission already restricting land availability at Haywards Heath station we propose the following amendment at the end of the last sentence. "Sufficient land will be safeguarded at Haywards Heath for both the railway operational requirements and station facilities for a terminus station.</p> <p>Also specific council resources to help manage sustainable tourism should be identified as part of this policy to enable overview and scrutiny of its effectiveness to be judged.</p>
<p>DP17 Securing Infrastructure</p>	<p>Given the extent to which in places existing infrastructure is inadequate the wording of the opening paragraph is too weak and woolly. Proposed new start – Replace "A..." with "With the existing local infrastructure already stretched in places it is essential that a..."</p> <p>Would also benefit from more openness and transparency, local discussions across councils etc.</p> <p>Essential infrastructure to be provided early in the development phase; not left to last. Early agreements with water utilities need to be finalised to ensure 'day one' provision.</p>
<p>DP18 Transport</p>	<p>Need to consider/extend 20's Plenty policy in neighbourhood areas. The 20splentyforum.org.uk offers help with understanding the need and how to achieve a coordinated scheme to neighbourhoods in a democratic way. This needs integrating into any planning document and Local Plan and promoting through the councils policies.</p> <p>Transport needs a coordinated and defined approach with full consideration of access locally and on a district wide level. Not only for road based usage, but also cycling, pedestrian and rail.</p>
<p>DP19 Rights of way and other Recreational Routes</p>	<p>A clear statement to the effect of: A multi-user Route between Haywards Heath and Burgess Hill with extensions to links with NCR routes 20/21 – Technically they are not Sustrans routes currently.</p> <p>Transport needs a coordinated and defined approach with full consideration of access locally and on a district wide level. Not only for road based usage, but also cycling, pedestrian and rail.</p>
<p>DP20 Community Infrastructure</p>	<p>Preference given to delivering a holistic network and the sensitivity issues of 'location' to be supported by a specific local</p>

	<p>planning document. Which sets out clear parameters for consideration with any site specific planning application(s). This SPD to set out clear understanding of minimum square Meterage per head of population and the provision requirement for indoor and outdoor facilities.</p> <p>Please also see DP21 below.</p>
DP21 Leisure & Cultural Facilities & Activities	<p>Facilities should work at a sub-regional level to provide coaching/training facilities for specialist athletics as well as other sports. Provide adequate parking/transport access to major sports facilities/grounds. Aim to provide for a higher standard Football Ground within the district.</p> <p>Plan must continue to work to improve the provision of Cultural facilities within the district. These to include the retention/re-provision of community buildings in the district, such as Martlets Hall in Burgess Hill and Clair Hall in Haywards Heath, but also community halls across the smaller towns and villages in Mid Sussex. A link to the Health and Wellbeing agenda to be formalised and enshrined in all planning applications.</p> <p>Leisure and Cultural Facilities and Activities page 49 – 50 “The on-site provision of new leisure and cultural facilities,…” It should be noted that East Burgess Hill has a deficit of such facilities. The finalised plan has to set out specifically how the requirement to provide for these facilities will be achieved.</p>
DP22 Community Facilities and Local Services	<p>There is a need to revamp existing major Community Halls into composite Arts and Performance Centres, which are also suitable to provide conference facilities. With the long term aim of a central location for a hotel in the Burgess Hill Town Centre Masterplan, for example, this should not be difficult to achieve.</p> <p>Better use should be made of purpose built facilities within the district such as the one at the 6th Form College in Haywards Heath.</p> <p>Please also see comments in DP21</p> <p>Re-provision of community facilities to be provided before any decommissioning of any existing facility not after any development(s).</p>
DP23 Character and Design	<p>The character of the Towns and Villages can be enhanced by implementing traffic relief schemes in the centres.</p> <p>Part of the aesthetic character and design of Mid Sussex lies within its current mix of building to ensure reasonable gardens and sufficient car parking provision. This must continue and needs strong wording to encourage developers to meet this established principal.</p>
DP24 Dwelling Space Standards	<p>Schemes that encourage separate living within one abode would be sustainable and financially affordable.</p> <p>Mid Sussex District Council adopted a Dwelling Space Standard, based on research, some years ago. This is an essential policy to retain. Any emerging National Standard policy should be scrutinised</p>

	<p>against the MSDC space standards and representations made at the highest level to uphold our standards if the NS's are lower.</p> <p>'Cheap to produce' "little boxes" are not acceptable</p>
<p>DP25 Accessibility</p>	<p>Wheelchair users to be welcomed to Public Transport and not surcharged by either Hackney Plate or Private Hire Plate holders. Universal high level kerbs to be installed at bus stops to aid access.</p> <p>A minimum level of affordable homes is stated in planning. As far as we can tell, no such minimum level is required to be met by developers for wheel chair users and other disabilities, we feel this should be addressed and a 45% target of provision or the standard set out in the Habinteg organisations 'Lifetime Homes Guide' now recommended as a national standard by government, should be included in any new build or conversion schemes. Please also see comments included in DP5 & 6.</p>
<p>DP26 Noise, Air and Light Pollution</p>	<p>NLA should be reduced if traffic lights are removed or turned off outside of 'rush hour' times. Specifically, congestion needs to be reduced at Stonepound Crossroads in Hassocks to deal with reported levels of pollution. Turning off engines is not the solution. This site needs specific assessment and not just an evidence based paragraph.</p> <p>The assessment to include reports into the provision of a roundabout, for and against, and thinning of the tree and vegetation canopy as well as re-phasing of the traffic lights.</p> <p>Applications take reference of reducing light trespass by selecting light fixtures which limit the amount of light emitted more than 80° above the nadir and include limits on light emitted above 90° to reduce sky glow.</p> <p>Attention is particularly paid to commercial buildings to prevent the harmful effects of over-illumination for example by ensuring controls to extinguish lighting when not needed. This needs to be in this policy.</p>
<p>DP27 Housing Mix</p>	<p>We are surprised the Gypsy & Travellers site in East Grinstead is not mentioned in here. We strongly feel it needs to be to give it more traction in getting provided.</p> <p>40% affordable housing should be in. Not just affordable housing.</p> <p>Burgess Hill is going to take at least one other large G&T site in this plan as this site is also very near Haywards Heath there needs to be infrastructure in HH for these travellers – particular education & health so choices can be made. BH already has two large sites and many traveller families are living in housing happily in the community this is in part due to BH schools and health services working well with this relatively large community. This work needs to be extended in other communities – no idea where this bit fits but something along this line needs to be included or we could get high risk excluded traveller families again (that is to say high risk to the excluded traveller</p>

	<p>families). The police should be a mandatory consultee in all planning applications as a check on making developing communities and neighbourhoods as safe as possible under the 'Secure by Design' standard</p> <p>Social and market housing should be together. Flats for the single/couples without children and ground floor/bungalows for the elderly and those with mobility problems.</p>
DP28 Affordable Housing	<p>The percentage should be 40%. The need is shown to be 44.2% and there is nothing to indicate this figure will come down in future, in deed just the opposite. House prices are out stripping affordability massively in this area. The first sentence on page 57 is not proven, indeed officers proved otherwise in their report to cabinet some years ago when the 30% was adopted and it was only the cabinet that altered the percentage at the last minute and during the Cabinet meeting.</p> <p>The policy of 'pepper potting' social and affordable homes within developments needs re-establishing in this planning policy.</p> <p>Whole site numbers need to be calculated and adhered to when setting out generic housing numbers for specific identified sites. In this way smaller schemes being brought forward to avoid the need to supply a 40% total build of affordable units (or any) target, should be less likely to happen.</p> <p>The accessible housing target should be across the board for all private or social housing development, including conversions and change of use, designed to be wheelchair accessible, or easily adaptable, following the Wheelchair Housing Design Guide 2006 so should be referenced under DP5 Housing.</p>
DP29 Rural Exception Sites	To support Towns and Parishes who wish to provide properties on Rural Exception Sites for their own residents.
DP30 Gypsies, Travellers and Travelling Showpeople	Broadly support plan details but needs strengthening to include the obligation 'Sites provided at the appropriate time and in the appropriate <u>areas</u> .' Also to include 'consultation with all appropriate agencies'.
DP31 Listed Buildings & Other Buildings of merit	Appearance and setting of listed buildings should be protected from out of character alterations. Other buildings of significant merit should also be considered.
DP32 Conservation Areas	Support policy as described for conservation areas. Modern technology and materials should be introduced sympathetically. It should be possible to extend or designate new conservation areas if found to be of significant merit.
DP33 Historic Parks and Gardens	No comment
DP34 Archaeological Sites	No comment
DP35 Trees, Woodlands &	Broad support but the wording of the last paragraph of the policy should be strengthened by moving the word 'normally' to require

Hedgerows	<p>planting but allow exceptional leeway of where the planting is rather than allowing leeway of whether to plant. Suggested replacement paragraph:</p> <p>“The felling of protected trees will only be permitted if there is no appropriate alternative. Where a protected tree or group of trees is felled, a replacement tree or group of trees, on a minimum of a 1:1 basis, but target should be 1.5/2:1 basis and of an appropriate size and type, will be required. The replanting should normally take place as close to the felled tree or trees as possible having regard to the proximity of adjacent properties.</p>
DP36 Biodiversity	Broadly support
DP37 Green Infrastructure	<p>The explanatory paragraphs should explain that retention and improvement of green areas within our towns and villages is important in its own right and for the continued provision of a pleasant place to live. This is particularly so where green space is already at a premium (shortage on accepted standards).</p> <p>The policy should include “Proposals to develop over existing green spaces, where such space is already limited, should only be permitted if they can re-provide nearby with safe routes to access, to at least the extent, and condition, lost by the proposed development.”</p> <p>Set a clear ratio of new allotments for any new developments and a district wide target for new allotments with co-ordination of the identification of new sites to meet current and future demand for allotments.</p>
DP38 Sustainable Design and Construction	<p>Broadly support but in addition significant weight should be afforded to proposals of isolated or small groups of 10 or less of fewer zero carbon homes which broadly meet or exceed other standards measured against this policy but which conflict with other policy areas.</p> <p>Follow the Department of Transport Manual for Streets by always putting pedestrians and cyclists first in the design of new developments and ensure a ‘legible’ development design with a preference to join up communities rather than promote a myriad of cul-de-sacs.</p>
DP39 Renewable Energy Schemes	<p>We have noted the continued expansion of farm scale solar and medium scale wind generation in neighbouring areas. There is also significant importance of sites in Mid Sussex in connection of other renewable energy schemes, particularly at Bolney, associated with the offshore Rampion development. Given those facts the premise that impact on Mid Sussex will be small scale and limited is in error. There will be small scale and local sites too but consideration of some larger sites within the plan period is certain and the policy should reflect the extent to which that is supported.</p> <p>Should refer to new industrial estates being required to generate at least a minimum 10% of their energy needs e.g. the Merton Rule.</p> <p>Renewable Energy Schemes page 68: “proposals for new renewable and low carbon energy projects, including community-led schemes,</p>

	<p>will be permitted provided ...” This seems a very weak statement by Mid Sussex District Council.</p> <p>This should read “will be compulsory for developments of over 100 houses”, unless there are substantial reasons for such projects having an adverse local impact. It should be assumed that energy projects will be forthcoming, and should be encouraged.</p> <p>Mid Sussex District Council is not showing vision and responsibility for ensuring that future generations will have a sustainable environment.</p>
<p>DP40 Flood Risk and Drainage</p>	<p>No development in flood risk areas without suitable mitigation measures. Proper installation and maintenance of flood drainage systems by landowners at construction stage and maintained by landowners or residual management companies, whichever is the most appropriate to be a standard condition with transferable responsibility for any planning consents given.</p>
<p>DP41 Water Infrastructure and the Water Environment</p>	<p>The word ‘must’ in to the policy instead of ‘should’. If ‘must’ is not possible - would ‘will’ be a more forceful, (will is used in the last paragraph). This needs as much strength as possible; we already have problems in Hurstpierpoint where discharge from the sewage works sometimes overflows. We suspect in other areas too but know about this because the South Mid Sussex County Local Committee wrote and complained to Water authority and asked parish councils to help monitor the situation that they had complained about.</p> <p>‘In time’ provision of adequate water supplies and sufficient foul water removal by commitment from water utilities.</p> <p>Sufficient surface water drainage with adequate culverts and cleared water courses.</p> <p>100% odour mitigation measures to be compulsory and enforceable in water treatment works areas and air circulation corridors. With increased development and residential/industrial areas being created across the district, but particularly around the Burgess Hill area, the mistakes of the past will not be an acceptable standard for the future living/working environment.</p>
<p>Local Plan policies that will continue to be saved on adoption of the District Plan</p>	<p>We cannot find these on the website and feel that due to the lack of ease of access, any further consultation needs to place all these Local Plan policies links on a single page along with the consultation document(s).</p> <p>It is very difficult as consultee’s to comment on things which are withheld from being commented on due to lack or difficulty of access. To have a consultation without the ability to access these policies does leave those being consulted with a view of <u>‘what is it they are trying to hide!’</u></p>