



Sussex
Wildlife Trust

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Mid Sussex Regulation 18 Draft Local Plan Consultation

Thank you for consulting the Sussex Wildlife Trust (SWT) on the draft Mid Sussex Local Plan. SWT recognises the importance of a plan led system as opposed to a developer led process and supports Mid Sussex District Council's (MSDC) desire to produce a cohesive Local Plan. Therefore, we hope that our comments to this regulation 18 consultation are used constructively to make certain that the plan properly plans for the natural capital needed within the district and ensures that any development is truly sustainable.

When commenting on the Regulation 18 Draft Plan, where we are proposing a change to policy or the supporting text, recommended additions are highlighted in **bold** and deletions are ~~struck through~~.

Chapter 3 Achieving Sustainable Development

We welcome the local plan acknowledging the many environmental challenges facing the district. As well as the individuality each bullet point is given, it is important to recognise that each of those challenges are intertwined and linked with the challenges highlighted as social and economic. Therefore, the plan must ensure mechanisms to address these challenges are embedded throughout the vision, objectives, policies and allocations and not siloed into individual policies only (see comments on vision and objectives below).

Chapter 4 Evidence Bases

Sussex Wildlife Trust believe that a sound evidence base is fundamental to the delivery of a sustainable Local Plan that has planned positively for the natural capital needs of the district.

In addition to the evidence bases already presented, we are keen that the following evidence is used to support the progression of the plan:

Preliminary Ecological Appraisals

By ensuring site allocations are supported by preliminary ecological information it will enable MSDC to determine the suitability of the site and policy specific measures required for biodiversity if the site progresses. It may also enable the council to build broad understanding of the Biodiversity Net Gain (BNG) requirements of the Local Plan allocations and the ability and split of achieving onsite and offsite gains.

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Green Infrastructure Mapping/ Ecological Network Mapping

SWT are supportive of the policies within the plan that highlight the requirement to enhance Green infrastructure (GI). At this time we can see that the interactive policies map highlights strategic locations where MSDC will safeguard GI. We are unclear of the parameters that were used to select these areas, but are pleased to see MSDC working towards the requirements of paragraph 175 of the National Planning Policy Framework (NPPF) that requires that plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure and plan for the enhancement of natural capital at a landscape scale. We recommend that MSDC provide visions for the strategic locations that show a joined up way of think for these assets and clarity of how contributions and actions can be made to support district wide green infrastructure.

Infrastructure Development Plan

We note that the draft regulation 18 consultation is supported by an Infrastructure Development Plan within the evidence base. Having looked at this document, we are pleased to see green infrastructure acknowledge. However, we encourage MSDC to be more ambitious with their vision for this provision and ensure that onsite delivery from development supports the wider offsite network. Well thought out targeted delivery could significantly enhance GI provision within the District, an evidence base to deliver these aspirations is vital.

Chapter 5 Vision and Objectives

Sussex Wildlife Trust has viewed the 6 environmental objectives for the Local Plan. While the consultation sets out that MSDC see no reason for them to be updated, SWT feel that they fail to reflect the ambition and urgency needed to restore our natural environment. It is no longer enough to protect, we need to ensure that growth embeds the objective of restoring our degraded natural environment, which is the foundation of a sustainable future. We especially think that the objectives should capture the need to deliver a net gain to biodiversity over the lifetime of the plan. This is in line with the NPPF requirements for net gains (paragraph 8).

With this in mind, we propose the following update to objective 3 or it could sit as a separate objective entirely. Examples include;

Objective 3. To protect **and enhance** valued landscapes for their visual, historical and biodiversity qualities. **Delivering a net gain in biodiversity over the plan's lifetime.**

Or a new objective

The District will have prepared for the increasing effects of climate change, through adaptation and mitigation measures and by delivering a net gain in biodiversity.

Chapter 6 District Plan Strategy

SWT are supportive of the MSDC statement;

A key principle for the District Plan Strategy and Strategic Objective of the Plan is the protection of designated landscapes and in Mid Sussex District this is the High Weald Area of Outstanding Natural Beauty.

We remind you that Mid Sussex has many other natural ecological assets, such as SSSI's, Local Nature Reserves, Local Wildlife Sites, Ancient Woodland and Biodiversity Opportunity Areas. No map of Mid Sussex's ecological assets underpins this Reg. 18 Local Plan. This must be addressed before the Reg. 19 Local Plan is published, as we do not believe any Plan can be considered sound if its impact on the natural environment has not been fully assessed, in line with Paragraph 175 and 179 of the NPPF.

Chapter 7 Policies

SWT welcomes the approach that MSDC have taken to give clarity to the policies and their status within the plan.

Chapter 8 Sustainability

DPS 1 Climate Change Policy

SWT strongly support the inclusion of climate change policy that seeks to recognise the diverse ways in which climate change must be incorporated into decision making. However, we need to see this play out in other policy wording, so that it is not confined to one policy and instead is embedded in all aspects of a sustainable growth.

We ask MSDC to be confident that the monitoring proposed in Chapter 18 for the respective policies which are place to give detail to this policy, fit the ambition expressed in the policy DPS1. Currently this seems quite vague.

SWT believes bullet point (J) of the policy should be consistent with other biodiversity policies and reference the Local Nature Recovery Strategy.

DPS3 Renewable and Low Carbon Energy Schemes

SWT are encourage to see MSDC taking a positive and proactive approach to this policy. We support the inclusion within the policy to consider individual and cumulative impacts on ecology and biodiversity, including protected species, and designated and non-designated wildlife sites;

SWT seek clarity that the impacts extend to connection to the grid and this would not be considered separately.

DPS4: Flood Risk and Drainage

SWT would like to see support for Natural Flood Management options within this policy through the following addition to paragraph 6:

'SuDS should be sensitively designed and located to promote improved biodiversity, an enhanced landscape and good quality spaces that improve public amenities in the area, where possible.

Opportunities to incorporate Natural Flood Management and Nature Based Solutions into development will be supported.'

DPS5 Water Infrastructure and Water Environment

SWT is concerned about the potential for package treatment works to be included in development. We feel that this policy should be strengthened to deter this through the following addition to paragraph 6:

'Development should connect to a public sewage treatment works. If this is not feasible, proposals should be supported by sufficient information to understand the potential implications for the water environment, wider biodiversity and climate change. Long term maintenance and management commitments must be clearly set out at the application stage.'

DPS6: Health and Wellbeing

SWT support the recognition this policy gives to the importance of green infrastructure, biodiversity, climate resilience and community spaces such as allotments and orchards to the Health and wellbeing of communities.

Chapter 9 Natural Environment and Green Infrastructure

DPN1: Biodiversity, Geodiversity and Nature Recovery

Sussex Wildlife Trust is pleased to see that MSDC recognised that the policy fell into the category of requiring a major update. With that in mind, we strongly support the updated policy and are encourage to see the inclusion of progressive language used to reflect the requirements of the Environment Act 2021, as well as the requirements of the NPPF.

DPN2: Biodiversity Net Gain

We support the inclusion of this new policy within the MSDC Local Plan. Although at the time of the Regulation 18 consultation the details of Biodiversity Net gain continue to evolve, it is imperative that a Local Plan embeds an approach given the longevity of the plan.

When looking at the supporting text of the policy, SWT would recommend that the second paragraph is extend to make it clear that the delivery of Biodiversity Net Gain is in addition to requirements of the Mitigation Hierarchy:

For example;

Biodiversity Net Gain is an additional requirement and should only be applied after impacts of development on nature conservation sites, habitats and species have first been avoided. Where impacts are unavoidable these must be sufficiently mitigated and compensated before Biodiversity Net Gain is applied.

The council have developed the policy at a time of an evolving approach, we are therefore pleased to see the policy provides clear requirements whilst making it clear that these may change over the consultation period of the plan and as a result amendments will be made.

The commitment to delivering 20% Biodiversity Net Gain is strongly supported. It would be beneficial for the policies DPSC1, DPSC2 & DPSC3 to reference this commitment in their policy requirements for clarity.

We would also welcome policy DPH4 including reference to Biodiversity Net Gain as it has failed to do so. We feel this is vital as the site allocation policy requirements fail to mention Biodiversity Net Gain for sites. For consistency we feel the requirement should be consistently captured.

We also refer MSDC to the comments we have made regarding the monitoring in place for this policy in Chapter 18.

DPN3: Green Infrastructure

We support the inclusion of the Green Infrastructure policy and the information provided in the supporting text. We feel that the identification of sites on page 61& 62 of the plan and within the policies map demonstrates a commitment to mapping green infrastructure as stipulated in paragraph 179 of the NPPF.

However we have been unable to see information that MSDC are putting forward to communicate the aspirations for those green infrastructure assets in the district. This would be positive step to enable paragraph 153 &154 of the NPPF 2021.

DPN4: Trees, Woodland and Hedgerows

We support the continued inclusion of this policy in the MSDC Local Plan review. We would ask the policy better reflects the importance of soils in woodlands and ancient trees. This could be incorporated into the policy with the following amendment:

*The District Council will support the protection and enhancement of trees, woodland and hedgerows, and encourage new planting. In particular, ancient woodland and ancient, aged or veteran **trees and their soils** will be protected.*

Chapter 10 Countryside

DPC1: Protection and Enhancement of the Countryside

SWT have considered this policy and ask that the scope of the policy goes beyond intrinsic character and beauty. We feel there is a wider need for the countryside to be recognised for the multiple benefits it delivers in terms of climate adaptation and delivery of the Environment Act's requirements for a nature recovery network. We recommend that the policy also requires that any proposals would need to ensure they are not in conflict with Policy DPN1, DPN2, DPN3 & DPN4.

DPC4: High Weald Area of Outstanding Natural Beauty

SWT appreciate that there are other policies that also offer protection for the AONB, however, we would like to see a clear statement as part of DPC4 that large-scale housing, industrial or leisure developments within the AONB will not be supported. For example, an amendment might be;

*Major development within the High Weald Area of Outstanding Natural Beauty (AONB), as shown on the Policies Maps, will **not be supported**. Development will only be permitted where it conserves and enhances natural beauty and has regard to the High Weald AONB Management Plan, in particular;...*

Policy DPC6: Ashdown Forest SPA and SAC.

SWT welcome the recognition for the need for developments within 7km of the Ashdown Forest SPA and SAC to pay a contribution towards; either providing a new SANGS or contributing to a new strategic SANGS alongside a contribution towards the SAMMS activities currently starting up at Ashdown Forest. We would like to understand what process is being undertaken to determine whether Mid Sussex will be providing this SANGS.

Chapter 13 Economy

Policy DPE9: Sustainable Tourism and the Visitor Economy

We would like to see the 3rd paragraph at the foot of the first column of page 109 contain the following addition:

*Development proposals for new tourism accommodation and attractions... will be supported where it is not in conflict with **Policy DPC4: High Weald Area of Outstanding Natural Beauty**, **Policy DPE8**, etc.*

Chapter 14 Sustainable Communities

We ask if the allocation of the three major allocations have been looked in terms of the cumulative impact with existing and new proposed housing allocations coming forward and the delivery of a cohesive strategic ecological network. This information must be set out clearly as part of the evidence base for the local plan.

We note that there is a no mention regarding the delivery of BNG in any of the policy requirements for these allocations or the supporting DPH4 principles for site allocations policy. Given that policy DPN2: Biodiversity Net Gain, states that a minimum percentage of biodiversity net gain of 20% will be required on Significant Sites DPSC1 - DPSC3. SWT would suggest that this is captured in the policy requirements for each of the major site allocations.

We also note that the small allocations captured in Chapter 15 do suggest specific requirements such as retain hedgerows, but that does not appear to be capture for these larger sites. Despite the scale of the allocations we question the inconsistencies in approach.

We are picking up from the regulation 18 Draft Local Plan that the ambition of 20 minute neighbourhoods are driving goal for MSDC. With this clear goal in mind, SWT ask if all three of the proposed major allocations meet this ambition for 20 minute communities? It is currently not clear.

Having looked at the major site allocations based on the information available to us we wish to submit the following comments.

Given the lack of ecological information provided against which to assess the suitability of the potential strategic sites, SWT objects to all sites and would not wish to see any of them move forward to inclusion in the submission plan without further detailed analysis and opportunity for comment. As a minimum, preliminary ecological appraisals of the potential strategic allocations should be provided. The allocations should then be set in the context of wider environmental information about the whole District.

SWT believes that there is a fundamental flaw in this local plan. Namely that the spatial strategy and potential site allocations are being decided without an up to date picture of the current extent and quality of the District's ecological network and natural capital assets. Therefore, the plan cannot be considered sound in terms of delivering sustainable development.

DPSC1: Land to the West of Burgess Hill

This site contains designated ancient woodland, tributaries of the River Adur, hedgerows and several ponds. It also includes Malthouse Lane Notable Road Verge and very significantly some extremely rare mature black polar that must be protected. There appears to be some traditional orchard priority habitat and the site sits in the Burgess Hill Green Crescent Biodiversity Opportunity Area. This means the site is likely to be a key area within emerging Local Nature Recovery Strategies in terms of potential to recover nature.

Aerial photos show large areas of grassland, possibly unimproved meadows and more scrubby areas e.g. Pangdean Lane meadows and Malthouse Lane meadows. There are also significant species records for barn owl, nightingale, bats and fish records e.g. eel and brown trout. The site looks to have a mosaic of habitats which cumulatively are likely to be quite valuable, especially compared to the arable fields to the west and the housing to the east.

Ecological connectivity is clearly very important across this site. Detailed surveys are required to assess the quality of the habitats, particularly the grasslands.

The policy requirements for this allocation fail to reflect any of the biodiversity elements mentioned above. While we acknowledge the policy requirements box states *This is in addition to the General Principles for Site Allocations set out in policy DPH4*. Policy DPH4 does not reflect the need for allocations to contribute towards the delivery of a Local Nature Recovery Strategy. SWT would wish to see a much more cohesive approach to the aspirations of supporting policy and development allocations. A more detailed evidence base is required for this site before the plan progresses.

DPSC2: Land to the South of Reeds Lane, Sayers Common

Desktop surveys at our availability do not identify priority habitats, but these layers are not comprehensive. There are species records on the site, for example sky lark and barn owl, which are significant. That said, SWT can say nothing about the biodiversity value of the area without site surveys and therefore cannot support the allocation.

From aerial photograph, the site appears to be open farm land. There appear to be drains and hedgerows running across the site which will feature as corridors and be important for connectivity, particularly to the areas of ancient woodland in the vicinity. As a basic principle, these would need to be significantly buffered and enhanced.

The site appears unsustainable in terms of transport and therefore carbon emissions. The impact on climate change of developing this site should be assessed.

We are also concerned that the draft Local Plan does not make it easy to realise that this major allocation will be close proximity to other proposed allocations. As such, the cumulative impacts are not easily identifiable in this plan as it currently reads.

When looking at the interactive map on the consultation website we can see that together with housing allocations at sites DPH19-22, this represents a huge expansion of Sayers Common.

We question how these allocations are also interacting with other Local Plans and strategic documents. For example, the current consultation running on the Southern Water Draft Water Resources Management Plan. On Page 32 of the Non-Technical Summary it states;

We need to develop new sources of water to secure water supplies for customers and the environment across our central supply area, covering West Sussex and Brighton and Hove...

A new reservoir close to the village of Blackstone, near Henfield in West Sussex would store water from the nearby River Adur to supply parts of Sussex.

Given the potential proximity of the scheme we are wondering if the allocations and potential for a reservoir in that location are something that needs to be considered cumulatively.

DPSC3: Land at Crabbet Park

The site is adjacent to Oaken Wood, Stony Plats & High Lines LWS and within the High Weald AONB. Given its position overlapping the AONB boundary, we strongly recommend advice is sought from the High Weald AONB Unit and consideration is given to the High Weald Management Plan.

As well as being adjacent to ancient woodland LWS, the site contains large sections of ancient woodland, watercourses and ponds. Aerial photography also appears to show open grassland with large standard trees and hedgerow.

We are unable to advise you on specific impacts without ecological surveys and further information on the proposal. However the following should be considered:

- Impacts of disturbance of the LWS and Ancient Woodland arising from people and domestic pets
- Impacts of hydrology resulting from development given the Ghyll Woodland within the LWS
- Impacts of light and noise pollution
- The need for appropriate buffers to Ancient Woodland

The site is also adjacent to Worth Forest Biodiversity Opportunity Area which is likely to be a key area within emerging Local Nature Recovery Strategies in terms of potential to recover nature.

The watercourses, hedges and linear woodlands will feature as corridors and be important for connectivity. As a basic principle, these would need to be retained, significantly buffered and enhanced.

The policy requirements for this allocation fail to reflect any of the biodiversity elements mentioned above. While we acknowledge the policy requirements box states *This is in addition to the General Principles for Site Allocations set out in policy DPH4*. Policy DPH4 does not reflect the need for allocations to contribute towards the delivery of a Local Nature Recovery Strategy. SWT would wish to see a much more cohesive approach to the aspirations of supporting policy and development allocations and a more thorough evidence base.

Chapter 15 Housing

Typo page 121, please see strike through below regarding what we feel needs removing:

A windfall allowance of ~~allowance of~~ 1,714 units over the plan period is included in policy DPH1 (from year 6 onwards at an average of 14319 pa for 12 years).

DPH1: Housing

We acknowledge this policy sets out that MSDC will look to exceed its local housing need of 20,142 by 302, achieving a project delivery 20,444.

Given that the stand method for calculating housing need does not consider an area's environmental limits in the calculation, is MSDC confident that the environmental evidence base supporting the local plan is sufficient to confidently ensure this housing need can be delivered sustainably?

We also ask that in light of the Ministerial Statement on 6th December¹ regarding potential changes in respect of housing components of strategic plans, will MSDC be seeking to reconsider the delivery of the housing target?

As it stands, we question the ability of MSDC's natural capital to absorb this level of development without harm.

SWT believes that there is a fundamental flaw in this local plan. Namely that the spatial strategy and potential site allocations are being decided without an up to date picture of the current extent and quality of the District's ecological network and natural capital assets. Therefore, the plan cannot be considered sound in terms of delivering sustainable development.

DPH4: General Principles for Housing Allocations

We recognise the value of an overarching policy to reduce repetition and large list of requirement on each site allocation. However, the biodiversity section of this policy does not make clear the need for delivery of Biodiversity Net Gain for each allocation. As this is also not consistency reflected in in policy requirements for each site allocation, we proposed the policy is amended to reflect the need for BNG at a minimum of either 10 or 20% depending on the site.

Site Allocation

Overall, we are concerned that the evidence base supporting these allocations are not sufficient to demonstrate consistency with the NPPF and the requirement to provide truly sustainable development. Given the lack of ecological information provided against which to assess the suitability of the potential housing allocations, SWT objects to all sites and would not wish to see any of them move forward to inclusion in the submission plan without further detailed analysis and opportunity for comment. As a minimum, preliminary ecological appraisals of the potential strategic allocations should be provided MSDC must demonstrate how these allocations interact with the ecological networks within the district and the natural capital required to support these developments.

Ahead of looking at these site allocation, it is our understand that MSDC and or the site promoters for these allocations have not undertaken any biodiversity surveys to support the suitability of these for allocation ahead of this submission in the MSDC regulation 18 consultation.

As a result our comments are based on desktop data available to us and an absence of records for a site does not mean that there is an absence of ecologically important features, it just means there has been no recording effort for that site.

¹ <https://questions-statements.parliament.uk/written-statements/detail/2022-12-06/hcws415>

We note that the site allocations have policy requirements, we seek clarity from MSDC the weight given to these requirements.

DPH5: Batchelors Farm, Keymer Road, Burgess Hill

To our knowledge no ecological surveys have been submitted within the draft local plan regarding the ecological value of this site. Our desktop information for this site allocation shows it sits adjacent to the Biodiversity Opportunity Area of Burgess Hill Green Crescent and Batchelors Farm Nature Reserve. We acknowledge that the policy requirements stipulate the retention of certain ecological features. However we are less clear if there has been an assessment to understand if the site allocation and adjoining sites designated for nature conservation value have the ability to accommodate the level of housing proposed and the recreational pressure that will be associated with it. We suggest that if development does proceed on this site, how the nature reserve can be support in terms of management and associated pressures is considered by MSDC.

DPH6 Land at Hill Brow, Janes Lane, Burgess Hill

To our knowledge no ecological surveys have been submitted within the draft local plan regarding the ecological value of this site. SWT do not have access to any desktop records which provide information on the ecological value of the site. We can see from aerial photographs that the site has a number of established trees and hedgerows which provide significant connectivity to the wider landscape as well as on site benefits.

SWT acknowledge that the allocation has policy requirements but question whether it should be made clearer across all site allocations the requirement to deliver Biodiversity Net Gain. This is could alternatively be addressed by clearer inclusion of Biodiversity Net Gain in DPH4

DPH7: Burgess Hill Station, Burgess Hill

To our knowledge no ecological surveys have been submitted within the draft local plan regarding the ecological value of this site. However, from the information presented with this allocation it appears to be resulting in the loss of allotments within an urban area. We can see within the policy requirements that there is a requirement to provide new allotments but we remind the council that the location of these in an urban area may be making allotments accessible without the need to utilise a car. We ask that they consider the accessibility of any new allotment provision with this in mind. The allotments are also functionally linked Lowland Deciduous Woodland, which is a priority habitat. We do not feel the policy requirements adequately reflect the loss of habitat within the urban area or addresses the need to retain features of importance such as mature trees we can see from aerial photography of the site.

DPH 8, Land off West Hoathly Road, East Grinstead

To our knowledge no ecological surveys have been submitted within the draft local plan regarding the ecological value of this site. Looking at our desktop data I can see that the allocation appears to be entirely within the High Weald AONB. Our desktop data shows that the allocation includes priority habitat of deciduous woodland and is bordered by Ancient Woodland. The policy requirements acknowledge the need for a buffer but we question the viability of this allocation if the biodiversity requirements to be fulfilled in line with policy.

DPH9: Land at Hurstwood Lane, Haywards Heath & DPH10: Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath.

To our knowledge no ecological surveys have been submitted within the draft local plan regarding the ecological value of these two site. The two allocations seem disconnected from Haywards Heath. Whilst we acknowledge the policy requirements, we are unclear of the ecological value of the sites and how development on this sites would impact positively or negatively the broader ecological network of the district.

DPH11: Land east of Borde Hill Lane, Haywards Heath

To our knowledge no ecological surveys have been submitted within the draft local plan regarding the ecological value of this site. Our desktop data is showing us that this area has priority habitat of Semi Improved grassland. The policy requirements as they stand make no reference to ecological requirements and this needs to be addressed.

DPH12: Orchards Shopping Centre, Haywards Heath

We feel the policy requirements would benefit from expressing the huge potential for positive delivery of green infrastructure with this site allocation.

DPH13: Land to west of Turners Hill Road, Crawley Down

To our knowledge no ecological surveys have been submitted within the draft local plan regarding the ecological value of this site. SWT note that this site, on which 350 dwellings are proposed, contains a significant area of Ancient Woodland. Whilst there are a number of policy requirements to protect the ancient woodland and veteran trees this allocation coming forward in the Draft Local Plan highlights the kind of site where we believe an ecological assessment of the impact of the development is needed before it can be adequately assessed as being a suitable site for development. Whilst we note the policy requirements mention ancient woodland, we question whether development on this site is suitable or viable without affecting the connectivity of the habitat to the wider landscape

DPH14: Hurst Farm, Turners Hill Road, Crawley Down.

To our knowledge no ecological surveys have been submitted within the draft local plan regarding the ecological value of this site. Looking at aerial photograph this site already appears to be in the process of being built out. The status of the site should be made clear in the plan.

DPH15: Land rear of 2 Hurst Road, Hassocks

To our knowledge no ecological surveys have been submitted within the draft local plan regarding the ecological value of this site. Our desktop information provides no ecological information for this site allocations. SWT are unable to assess the suitability of the site for development in terms of ecological impacts.

DPH16: Land west of Kemps, Hurstpierpoint

To our knowledge no ecological surveys have been submitted within the draft local plan regarding the ecological value of this site. Our desktop information provides no ecological information for this site allocations so we are unable to give comment relating to ecological impacts. However it is possible to ascertain from aerial imagery that the site has habitat features such as hedgerows, trees and waterways that will be providing vital connectivity for climate resilience in the landscape. We ask MSDC to ensure that the policy requirements are sufficient to ensure that the sites function for biodiversity is not compromised by development.

DPH17: The Paddocks, Lewes Road, Ashurst Wood

To our knowledge no ecological surveys have been submitted within the draft local plan regarding the ecological value of this site. Our desktop information provides no ecological information for this site allocation, therefore we are unable to provide comment on the sites suitability for development.

We can see from our desktop information that the site sits within the High Weald AONB

DPH18: Land at Foxhole Farm, Bolney

To our knowledge no ecological surveys have been submitted within the draft local plan regarding the ecological value of this site. Our desktop information provides no ecological information for this site allocations. Therefore we are unable to provide comment on the suitability of the site for development in terms of ecological impacts.

We note that the policy requirements propose a country park. Will this be within the site allocation boundary and would MSDC consider setting a minimum size for the country park?

DPH19 Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common**DPH20 Land at Coombe Farm, London Road, Sayers Common****DPH21 Land to the West of Kings Business Centre, Reeds Lane, Sayers Common****DPH22 Land at LVS Hassocks, London Road, Sayers Common**

As mentioned in our comment for DPSC2: Land to the South of Reeds Lane, Sayers Common, the interactive map supporting the consultation shows how the allocations DPH19 -22 should be considered in conjunction with the strategic site.

To our knowledge no ecological surveys have been submitted within the draft local plan regarding the ecological value of these site allocations. Our desktop information provides no detailed ecological information for the site allocations. However the impact of the allocations in conjunction should also be considered in terms of impacts on ecological networks, especially for vulnerable habitats such as Ancient Woodland and the species it supports.

The current consultation running on the Southern Water Draft Water Resources Management Plan states on Page 32 of the Non-Technical Summary:

We need to develop new sources of water to secure water supplies for customers and the environment across our central supply area, covering West Sussex and Brighton and Hove...

A new reservoir close to the village of Blackstone, near Henfield in West Sussex would store water from the nearby River Adur to supply parts of Sussex.

Given the potential proximity of the scheme, we are wondering if the allocations and potential for a reservoir in that location are something that needs to be considered.

DPH23: Ham Lane Farm House, Ham Lane, Scaynes Hill

As no ecological information has been provided with the local plan evidence base in order to assess the suitability of the site for development in terms of ecological impacts, we are unable to provide comment on its suitability. However, we note the presence of Ancient Woodland and support the policy requirement to exclude development within Ancient Woodland and buffer in south east corner of site. We ask that other policies that require buffers for Ancient Woodland also make it clear that development will be excluded from buffers, to ensure policy consistency.

DPH24: Challoners, Cuckfield Road, Ansty**DPH25: Land to the west of Marwick Close, Bolney Road, Ansty**

SWT are considering these two sites in combination, as they are adjacent to one another. Our desktop information provides no detailed ecological information for this site allocations. As no ecological information has been provided with the local plan evidence base in order to assess the suitability of the site for development in terms of ecological impacts, we are unable to provide comment.

DPH27: Land at Byanda, Hassocks

As no ecological information has been provided with the local plan evidence base in order to assess the suitability of the site for development in terms of ecological impacts, we are unable to provide comment.

DPH28: Land at Hyde Lodge, Handcross

As no ecological information has been provided with the local plan evidence base in order to assess the suitability of the site for development in terms of ecological impacts, we are unable to provide comment. We can see from our desktop data that the site sits wholly within the High Weald AONB and is bordered by priority habitat.

Chapter 16 Infrastructure

DPI1: Securing Infrastructure

This policy currently makes no reference to the natural environment, however nature provides fundamental infrastructure that we all rely on. When considering existing infrastructure, the natural environment should be included, particularly irreplaceable habitats such as ancient woodland.

Chapter 17 Implementation and Monitoring

SWT support the implementation of meaningful and effective monitoring for the local plan policies. We believe this chapter of the plan would benefit from including an additional column to the table, which indicates management actions that would be taken if the target for the monitoring were not being met. This would make it clear how remedial action can be implemented to ensure the plan delivers its aims and objectives.

DPN1: Biodiversity, Geodiversity and Nature Recovery

- Given that MSDC has a significant number of LWS, monitoring should also cover the number of LWS infringed by planning applications. This information is made available to you through the SxBRC's annual monitoring report.

DPN2: Biodiversity Net Gain

- This should consider that there will also be an annual reporting requirement through Defra/Natural England.

DPN3: Green Infrastructure

- The monitoring for this policy should go further. As well as monitoring new assets information relating to the multiple benefits those new assets provide should be captured. MSDC could consider how this monitoring sits alongside the Natural England GI Framework. Given that this policy also identifies locations where GI is to be safeguarded we ask that the monitoring requirements capture the success of this policy requirement

DPN4: Trees, Woodland and Hedgerows

- The monitoring suggestion for this policy is to measure the area of ancient woodland lost. We are pleased to see that given the high level of protection for this irreplaceable habitat it has a target set at Zero. However, we encourage the monitoring for this policy to be more ambitious and consider the aspirations of the policy to deliver more trees, hedgerows and woodlands. MSDC should consider an additional monitoring target to capture the additional trees, lengths of hedgerow and areas of Woodland/natural regeneration that have been committed to by the planning applications.

Chapter 18 Saved Policies

We see from this section that a number of policies and allocations are to be saved. This includes Site Allocations Development Plan Document (2022) Policies that will be saved on adoption of the District Plan 2021 -2039.

As these allocations are not in the draft plan and to our understanding we did not see them on the interactive policies map, it makes it difficult to determine how the allocations will be spatially working together. We would suggest that MSDC consider how this information is presented to give a clear spatial understanding of the proposals for the district.

We hope that MSDC can use our comments constructively for the next iteration of the Local Plan. It is imperative that the protection, enhancement and restoration of the environment is embedded across the plan policies and allocations. If you wish to discuss any of the points SWT have raised in our response please feel free to get in touch.

Yours sincerely,

Laura Brook
Conservation Officer
Sussex Wildlife Trust