

# **LINDFIELD & LINDFIELD RURAL NEIGHBOURHOOD PLAN**

## **REGULATION 14 REPORT**

### **Purpose**

The purpose of this report is to summarise the recommended minor modifications to the Neighbourhood Plan (LLRNP) in the light of representations made on the Pre Submission Plan during its consultation period.

### **Consultation Analysis**

During the consultation period there were 62 responses received from members of the public and a series of representations made on behalf of organisations. The local planning authority – Mid Sussex District Council (MSDC) – has provided informal comments at this stage.

Most of the public responses were in favour of the plan though some raised concerns with one or two policies. These mostly related to concerns with the failure of the plan to allocate land at Great Walstead School or to include a wider range of environmental and transport related policies.

There were few representations made by landowners and other interested parties. In general terms, where they have objected, they have done so in respect of the failure of the plan to make any housing site allocations and its reliance on the replacement District Plan for its legitimacy.

In more general terms, there appear to be the following issues that the final version of the LLRNP needs to address:

- Recognise the value of many of the comments received on the draft and the need to make changes that reflect the views expressed whenever possible, in particular from the locally well informed and respected Lindfield Preservation Society.
- Recognise the value of the work of the Focus Groups and to try and incorporate more of their suggestions into the policies and where that is not possible, to explain why.
- More clearly explain the past and more recent history of new housing developments within our communities and the infrastructure issues that the most recent large expansions have already generated, in order to better justify the housing policies.
- Feature more clearly our Housing Needs Survey results and explain the difficulties we have within the plan in meeting the considerable local need for affordable housing that it has identified, when the appeal to landowners to come forward with suggestions on possible housing sites was unsuccessful.
- Respond to the many comments about the 6 limit on “Windfall” sites, most of which actually want more such sites developed, certainly in preference to another large scheme and review the limit.

- To update the plan to reflect the latest situation with MSDC's Local Plan and to make our Plan robust enough to proceed to examination before the Local Plan.

On this basis, it is considered possible to incorporate minor modifications to the Pre Submission Plan and to proceed to submission for examination. It is not considered that the modifications are of a significance that warrants the publication of a revised Pre Submission Plan.

## **The Relationship between the Neighbourhood Plan and Development Plan**

The LLRNP will be examined for its general conformity to the development plan by reference to the 2004 Local Plan and not the 2013 Submission District Plan, though the examiner will be mindful of the relationship between the two.

At present, the LLRNP, in places, puts some emphasis on its alignment with the new District Plan. The recent District Plan Inspector recommendation to MSDC to withdraw the plan from examination means that the final version of the LLRNP may need to place less emphasis on this relationship, especially in respect of housing supply.

## **Recommendations**

The recommendations for minor modifications to the relevant policies of the LLRNP are set out below:

### **Section 2**

Various comments made requesting greater explanation of the evidence base and policy context in respect of the Focus Group work, of the Housing Needs Survey and of the current status of the new District Plan.

Recommendation: modify text as appropriate.

### **Policy 1**

No objections made.

Recommendation: no change.

### **Policy 2**

Some objections made to the failure of the plan to support development at Great Walstead School and to the dependence on the consented Gravelye Lane scheme to deliver a local housing 'target' set by the untested District Plan. Others would like the policy to make clear the protection of the gap between Lindfield and Scaynes Hill.

Recommendation: modify policy to refer to settlement gap and delete para's 4.5 and 4.6 relating to the Gravelye Lane scheme and to Great Walstead School to aid clarity.

### **Policy 3**

Some objections made to the constraint on housing development to small schemes within the existing built up area boundary. Some objections made to the intention to place a cap on, and phase, windfall schemes over the plan period.

The promoter of development at Great Walstead School has objected to the policy not allocating land at the school for housing development. As the land in question is well beyond the existing built up area boundary, it is not possible for the LLRNP to allocate the site and remain in conformity with the development plan. Further, there is no obligation on the LLRNP to allocate housing sites.

Some have proposed greater attention be given to affordable housing policy. It is possible to add supporting text to the policy to explain how the MSDC Local Lettings Policy will favour households with a local connection.

It is also noted that the evidence on historic trends in windfall schemes shows 336 dwellings built or consented in the area since 1989, i.e. at an average 14 per annum. The last 10 years have resulted in 120 dwellings being completed in the area. If this trend continues then the total number of windfalls in the plan period may be 200 homes, that is far in excess of the previous anecdotal evidence that guided the 50 number in the policy.

Recommendation: modify policy to increase the maximum size of scheme to a net 10 dwellings and to delete the maximum number of dwellings over the plan period, with corresponding changes to the supporting text.

### **Policy 4**

No objections made.

Recommendation: no change.

### **Policy 5**

No objections made.

Recommendation: no change.

### **Policy 6**

No objections made.

Recommendation: no change.

### **Policy 7**

No objections made. However, further analysis indicates some proposed spaces may not qualify and should be deleted.

Recommendation: modify policy and evidence base.

### **Policy 8**

No objections made. However further analysis indicates that minor changes are made to one proposed area boundary.

Recommendation: modify policy and evidence base.

### **Policy 9**

No objections made.

Recommendation: no change.

### **Policy 10**

No objections made but a number of comments wanting the scope of the policy to be broader than just cycling to cover other local transport issues.

Recommendation: modify policy and supporting text .

### **Policy 11**

Some objections made to the proposal to include the King Edward Hall and Scaynes Hill Millennium Hall on the list.

Recommendation: modify the policy to delete items as above.

### **Policy 12**

No objections made.

Recommendation: no change.

### **Policy 13**

No objections made but some comments on the inclusion of Costells Wood, which should be deleted.

Recommendation: modify the policy to delete item as above.

### **General**

There are also other minor modifications that should be made to correct drafting errors or to improve the clarity of a policy and/or supporting text.