

Turners Hill Neighbourhood Plan

Draft Plan Consultation November - December 2014 Comments and Parish Council Responses

Comments

NAME	POSTCODE	OVERALL OPINION	POLICY OPINION	COMMENT	PARISH COUNCIL RESPONSE
1 Mr J S Grayson	RH10 4RG	Mostly Support		I support most of the policies but feel that the lack of pavements and the poor public transport links are most important. Many of my neighbours are old with medical problems and cannot drive, getting about being very problematic.	Lack of pavements is addressed in the Plan for some areas of village along with provision of safer crossing points. There is a continuous path between Turners Hill Park and the village centre. The Plan also refers to continuing dialogue with WSCC re bus services
2 Peter and Frankie Dodds	RH10 4YY	Support		Having read thoroughly the Draft Consultation Doc and the Sustainability Appraisal you are to be commended in the effort and time you must have spent putting together such a well thought out and comprehensive set of proposals. We have no objections to any of the suggestions being made and support them fully. There is one area, which is not up for discussion as outline planning permission has already been given, being the development of Clock Field which we think is a mistake but I guess you can't have it all! Keep up the good work – the village is lucky to have such an active PC.	Thank you.
3 Anna- Marie De- Castro	RH10 4PW	Mostly Support	Traffic & Transport Section 11	Continued concern over volume of traffic, type of vehicles (trucks etc.) and speed. Numerous cars speed through other side of roundabout!! No lighting by pond!! Walking to restaurant –no lighting. Not balanced. As housing is not being built in 'back garden ' has no real impact on my own living arrangements, therefore no objections.	Concerns shared by everyone and the Village Enhancement Scheme addresses these issues. The Withypitts roundabout will be made safer by the implementation of the 20mph speed limit. Cars driving illegally at the Withypitts mini roundabout can be reported to the Police if number plates are recorded. Noted Noted
4 Mr N & Mrs A Daniels	RH10 4PU	Support	THP5 Support THP15 Support	But we are going to have shortage of water and think provision should be made to collect rainwater/grey water to use for toilets and garden watering. Think new houses should be required to have solar panels and heat pumps.	We would like as many eco-friendly devices incorporated into all new homes but are only able to require not enforce due to current legislation

5 J A Turner	RH10 4QZ	Support			Thank you
6 Mr Simon Pamplin	RH10 4PW	Mostly support	<p>THP2 Do not support</p> <p>THP3 Do not support</p> <p>THP16 Support</p> <p>THP17 Support</p> <p>THP19 Support</p> <p>THP9 Support</p>	<p>I do not believe there is a need for an estate like the one proposed for Vicarage field nor do I believe the infrastructure as described will be sufficient for the increase in traffic the development will generate.</p> <p>Pointless for the sake of 3 small houses. Access directly off the proposed roundabout is dangerous. This is a SSSI so why even consider planning permission!</p> <p>No consideration in the draft plan for the completely inadequate mini roundabout at Withypitts on Selsfield Road – this needs to be a proper offset roundabout not a painted symbol that is largely and dangerously ignored. The 20 MPH zone should be extended to at least the ponds on Selsfield Road.</p> <p>Width restrictions should be placed at the outskirts of the village near to Tarana to slow traffic as it approaches the village. It should be made difficult to speed not just inconvenient,</p> <p>Footpaths along Selsfield Road to allow children to get to school, unaccompanied teenagers and the elderly to get to the centre of the village without having to cross the road twice are long overdue. The north south road through Turners Hill is lethal due to Traffic. Controlled pedestrian crossing (traffic lights) should be in place rather than ‘safe’ area in the middle of the very fast road.</p> <p>No justification at all for the size of commercial traffic allowed through the village. There should be a weight limit for the size of lorry allowed and brick / waste lorries banned from the village due to the damage caused to properties next to the road.</p> <p>The Village setting and feel must be protected and we must not grow to be another part of Crawley Down. Creation of small estates is not the way to do this. Before more houses are built</p>	<p>The future housing needs of the village will be aided by this development. The infrastructure to be provided has been tested to ensure it can cope with the additional numbers</p> <p>Due to the latest National and District Policies this item will be removed from the Neighbourhood Plan as it is as no longer complying with the above policies. Other options for improving the area will be investigated with the landowners in order to enhance the area and allow access to the rock face.</p> <p>There is insufficient space to enlarge the mini roundabout and it does, in the main, reduce speeds. The majority use it correctly. Illegal use of the roundabout should be reported to the Police. The 20mph zone can only cover the centre of the village and has to have a traffic calming feature at each entry point. Much as we would like to encourage 20mph throughout the village we are unable to do so under current rules. When the Village Enhancement scheme is implemented the Plan will be reviewed to see what else would be beneficial.</p> <p>A continuous footpath for Selsfield Road has been the subject of discussion with Highways for many years and by including it in the Neighbourhood Plan we hope to bring a scheme forward as soon as possible. The proposals are safer than traffic lights according to Highway information and the traffic will be slower due to the Village Enhancement Scheme.</p> <p>We have no control over the type of vehicles using the public highway.</p> <p>The village has developed by provision of small estates.</p>

			THP6 Support	<p>the Village should have more functioning shops to sustain the people who currently live in the village.</p> <p>Agree the Village needs a central 'small' car park but access to and from it will again cause problems with the traffic due to its location near the junction.</p>	<p>We try to encourage and support local shops and hope that an increase in the population will help to make them more sustainable. We can only encourage residents to shop locally.</p> <p>The entrance to the new estate and car park is not at the crossroads but west of The Old Vicarage.</p>
<p>7 Mr & Mrs Dennis Munday</p>	RH10 4NS	Mostly Support	<p>THP1 / 2 / 4 / 5 / 6 / 7 / 8 / 9 / 10 / 11 / 12 / 13 / 14 / 15 / 17 / 18 / 19 Support all</p> <p>THP3 Support</p> <p>THP16 Support in principle</p> <p>THP19 Support</p>	<p>This would tidy up a very untidy plot at the entrance to the village.</p> <p>Particular care needs to be taken to safeguard owners of properties where driveways exit on to new roundabout. Diminution value – compensation?</p> <p>Some degree of enforcement needs to be made to restrict the numbers of waste disposal lorries with more than six wheels. Possible outright ban from the village centre. New road from site avoiding village</p>	<p>Noted, thank you</p> <p>Due to the latest National and District Policies this item will be removed from the Neighbourhood Plan as it is no longer complying with the above policies. Other options for improving the area will be investigated with the landowners in order to enhance the area and allow access to the rock face.</p> <p>Protection has been and will continue to be an important consideration as the scheme progresses</p> <p>We have no control over the type of vehicles using the public highway and are unable to ban any vehicles. Your suggestion is noted.</p>
<p>8 John England</p>	RH10 4NS			<p>I have viewed the proposed road scheme for the village and would like to raise the following points for consideration prior to the scheme being agreed.</p> <p>1, The plan shows the bus stop to be removed, but does not show where it's going to. Surely this needs to be sited on the new scheme.</p> <p>2, The village car park and housing scheme is shown behind the existing fire station. With the build-up of traffic approaching the roundabout, how do you get in and out of this area without causing problems to the main flow of traffic, at rush hour when most of the parents want to park.</p>	<p>This is still to be negotiated and discussions have already begun with the bus company and highways. Consideration is being given to using the bus stops on East Street.</p> <p>The entrance to the new estate and car park is to be situated west of The Old Vicarage in the 20mph zone. Current arrangements for dropping of children will continue with parents pulling in at front of school and staff</p>

			<p>3, Remove existing barriers, take a look at them now and see the damage caused to them by the big lorries attempting the corners. If there not left in their current position how do you protect people from getting injured.</p> <p>4, Traffic approaching the village from the North will have to give way to traffic approaching from South and West at the first roundabout to the village. This will surely cause a build-up of traffic way down North street and with the added proposal of sighting another roundabout at the bottom to gain access to the new housing development will add to the existing problems. As it stands at present the houses South of the antiques shop in North street have a problem accessing the village by foot without the use of a pavement, this in itself is a safety hazard and with this new scheme we will have to contend with the additional noise with slow moving traffic and the pollution that goes with it. Surely this must come under Health and Safety Regs. We need to go back to the original scheme of widening North street and providing a pavement to one side. The size of the lorries these days means two lorries cannot pass one another without one giving way to the other, thus slowing the traffic up yet again.</p> <p>5, The proposed soft landscape area will be made use of by cyclist as a short cut to access roads. This needs a hard finish.</p> <p>I appreciate that we must look to the future for the village but I'm not convinced that this scheme is right for the future taking into account more housing development being planned in the area with the increase of at least two cars per house.</p>	<p>collecting them with no need for parking. Parents will be able to park in the new car park for 3pm collection.</p> <p>We are already considering the retention of the barriers as part of the ongoing work on the scheme.</p> <p>All these issues have been considered in great detail and are contained in the design report available on the website or from the office. The direction of any queues at peak times will move from the current situation but will flow. It is our intention to reduce the speed of all traffic within the village in order to make it safer for everyone.</p> <p>We believe this refers to the outline planning permission granted for Clock Field the final details of surfacing and protection for pedestrians will be considered when full planning is requested.</p> <p>The increase in local traffic has been taken into account</p>
<p>9 Alison Englebright</p>	RH10 4NS	Mildly oppose	<p>I am concerned about the relocation of the bus stop by the green. This is used by pupils travelling to school by coach and bus.</p> <p>I am concerned about the possible reduction of parking for residents (those who live in Lion Lane and on North Street) who need to park in Lion Lane.</p>	<p>We are considering relocating to the existing bus stops on East Street where students can wait in safety and can disembark safely and not in the middle of the road.</p> <p>Many Lion Lane residents have use of the private car park to the rear of the properties. Others will be able to use the new car park.</p>
<p>10 Karen Kyle</p>	RH10 4PN	Support		<p>Thank you</p>

<p>11 Elizabeth & Andrew McKnight</p>	<p>RH10 4PB</p>		<p>We are the owners of Grove Cottage, Church Road, and wish to submit our comments on the Draft Neighbourhood Plan. Before doing so, we should like to thank the Council and its officers for producing the Draft Plan and affording us the opportunity to discuss it with them at the information session on 22nd November 2014.</p> <p>Proposed Development of Clock Field, Vicarage Field, the Old Estate Yard and the old Quarry site: We believe that these will result in more motor vehicles in the village, thereby adding to the already excessive volume of traffic in the village. Furthermore, such developments will take place on agricultural land or other open space, thus detracting from the rural atmosphere of the area. There is the risk, as well, that these developments will simply be a stepping stone, over time, to even more developments which will endanger the village character of Turners Hill. It should not be forgotten that in the last 50 years or so, the size of Turners Hill has already expanded significantly by the developments that have taken place at Medway, Withypitts, Willow Ridge and Hill House Close.</p> <p>Proposed developments of Vicarage Field and the Old Estate Yard: In relation to these proposed developments, the entry and exit point for motor vehicles will be opposite or almost opposite, the School's grounds. In general terms, traffic entering and leaving the site will only add to the volume of traffic passing along Church Road and, in our opinion, will also add to the traffic problems that currently obtain in that area at school times. Moreover, more children will have to cross the road to reach homes and parking. That entry and exit point to the developed sites will have to cut through the substantial bank on the north western side of Church Road, which will destroy the appearance and the character of the bank and could cause engineering and erosion problems.</p> <p>Proposed roundabout at the junction of Church Road and Paddockhurst Road:</p>	<p>Thank you</p> <p>This has been taken into account within the Village Enhancement Scheme</p> <p>This plan is for the next twenty years. Further development might be considered by others beyond that time but for the next twenty years it will not be.</p> <p>Developments took place in 1949 (Medway), 1955 & 1961 (Withypitts), 1967 (Willow Ridge) 1977 (Hill House Close) and 1993 (Noahs Court). These developments have led to a more sustainable community and allowed local facilities to continue and flourish. Without them Turners Hill would be a hamlet with no facilities. Some growth is necessary if the village is to remain sustainable in terms of shops, school, church etc..</p> <p>The entrance is to the west of Old Vicarage. The entrance to the new estate and car park is to be situated west of The Old Vicarage in the 20mph zone. Current arrangements for dropping of children will continue with parents pulling in at front of school and staff collecting them with no need for parking. Parents will be able to park in the new car park for 3pm collection. Ideally more children should be walking to school. Most children have to cross one or more of our roads to access parked cars as parking at the school is not allowed. With parents parking in the new car park only one road will require crossing. The engineering works have been considered in detail by the landowner as has appearance.</p>
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				<p>large bank. The ground is gradually being taken back by nature for the benefit of wildlife. Furthermore, the site lies outside the built up area boundary of the village. We doubt that the proposed housing could be constructed in such a way as to leave adequate access to the SSSI protected stone and, even if there were some type of immediate access for viewing, the erection of the housing would prevent viewing of the stone from other than a very close proximity. As stated above, motor vehicles entering and leaving the site will simply add to the traffic in the area particularly at the junction/roundabout at Church Road and Paddockhurst Road. Without detracting from our objection to the proposed development, we would wish to see the copper beech hedge fully preserved if any development of the site were to proceed.</p> <p>Proposed footpath along Church Road: We request that the construction of the footpath should not result in the copper beech hedge referred to above being cut down or cut back. The hedge is a pleasant feature in its own right, it provides a good and substantial border to most of the Old Quarry site and, if any development of that site should take place, it will provide some natural barrier for our benefit.</p>	Noted.
12 Alison White	RH10 4PN	Mostly Support	<p>Possible Housing Strongly Oppose</p> <p>Highway Changes – Cross-roads Strongly Support</p>	<p>Unsure of policy numbers as this is not in the document on the website</p> <p>A main purpose of the neighbourhood plan is to reduce or ease traffic, particularly at the crossroads. To place 40 odd houses directly off the crossroads is lunacy. If this goes ahead I will sell up!</p> <p>I am very much in favour of merging the central verge with the Crown, and adding roundabouts. However the existing roundabout outside the Withypitts is – in the main – ignored by those that use Selsfield road. Coming from the Withypitts I am frequently met whilst still on the roundabout, with a swiftly approaching vehicle which does not stop. The road layout and signage needs to change significantly to remind people to give way to the right.</p>	<p>All policy numbers are in the Neighbourhood Plan document.</p> <p>The entrance to the site will not be at the crossroads and the development has been taken into account in the production of the Village Enhancement Scheme. We do need to provide more housing for local people. We hope you will not feel the need to move.</p> <p>We will discuss this once again with WSCC but any illegal driving should be reported to the Police.</p>

				From experience with crossroads changed to roundabouts there is often a 'standoff' where all vehicles are giving way to the right and nobody goes! This can cause congestion. It needs to be clear or slightly staggered in such a way if possible, that if all roads are being used (which is the case in rush hour) that the flow of traffic is obvious.	Agreed but this is down to individual drivers.
13 Michael & Patricia Funnell	RH10 4NS	Support			Thank you
14 Michael & Linda Beasley	RH10 4YY	Mostly Support			Thank you
15 Carole Doherty	RH10 4YY			<p>Overall, would it not prove far more effective to reduce the speed limit throughout the village to 20mph? (using the village parameters/gates as the markers for this) This would prevent motorists who enter the village being presented with a confusing array of varying speed changes rather than taking due care and attention of other road users. Motorists approaching the village from Church Road proceeding to the Paddockhurst Road junction will be faced with reducing their speed from 60 mph to 30 mph to 20 mph in a very short stretch of road, for example.</p> <p>Traffic using the proposed two new roundabouts at the East Street, Church Road, Selsfield Road junction could encounter problems at peak traffic flow times with a 'no go' area being created between the two roundabouts due to the volume, achieving a gridlock effect.</p> <p>The relocation of the bus stop opposite the Mount Lane junction could inhibit traffic exiting from the lane and turning right effectively, if a bus is stopped there.</p> <p>The problems concerning the Church Road/Paddockhurst Road junction are mainly confined to the rush hours and indicative of excessive volume and a need to create a more effective flow. Should traffic flow at the two proposed roundabouts around the village green not be achieved, the situation will be exactly the same as it is now. With the proposed exit/entrance for the Old Vicarage Field development to be located along Church</p>	<p>Legally we are unable to reduce the speed limit for the whole village although it would be nice to do so.</p> <p>We are discussing the changes in speed limits at this junction to prevent this rapid change in speeds.</p> <p>The assessment work carried out shows that the queues will change from west/east to north/south at peak times but will still flow.</p> <p>There could be some short delays but as the service is currently so limited this should not be a problem. We will look at this again.</p> <p>All these issues have been considered in detail in the preparation of the Village Enhancement Scheme. There will always be queues and delays at peak times due to everyone's reliance on the car but the scheme will make it safer for all. The plan will reduce the queues on Church Road/Paddockhurst Road.</p>

				<p>Road before the Selsfield Road junction will this not add to the problem? Pedestrian access to St. Leonard's church would appear to have been made more complicated. The plans implying that you would walk along the existing pavement on Church Road, on the school side, to the proposed new roundabout, cross over the road using the appropriate refuge to the 'Rayces/Riders' side, carry along the proposed pavement on that side of the road, and then cross back to the church side.</p> <p>It is of concern that provision of infrastructure to support the two new proposed housing developments is limited to immediate concerns and the developers are not encouraged to take a wider view such as provision of water. With increasing housing development in the south east of England, has provision for increasing water supply provision (reservoirs etc.) been increased similarly? It is within recent memory that water shortages/rationing was mooted.</p> <p>With the proposed housing developments, will infrastructure improvements be put in place at the same time (e.g. Increased provision for pupil capacity at the school?)</p> <p>Overall, the need for new housing provision and progression within the village community is needed. We do need to plan and build carefully to preserve the essential elements of village life that we enjoy and value.</p>	<p>With the mini-roundabout in place the crossing points have to move to provide safety. The change means that you would no longer cross the slip road from the island refuge.</p> <p>All developers have to take into account the provision of water, sewage requirements, provision of gas, electricity etc.</p> <p>The District Council meets with the Water Companies to discuss future long term requirements.</p> <p>The developers will have to provide funds for infrastructure needs. Currently the capacity of the school is sufficient for the children within the catchment area. 68 children from outside the catchment area attend the school out of 140.</p> <p>Noted and we hope that is what can be achieved by a 20 year plan</p>
<p>16 Mrs Demelza Staples</p>	RH10 4YY	Mostly Support	<p>THP16 Support</p> <p>THP17 Support</p>	<p>I am concerned that the 20mph zone ends before Hill House Close and Medway. There are young families living in these roads and the zone should extend north beyond here.</p> <p>A safe place to cross is required from North Street across to Lion Lane to reach the village shops safely. Lion Lane is a 'rat run' for lorries when the main road is busy. Please ensure this stops for the safety of all.</p>	<p>Legally we are unable to reduce the speed limit for the whole village and where we do, we have to provide a traffic calming feature at the entrance to the zone.</p> <p>A safe crossing is to be provided as part of the Highway element of Clock Field development. The outline plans can be viewed at http://www.midsussex.gov.uk/8085.htm under reference 11/01332/OUT document Proposed Junction Layout. These plans include a pinch point priority system for Lion Lane.</p>
<p>17 Anthony & Joy Cocklin</p>	RH10 4NS	Support			<p>Thank you</p>

<p>18 Joanne Mackintosh</p>	<p>RH10 4NR</p>	<p>Support</p>	<p>THP2 Support</p> <p>THP6 Partially Support</p> <p>THP17 Partially Support</p>	<p>Given the acknowledged shortfall of village children in the village school the development should not be limited to 3 bed houses as it is important to retain growing families of various ages within the village</p> <p>Given that there are only limited amenities in the village and there is a stated aim to encourage walking, it is not clear what need there is for a central parking facility</p> <p>Footpath improvements should not be restricted to the Southern side of the village. The roads on the northern side of the hill are straight and long and vehicles rarely stick to the current 30 mph speed limit. While the 20mph limit proposed will help matters, steps should be taken to improve the footpaths on this side of the hill as well. This includes both lengthening the footpath (so that it is possible to access the central village amenities without having to cross the road multiple times) and also widening the existing ones. We live on that side of the village and have two small children. If walking to the park the footpath is not wide enough to walk with our three year old beside the pushchair with the one year old in it. The three year old therefore needs to walk in front of the pushchair beside the road that is regularly acknowledged throughout the plan and supporting documents as very fast and busy and therefore dangerous.</p>	<p>The housing requirement information received from MSDC and from our questionnaires shows that 1, 2 and 3 bedroom homes are required for all age groups. This should benefit the school.</p> <p>Not everyone wishing to avail themselves of the amenities lives close enough to walk to the village centre, others need parking whilst working in the village, collecting children from school, visiting etc. The local shops suffer from the lack of parking as do many residents in the village centre, especially Lion Lane. The new car park will resolve these issues and aid the sustainability of the limited, but vital, amenities.</p> <p>Improvements to footpath facilities for the north of the village centre are planned within the Clock Field Development Scheme. This development will also provide direct access through it to the recreation ground.</p> <p>Widening the roads would prove difficult with so many properties being very close to them.</p> <p>Your concerns are noted and we assure you we are doing all we can to overcome all highway issues in the Parish; however this is a long and costly process.</p>
<p>19 Mr & Mrs R M Jones</p>	<p>RH10 4NS</p>	<p>Support</p>	<p>THP16 Support</p>	<p>Suggest restricting/prohibiting parking on B221 between North Street and East Street (along by current bus shelter) given increase in traffic under proposals on a stretch which is easily congested at the moment with just one vehicle parked.</p>	<p>We will look at this again and see what can be done to achieve this.</p>
<p>20 Pam & Gareth Williams</p>	<p>RH10 4QQ</p>	<p>Support</p>		<p>General comments: Agree with housing plans, though concerned about how access to Clock Field development will work. Housing should only be considered IF the highway improvements are made. Highway improvements seem sensible though it does mean a lot of mini roundabouts. Is it possible to put a cycle path between the Worth Way at Crawley Down? This would be a huge help to both cyclists and motorists.</p>	<p>Clock Field plans are not subject of the Neighbourhood Plan as they already have outline planning permission. The highway element will bring benefits to all and allow the 20mph zone to be installed. Highway improvements are, in part, paid for by the housing developments when planning permission is granted and work starts. Hopefully they can run in tandem or close together time-wise. We have been trying to arrange for a Bridleway between Turners Hill and Crawley Down (Worth Way) but so far</p>

					have not been able to reach agreement with landowners. We are still looking at alternative routes.
21 Ann Webber	RH10 4PN	Support			Thank you
22 Mrs L Furzer	RH10 4QZ	Support	<p>THP1 Support</p> <p>THP2 Support</p> <p>THP3 Support</p> <p>THP4 Support</p> <p>THP6 Support</p>	<p>These two sites seem the most logical</p> <p>The SSSI must be protected at all costs</p> <p>It is essential that all new housing has adequate parking</p> <p>Provided the public can be persuaded to use public car parks</p> <p>May I say that I agree with everything but most importantly feel that as a matter of urgency the crossroads MUST be made safer</p>	<p>We are grateful for your support and agree that the crossroad improvements must be of high priority.</p> <p>Due to the latest National and District Policies this item will be removed from the Neighbourhood Plan as it is as no longer complying with the above policies. Other options for improving the area will be investigated with the landowners in order to enhance the area and allow access to the rock face.</p> <p>Noted</p>
23 Mr George Back RH & RW Clutton	For Paddockhurst Estate			<p>Thank you very much for sending out the draft Neighbourhood Plan for consultation following the amendments. You and your colleagues must be applauded for the hard work that has gone into the document and I hope the village appreciates what efforts have been made.</p> <p>Please do not feel what follows is criticism but helpful advice from a separate third party.</p> <p>1. Village Enhancement Scheme - The document refers to the Village Enhancement Scheme in a number of places but on page 17 the narrative seems to change to describing it as a Village Enhancement Plan which would suggest that there is a plan to be attached to the document. Perhaps this ought to revert to Scheme. In addition throughout the document it may be helpful to continue to use capitals as a matter of continuity.</p> <p>2. THP9 Provision of Public Car Park - Could I possibly make a suggested alteration to the wording "the car park should also include a well-designed building to add visual interest to provide small scale office/commercial use, probably at first floor level, with an undercroft parking below to help maximise</p>	<p>Thank you</p> <p>Noted and will amend</p> <p>Refers to THP6 (now 5) Wording to be amended to: "Applications for a centrally placed, accessible community car park on the Old Estate Yard will be actively supported. Incorporating a small well designed office unit with undercroft parking in order to help maximise the number</p>

			<p>the number of new spaces”.</p> <p>3. THP10 New Homes Parking - I think that there is some difficulty with this policy for properties with 4 or more bedrooms. Parking for 5 cars will require a considerable amount of hard standing and is not compatible with a rural village. Nevertheless I quite appreciate the sentiments behind this proposal and would anticipate that it is unlikely to be amended.</p> <p>4. Clockfield - Obviously the inclusion of Clockfield is a necessity within the document and the support that the Parish Council gives to Clockfield is invaluable but I wonder whether references to site difficulties and various difficulties have been encountered are helpful to attracting developers to take advantage of the Planning Consent that has been granted.</p> <p>5. The Quarry - Again I think you should be supported for your foresight in including the quarry as a site for potential housing but having discussed it with Craig Noel we have some concern that the detail within the Neighbourhood Plan is not necessary and as a result potentially not helpful to its future development. These are some points of note:-</p> <p>(a) I do not believe that there is any need for the plan to quote the detail of the SSSI designation or the response from English Nature or the NPPF advice. We feel that this all draws attention to potential problems rather than benefits of the ideas.</p> <p>(b) We think that the three criteria identified by English Nature should be within the policy THP14 and not the preamble.</p> <p>(c) Could I suggest that the heading for TPH14 should be Old Quarry, Church Road not SSSI site Church Road.</p> <p>(d) Could I suggest an additional sentence to the paragraph starting “However due to the condition of the site....” as a second sentence perhaps the following wording could be used “There is no current incentive for the sandstone to be made available for public viewing but the use of site for sympathetic housing would enable the sandstone to be exposed and more available for accessing by the public.”</p>	<p>of new spaces will also be actively supported.”</p> <p>Considered but agreed to remain as is</p> <p>Factually correct and therefore will remain as is</p> <p>Due to the latest National and District Policies this item will be removed from the Neighbourhood Plan as it is as no longer complying with the above policies.</p>
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				As already stated please accept these comments as comments and certainly not as criticism of the detailed report that the Parish have drafted.	
24 Dr Ian Gibson	Worth Parish Councillor			<p>I have been working on the Crawley Down plan and it is clear that our separate local surveys have identified very similar local needs in term of a lack of 1 and 2 bedroom affordable properties for local youngsters and retirement properties to allow older residents to downsize/reduce the maintenance/gardening burden. The main difference is that Crawley Down has faced a storm of development approvals over the past 2 years that give a 15% increase in housing stock without the corresponding investment in infrastructure. Also the houses that have been, are being and are still to be built around the village are not the ones that meet local needs. Faced with a lack of suitable proposals from local landowners we have opted not to allocate and specific land parcels, but to rely on a policy based approach to deliver windfall sites within the village built-up area (a return to pre 2012 position)..</p> <p>This leads me to my main comment on your policies in that I do not believe that you can rely on C2 to avoid coalescence with Crawley Down to the north. The recent Hurstpierpoint planning appeal (APP/D3830/A/132203080) focused on the relative size of the proposed development to the size of the gap at the location. Policy C2 protects the strategic gap between Crawley and East Grinstead and it is unlikely that any individual development would have a significant impact. This has prompted the adoption of a local gap policy in the Crawley Down Plan, with one of the key gaps being between Crawley Down and Turners Hill. I would urge you to adopt a similar policy to protect the gap 'from your side' and also the gap west to the M23. If you revise your policies map to show the Woodlands Phase 1 and Phase 2 developments (96 new homes currently under construction), you will see how little gap remains between the southern boundary of Crawley Down and the mobile home park.</p>	<p>Noted</p> <p>We feel that Policy DP10 of the Emerging District Plan does provide the protection that is required. We do not have evidence to demonstrate that existing local and national policies cannot provide the necessary protection.</p>

				<p>Otherwise I think your plan is excellent. I particularly like the detailed proposals for solving the traffic crisis at the crossroads. The B2028 presents us with problems of a slightly different nature. The cross-referencing of policies is excellent, although you might also refer to the NPPG. I am surprised that you make no mention of the Gatwick 2nd runway decision. I appreciate that it's not in your area, but it really is the elephant in the corner. It will be something for consideration at your first 5 year review.</p> <p>I expect that you are aware that you need to get a revise plan to MSDC quickly if you are to beat the Gen. election moratorium on planning and set up a summer referendum.</p>	<p>Thank you</p> <p>Gatwick will be included in the review of our plan as more definite information will be available for consideration.</p> <p>We were aware of this situation.</p>
<p>25 Tom Bowkett Sport England</p>				<p>Thank you for consulting Sport England on the above Neighbourhood Plan. Planning Policy in the National Planning Policy Framework identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.</p> <p>It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, 'A Sporting Future for the Playing Fields of England – Planning Policy Statement'. http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/ Sport England provides guidance on developing policy for sport</p>	<p>The Neighbourhood Plan does reflect the national policies and looks to protect and enhance sports facilities in conjunction with MSDC.</p>

				and further information can be found following the link below: http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/	
26 Catherine Hutchins Environment Agency				Thank you for consulting the Environment Agency on the revised draft version of your Neighbourhood Plan. We are a statutory consultee in the planning process providing advice to Local Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans. We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest. Based on the environmental constraints within the area, we therefore have no detailed comments to make in relation to your Plan at this stage. However please find attached a copy of a Neighbourhood Plan checklist we have recently developed to help provide Environment Agency advice at the earlier stages of Neighbourhood Plan preparation. We would also welcome the opportunity to work with your neighbourhood forum on this to ensure environmental infrastructure is taken into consideration when looking to fund local infrastructure.	Noted
27 Amanda Purdye Gatwick Airport Limited	RH6 ONP			Further to the email from Mid Sussex District Council dated 31 October 2014, regarding the above mentioned document. Our comments are as follows: Gatwick Airport Ltd are a statutory consultee and we would ask that any future development complies with aerodrome safeguarding requirements as detailed in ODPM/DfT Circular 01/2003 'Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas: The Town & Country Planning (Safeguarded Aerodromes Technical Sites and Military Explosives Storage Areas) Direction 2002. Some of the matters that we would need to take into consideration are, building design including heights. No buildings or structures are to exceed 209.35m Above Ordnance Datum (AOD) in this area. Other matters are landscaping, water bodies and any other bird attractants, renewable energy with particular regard to wind turbines and large areas of solar panels. We are happy to work with yourselves and developers	Noted

				<p>at the early stages of any proposed developments to advise on aerodrome safeguarding requirements. Please be advised that the comments given are without prejudice to the consideration of any planning application which may be referred to us pursuant to Planning Circular 01/2003 in consultation under the safeguarding procedure.</p>	
<p>28 Robert Lloyd- Sweet</p>	<p>English Heritage</p>			<p>Congratulations on producing an informative plan that provides a clear vision for the future of Turners Hill. If you have any queries regarding the comments provided or would like any further information about planning for the historic environment, please don't hesitate to contact me or the Historic Places Team at English Heritage's South East office.</p> <p>English Heritage's remit is for the historic environment and the range of heritage assets, both designated and non-designated, therein. Our comments reflect this remit - for example, as regards comments on site allocations our comments will reflect any likely impacts of the development of the site on heritage assets and their setting. We also promote good practice for plan-making and opportunities to make best use of the Neighbourhood Plan to manage heritage assets and the historic environment, and advice on neighbourhood planning and the historic environment is available on our website: http://www.english-heritage.org.uk/caring/get-involved/improving-your-neighbourhood/.</p> <p>As such, within the areas of concern to English Heritage we find that in general the plan provides a suitable level of policy for the heritage assets within the area, subject to a small number of recommendations to add to their robustness or provide clarity for their implementation.</p> <p>English Heritage welcomes the identification of protecting and enhancing the character and appearance of the conservation area and the landscape character of the parish as a whole as a key consideration for determining the acceptability of new development within the Neighbourhood Plan. The Village Design Statement provides a potentially powerful tool for the management of the design of development within the conservation area and in its setting and we commend its use to</p>	<p>Thank you</p> <p>Thank you</p>

			<p>the Council alongside the Neighbourhood Plan and, as a part of its evidence base, as a material consideration in planning decisions.</p> <p>We would also commend the design of the highways improvements set out as the Village Centre Enhancement as a means of reclaiming the public realm for pedestrians and supporting local business by providing public open space and an attractive setting. We recommend referring to the English Heritage publication Streets for All: South East to assist in the design and choice of materials for highways and public space works in sensitive historic locations such as the Village Centre.</p> <p>In guiding the development of the two allocated sites for housing development, which lie either within or in the setting of the Turners Hill Conservation Area we would recommend the policy includes a requirement for development proposals to demonstrate how the design has been prepared to avoid or minimise any potential harmful impact on the significance of the conservation area, including its setting. This is required to ensure meet the statutory requirements of the Planning (Listed Buildings and Conservation Areas Act) for the Council, as the local planning authority, to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area, as well as the guidance of the National Planning Policy Framework with regard to designated heritage assets.</p> <p>To provide an appropriate consideration of the need to sustain and enhance the significance of heritage assets (including listed buildings, other buildings that contribute to the conservation area or that contribute to the rural character of areas outside it) we would recommend adding an additional bullet point to Policy THP8 to state:</p> <p>Building extensions that require planning permission, will be permitted where it meets all the following criteria:</p> <p>x) The extension is designed to preserve or better reveal the features that contribute to any significance of the building or surrounding area as a heritage asset, including listed buildings, the Turners' Hill Conservation Area or non-designated heritage assets.</p> <p>We hope that this advice will help you to move forward to</p>	<p>Thank you. 'Streets for All' has been used in producing our scheme.</p> <p>Noted</p> <p>Reviewed and to be included in THP7 (numbering amended)</p>
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				presenting a robust neighbourhood plan to Mid Sussex District Council.	
29 MSDC Norman Webster	RH16 1SS			<p>Thank you for providing Mid Sussex District Council with an opportunity to formally comment upon the Neighbourhood Plan for Turners Hill Parish. We welcome the positive contribution the Parish is making towards meeting its needs over the plan period. The Neighbourhood Plan is ambitious for the community of Turners Hill and recognises the distinctive hilltop character of the Parish and the AONB landscape constraints. We welcome the inclusion of additional land at Vicarage Field for housing and a car park which is in addition to the extant planning permission on Clock Field. The District Council is concerned by the allocation of a Site of Special Scientific Interest (SSSI) for 3 dwellings with no gardens and the precedent this may set. The SSSI designation is to protect a significant site for geology and it is considered that there are other options available to tidy the site.</p> <p>These should be considered through the Sustainability Appraisal which in the assessment of this policy (THP3) makes the assumption that this land should be developed without first considering alternative options to residential development. The National Planning Policy Framework (NPPF) states that planning policies should 'aim to prevent harm to geological conservation interests' (paragraph 117) and in determining a planning application, proposed development likely to have an adverse effect on the SSSI should not normally be permitted (paragraph 118). In addition, the emerging District Plan policy DP36: Biodiversity, requires development to avoid damage to and protect the special characteristics of such designated sites as well as giving appropriate weight to their importance and preventing harm to geological conservation interests.</p> <p>We are delighted to be able to continue working alongside the Parish Council with a view to bringing forward some of the exciting propositions contained within the Neighbourhood Plan. If you would like to discuss in further detail please do not hesitate to contact the planning policy team on 01444 477391.</p>	<p>Noted thank you</p> <p>We have considered the concerns of the District Council in relation to the inclusion of the SSSI for development. Having taken independent advice and looked again at all our options we have decided to remove the site from the Neighbourhood Plan.</p> <p>Other options for improving the area will be investigated with the landowners in order to enhance the area and allow access to the rock face.</p>

<p>30 Catherine Tonge Natural England</p>				<p>Thank you for consulting Natural England on your Neighbourhood Plan. My brief comments are as follows:</p> <p>The plan is particularly strong regarding potential landscape issues and we welcome the commitment to protect the local landscape character and respect both the designated landscape of the High Weald Area of Outstanding Beauty and its setting.</p> <p>We support the recognition of the proximity of the internationally important Ashdown Forest your commitment to work with Mid Sussex District Council regarding the provision of appropriate mitigation.</p> <p>We also welcome the commitment to protect and improve condition of the area's ancient woodland (noted in the Sustainability Appraisal) and would like to see this reflected in the policies themselves. The area's mature hedgerows are an important habitat and, while their importance as a landscape feature is recognised in the plan, their biodiversity value is not. Brief mention of both ancient woodland and hedgerows could be added to policy THP9 Countryside Protection, or, ideally an additional policy reflecting the plan's commitment to protecting and enhancing biodiversity (as outlined in the Sustainability Appraisal scoping report) could be added. Policy THP2 may also need a reference to protection of the surrounding hedgerows as the minimal impact of proposed development on the landscape apparently relies on their existence (para 7.24) Paragraph 118 of the Government's National Planning Policy Framework (NPPF) indicates that "proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of</p>	<p>Thank you</p> <p>Noted</p> <p>Policies in the emerging District Plan, DP35 & DP36, will provide protection and enhancement in relation to trees, woodland and hedgerows as well as biodiversity. We are advised not to replicate such policies but to refer to them.</p> <p>See above</p> <p>Noted</p> <p>SSSI site has been removed from the Neighbourhood Plan</p> <p>Other options for improving the area will be investigated with the landowners in order to enhance the area and allow access to the rock face.</p>
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				<p>Sites of Special Scientific Interest”.</p> <p>If alternative sites have been assessed and the land in the Turner’s Hill SSSI is demonstrably the best option, and if adverse effect of development on the site’s notified special interest features can be avoided or mitigated, or if the benefits of the development clearly outweigh the dis-benefits, it may be appropriate to allocate the site. We welcome your prior discussion with Natural England on these matters, and would expect further consultation should development progress, particularly on how damage to the site will be prevented by this development and during construction work and on devising a forward plan for long-term access, maintenance and monitoring of the interest features.</p> <p>The plan refers frequently to “English Nature”. Some of these references cite historical consultations but we suggest changing all to “Natural England” to avoid confusion.</p> <p>Due to the current pressure of consultations on land-use plans, I have not been able to spend the time I would have wished reviewing and commenting on your Neighbourhood Plan. Nevertheless, I hope you find these comments helpful.</p> <p>If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please contact me</p>	<p>Acknowledged and changed</p> <p>Noted thank you</p>
<p>31 Elizabeth Cleaver Highways Agency</p>	<p>RH4 1SZ</p>			<p>The Highways Agency is an executive agency of the Department for Transport. We are responsible for operating, maintaining and improving England's strategic road network on behalf of the Secretary of State for Transport. The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the strategic road network. We have reviewed the consultation and do not have any comments at this stage.</p>	<p>Noted</p>

<p>32 Chris Owen West Sussex County Council</p>	<p>PO19 1RH</p>		<p>Thank you for the opportunity to comment upon the Parish Council's draft Neighbourhood Plan for Turners Hill.</p> <p>General:</p> <p>In general, the County Council looks for draft Neighbourhood Plans to be in conformity with the District and Borough Councils' latest draft or adopted development plans. The County Council supports the District and Borough Councils in preparing the evidence base for these plans and aligns its own infrastructure plans with them. The County Council encourages Parish Councils to make use of this information which includes transport studies examining the impacts of proposed development allocations. Where available this information will be published on its website or that of the relevant Local Planning Authority. In relation to its own statutory functions, the County Council expects all Neighbourhood Plans to take due account of its policy documents and their supporting Sustainability Appraisals. These documents include the West Sussex Waste Local Plan, Minerals Local Plan and West Sussex Transport Plan. It is also recommended that published County Council service plans, for example Planning School Places, are also taken into account.</p> <p>Following a review of the draft Neighbourhood Plan for Turners Hill, it has been decided not to submit a formal County Council response on this occasion. We do however encourage you to informally discuss any specific issues you may have which relate to the County Council with the Principal Community Officer who deals with your area. An outline of how the County Council supports neighbourhood planning is given on the Neighbourhood Planning page of our website which includes contact details and can be accessed via the following link: http://www.westsussex.gov.uk/living/environment_and_planning/planning/planning_and_you/neighbourhood_planning.aspx</p> <p>Specific considerations</p> <p>Paragraph 11.3: West Sussex County Council is the Local Highway Authority and is statutorily responsible for all publicly-maintainable roads in Turners Hill. The implementation of the Parish Council's desired changes to the highway will therefore</p>	<p>Thank you for the feedback on the Neighbourhood Plan.</p> <p>Noted</p> <p>Noted</p>
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			<p>depend upon decisions taken by other authorities, especially WSCC. The Parish Council is therefore recommended to amend the wording "...implement changes to the highway..." in the first sentence to read "...support changes to the highway...".</p> <p>Policy THP16: This policy in its current form seeks the full implementation of the Village Enhancement Scheme, a set of specific highway improvement proposals developed by the Parish Council. In response to Parish Council requests the County Council's North Mid Sussex County Local Committee decided in October last year to identify a "Package of traffic improvement measures and pedestrian safety enhancements, Turners Hill" as a priority scheme in its Local Infrastructure Plan for delivery in 2016/17 or 2017/18. However, as with many highway improvement projects, implementation will be subject to funding and the outcomes of further consultations, design work and safety audits. As a result it is not possible at this stage to say with certainty that all aspects of the Village Enhancement Scheme can be delivered. It should also be noted that ultimate responsibility for the details and programming of highway improvement schemes rests with the County Council as highway authority. In view of this the Parish Council is requested to review how its aspirations for highway improvements are presented in the Neighbourhood Plan. For example it may be more appropriate to base a policy around the objective of "working with relevant agencies" as already mentioned in the second sentence, perhaps adding wording such as "to pursue desired changes to local highways, as proposed in the Village Enhancement Scheme developed by Turners Hill Parish Council, in order to manage traffic impacts and enhance safety".</p> <p>Small scale housing sites: Given that the draft Neighbourhood Plan for Turners Hill includes the proposed allocation of small scale housing sites, it should be noted that site specific principles in the Neighbourhood Plan will need to be tested and refined through the Development Management process (through the provision</p>	<p>Change agreed and made</p> <p>Turners Hill Parish Council policy THP16 Highway Improvements will be revised. However our view is that we are aiming to transform and enhance the centre of the Village from a crossroads dominated by vehicular traffic to an environment with a sense of place providing improved safety for all as per our Walk & Drive in Safety document. The Parish Council objective is not just to "manage traffic impacts and enhance safety" but seek an alternative approach to village life as set out in "Traffic in Villages" endorsed by the CIHT</p> <p>In the light of your feedback we would like to meet with WSCC Officers who have authority to discuss progress and available funding towards delivery and implementation. We would like to discuss and agree (1) current funds available – given the CLC has already committed to working on design in the background ready for future works programme – how is this progressing (2) potential available funds ie identifying future development opportunities that could fund highway improvements in Turners Hill (3) the legal process – when and how this can be followed through given any option may take some time to develop (4) an outline timetable. Please advise how and when this meeting can be taken forward.</p> <p>Policy now changed to the following: Working with the relevant agencies to pursue desired changes to local highways, as proposed in the Village Enhancement Scheme developed by Turners Hill Parish Council, in order to manage traffic impacts and enhance safety for all. See Plan pages 38-40. Existing and future funds raised from new development S106/CIL agreements, in combination with Parish Council and WSCC funding, will</p>
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				<p>of pre-application advice or at the planning application stage) or as part of a consultation for a Community Right to Build Order. Whilst the County Council supports the proactive approach undertaken to allocate sites in the Neighbourhood Plan, we are unable to comment on site specific principles at this stage. In considering site specific principles, please refer to the attached Development Management guidance.</p>	<p>be used to fund the highway Improvements.</p> <p>Noted</p>
<p>33 Claire Gibbons Southern Water</p>	<p>BN1 9PY</p>		<p>Oppose THP2</p>	<p>Policy THP2 allocates two adjoining sites (Old Vicarage Field and the Old Estate Yard) for 44 new homes. In line with paragraph 162 of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance, we have undertaken assessments of the existing capacity of our infrastructure and its ability to meet the forecast demand for the proposed development. That assessment reveals that the local sewerage system has limited capacity. To address the limited capacity in the local sewerage network, the proposed development would need to make a connection at the nearest point of adequate capacity. This is not a constraint to development providing there is planning policy support for the provision of the necessary local infrastructure. If development is permitted to proceed where there is inadequate capacity in the sewerage network, then the system would become overloaded, leading to pollution of the environment. This situation would be contrary to paragraph 109 of the NPPF, which requires the planning system to prevent both new and existing development from contributing to pollution. There is a risk that the necessary local sewerage infrastructure will not be delivered in time to service the proposed development, unless delivery is supported by planning policies and subsequently in planning conditions. This is endorsed by the core planning principles, identified in the NPPF, notably to: 'proactively drive and support sustainable economic development to deliver the homes,</p>	<p>Noted</p>

				<p>business and industrial units, infrastructure and thriving local places that the country needs’ and ensure that plans ‘provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency’. Our approach is also supported by paragraph 21 of the NPPF, which requires that planning policies should recognise and seek to address any lack of infrastructure. The National Planning Practice Guidance specifies that ‘Adequate water and wastewater infrastructure is needed to support sustainable development’. Proposed amendment To ensure consistency with the NPPF and National Planning Practice Guidance, we propose the following additional policy provision for policy THP2: The development will need to provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.</p>	<p>Agreed, however we note that MSDC Emerging District Plan policy DP40 covers the requirements for water and sewerage and DP17 refers to utility infrastructure requirements.</p>
<p>34 Claire Gibbons Southern Water</p>	<p>BN1 9PY</p>		<p>Oppose THP9</p>	<p>Southern Water understands Turners Hill Parish Council’s desire to protect the countryside. However, we cannot support the current wording of this policy as it could create a barrier to statutory utility providers, such as Southern Water, from delivering their essential infrastructure required to serve existing and planned development. Paragraph 116 of the National Planning Policy Framework (NPPF) establishes that development should be permitted in designated areas in exceptional circumstances, where it can be demonstrated that the proposal is in the public interest. This approach is further supported by paragraph 118 of the NPPF, which describes the principle that development should be permitted if the benefit outweighs any harm. Provision of sewerage and wastewater treatment infrastructure would be in the public interest, as it would serve both existing and new development or meet stricter environmental standards. Also there are limited options available for the location of new sewerage infrastructure (e.g. a new pumping station) due to the need to connect into the existing sewerage network, so it is considered that the provision of wastewater or sewerage infrastructure constitutes ‘special circumstances’. The draft National Planning Practice Guidance recognises this scenario and states that ‘it will be important to recognise that water and wastewater</p>	

				<p>infrastructure sometimes has needs particular to the location (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered’.</p> <p>Proposed amendment: To have regard to national policies and advice contained in guidance issued by the Secretary of State and contribute to the achievement of sustainable development, we propose the following additional criterion: f) It is essential to meet specific necessary utility infrastructure needs and no alternative feasible site is available.</p>	Agreed and included
<p>35 Claire Gibbons Southern Water</p>	BN1 9PY		<p>Oppose THP12</p>	<p>Southern Water understands Turners Hill Parish Council’s desire to protect areas of open space. However, we cannot support the current wording of this policy as it could create a barrier to statutory utility providers, such as Southern Water, from delivering their essential infrastructure required to serve existing and planned development. Southern Water may have to provide additional water or wastewater infrastructure to serve new and existing customers or meet stricter environmental standards. It is likely that there would be limited options with regard to location, as the infrastructure would need to connect into existing networks. The National Planning Practice Guidance recognises this scenario and states that ‘it will be important to recognise that water and wastewater infrastructure sometimes has locational needs (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered’. Therefore, utility infrastructure is considered to constitute the ‘very special circumstances’ envisaged by paragraph 76 of the National Planning Policy Framework (NPPF). This approach has recently been supported by the Examiner of the Hurstpierpoint and Sayers Common Neighbourhood Plan and page 13 of the guidance on ‘Writing planning policies’ (A guide to writing planning policies which will address the issues that matter to your neighbourhood plan) written by Tony Burton and issued in September 2014.</p> <p>Proposed amendment: To ensure consistency with the NPPF and other government guidance and to facilitate sustainable development, we propose the following amended wording: Proposals that involve the loss of open space, sports and</p>	

				recreational buildings.....This new site must be fully operational prior to any development commencing on the original site. In very special circumstances, development will be allowed, for example, it is essential to meet specific necessary utility infrastructure needs and no alternative feasible site is available.'	This is covered by DP41 of the emerging District Plan
36 Claire Gibbons Southern Water	BN1 9PY		New policy on the provision of infrastructure	<p>We welcome paragraph 7.20, however, we can find no policy provision to support the delivery of new or improved infrastructure. Southern Water is the statutory sewerage undertaker providing wastewater services to Turners Hill. Southern Water has a statutory duty to serve new development, and is committed to ensuring the right wastewater infrastructure in the right place at the right time in collaboration with developers, the Parish Council and the planning authority. The adopted Turners Hill NDP and adopted Mid Sussex Local Plan will inform Southern Water's investment planning. Adoption provides the planning certainty required to support investment proposals to Ofwat, the water industry's economic regulator. Investment proposals are prepared every five years through the price review process. The next price review is this year (2014). Ofwat's price determination will fund the investment programme in the period to 2020. There will be another price review in 2019, covering the investment period 2020 to 2025.</p> <p>Although there are no current plans, over the life of the NDP it maybe that we need to provide new or improved infrastructure. Page 8 of the National Policy on Wastewater states that 'Waste water treatment is essential for public health and a clean environment. Demand for new and improved waste water infrastructure is likely to increase in response to the following main drivers: More stringent statutory requirements to protect the environment and water quality; Population growth and urbanisation; Replacement or improvement of infrastructure; Adoption to climate change. The Government is taking measures to reduce the demand for new waste water infrastructure to complement these approaches and ensure that the natural and man-made systems are able to function effectively together to deliver a wide range</p>	

				<p>of ecosystem services and other benefits to society'. Accordingly, we seek policy provision to support new or improved utility infrastructure. Such policy provision would also be in line with the main intention of the National Planning Policy Framework (NPPF) to achieve sustainable development. For example, one of the core planning principles contained in paragraph 17 of the NPPF is to 'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs'. Also paragraphs 157 and 177 of the NPPF require positive planning for development and infrastructure necessary in an area.</p> <p>Proposed amendment: To ensure consistency with the NPPF and other government guidance and facilitate sustainable development, we propose the following additional policy: New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community, subject to other policies in the development plan</p>	<p>This is covered by DP41 of the emerging District Plan</p>
<p>37 Carmelle Bell for Thames Water</p>				<p>Thames Water are the statutory sewerage undertaker for the north western part of the Mid Sussex District. For the area under consultation, Thames Water provides sewage/wastewater treatment at Crawley Sewage Treatment Works (STW). The sewerage network in the village of Turners Hill is provided by Southern Water, until it reaches Forest Barn Farm, Turners Hill Road RH10 4QH where from this point onwards to Crawley STW the piped network is Thames Waters responsibility. On the information available to date Thames Water do not envisage infrastructure concerns regarding sewage/wastewater treatment capability in relation to the sites in the Neighbourhood Plan. The water supplier for the area under consultation is South East Water. Thames Water recommends that Turners Hill Parish Council to contact Southern Water and South East Water to confirm the capacity in their networks.</p> <p>General Comments on Sewerage/Wastewater Infrastructure: Sewerage/wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside</p>	<p>Already consulted</p>

			<p>development could result in adverse impacts in the form of internal and external sewer flooding, pollution of land and water courses. New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: “Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....”</p> <p>Paragraph 162 of the NPPF relates to infrastructure and states: “Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”</p> <p>The new web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>It is therefore important that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & wastewater/sewerage infrastructure. Where there is a capacity problem and no improvements are programmed, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development. It is therefore important that the</p>	<p>Included in Emerging District Plan</p>
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			<p>Neighbourhood Plan considers the net increase in water and wastewater/sewerage demand to serve proposed developments and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided. Thames Water therefore recommend that developers engage with them at the earliest opportunity to establish the following:</p> <ul style="list-style-type: none"> • The developments demand for water supply and network infrastructure both on and off site and can it be met • The developments demand for sewage/wastewater treatment and network infrastructure both on and off site and can it be met • The surface water drainage requirements and flood risk of the development both on and off site and can it be met <p>To accord with the NPPF and the above, text along the lines of the following should be added to the Neighbourhood Plan: “Water Supply & Sewerage Infrastructure It is essential that developers demonstrate that adequate water supply and sewerage infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development.”</p> <p>As part of their five year business plan Thames Water advise OFWAT on the funding required to accommodate growth at all of their sewage/wastewater [and water] treatment works. As a result Thames Water base their investment programmes on development plan allocations which form the clearest picture of the shape of the community as set out in the NPPF (paragraph 162) and the NPPG. The time to deliver solutions should not be underestimated. For example, local network upgrades take around 18 months and sewage treatment works upgrades can</p>	<p>This is covered by the policies of the Emerging District Plan</p>
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			<p>take 3-5 years. In general terms, Thames Water's preferred approach for growth is for a small number of large clearly defined sites to be delivered rather than a large number of smaller sites as this would simplify the delivery of any necessary sewerage/wastewater infrastructure upgrades. As a general comment, the impact of brownfield sites on the local sewerage treatment works is less than the impact of greenfield sites. This is due to the existence of historical flows from brownfield sites, as opposed to greenfield sites that have not previously been drained. The necessary infrastructure may already be in place for brownfield development. We would therefore generally support the use of brownfield sites before greenfield sites. We also wish to highlight the opportunity to introduce sustainable urban drainage systems into brownfield development to reduce surface water flows into the sewers. It is important to maximise capacity in the sewers for foul sewage thus reducing the risk of sewer flooding. Where development is being proposed within 15 metres of a sewage pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour and / or noise and / or vibration impact assessment is required as part of the promotion of the site and potential planning application submission. Any impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a pumping station. Where development is being proposed within 800 metres of a sewage/wastewater treatment works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.</p>	
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