

## Burgess Hill Town Council

### Submission to Mid-Sussex District Council Plan 2021-2038 Regulation 18 Consultation

Further to Minute 570 of Planning Committee, 28 November 2022, this submission was reviewed and agreed by Members of BHTC Planning Committee: Janice Henwood (Chairman), Matthew Cornish (Vice Chairman), Robert Duggan, with Cllrs Anne Eves and Sylvia Neuman, on 9 December 2022.

1. **DPS2 - Sustainable Design and Construction:** We welcome the adoption of BREEAM HQM standards. However, we are not clear what improvement in carbon emissions over current Building Regulations will be required. What improvement does each required HQM level represent? For example, in **DPH4**, what does '*HQM 4\* with 55 credits for energy*' represent? Is this zero-carbon?
2. **DPS2:** This policy should require that all designs offer options for occupiers, such as:
  - 1) Addition of PV (with prior design optimisation of orientation);
  - 2) Installation of ASHP in place of gas boilers, either at time of first occupation, or later.
3. **DPN1 – Biodiversity, Geodiversity and Nature Recovery:** The Plan policies should recognise the special nature of Worth Forest and protect this area. The two forests of Worth & St Leonard's are twins and should be considered a natural habitat shared between Horsham DC and MSDC. The combined footprint of the twin forests is equal that of Ashdown Forest and constitute the greatest block of ancient woodland in Mid Sussex. Has Worth Forest been measured against the Ratcliffe Criteria (1977)? These criteria measure the biological worth of sites - by examining their Typicality, Fragility, Size, Diversity, Naturalness, Rarity, Ecological coherence, Potential Value, and Recorded History.
4. **DPN2 - Biodiversity Net Gain:** We welcome this policy, and note that it will be subject review throughout the plan period.
5. **DPN2:** This policy should require that integral nesting boxes or bricks for migratory birds (such as swifts), or bats are included in all buildings of at least 5m eaves height.
6. **DPN9 – Pollution:** This policy should create emission-free zones for streets around schools. [For more information see <http://schoolstreets.org.uk>]
7. **DPN9:** This policy does not address emissions from open slurry lagoons, which should be covered to minimise ammonia air pollution and odour. [See Chief Medical Officer's Report 8 December 2022: *...techniques to reduce NH3 emissions include covering slurry stores – in laboratory-scale and on-farm studies using granules and straw as covers, this has been shown to reduce odour emission by about 83–91% and NH3 emission by between 80% and 90%.<sup>20</sup> Detailed guidance on such methods has been provided by the UNECE Air Convention both for NH3 specifically and considering wider interactions in the context of integrated sustainable nitrogen management*]
8. **DTP3 – Rights of Way:** The Burgess Hill to Haywards Heath cycle path is only 'safeguarded' but it must be built before completion of secondary schools in Brookleigh (Northern Arc).

9. **DTP3 – Active Travel:** This policy should anticipate ‘new’ forms of micro-mobility such as e-scooters and e-bikes and plan for them. Provision should be made for cycle-hire hubs in new developments.
10. **DPT3, DPT4 (Parking):** Schemes to encourage employees to use active travel to get to work should be planned for, with clear priorities over the provision of car parking. Where financial incentives are created (for example, workplace parking levies), funds should contribute to bus service and cycling infrastructure.
11. We welcome the plan's adoption of the concept of a 20 minute neighbourhood [Ch3, Page 17]. However, the plan should add detail of a commitment for MSDC to work with WSCC on the improvement of bus services, particularly to connect the Burgess Hill Western Arc **DPSC1** and Sayers Common **DPSC2** sites to railway stations and to provide direct bus connections to Crawley and Brighton.
12. **DPSC1** Western Arc, should include a plan for a bus route connecting the site into Burgess Hill on a more direct route than via the A2300, for example through a bus-gate on Gatehouse Lane. Bus travel is a sustainable mode of transport that supplements cycling and walking particularly during periods of cold or wet weather.
13. **DPH4 – General Development Principles for Housing Allocations:** This policy should require 11 HQM credits as a minimum for Water Efficiency. (HQM ONE offers up to 17 credits, with 3 credits for >50% grey/rain recycling for flushing, and up to 8 where water efficient fittings are installed).
14. We object to **DPH7 (Burgess Hill Station)**, with the building over of **Chanctonbury Allotments**. Please refer to statement from BHTC submitted to our Planning Committee on 28/11/2.