



Representation to the Examination of the Mid Sussex District Plan

2021-2040 - Matter 5 – Spatial Strategy

DMH Stallard LLP on behalf of Haywards Heath Golf Club
Ltd

Land at Haywards Heath Golf Course, Haywards Heath

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1. INTRODUCTION

- 1.1 This representation is submitted on behalf of Haywards Heath Golf Club Ltd (HHGCL) in response to the Matters and Issues (“IDJB-05”) raised in respect of the Mid Sussex District Plan 2021-2040 examination.
- 1.2 HHGCL considers that the District Plan’s approach to the spatial strategy is unsound for the reasons set out below.
- 1.3 HHGCL considers that the District Plan’s housing requirement is not high enough (see our response to Matter 1). Furthermore, the housing supply and identified allocations are insufficient to support the housing requirement (see our Matter 2 response).
- 1.4 This representation responds to the Inspector's Matter 5 questions concerning the spatial strategy in the DP and the effectiveness and soundness of the proposed distribution of new development in meeting social, economic, and environmental objectives.
- 1.5 HHGCL does not object to the allocations made in the Plan. However, whilst HHGCL’s Matter 1 and Matter 2 Statements identify concerns regarding the sufficiency of housing provision and headroom, this Matter 5 Statement also identifies that the spatial strategy is unsound in relation to the lack of allocations in Haywards Heath.
- a) **Whether the plan's apportionment of development to larger and smaller settlements and freestanding allocations, and to different sizes of site, is effective in ensuring delivery and in meeting community needs.**
- 1.6 The Plan’s approach to apportioning development, is supposedly founded upon a coherent spatial strategy comprising four key principles: protection of designated landscapes; making effective use of land; growth at existing sustainable settlements where it continues to be sustainable to do so; and opportunities for extensions to improve the sustainability of existing settlements. We have no objection to that. However, a sustainable site, close

to the British Rail mainline services to London, Gatwick and Brighton (the best rail service in the District) has been inexplicably overlooked.

1.7 Paragraph 11(a) of the NPPF 2023 requires all plans to promote a sustainable pattern of development that seeks to meet the development needs of their area, align growth and infrastructure, and improve the environment. It is also broadly justified under paragraph 35(b) of the NPPF 2023 as an appropriate strategy taking into account the reasonable alternatives, having been informed by the Sustainability Appraisal which considered various spatial options including maintaining the existing spatial strategy, growth to support sustainability of existing smaller settlements, creating a new sustainable settlement, focusing development in the three towns, and prioritising brownfield land.

1.8 However, the Plan is unsound in failing with the stated aim of *'focusing development in the three towns'*.

b) The relationship between the spatial strategy and transport objectives, transport infrastructure and transport constraints.

1.9 HHGCL considers that the spatial strategy fails to properly address transport considerations in accordance with paragraph 108 of the NPPF, which requires transport issues to be considered from the earliest stages of plan-making so that the potential impacts of development on transport networks can be addressed and opportunities to promote walking, cycling and public transport use are identified and pursued.

1.10 The DP embodies the concept of 20-minute neighbourhoods, which the NPPF 2023 encourages through its focus on significant development being located in places which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Policy DPT1: *Placemaking and Connectivity* requires development to create liveable communities which embody 20-minute neighbourhood principles, demonstrate

accordance with the movement hierarchy, and deliver attractive, healthy places with permeable street networks.

- 1.11 Furthermore, the Plan identifies that sustainable expansion of an existing settlement will help provide the critical mass to support viable sustainable travel solutions and improved active travel connectivity for all the community, reducing the need to travel by car and reducing the district's carbon footprint.
- 1.12 The Haywards Heath golf course site comprises circa 37 hectares is located immediately adjacent to Haywards Heath, the most sustainable town in the District, and is within reasonable walking distance of Haywards Heath town centre, main line rail services and local branch lines and its concentration of high street retail outlets and services including two major supermarket chains, and major businesses engaged in commercial, industrial and professional services. The site itself offers overwhelming advantages in comparison with other strategic sites proposed for allocation in the current and Plan.
- 1.13 The District Plan promotes three strategic sites – with only that West of Burgess Hill arguably being considered as an adjunct to a Category 1 settlement, although twice the distance to the railway station. The site at HHGCL is closer to the heart of a Category 1 settlement than any of the three main sites within the draft Plan.
- 1.14 The spatial strategy is to “focus growth to locations that support the sustainability of existing settlements”. This will be best achieved through urban extensions which deliver logistical sustainable growth of existing settlements. The site at Haywards Heath golf Course can fulfil this aim.
- c) Whether the spatial strategy takes an appropriate approach, at the strategic level, towards climate change mitigation, countryside protection, environmental protection, flood risk and heritage.**

- 1.15 HHGCL considers that the spatial strategy takes an appropriate approach to these matters, consistent with the requirements of soundness under paragraph 35 of the NPPF. However, other more sustainable sites such as the HHGCL land would fully comply with this approach, having no over-riding flooding issues, suitable environmental protection, no heritage harm and being very sustainable in locational terms.
- 1.16 The site selection process has directed growth away from protected landscapes towards locations outside the National Landscape and National Park. The HHGCL land falls outside both the High Weald National Landscape and South Downs National Park, making it an appropriate location for strategic growth.
- 1.17 The development of the golf course site can be contained below the Northern Ridge line which means it would be barely visible from the National Landscape/AONB, which in any event is not located immediately adjacent to the proposed site, being located some 200 metres to the North of the site, beyond extensive blocks of woodland. Furthermore, the site is extremely well contained with belts of trees screening longer views of the site. The site is also sufficiently well separated from the Borde Hill registered park and gardens (some 760m distant) and would avoid any adverse impact from Wickham Wood, protecting the Ancient Woodland with appropriate buffers.

2. **CONCLUSION**

- 2.1 HHGCL supports the spatial strategy of the Plan as a sound approach to the distribution of development that accords with the December 2023 NPPF. HHGCL do not object to the allocations proposed but the Haywards Heath golf course site would fully comply with all the aims of the strategy which are to:
- Apportion development between larger and smaller settlements and different sizes of site in an effective manner;
 - Addresses transport objectives through the 20-minute neighbourhood concept and movement hierarchy; and

- Take an appropriate strategic approach towards climate change mitigation, countryside protection, environmental protection, flood risk and heritage.

2.2 As set out in the preceding paragraphs the proposed development at Haywards Heath golf course can provide at least 600 new homes as an expansion of the existing settlement, in the form of a mixture of market and affordable housing in order to meet identified local needs, whilst complying fully with the Plan's spatial strategy.

2.3 Community facilities and a retail element are planned which will be a significant benefit of the development as it will provide a range of services as part of the development, as well as local employment.

2.4 The proposal will provide a high quality, sustainable development, which will set a positive benchmark for the District of Mid Sussex. It accords with the aims and objectives of national, regional and local policy and guidance. The site is a suitable location for housing and is one which should be supported accordingly. The site is free from technical constraints, and it is therefore suitable, appropriate for development and deliverable.