

Mid Sussex District Plan Review Examination

Our ref 65901/04/MS/RN
Date 10 February 2026
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Subject Matter 5: The spatial strategy

1.0 The effectiveness and soundness of the proposed distribution of new development in meeting social, economic and environmental objectives, whether it will achieve more than the sum of its parts and whether it will amount to positive planning.

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

- 1.1 Berkeley Latimer considers the Plan's approach to distributing development across the different locations within the District and across the different size and types of site is one that can be effective in ensuring delivery and meeting community needs. It reflects the approach of the Plan to meet interlinked social, economic and environmental objectives.
- 1.2 The Plan's strategic vision is set out within Chapter 5 and is underpinned by three priority schemes which reflect the three objectives as set out in Para 8 of the 2023 NPPF, i.e. an economic, social and environmental objective in achieving sustainable development. Under these three overarching themes, the plan sets out 15 supporting strategic objectives. Berkeley Latimer supports this strategic vision and considers that through the delivery of 'Land South of Reeds Lane' (DPSC3), the site allocation can help the Council realise this vision and deliver a highly sustainable place to live, work, and visit that is both thriving and attractive.
- 1.3 Chapter 6 of the Plan then sets out how the Council has translated those objectives through the Plan's strategy for the District. Berkeley Latimer considers that, read as a whole, this is a positively prepared, justified, and effective spatial strategy to meet the district's needs, with the Plan and evidence expressing why the Council has arrived at the strategy that it has. In particular, the Council's existing strategy (within the adopted 2018 Plan) has been to focus growth on the three towns in the district: Burgess Hill, East Grinstead, and Haywards Heath and to deliver proportionate growth at other settlements to meet local needs and support local services.¹ Given the extended plan-period, site availability and current housing needs, the Council has sensibly sought to revisit this strategy.

¹ Chapter 6, first two paragraphs, (page 32, DP1)

- 1.4 In revisiting this strategy, the Council highlights that there are environmental and infrastructure constraints.² It has also reviewed potential sites for allocation and identified areas within the district that have – based on interlinked considerations of constraints, site availability, as well as the characteristics of the area and ability to enhance infrastructure to accommodate greater degree of change – higher potential for growth. This includes Sayers Common and Copthorne. In addition, Burgess Hill and other small settlements have the potential for proportionate growth. Ultimately, it is concluded “*necessary to revise the 2018 District Plan strategy insofar as it relates to additional growth beyond that already planned for*”.³
- 1.5 The updated plan strategy is therefore summarised on Page 33 of the Plan with four themes (Chapter 6, DP1):
- 1 protect the High Weald National Landscape; then
 - 2 make effective use of land; then
 - 3 grow existing sustainable settlements (where sustainable to continue doing so and where sites are available); and then finally
 - 4 extend existing settlements where there is the opportunity to improve their sustainability.
- 1.6 This is supported by the wider evidence base including the Sustainability Appraisal (DP7) within which the reasonable alternatives are tested and the site selection documents (SSP1 to SSP5). This process is also summarised in the ‘Housing Need and Requirement’ Topic Paper (H5). The Reg.19 SA (DP7) identifies that five reasonable alternatives for growth were tested against the different objectives and updated throughout the plan making process.⁴ It compares these options against each other before concluding that Option 2 (growth to support sustainability potential of existing smaller settlements) was preferred while also incorporating Option 1 where sites were available (i.e. maintain the existing spatial strategy by growing existing settlements proportionate to their size).⁵ This was noting there is considered insufficient capacity at some settlements to wholly continue that ‘proportionate’ approach noting developments already coming forward.
- 1.7 Next, the Council’s assessment of the ‘potential for growth’ at settlements (as summarised at the table on Page 33 of the plan) is the amalgamation of the Council’s view as to the outcome of its whole site selection process as summarised in document H5 (with further detail in document SSP3 in particular as well as testing different growth options in the SA [DP7]). This process concludes that areas such as Copthorne and Sayers Common have higher potential for growth (i.e. Option 2 growth), while others such as Burgess Hill can continue to support proportionate growth (i.e. Option 1 growth) and others such as East Grinstead cannot.

² Chapter 6, fifth paragraph, (page 32, DP1)

³ Chapter 6, first paragraph (below table) (page 33, DP1)

⁴ Set out within Section 4.2.3 (Page 58 of DP7)

⁵ DP7 – Appendix A

- 1.8 In justifying the scale of growth proposed at some settlements, the Council notes that many villages have seen the closure of public houses and shops. It also observes that people are needing to travel further to services causing traffic issues as places have grown via more piecemeal development.⁶ This has led to a strong reliance on private vehicle use with population increasing without the critical mass to support new facilities and services.⁷ Against this, the Council recognise that growth at scale can deliver infrastructure: built out using 20-minute neighbourhood principles reducing the reliance on private vehicles.
- 1.9 Ultimately, this approach has been translated into the plan through its policies and allocations. For example, large-scale development at Sayers Common is proposed whereby the Council are seeking to allocate sites that will deliver a sufficient critical mass of new infrastructure to make this settlement more sustainable. Sayers Common is a ‘medium village’ (Category 3). It currently only has ‘essential services’ for the needs of its residents: with a pre-school, an independent school, and a small community shop alongside a public house. Sites have been promoted through this plan and the Council has considered them to be suitable for allocation.⁸ The Council has then determined that allocating the sites put forward in combination would be able to deliver a sufficient critical mass to support key education, sustainable transport and community facilities as well as wider infrastructure (such as a wastewater treatment and drainage). This would serve the current and future populations and be secured via planning policies (i.e. DPSC GEN and DPSC3).
- 1.10 Sayers Common is an area outside the High Weald National Landscape and follows other allocations and policies that seek to make the effective use of land (i.e brownfield land) following the preparation of an Urban Capacity Study (H3): for example, policies DPB1 and DPC1. It also follows further allocations that have been made around principal settlements first – including at Burgess Hill (Policy DPSC1) – with the Council then allocating development at Sayers Common. Development at Sayers Common will be implemented in accordance with policies DPSC GEN, DPSC3 to DPSC7, and other development management policies to ensure homes supported by sufficient infrastructure (appropriately phased and funded by proportionate contributions) will come forward to make the settlement sustainable through growth.
- 1.11 The strategy for growth across the district has clearly been heavily influenced by the presence of the High Weald AONB and the South Downs National Park, with the apportionment of development reflecting the areas and settlements within the district where growth can occur whilst protecting those particularly special parts of the district. This is shown in Figure 1 below.

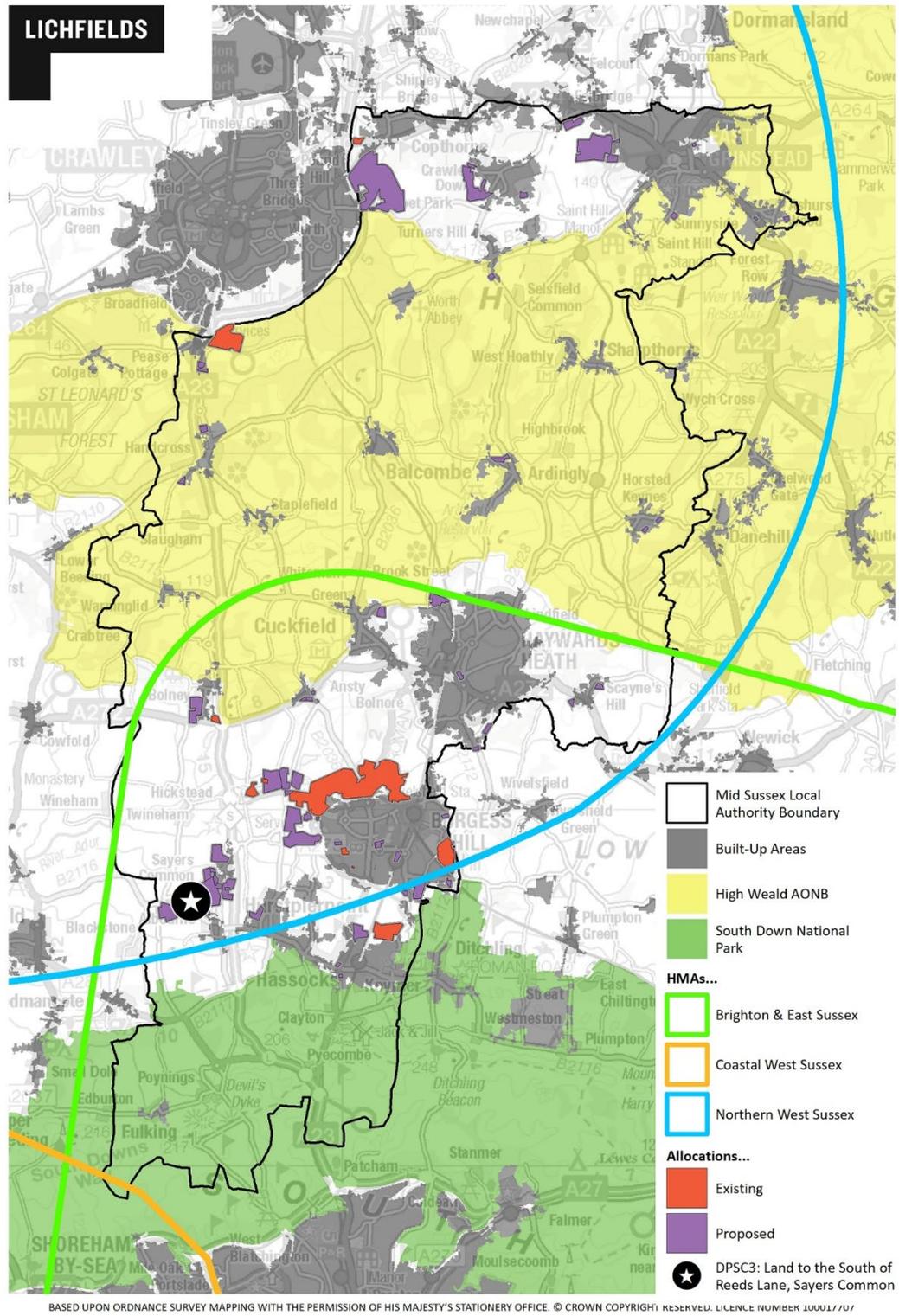
⁶ Third paragraph (page 39, DP1).

⁷ DP1 – Page 39, Para 3

⁸ H4 – Appendix 6

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Figure 1 Adopted and Proposed Allocations in Mid Sussex District (with key constraints)



Source: Lichfields

1.12 In this context, Berkeley Latimer considers that the Council’s rationale in apportioning growth across the District is soundly based, and it is a pattern of development will be effective in delivering upon the objectives of the Local Plan to achieve sustainable development. The strategy apportions development to locations in full consideration of both its existing position in a settlement hierarchy, but also reflecting how places can change to accommodate both housing as well as other community needs. This is fully consistent with NPPF para 74 which sets out how the “*supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities*”; such a direction clearly recognises that apportionment of needs across an existing settlement hierarchy need not be constrained to being ‘in proportion’ to the current size and role of individual settlements. The litmus test is whether any strategy is effective at achieving the objectives of an overarching vision. In the case of Mid Sussex, the mix of small and large sites, across different locations, would achieve key interlinked outcomes of delivering homes, supported by enhanced infrastructure intrinsic to the delivery of those new communities.

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

1.13 The plan submitted for examination sets out that the spatial strategy is to focus growth at locations that support the sustainability of existing settlements.⁹ To achieve this, the plan will

- 1 Expand existing smaller settlements at a scale to provide a new critical mass of people and investment to support infrastructure (e.g. Sayers Common – Policy DPSC3, in accordance with the preferred spatial Option 2 assessed in the Sustainability Appraisal);¹⁰
- 2 To design developments based on a 20-minute neighbourhood concept (where active travel is the natural choice) (through wider policies DPB1 and specifically through site policies such as DPSC GEN and the strategic site allocations); and then
- 3 Implement a ‘demand management’ approach, as part of overall transport monitoring and management processes, to reduce private car use (as per proposed modifications to the plan, see M52, M53 in the DP2 schedule).

1.14 In taking this approach, the plan’s strategy seeks to focus growth on places that can be made sustainable – such as the development allocated at Sayers Common – as well as other allocations in places that are already sustainable such as Burgess Hill. By providing a critical mass of growth in particular locations it can successfully deliver and support key local infrastructure, including ensuring viable bus services. This has clearly been a key consideration in adopting the spatial strategy and setting the site allocations.

⁹ District Plan Reg 19 Page 136

¹⁰ DP7: Sustainability Appraisal: Main Report including Non-Technical summary (Regulation 19)

1.15 Berkeley Latimer therefore considers that the relationships between the spatial strategy accords with the transport objectives of the plan in increasing the opportunities for residents to meet their day-to-day needs through walking and cycling, and/or public transport, improving on the status-quo of the current dominance of car travel within Mid Sussex. This is consistent with NPPF para 105; it actively manages patterns of growth to focus significant development in locations which are or can be made sustainable.

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

1.16 Berkeley Latimer consider that at a strategic level, the spatial strategy does take an appropriate approach. Such factors have informed the approach and the identification of locations within the spatial strategy, with the remaining policies of the plan providing suitable policy safeguards and mitigation required to achieve development at a site-specific level. Each of these factors is reflected in the SA objectives that have informed the chosen spatial strategy.