

## **Mid Sussex District Plan Examination**

### **Hearing Statement – Matter 7: Site Allocations**

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On behalf of B.Yond Homes Ltd (formerly Rydon Homes)

(Response ID: 1189677)

February 2026

## 7. Site Allocations

For each of sites DPSC1, DPSC2, DCSP3, DCSP4, DCSP5, DCSP6, DPSC7, DPA7 and DPA12.

Whether the plan adequately lays the framework for the sustainable development of each site.

### DPSC1: Land to the west of Burgess Hill

1. We do not contest the rationale behind the strategic allocation DPSC1, located adjoining a Tier 1 settlement such as Burgess Hill, particularly so given development allocations already committed to the north of Burgess Hill. However, a detailed delivery trajectory for DPSC1 has only just been provided (it had not been provided at the time of the deadline for our Matters 5 & 6 Hearing Statements) in the DPSC1 Statement of Common Ground (ref: S2) (published in the examination document library on 18<sup>th</sup> February). We would raise the following concerns and inconsistencies:

- The Housing Topic Paper (MS-TP2) indicates that the first housing completions are not anticipated until Year 6 of the Plan, and therefore DPSC1 is not included within the anticipated 5 year housing land supply statement provided. However, this is inconsistent with the SoCG (ref: S2), which implies development before Year 6.
- The housing trajectory provided for DSCP1 does not appear to consider the impact of the anticipated delivery trajectory of the committed development at Burgess Hill (DP9: North and North West Burgess Hill) which DPSC1 would overlap with. It is questioned as to whether there will be an element of saturation in the localised housing market around Burgess Hill, with so much housing anticipated to be delivered in a relatively small area of the district, that delivery rates will actually be lower than those currently anticipated.
- Paragraph 4.11 of the SoCG confirms that “*work on a detailed schedule of infrastructure delivery, including key trigger points, remains ongoing...*” Clearly, therefore, it has not been evidenced as to when the necessary mitigating infrastructure is to be provided.
- Whilst the intent stated within the SoCG is to enter into a Planning Performance Agreement (PPA) with the Council to address the planning permission process, and this should help to speed this process up, notwithstanding that similar PPAs will likely be in place for the other strategic scheme also, it is questioned as to the assumed length of time it will take for the planning application process to be completed in order development to commence on site, leading to housing completions is realistic.

The SoCG, at paragraph 4.11 and 4.12 states that firstly, planning permission is anticipated for summer 2027, with first completions in year 2 after planning permission is granted. This is considered particularly ambitious given that data provided within the Lichfields: Start to Finish

Report<sup>1</sup> shows that the average (mean) timeframes from validation of the first planning application to completion of the first dwelling for schemes providing 1,000 to 1,499 dwellings is 6.2 years. Approximately 3 years is stated for DPSC1.

2. As such, it is unclear as to whether the delivery assumptions (point j) of Matter 7) are realistic.

#### DPSC2: Crabbet Park

3. Similar to DPSC1, the delivery trajectory now provided in the Statement of Common Ground (ref: S4), which also post-dates the deadline for our Hearing Statements submitted in regard to Matters 5 & 6, is inconsistent with the detail provided in the Council's Housing Topic Paper. The Topic Paper again states that housing completions are not anticipated until Year 6 and DPSC2 is not listed in the 5 year housing land position statement provided. However, Table 1 of S4 indicates that some 90 dwellings are anticipated in that 5 year period. Clarification should therefore be sought as to the delivery assumptions for DPSC2.
4. Again, a PPA is anticipated for the planning delivery of DPSC2, but the delivery assumptions for first completions are also considered ambitious; paragraph 6.9 of the SoCG confirms the intent for submission of a planning application after the adoption of the Plan, which is assumed to be late 2026. This results in only a 3 year timeframe for first completions on site, in comparison to the average 6.6 years for schemes of 1,500-1,999 dwellings stated in the Lichfields Start to Finish Report.
5. In addition, paragraph 6.11 of S4 also states that *"...work on a detailed schedule of infrastructure delivery, including key trigger points, remains ongoing..."* Clearly, therefore, it has not been evidenced as to when the necessary mitigating infrastructure is to be provided (points c) and h) of Matter 7). As we outline below, Crabbet Park is likely to produce an isolated community which will be reliant on the services and facilities being provided within the strategic allocation; delivery of which will be critical to its sustainability.
6. Our previous Regulation 19 representations set out our concerns as to its locational rationale – the site is stated as being an urban extension located at Copthorne, a lower order centre in the settlement hierarchy stated in the Plan. However, the site does not actually adjoin the settlement and is instead separated by woodland. It is therefore questioned as to how well the proposed community will be visually and physically linked to Copthorne. Instead, the community is likely to be isolated.
7. Equally, with regard to Crawley, the site of DPSC2 is similarly visually and physically separate. The M23 demarcates the eastern boundary of Crawley, and this is further enhanced by a significant buffer of existing ancient woodland, parkland and water features. It is accepted that some areas proposed for residential development would be located, 'as the crow flies' only a short distance from the existing built-up edge of Crawley and would surround the existing Crabbet Park House complex and Holiday Inn hotel, but visually and

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<sup>1</sup> Lichfield – Start to Finish: How quickly do large-scale housing sites deliver? (Third edition – post 2024 election and NPPF Consultation 2024) – September 2024

physically it would be distinctly separate. It cannot therefore be considered to be a sustainable development in relation to Points a) and e) of Matter 7.

### Sayers Common – DPSC3 to DPSC7

8. The proposed urban extension to Sayers Common comprises one strategic land allocation, DPSC3. However, on the basis that the scale of the wider development proposed by allocations DPSC4 to DPSC7 would not be sustainable in the absence of this strategic allocation, it is necessary to consider development at Sayers Common as a whole, providing for a total of just over 2,500 dwellings with associated community services and facilities, and infrastructure.
9. Comparable to both DPSC1 and DPSC2, the updated delivery trajectory that has now been provided in the Statement of Common Ground Update (ref: S2), which also post-dates the deadline for our Hearing Statements submitted in regard to Matters 5 & 6, is inconsistent with the detail provided in the Council's Housing Topic Paper. The Topic Paper again states that housing completions are not anticipated until Year 6 for DPSC3 (completions are anticipated for the smaller allocations (DPSC4 to DPSC7)) and is not listed in the 5 year housing land position statement provided. However, Appendix 1 of S2 indicates that some 60 dwellings are anticipated in that 5 year period from DPSC3, and differing delivery rates for the smaller allocations are stated also. There is a difference of 50 dwellings between the Topic Paper and S2, with them anticipating 357 dwellings and 407 dwellings respectively up to 2029/30. Clarification should therefore be sought as to the delivery assumptions for Sayers Common.
10. Again, like DPSC1 and DPSC2, a PPA is anticipated for the planning delivery of DPSC3, but the delivery assumptions for first completions are also considered ambitious. Based on the trajectory in S2, there would only be a 3 year timeframe for first completions on site, or 4 years in reference to the Topic Paper, in comparison to the average 6.6 years for schemes of 1,500+ dwellings stated in the Lichfields Start to Finish Report. On this basis, concerns are raised as to how realistic the trajectory assumptions are for development at Sayers Common as a whole, but specifically DPSC3 (point j) of Matter7).
11. Furthermore, with regard to the provision of necessary social, community and service infrastructure, all of which is crucial to the delivery of the envisaged growth at Sayers Common, the housing delivery trajectory in S2 shows that some 400 dwellings are anticipated to be provided in advance of the delivery of much of the community infrastructure facilities proposed, including schools, all of which are in DPSC3. This is notwithstanding the fact that paragraph 5.17 of the original Statement of Common Ground (ref: S1) states that *"...the timing and co-ordination of infrastructure delivery will be the subject of further joint working between the parties"* meaning that infrastructure delivery and the timing for it is less than certain.
12. This raises significant concerns as to the level of development which would be provided in advance of necessary infrastructure at what is a Tier 3 settlement. At 400 dwellings, this is far in excess of that allocated

to other Tier 3 settlements and indeed, Tier 2 settlements such as Hurstpierpoint, and therefore clearly conflicts with the ability to deliver sustainable development and the Plan in that regard.

13. As we have set out in our representations at both Regulation 18 and Regulation 19 stages and in our Hearing Statements to Matter 5 & 6, the smaller allocations (DPSC4 to DPSC7) all score negatively in terms of access to community facilities; only DPSC5 scored neutrally against access to education as the primary school in Albourne is within the 20 minutes walking distance. The physical distance is not disputed, but the route that small children would have to take is along the side of a road with a 60 mph speed limit, is likely to discourage walking. As individual sites, they cannot be considered as sustainable developments.
14. If, therefore, the sustainability of the small allocations is tied to the delivery of the social and community infrastructure of DPSC3, their timing for delivery should be intrinsically linked to the provision of the necessary infrastructure. This does not appear to be the case and, in regard to Points c) and j) of Matter 7, consideration of the quantum of development which is appropriate and sustainable for Sayers Common in the absence of the infrastructure to be delivered by DPSC3, has not been demonstrated.

#### Point a) – Urban Design

15. Notwithstanding the concerns raised in our Representations at both the Regulation 18 and Regulation 19 stages, together with Hearing Statements for Matters 5 & 6, with regard to the overarching sustainability of the Sayers Common location for strategic scale growth, we have concerns as to the form of development proposed. The Illustrative Masterplan Framework document (ref: DPSC3-6), which was only added to the Examination Library on 16<sup>th</sup> February, shows that whilst individual character areas could be well designed and provide for a legible layout, the settlement extension as a whole is not well designed and does not provide for a legible layout, either around the existing Sayers Common village or a singular proposed new core. Instead, its layout is a product of a series of individual land parcels which have been arbitrarily amalgamated. The result is a fairly linear format, with Reeds Lane being the spine; it does not read as a comprehensively considered ‘settlement extension’.
16. The largest allocation (DPSC3) is, itself, made up of two land parcels and the smaller of the two appears somewhat remote from the remainder of the proposed allocation and the existing village itself. Equally, the smaller site allocations (DPSC5 to DPSC7) appear as ‘add-ons’ rather than part of an holistically planned development.
17. As such the Sayers Common extension cannot be considered as a sustainable development in regard to layout and design.

#### Point e) – Effect on appearance of the area and Landscape Character

18. In addition, what fails to be recognised in proposing a sustainable community at Sayers Common is that it is not simply an extension of Sayers Common, but a merging of Sayers Common with High Cross and Albourne,

to the detriment of the character and appearance of these settlements (point e) of Matter 7). A narrow green buffer is shown on the Illustrative Masterplan in the Sayers Common Statement of Common Ground – ref: S1), however, this would do little to visually and physically prevent the coalescence to Albourne. This would be in direct conflict with Policy DPC2: Preventing Coalescence and Strategic Objective 2 in the Consultation Plan which seek to protect the separate identities of the towns and villages in the district and prevent coalescence. The proposed allocation cannot therefore be considered to be sustainable with regard to point e) of Matter 7.

#### DPA12: Land west of Kemps, Hurstpierpoint

19. Given the that the Site is no longer represented by a site promoter, the Council's stance in not considering that it is deliverable in the first five years is supported. In the January 2026 Housing Topic Paper (ref: MS-TP2) the Council has indicated that it is minded to remove the site from its anticipated supply in the Plan and for the purposes of the topic paper, they have done so. We consider that the removal of the Site from the Plan would be appropriate. The development potential of the site in the future, should an alternative promoter come forward, would be considered at that time. However, at this current time, the proposed allocation is not deliverable or developable, and should be excluded from the Plan, accordingly.
20. However, for reasons set out in our Hearing Statements to Matters 1, 2, 5 and 6, the Council should not be reducing (whether by choice or as a result of matters beyond their control) the supply of housing from non-strategic, smaller sites, particularly from the higher order settlements in the district which would otherwise not be allocated any growth.
21. In order to reduce what is an overreliance on strategic scale growth to meet housing needs, and in line with the settlement hierarchy in the Plan, the Council should maintain its position of Hurstpierpoint being a sustainable location for growth by allocating an alternative site for development; Land at Little Park Farm, Hurstpierpoint (Site ref: 575).
22. As set out in our representations at both the Regulation 18 and Regulation 19 stages set out how Land at Little Park Farm would provide a sustainable development at Hurstpierpoint, directly addressing the issues raised in the Site Selection process. Our representations confirmed (and it remains the case) that Little Park Farm is a deliverable site in the short term that can make a meaningful contribution to the required housing in the district, as well as delivering community benefits through an extension to Hurst Meadows and improvements to biodiversity, and an area for a potential community use such as a pump track/ allotments /destination natural play area.

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