

Representations to Examination Hearing of Draft Mid Sussex District Plan 2021-2039

Matter 5 - Spatial Strategy

Prepared by dowsettmayhew Planning Partnership Ltd as Instructed by

Hurstpierpoint & Sayers Common Parish Council

February 2026

Document Reference: 167-07-72 Version - 2.0

1. INTRODUCTION

- 1.1. This document comprises Representations for, and on behalf of, Hurstpierpoint and Sayers Common Parish Council (the 'Parish Council'), to the Examination Hearing of the draft Mid Sussex District Plan 2021-2039.
- 1.2. These Representations have been prepared following the submission of Representations by the Parish Council in response to the statutory consultation on (i) the Consultation Draft (Regulation 18) Mid Sussex District Plan 2021 - 2039 (December 2022); the (ii) the Submission Draft (Regulation 19) Mid Sussex District Plan 2021 - 2039 (February 2024) (the 'Draft Plan'); and (iii) representations in response to, and attendance at, the Stage 1 Examination Hearings in October 2024.
- 1.3. These Representations relate to the 'Matters and Issues' (MI) outlined by the Inspector, and in particular MI5: the Spatial Strategy.
- 1.4. The Parish Council seek to supplement these Written Representations by attending and participating in the Hearings in relation to this Issue and Matter.

2. ISSUE AND MATTER 5: THE SPATIAL STRATEGY

- 2.1. The Inspector has identified that the key issue in respect of MI5 is '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'.
- 2.2. Chapter 6 of the Draft Plan sets out that the 2018 District Plan Spatial Strategy focussed development towards the three main towns of the district (Burgess Hill, East Grinstead and Haywards Heath) and encouraged proportionate growth at other settlements to meet local needs and support the provision of local services. It noted this Spatial Strategy informed the location of allocations within the 2018 District Plan and subsequent Site Allocations DPD.
- 2.3. It sets out that the District Plan Review process has sought to determine whether the existing strategy is still relevant given any changes to evidence or local circumstance, and whether the strategy can be maintained given the extended Plan period, future predicted needs, and availability of sites. It states that the findings of the Evidence Base have indicated that beyond existing commitments, there is limited growth potential at East Grinstead, Haywards Heath and settlement located within the High Weald National Landscape.
- 2.4. In light of this, it states that further growth identified within the Submission Draft Plan is in accordance with a revised District Plan Spatial Strategy based on four key principles.
- 2.5. The Parish Council consider that these do not constitute a Spatial Strategy, but rather a cascade approach that has been used to assess candidate development sites for allocation in the Draft Plan.
- 2.6. The Parish Council consider that there is an absence of an overall Spatial Strategy that has been used to guide and determine the pattern, scale, and design quality of development within the Draft Plan.
- 2.7. Whilst the Draft Plan contains a Settlement Hierarchy, comprising five categories of settlements within the district, this does not appear to have guided the overall distribution of development or

informed a Spatial Strategy; reflected in the comparatively modest growth envisaged in 2 of the 3 main settlements in the district.

- 2.8. In the absence of an overarching strategy, it is considered that the Draft Plan fails to comply with the requirements for strategic policies that are set out in paragraph 20, and the tests of soundness set out in paragraph 35 of the NPPF (December 2023).
- 2.9. The first key principle of the Updated District Plan Spatial Strategy is to protect designated landscapes, i.e. the High Weald National Landscape.
- 2.10. The Draft Plan sets out that the High Weald National Landscape, designated as an Area of Outstanding Natural Beauty in 1983, covers nearly 50% of the land area of Mid Sussex district (approximately 11% of the overall High Weald National Landscape area). It covers the upper central swathe of the district, south of East Grinstead and Turners Hill, and north of Bolney, Ansty, Cuckfield and Haywards Heath.
- 2.11. The Draft Plan notes that the NPPF makes clear that the scale and extent of development in protected landscapes should be limited. It notes that this does not preclude growth of settlements within the National Landscape, but these should be smaller in scale and only where any impacts on the National Landscape have been minimised.
- 2.12. The application of the first key principle, to protect the High Weald National Landscape, has resulted in very little new housing being allocated within areas of the district that are the subject of this landscape designation¹.
- 2.13. It is noted that the Inspector undertaking the Examination of the Mid Sussex Site Allocations Development Plan, considered that, *"it is clearly important to enable the organic growth of settlements within the AONB wherever this is sustainable"*².
- 2.14. It is considered that the Spatial Strategy for the Draft Plan should identify the importance of facilitating the organic growth of settlements within the High Weald National Landscape, where appropriate, and to provide direction on how this would be applied to the differing scale of settlements throughout the district.
- 2.15. The second key principle of the Updated District Plan Spatial Strategy is to seek to make effective use of land. This is noted as meaning maximising opportunities for reusing brownfield sites. It also notes that this means where greenfield sites are required, development is planned at an appropriate density to make efficient and effective use of them.
- 2.16. The Draft Plan, however, makes little provision for development within existing defined urban areas³.
- 2.17. The Parish Council consider that there are areas within the district, in particular the 3 main towns, which are presently underutilised, such as surface level car parking.

¹ Two housing allocations comprising DPA4 and DPA13

² Paragraph 195 of the Inspectors report

³ The two significant allocations comprise DPA3 (330 dwellings at Burgess Hill Station) and DPA8 (100 dwellings at The Orchards Shopping Centre)

- 2.18. It is considered that the Spatial Strategy should emphasise the importance of maximising the potential of previously developed land within urban areas in order to minimise the need to release greenfield sites.
- 2.19. This should be aligned to proactive measures undertaken by the District Council to facilitate the identification and allocation of such areas to help bring these forward. This would reflect the recommendation in the LPA's own Urban Capacity Study⁴.
- 2.20. The Parish Council consider that the Draft Plan fails to provide a Spatial Strategy that would ensure development is maximised in settlements that are most suitable and capable of facilitating growth in the district.
- 2.21. The third key principle of the Updated District Plan Spatial Strategy is to direct growth to existing sustainable settlements, where it continues to be sustainable to do so. It notes that this meets the objectives of ensuring development is directed away from protected landscapes towards locations which benefit from existing infrastructure and services. It notes the sustainable expansion of an existing settlement helps to provide the critical mass to support viable sustainable travel solutions and improve active travel connectivity, reducing the need to travel by car and reducing the district's carbon footprint.
- 2.22. The Submission Draft Plan sets out proposals for the growth of the district's main towns and villages. It allocates a site for 45 dwellings on land on the edge of East Grinstead for the period 2021 - 2039 (Policy DPA4), and allocates land in and around Haywards Heath for 226 dwellings over the same period. In comparison to this, it allocates land in and around Burgess Hill for 1,708 dwellings over the Plan period.
- 2.23. Having regard to this and existing commitments, the total supply over the Plan period 2021 - 2039 for the three main settlements of the district would be:
- East Grinstead - 1,453;
 - Haywards Heath - 1,230; and
 - Burgess Hill - 6,877.
- 2.24. The Submission Draft Plan states that this imbalance in growth is due to more limited opportunities in and around East Grinstead and Haywards Heath. However, the Evidence Base reveals that numerous sites have been promoted for housing development in and around these towns, but were discounted through the LPA's Site Assessment process.
- 2.25. The District Plan Review: Site Selection Methodology (October 2023) details a three stage assessment process following the identification of candidate sites. The majority of sites in and around East Grinstead and Haywards Heath were rejected for allocation by the LPA through this assessment process, including at the final overall assessment stage (Stage 2c).
- 2.26. This indicates that there are sites within and around these two towns which could be allocated to provide a more balanced housing distribution across the district.

⁴ Paragraphs 6.20 and 6.21 of the Mid Sussex District Urban Capacity Study - September 2022

- 2.27. A more balanced growth strategy, with development more evenly distributed across the district's 3 main towns, would place less concentrated pressure on existing infrastructure within the district. The current strategy places disproportionate impacts on Burgess Hill.
- 2.28. The fourth key principle of the Updated District Plan Spatial Strategy is opportunities for extensions to improve the sustainability of existing settlements that are currently less sustainable. It notes that the strategy is to allocate such communities with development of a scale which can provide the infrastructure and services which not only meet the needs of the new community, but the existing community as well.
- 2.29. The Draft Plan states that based around the 20-minute neighbourhood principles, the Strategy 'seeks to deliver complete, compact and well-connected communities which provide the facilities and services to support the majority of the day to day needs of the community as a whole, accessed by a safe, accessible and well-connected movement network for walking, wheeling and cycling'.
- 2.30. It states that the 2018 District Plan Strategy sought to resist all but small-scale growth at smaller rural settlements on the basis that they are unsustainable. It considers that this approach was flawed on the basis that it did not enable the population size to reach a critical mass to support new facilities, and reinforced a strong reliance on the private car to access neighbouring larger settlements.
- 2.31. The Draft Plan considers that the fourth key principle of the Updated District Plan Spatial Strategy will help to reduce the 'tidal flow of people out of the settlement each day' by providing new neighbourhood centres with potential for appropriate scale commercial development; new schools; affordable and extra specialist care housing; advanced digital infrastructure; improved bus services; and active travel links to nearby settlements to access train services, facilities and goods in the district's main towns.
- 2.32. The Draft Plan allocations for development under this limb of the Strategy, is therefore based on the principle, that the development is being directed to a location that, at present, is inherently unsustainable, and thus in conflict with the underlying purpose of the planning system, as expressed in the NPPF.
- 2.33. The justification for the strategy, and its asserted compliance with the aim of sustainable development, is thus reliant on securing the delivery of, and/ or improvement to, a range of services, facilities, infrastructure and non-car modes of transport links as an intrinsic part of housing development.
- 2.34. In the absence of such aligned provision, new housing development in such locations would be inherently unsound.
- 2.35. The Parish Council consider that there is an absence of a coherent analysis of the level of growth that is required to achieve these 20-minute neighbourhood principles. There is no spatial strategy concept that details the level of growth and service and infrastructure provision that is required to successfully achieve the aspired 20-minute neighbourhoods, nor how these should be planned in relation to existing communities, to ensure the delivery of coherent extensions to existing settlements.

- 2.36. Furthermore, the Parish Council consider that the delivery of the requisite associated facilities and infrastructure must be embedded into the Draft Plans spatial strategy and housing allocations. This must be explicit in both the facilities and infrastructure that must be delivered, their location and relationship to existing settlements, and their timing and delivery obligations. These are all fundamental components to ensure the successful delivery of development that is allocated under the fourth key principle.
- 2.37. On this basis, the Parish Council consider that such allocations should be accompanied by an associated Masterplan, prepared as an integral part of informing the quantum of development and the spatial distribution that is contained within the Draft Plan.
- 2.38. This Masterplan should include proposals that not only include allocation of land for development, but also detail how the settlement will be completed and set within an appropriately landscaped context, that, for example, maintains the clear separation of existing communities from one another.
- 2.39. The allocation should also be accompanied by an Infrastructure Delivery Strategy that evidences the appropriate and effective delivery of associated requisite infrastructure, as part of new development, including but not limited to improvements in non car modes of transport. This should not be limited to a set of aspirations, but should comprise specific transport improvements, that are evidentially achievable and deliverable in accordance with a clear timeline.
- 2.40. The Parish Council note that the Draft Plan has been modified from the Regulations 18 Draft, by the inclusion of a policy requirement that sites over a 1000 dwellings are to be brought forward in accordance with a list of criteria (Policy DPSC GEN). These, amongst other things, require an allocation wide Masterplan, and Infrastructure Delivery Strategy and Phasing Plan.
- 2.41. The Parish Council consider that these requirements should not be deferred, post allocation of land within the Plan. They should be integral to the land allocation policies, to ensure development is evidentially capable of being delivered in accordance with a coherent Spatial Strategy.
- 2.42. The Parish Council consider that the quantum of development envisaged for Sayers Common is at such a scale, relative to the existing community, that the Spatial Strategy for this area in the Draft Plan should look ahead beyond the 15-year plan period, at least 30 years, in accordance with the terms of Paragraph 22 of the NPPF (December 2023).
- 2.43. It is considered that this time scale is required to ensure development is appropriately planned and phased and integrated with existing built form, and delivered in accordance with requisite infrastructure; noting the underlying purpose of the allocations is putatively to improve the sustainability of the settlement.
- 2.44. In the absence of the above, it is considered that the Draft Plan would not be based on an effective Spatial Strategy that satisfies the tests of soundness set out in paragraph 35 and the requirements of paragraph 20 of the NPPF (December 2023).