



Hearing Statement – Matter 5: The Spatial Strategy

Mid Sussex District Council – Examination in Public

Prepared on behalf of Miller Homes Ltd

Prepared by:

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1.0 Introduction

- 1.1 This statement has been prepared by SLR Consulting Ltd on behalf of Miller Homes Ltd in respect of the Mid Sussex District Plan (2021 – 2039) Examination in Public. The Statement focuses on questions raised by the Inspector in their MIQs in relation to Matter 5: The Spatial strategy.
- 1.2 By way of background, Miller Homes has an interest in land at Colwell Farm ('the site'), which is located on the eastern edge of Haywards Heath and has capacity to deliver up to 80 new homes on the edge of one of the district's most sustainable settlements. The location of the site is shown in Appendix 1.



2.0 Spatial Strategy

- 2.1. Matter 5 of the Inspector’s MIQs seeks to establish whether 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. Specifically, the Inspector sets out several sub-topics:
 - 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
 - b) The relationship between the spatial strategy and transport objectives, transport infrastructure and transport constraints
 - 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
- 2.3. This statement addresses matters relevant to all three topic areas:

Topic 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

- 2.4. The proposed District Plan sets out that the “spatial strategy is to focus housing growth at locations that support the sustainability of existing settlements” and that this “will be achieved through sustainable growth at existing settlements and for urban extensions that improve sustainability of existing settlements”.
- 2.5. Miller Homes does not believe that the proposed plan, as currently drafted, adheres to the approach set out in the NPPF i.e. focussing homes in the most sustainable locations. Whilst some settlements can be ‘made’ more sustainable, this is not making best use of existing resources.
- 2.6. The Category 1 settlements are Burgess Hill, East Grinstead and Haywards Heath. Only one of those three Category 1 settlements is being proposed to accommodate a new Sustainable Community (Burgess Hill – West of Burgess Hill for 1,350 homes).
- 2.7. The three Category 1 settlements all have railway stations and, other than Balcombe (a Category 3 settlement located in the National Landscape), are the only railway stations in Mid Sussex. This is important because the NPPF directs housing to be located within a reasonable walking distance of railway stations. This is given yet more weight in the published draft NPPF, with Haywards Heath train station meeting the footnote 26



definition of a ‘well connected’ station. Therefore, as can be seen from the analysis below, 70% of the housing allocations do not have direct and easy access to a railway station.

- 2.8. We have undertaken analysis of the distribution of homes and only 30%¹ of new homes are being allocated to the three Category 1 Settlements. The remaining 70%¹ is being delivered in Category 2 settlements (or lower category settlements). These are all much less sustainable settlements, with many needing much improved facilities and transport connections i.e. new or improved bus routes, which are not guaranteed to be successful.
- 2.9. It is therefore clear that three main settlements, which are also the most sustainable in respect to sustainable travel and community facilities (see more in at Topic b section below), are not being utilised to their best ability.
- 2.10. Alarming, East Grinstead only has one allocation for 45 homes, and Haywards Heath three small allocations totalling 226 homes.
- 2.11. We are aware that the council will say that some of the Category 1 settlements already have had growth from the previous plan. Miller Homes does not accept this argument. These are large towns and more than capable of accommodating and assimilating several large housing allocations at a time.
- 2.12. The plan cannot therefore be said to be apportioning the housing distribution to the most sustainable settlements and therefore the strategy needs to be reconsidered.

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

- 2.13. Whilst settlements can be, and are, made more sustainable by the addition of new homes with new associated facilities, this should not ignore those settlements that are already sustainable and have good and excellent transport links. It is often more efficient and effective to deliver homes where facilities already exist rather than rely on new build facilities, the delivery of which can be delayed or prove unfeasible.
- 2.14. As set out in our response to Topic a), the three Category 1 settlements all have a railway station with excellent direct links to Brighton and the wider south coast and Crawley/Gatwick and London to the north, which are all key employment centres. As such, these three settlements should be the focus for housing delivery, with the other settlement categories playing a supporting role.

¹ The 30% and 70% is calculated using the total number of homes allocated to the three Category 1 settlements (1,979 homes) and the remaining total allocations to Category 2 and lower settlements (4,708 homes).



- 2.15. As well as railway stations, all three Category 1 settlements also have good bus services and community facilities including secondary school, primary schools, libraries etc which are capable of being accessed on foot or bicycle. Sayers Common, for example has no supermarket either existing or proposed and so will mean accessing by car.
- 2.16. The emerging NPPF, whilst not policy at this time, clearly sets out the government’s thinking and approach to railway stations in particular. The emerging NPPF seeks to focus new development within a walking distance of “well-connected railway stations”. One station that falls within the criteria is Haywards Heath. Haywards Heath is therefore considered one of the top 60 settlements with a well-connected railway station in respect to sustainable connectivity in the country. Whilst this is a new and emerging test, the sustainability/accessibility of the three Category 1 settlements is not new information and should therefore already be informing and directing the location of new development in Mid Sussex.

Topic 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

- 2.17. Following on from our comments and conclusion in respect to topics a) and b) above, it is clear that the spatial strategy is flawed.
- 2.18. By locating 70% of new homes in lower tier settlements, this results in development taking place in less sustainable locations at the expense of land around the Tier 1 settlements, where the land is less visually valuable. In addition, the lower tier settlements all require additional infrastructure, all impacting on the use of resources and therefore being more unsustainable location for new homes.
- 2.19. Each site/location will have its own heritage, flood risk and environmental protections, but generally the lower tier settlements will be more sensitive to change and less able to imbed mitigation.



3.0 Conclusion

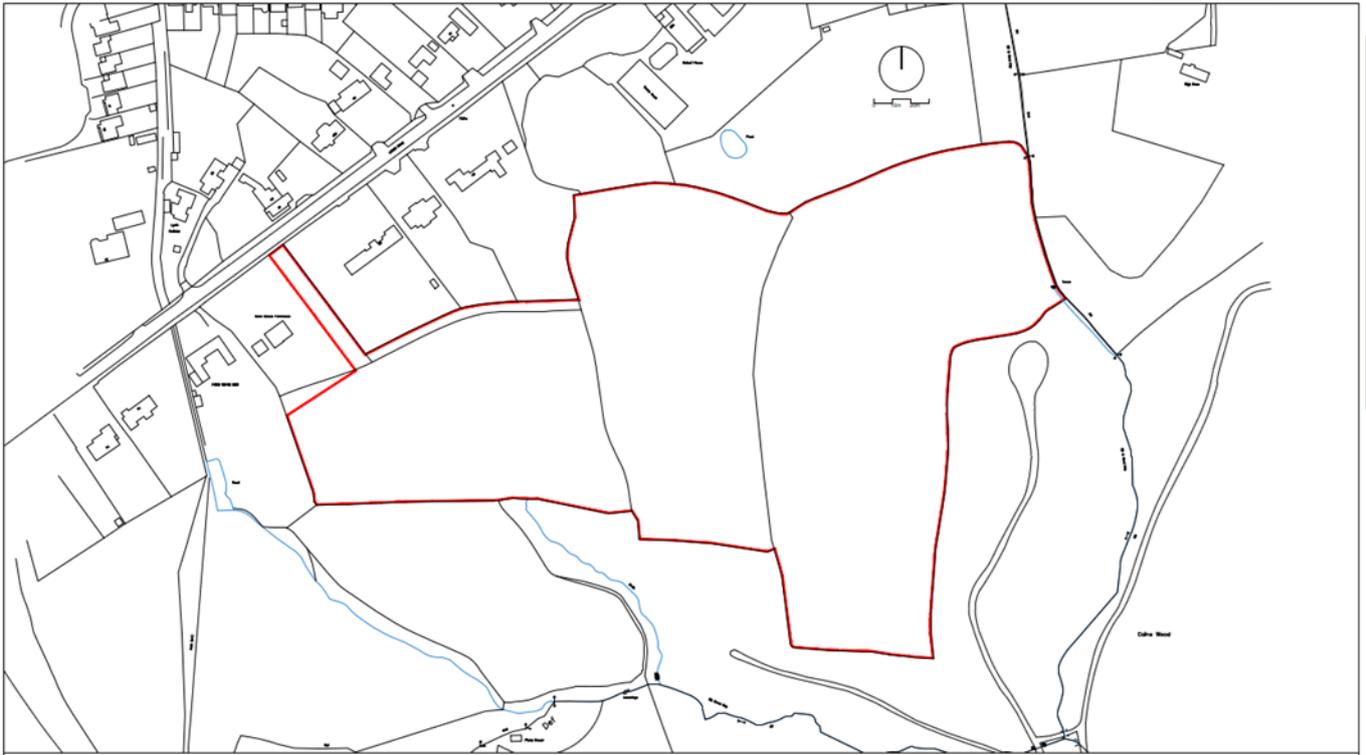
- 3.1. We recommend the following modifications in order for the Plan to meet NPPF soundness tests:
- 3.2. **MM1** – Additional homes need to be allocated to the three Category 1 settlements in order to meet the higher housing need and to ensure the most sustainable settlements, such as Haywards Heath, are the focus for sustainable development.





Appendix A Colwell Farm, Haywards Heath: Site Location Plan

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	CLIENT:	MILLER HOMES
	PROJECT TITLE:	LAND AT NORTH COLWELL FARM, HAYWARDS HEATH
	PROJECT NO.:	02.38
	DRAWING TITLE:	LOCATION PLAN
	DRAWING NO.:	01/00
	SCALE:	1:1250 @ A2
		

