

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

## **Matter 7: Site Allocations - Land West of Burgess Hill/ North of Hurstpierpoint**

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## **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 MI7: Site Allocations - insofar as this relates to land west of Burgess Hill/ north of Hurstpierpoint allocated under Policy DPSC1.
- 1.4. The Parish Council seek to supplement these Written Representations by attending and participating in the Hearings in relation to this Matter and Issue.

## **2. MATTER AND ISSUE 7: SITE ALLOCATIONS**

- 2.1. The Inspector has advised that this matter and issue relates to, amongst others, Site DPSC1 (Land west of Burgess Hill/ north of Hurstpierpoint).
- 2.2. The Inspector has identified that the key issue in respect of MI7 is 'whether the plan adequately lays the framework for the sustainable development of each site'. This comprises a number of matters including the quality of the urban design that would be created; implications for the wider transport network and how necessary mitigation measures would be delivered; impact on, and provision of, social and community facilities and how these would be funded and provided; effect on the appearance of the area, including the character of the countryside, taking account of mitigation measures; and the funding and delivery of necessary infrastructure and other necessary mitigation measures.
- 2.3. The site allocation under Policy DPSC1 seeks to conform to the third key principle of the draft plan Spatial Strategy, relating to growth at existing sustainable settlements where it continues to be sustainable to do so.
- 2.4. It notes that this can ensure development is directed to locations which benefit from existing infrastructure and services, and can help provide the critical mass to support viable sustainable travel solutions and improved active travel connectivity. It notes that such expansion helps to support the delivery of 20-minute neighbourhood principles by creating compact and well-connected places.
- 2.5. The Draft Plan allocates three 'Significant Sites'. These are identified as Policy DPSC1, DPSC2, and DPSC3.
- 2.6. These allocations are subject to the obligation to adhere to the requirements of Policy DPSC GEN. This notes that the Significant Sites must be progressed in accordance with an allocation wide Masterplan, Design Code, Infrastructure Delivery Strategy, and Phasing Plan which will need to be submitted to and approved by the LPA. It notes the Masterplan must be informed by community

engagement and must consider relationships with existing settlements and other site allocations in order to ensure future development is integrated with the existing community. It notes that the Infrastructure Delivery Strategy must demonstrate how the infrastructure will be delivered in a timely manner and meet the needs of the community and mitigate impacts of the development on the existing community.

- 2.7. The supporting text to the policy acknowledges that Burgess Hill is already identified for significant growth, with 3,500 homes consented as part of the Brookleigh development, along with associated infrastructure. The Plan considers that land at DPSC1 is suitable for sustainable growth on the basis that it is *“well connected to existing and planned sustainable transport networks.”*
- 2.8. The annotated plan that accompanies the policy, sets out that the allocation comprises part of a larger area of land that currently falls outside of the settlement boundary of Burgess Hill. It indicates not all of the land within the area is allocated, with the ‘site outline’ comprising four non-contiguous blocks. The largest, an L-shaped block, runs along the western and southern edge of the site allocation. The allocation does not include the central and eastern areas, which are closer to/ contiguous with the existing built-up edge.
- 2.9. The Evidence Base that supported the Submission Draft Plan included a ‘Vision Document’ prepared by the scheme promoter<sup>1</sup>. This contained little detail on the prospective spatial approach and layout of the allocation.
- 2.10. The LPA state that the Plan included within the Draft Plan is *“an indicative plan showing the approximate location of uses and mitigation ... [and] is for illustrative purposes only and subject to detailed masterplanning by the promoter at the planning application stage.”*
- 2.11. As part of updating the evidence base, the LPA have signed a Statement of Common Ground (SoCG) with the scheme promoter in February 2026<sup>2</sup>. Appendix 1 of the document comprises an ‘Illustrative Masterplan’. This is the same plan (but with annotation removed) that accompanied the December 2023 Vision Document.
- 2.12. The SoCG details that little progress has been made on the proposals since that date. It notes that *“the Parties agree that further work is required to develop and refine the schedule of infrastructure required to support the proposed growth from that included within the Viability Appraisal and Infrastructure Delivery Plan”*.
- 2.13. The SoCG contains at Appendix 2 an Illustrative Phasing Plan. The SoCG states that this is ‘high-level’ and is ‘one-way’ of sequencing development. It notes that work on a *‘schedule of infrastructure delivery, including key trigger points, remains ongoing and all Parties expect to have further information in this regard at the Examination’*.
- 2.14. Chapter 3 of the NPPF in relation to Plan-making states that strategic policies should set out the overall strategy for the pattern, scale and design quality of places and make provision for amongst other things, infrastructure.

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<sup>1</sup> Land west of Burgess Hill - Vision Document - Thakeham - December 2023

<sup>2</sup> Mid Sussex District Council - Statement of Common Ground - February 2026

- 2.15. It requires Plans to be shaped by early, proportionate and effective engagement between Plan-makers and the local community, local organisations, businesses, infrastructure providers and operators, and statutory consultees.
- 2.16. Policy DPSC1 is considered to lack sufficient clarity and detail to evidence that the development will be brought forward in an appropriate and acceptable manner.
- 2.17. The area being promoted does not represent a geographically logical site extent, in particular in that it excludes land between the proposed allocation and the existing settlement edge of Burgess Hill. The policy therefore fails to demonstrate how it would represent a comprehensive high quality evolution of the settlement edge.
- 2.18. Furthermore, the allocation does not include, and therefore demonstrate deliverability of, suitable appropriate long-term protection and management of land designated as Ancient and Semi-Natural Woodland and Deciduous Woodland Priority Habitat.
- 2.19. The allocation would result in the substantial surrounding of land the subject of such designation, significantly diminishing its connectivity to undeveloped land to the west. This undermines the value of these designations in habitat terms to wider ecosystems.
- 2.20. Policy DPSC GEN(10) requires 'Significant Sites' to co-locate new schools 'within/close to the centre of the development.' It is not considered this is achievable on the site allocation of DPSC1, on the basis that the extent of the site being promoted is largely contained on the southern and western periphery of the overall area. This indicates that the allocation will not result in the delivery of a sustainable development.
- 2.21. The evolution of Burgess Hill developed around the concept of a peripheral ring-road (Jane Murray Way (A273)) and an associated green space buffer around the southern edge of the settlement. This includes public open space and ecological designations (Batchelors Farm Nature Reserve and Hammonds Ridge Meadows Nature Reserve). This approach provides an existing clear defined edge to the built-up area and a suitable buffer with appropriate green landscaping between the urban edge and the countryside beyond.
- 2.22. The allocation of land for development under Policy DPSC1 breaches this defined edge and landscape buffer and coalesces the built up area with the hamlet of Goddard's Green. It would result in the significant erosion of the undeveloped gap between Burgess Hill and surrounding settlements, including its contribution to the setting of Hurstpierpoint.
- 2.23. Concerns are raised that the allocation fails to provide an replicated transitional landscape buffer between the proposed urban edge and countryside beyond.
- 2.24. The Illustrative Masterplan indicates that development will be located very close to the southern edge of the site allocation area. This is considered inadequate.
- 2.25. To ensure a satisfactory relationship to the settlement edge, and ensure an acceptable character with the surrounding countryside, it is considered that the allocation should detail the requirement for a significant undeveloped edge/ buffer, to the southern periphery of the land allocation. This should replicate the principles employed in the existing settlement edge around the periphery of the Jane Murray Way.

- 2.26. At present, given the modest detail in support of the allocation layout, there is no certainty that the allocation can deliver the proposed number of dwellings, whilst delivering an acceptable spatial layout and protection of surrounding countryside character.
- 2.27. There are numerous roads within the vicinity of DPSC1 and in particular to the south, that experience congestion. This is not only reflective of the rural nature of many of the roads, often with limited width and/or poor alignment, but also of the historic core of the settlement and Hurstpierpoint High Street.
- 2.28. The Mid Sussex Transport Study<sup>3</sup>, concludes that the level of development envisaged within the draft plan, including on land at DPSC1, would result in potentially significant impacts on existing travel routes. In particular, it considers that the developments would result in a 'significant' junction impact within Hurstpierpoint High Street at the junction with the B2117, and a 'severe' junction impact at Stonepound Crossroads.
- 2.29. The draft plan allocation under Policy DPSC1, does not require the development of the site to ameliorate this impact. This is considered unacceptable. The development of the scale envisaged, should evidence how existing transport networks have adequate capacity, or how mitigatory measures can be employed to address the constraints. It should be pre-requisite of such an allocation that there is, or can be, adequate infrastructure capacity delivered in a timely manner to provide for the proposed development.
- 2.30. It is considered that Policy DPSC1 should be brought forward in parallel with a Masterplan, Infrastructure Delivery Plan, and associated Phasing Plan. These should all be an integral component of the draft plan allocation.
- 2.31. This is required to ensure that the scheme will be delivered in a form which respects and protects its landscape setting, and the character of adjacent settlements, including Hurstpierpoint, and provides enhancements in the transport network, including non-car modes of transport, and mitigates the impact on the existing public highway network, which is modelled to have 'significant' junction impact in Hurstpierpoint High Street.
- 2.32. At present, it is considered the Policy allocation is unsound. It seeks to endorse the allocation, ahead of the necessary evidence of a Masterplan, and delivery of requisite and timely mitigatory infrastructure. These are fundamental components of achieving suitable and successful growth of the scale envisaged through Policy DPSC1.

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<sup>3</sup> Scenario 6 Interim Report - 16th August 2024