

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

Matter 7: Site Allocations - Sayers Common

Prepared by dowsettmayhew Planning Partnership Ltd as Instructed by

Hurstpierpoint & Sayers Common Parish Council

February 2026

Document Reference: 167-07-74 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 MI7: Site Allocations - insofar as this relates to land in and around Sayers Common.
- 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, Sites DPSC3 (Land to the South of Reeds Lane), DPSC4 (Land at Chesapeake and Meadow View, Reeds Lane), DPSC5 (Land at Coombe Farm, London Road), DPSC6 (Land to West of Kings Business Centre, Reeds Lane) and DPSC7 (Land South of LVS Hassocks, London Road). These all relate to land in and around the settlement of Sayers Common.
- 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 5 site allocations in and around Sayers Common seek to conform to the fourth key principle of draft plan Spatial Strategy, relating to settlements that currently benefit from only limited services, but which development can improve settlement sustainability by providing the infrastructure and services to meet the needs of both the existing and the new community.
- 2.4. It notes that this can be achieved by developing a single large site providing facilities and services on site or by a combination of smaller sites that on their own would not deliver sustainable development but collectively could support new schools, neighbourhood centres and employment opportunities.
- 2.5. The Draft Plan notes that this is based around the 20-minute neighbourhood principles which is promoted by the Plan in order to seek 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.

- 2.6. The Draft Plan allocates three 'significant sites'. These are identified as Policy DPSC1, DPSC2, and DPSC3.
- 2.7. 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 this 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.
- 2.8. With specific reference to growth at Sayers Common, the Draft Plan notes that the 5 allocations (Policy DPSC3 - DPSC7) accord with the strategy to seek opportunities for extensions to improve the sustainability of existing settlements. It notes that to achieve this objective *"it will be crucial that these developments are considered collectively rather than individually integrating with the existing settlement of Sayers Common and promoting opportunities for enhanced connectivity between the sites themselves and the existing community so that the entire settlement can take advantage from the services and facilities being provided in proximity."*
- 2.9. It notes that to achieve this objective, the LPA will facilitate collaboration between the site promoters to ensure a cohesive, integrated, and masterplanned development at Sayers Common, and that this will include developing the Mid Sussex Infrastructure Delivery Plan to ensure timely delivery of infrastructure and engagement with the local community to identify local issues and needs.
- 2.10. It notes that the allocation at DPSC3 will be integrated and masterplanned to be the focal point of the village; that education and a primary neighbourhood centre should be central and accessible to the settlement as a whole, providing opportunities to meet the day-to-day needs within walking distance consistent with the 20-minute neighbourhood, and that the allocations will deliver a development that prioritises active and sustainable modes of travel throughout, enhancing connectivity between all site allocations DPSC3-DPSC7, the existing village, and the wider network, facilitating delivery of additional routes off site to other nearby settlements, including a link to Burgess Hill Town Centre, creating permeable, legible and attractive connections between the allocations and existing settlements.
- 2.11. Following preparation of the submission draft (Regulation 19) Plan, 4 of the 5 sites allocated for development within and around Sayers Common have progressed independently to the submission of applications for development. These are:
- Policy DPSC4 - Land at Chesapeake and Meadow View, Reeds Lane - Application DM/25/1434 - Comprising proposed demolition of existing buildings and construction of 27 dwellings with new vehicular access and associated Works - Validated 23rd June 2025 and pending consideration;
 - DPSC5 - Land at Coombe Farm, London Road - DM/25/2661 - Outline application with all matters except access reserved for a development of 210 dwellings and associated works - Validated 21st October 2025 and pending consideration;

- DPSC6 - Land to the West of Kings Business Centre, Reeds Lane - DM/25/3067 - Application for the construction of 80 residential dwellings and associated works - Validated 3rd December 2025 and pending consideration; and
- DPSC7 - Land at LVS Hassocks, London Road - DM/26/0238 - Hybrid application for demolition of existing buildings and full planning permission for provision of a new SEN school and outline application (with appearance, landscaping, layout and scale reserved) for development of up to 210 dwellings and associated works - Validated 5th February 2026 and pending consideration.

- 2.12. The scheme promoters at Policy DPSC3 - Land South of Reeds Lane have also progressed proposals. This has been undertaken in conjunction with the establishment of a Liaison Group which has included representatives of local Parish Councils and other interested parties. The group have periodically met to be informed and engage with evolving proposals for the development of the site. This has included recent consultation on a Masterplan Framework Document.
- 2.13. There are a number of fundamental concerns in relation to the site allocations of land in and around Sayers Common. These are set out below by reference to the key Matters and Issues identified by the Inspector.
- 2.14. The allocations are based on the principle that Sayers Common is currently unsustainable, but through the development of the site allocations, the settlement will benefit from improved sustainability.
- 2.15. The draft plan makes clear that this should be achieved following the 20-minute neighbourhood principles.
- 2.16. It is considered that these principles should foster the creation of a nucleated settlement. It should be predicated on growth that respects the existing layout of the settlement and delivers expansion, which will positively contribute to the existing settlement form, character, and layout, and existing services and facilities.
- 2.17. Policy DPSC3 seeks for a neighbourhood centre to be created toward the eastern part of the site, and that these services and facilities should be central and accessible to the settlement as a whole.
- 2.18. The indicative layout contained within the draft plan does not accord with this principle. Instead, it seeks to deliver key infrastructure within the central part of the land area of DPSC3. This does not reflect the centre of the existing village, nor the geographic centre of the village that would result from the delivery of the proposed 5 allocations.
- 2.19. It is considered that the spatial extent of Policy DPSC3 is at odds with the concept of a nucleated settlement and 20-minute neighbourhoods.
- 2.20. The western limb of the allocation is remote from the existing centre of Sayers Common. It is physically detached from the core part of the allocation DPSC3, and is poorly related to the existing settlement.
- 2.21. It appears that the LPA have allocated development of this area solely on the basis that it is part of the area promoted by the same landowner/ developer.

- 2.22. Its lack of connectivity is acknowledged within the draft plan, by virtue of the policy requirement that this part of the site should contain community facilities. This is inadequate mitigation for fundamentally poor spatial planning.
- 2.23. It is considered that the detached western limb should be omitted from the policy allocation.
- 2.24. Concerns are also raised at the southern limb of the allocation of DPSC3, which extends along the eastern edge of Henfield Road (B2116), toward Albourne village.
- 2.25. Development of this area would significantly erode the spatial separation of Sayers Common from Albourne and result in, or significantly contribute to, the coalescence of these two settlements.
- 2.26. The inclusion of this part of the site also appears to be solely on the basis that it is part of the area promoted by the same landowner/ developer.
- 2.27. The scheme promoter's Landscape and Visual Appraisal confirms that this area is the most visually sensitive part of the land allocation¹.
- 2.28. Given the elevated visual sensitivity of this part of the site, and the effect on coalescence with the adjoining settlement of Albourne, it is considered that this part of the site should either be excluded from the allocation, or be excluded from built form development, and reserved as undeveloped and/ or landscape buffer land.
- 2.29. The Evidence Base that supported the statutory consultation of the Regulation 19 Draft Plan appeared to rely on the MSDC Strategic Flood Risk Assessment (SFRA) (Level 1), dated June 2015.
- 2.30. A subsequent Level 1² and Level 2³ SFRA were published in the summer of 2024, after decisions were made in relation to housing allocations in the Draft Plan.
- 2.31. It is considered that the Draft Plan was not prepared with the requisite evidence base in respect of flood risk. It is noted that the Level 1 SFRA acknowledges the material changes in guidance on flood risk since the 2015 document was prepared⁴.
- 2.32. It is noted that the decision to allocate significant development on land at Sayers Common within the Draft Plan was made against the evidence of the June 2015 Level 1 SFRA, which noted that *“numerous records of historical flooding exist in and around Sayers Common predominately due to poor surface water drainage systems ...”*⁵
- 2.33. The more recent Level 1 SFRA notes the risk from surface water flooding in the area, including in respect of land covered by the majority of the housing allocations. This therefore triggered the requirement to prepare a Level 2 SFRA.

¹ Figure 8 of the Landscape and Visual Appraisal - Stantec - October 2023

² Level 1 Strategic Flood Risk Assessment Final Report - Mid Sussex District Council - July 2024

³ Mid Sussex District Council Level 2 Strategic Flood Risk Assessment - August 2024

⁴ Paragraph 1.9 - Level 1 Strategic Flood Risk Assessment Final Report - Mid Sussex District Council - July 2024

⁵ Appendix C Mid Sussex District Council Strategic Flood Risk Assessment - Level 1 - June 2015

- 2.34. This identifies that there is a 1 in 100 year or greater risk of surface water flooding in existing built up areas of Sayers Common, and surrounding hinterland, including parts of the majority of the sites allocated for housing⁶.
- 2.35. The SFRA Level 2 concludes that, as these sites are at risk from surface water flooding, it will be necessary to assess the development under design flood conditions and provide appropriate mitigation. It notes in respect of land allocated for development under Policy DPSC3, safe access/ egress to the wider area should be considered in more detail as part of a Flood Emergency Evacuation Plan, given the flood risk to parts of Reeds Lane and Henfield Road⁷.
- 2.36. Given the acknowledged flood risk to Sayers Common and its hinterland, and the quantum of development in the Draft Plan, the Parish Council consider that the allocations should be assessed holistically in relation to flood risk.
- 2.37. The draft plan seeks for the 5 site allocations at Sayers Common to be brought forward as a coherent Masterplan, to ensure, amongst other things, that this enhances connectivity between all of the site allocations, the existing village and the wider network of non-car modes of transport.
- 2.38. Within the proposed developments, there is little meaningful connectivity between the allocations.
- 2.39. An early proposal envisaged access to DPSC3 (Land south of Reeds Lane) and DPSC5, (Land at Coombe Farm), to be delivered with a single new roundabout onto London Road.
- 2.40. The planning application for residential development of DPSC5 now proposes an access point that cannot deliver such connectivity with DPSC3⁸. This evidences an absence of collaboration between the site allocation promoters to bring forward connected and coherent developments.
- 2.41. The draft plan sets out that Sayers Common presently has poor connectivity by non-car modes of transport.
- 2.42. The Mid Sussex Transport Study⁹, concludes that the level of development envisaged within the draft plan, including at Sayers Common, 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.
- 2.43. This is particularly problematic, given that the site allocations require financial contributions towards improvements to Hassocks Station, thus acknowledging that this route is likely to be used by persons seeking non-car modes of transport to access higher tier centres. This would be likely to include pedestrians and cyclists.
- 2.44. It is an integral part of the site allocations at Sayers Common that improved provision is made for sustainable transport measures that promote non-car modes of transport. This includes enhanced

⁶ See plans at Appendix 1 - Site Assessment Summary Tables of the MSDC Level 2 SFRA - August 2024

⁷ see details under Policy DPSC3 - Appendix 1 - Mid Sussex District Council Level 2 Strategic Flood Risk Assessment - August 2024

⁸ Drawing P24-2029-DE-002F-05 of DM/25/2661

⁹ Scenario 6 Interim Report - 16th August 2024

travel connections by non-car modes of transport between Sayers Common and Burgess Hill Town Centre. The indicative route of this is shown at Appendix 3 of the draft plan.

- 2.45. The latest Infrastructure Delivery Plan¹⁰ (IDP) notes that it is important that 'Significant Sites in the draft plan fund safe and convenient active travel routes that link to key local facilities including employment areas, schools, town centres, and main railway stations in order to meet targets for sustainable mode share. The IDP notes that further design work is required in order to achieve the timely implementation of this.
- 2.46. The IDP confirms that such notable projects include the provision of cycle routes between Sayers Common and Burgess Hill, and between Sayers Common and Hassocks.
- 2.47. However, neither the draft plan, nor the IDP evidence how this transport improvement will be delivered. The route appears to comprise multiple landowners, including residential developments (including DPSC1) that are likely to be progressed according to unrelated, third party timescales.
- 2.48. Given that the justification for the quantum of development at Sayers Common is predicated on the need for a step change in infrastructure delivery, and the prospective impact of development on the highway network, it is considered that the site allocations should be accompanied by specific and fully detailed improvements in the accessibility of Sayers Common to higher tier centres by non-car modes of transport.
- 2.49. These should be evidentially deliverable, under a clear timeline that ensures provision at an early stage of the delivery of the proposed residential development.
- 2.50. In the absence of this, there is a risk of development that fails to achieve the necessary improvements in accessibility, in particular, by non-car modes of transport.
- 2.51. The draft plan sets out that the allocation of DPSC3, should include a new all through 2FE (expandable to 3FE), primary, and a 4-FE (expandable to 6-FE) secondary school, with provision of early years and special support centre and associated playing pitches.
- 2.52. The requirement for this is referenced in the IDP. This notes the intended education provision on-site allocation DPSC3. However, the IDP sets out that for such school provision '*there are caveats around... [this], which is broad brush at this stage and dependent on demographic changes and forecasts. Projects planned to be undertaken in order to cater for the increase in pupil numbers may be subject to change, particularly if they are more than 5 years away and the children are not yet born*'.
- 2.53. The draft plan emphasises that the quantum of development allocated at Sayers Common should come forward with significant improvements in infrastructure, including improved primary and secondary education provision. However, the delivery of this appears to be uncertain.
- 2.54. The failure to bring forward this improved education provision at Sayers Common, would significantly undermine the principles of achieving a step change in service provision to accompany the associated scale of growth.

¹⁰ Mid Sussex District Council Infrastructure Delivery Plan - December 2025

- 2.55. The promotion of the 5 site allocations in and around Sayers Common through the draft plan, was accompanied by a Statement of Common Ground (SoCG) signed by promoters of the sites¹¹.
- 2.56. In respect of infrastructure delivery, Table 2 of the SoCG sets out the expected phasing of the delivery of infrastructure, amplified by Table 3.
- 2.57. This was subdivided into short-term (prior to the end of 2027), medium-term (2028-2032), and long-term (beyond 2032).
- 2.58. The SoCG envisages that the majority of significant infrastructure is to be delivered in the medium or long term. Predominantly, only 'on-site' infrastructure is envisaged to be delivered in the short term and medium term. The delivery of improvements in a cycle route between Sayers Common and Burgess Hill, improvements to Hassocks Station, and delivery of secondary education provision are all indicated to be delivered in the medium to long term.
- 2.59. A revised SoCG has recently been signed by the scheme promoters and MSDC¹². This revises the timing of short term to 2029, the medium term to 2033, and the long term beyond 2033. Notwithstanding this, there does not appear to be any substantive change in the anticipated change in the relative timing of key infrastructure (ie still medium to long-term).
- 2.60. Concern is raised that it is a clear expectation of the scheme promoters that a significant quantum of development will be delivered at Sayers Common prior to the provision of key infrastructure improvements and enhancements.
- 2.61. This emphasises the lack of certainty around the delivery and phasing of infrastructure in conjunction with proposed development.
- 2.62. For the above reasons, it is considered that the allocations envisaged in and around Sayers Common 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 allocations.
- 2.63. This is required to ensure that the level of growth will be delivered with the associated provision of new social and community facilities, and enhancements in the transport network, including non-car modes of transport, that are required to improve the sustainability of the settlement. The draft plan sets out that this provision is the justification for the quantum of allocated growth, and is necessary to acceptably mitigate the impact on the existing resident community.
- 2.64. At present, it is considered the Policy allocations are unsound. They seek to endorse the allocations, ahead of the necessary evidence of a Masterplan, and delivery of requisite and timely infrastructure. These are fundamental components of achieving suitable and successful allocations and delivery of growth at Sayers Common.

¹¹ Mid Sussex District Council - Statement of Common Ground - July 2024

¹² Mid Sussex District Council - Statement of Common Ground - February 2026