

**Examination Statement
2026
Matter 5 – Spatial Strategy**

Mid Sussex District Plan

Representations on behalf of Crest Nicholson

13 February 2026

Lucid
Planning

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1. Introduction

- 1.1 This Statement has been prepared by Lucid Planning on behalf of our Client, Crest Nicholson, who has an interest in the land to the north of Old Wickham Lane, Haywards Heath (SHELAA Ref 988). This Statement is prepared in response to the Inspectors' Matters, Issues and Questions.
- 1.2 Representations have been made on behalf of our Client throughout the production of the emerging Local Plan and these representations expand upon earlier representations. While efforts have been made not to duplicate the content of previous representations, this Statement draws on previous responses where necessary.
- 1.3 These representations have been prepared in recognition of prevailing planning policy and guidance, particularly the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
- 1.4 These representations respond to the Inspectors' 2026 MIQs but do not necessarily respond to all questions raised under this Matter but focuses on those questions of particular relevance to our Client's interests.
- 1.5 These representations have been considered in the context of the relevant NPPF that the District Plan is being examined under - NPPF September 2023 - and tests of 'soundness' as set out at paragraph 35 of that NPPF. This requires that a Local Plan be:
- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

2. Response to Matter 5 – Spatial Strategy

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.

- 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**

Introduction

- 2.1 As no additional information has been presented by MSDC on this Matter, these representations are taken from Crest’s original representation to Matter 3 at the 2024 Examination.

The effectiveness and soundness of the proposed distribution

Is the Spatial Strategy is justified, positively prepared, effective, and consistent with national policy?

- 2.2 The spatial strategy must be read alongside the housing requirement established under Matter 1. If the housing requirement is understated or fails to embed a defined allowance for unmet need, the spatial strategy will inevitably be incapable of delivering a positively prepared outcome.
- 2.3 As set out in more detail in Crest’s Examination Statement 2026 on Matter 1 – Housing Requirement, despite Mid Sussex DC acknowledging there is an unmet need within Crawley of 7050 and an ‘unprecise’ need within Brighton & Hove, which has been published as totalling c.25000, no reasonable alternative strategies have been considered to test alternative growth options to consider

meeting some or all of unmet need from these neighbouring authorities. The absence of testing alternative growth scenarios which respond to declared unmet need represents a significant weakness in the evidence base and undermines the justification of the spatial strategy.

- 2.4 In terms of spatial options, five options were set out in paragraph 4.2.3 of DP7 the Sustainability Appraisal “*to reflect alternative strategies for delivery of growth and meeting housing need*” However, there is no clear audit trail demonstrating how those options were comparatively evaluated or why the preferred strategy was selected over higher-growth alternatives that could accommodate unmet need. The Sustainability Appraisal appears to move quickly from broad strategic options to individual site assessment without demonstrating that reasonable alternative spatial distributions were properly explored and discounted.
- 2.5 In effect the Council went straight to assessing individual sites as reasonable alternatives, as paragraph 6.1 of the Sustainability Appraisal explains: following assessment against the Site Selection methodology, 42 alternative sites for housing were identified. However, like the SA, the Site Selection methodology seems to have only considered individual sites without considering any spatial strategy and/or reasonable alternative spatial strategies. Then, the Council did not consider submitted evidence on individual sites which resulted in deliverable and developable sites being rejected in high order settlements.
- 2.6 The Council seemed to have dismissed Options and sites at two of its three largest towns: Haywards Heath, East Grinstead and Burgess Hill are Category 1 Towns, the highest category in the settlement hierarchy in Mid Sussex. They appear, to one degree or another in Options 1, 4 and Option 5 of the SA.
- 2.7 Despite a number of acknowledgments (e.g. Page 122 of the SA) that focussing development in the three towns would likely lead to a significant positive impact on economic growth and regeneration in the three towns and would have a likely major positive impact on objectives for health and wellbeing, education, community and crime, climate change, and transport (as well as contributing to

the creation of 20 minute Neighbourhood's – one of the Plan's main Sustainable Development objectives) – Option 2 (growth in smaller settlements) was preferred.

- 2.8 Further, development has been severely restricted in Haywards Heath (and East Grinstead) without strategic consideration, reasoning or evidence. This is difficult to reconcile with the principles of sustainable spatial planning set out in national policy.
- 2.9 Haywards Heath is a highly sustainable town with a rail station, education and health facilities that is well located to serve the south of the district and the towns in Coastal West Sussex. It is outside of the High Weald AONB/National Landscape and outside the South Downs National Park but is located within both the North West Sussex and Brighton and East Sussex HMA and FEMA.
- 2.10 There is no clear explanation in the District Plan, nor in submitted supporting evidence, that there is an overall spatial strategy which sets out the pattern, scale and design quality of places and makes sufficient provision for development and infrastructure – for Mid Sussex's own housing need or unmet need from its neighbours - as required by paragraph 20 of the Framework. Paragraph 20 requires strategic policies to set out an overall strategy for the pattern, scale and design quality of places and to make sufficient provision for housing and infrastructure. The current spatial distribution does not clearly demonstrate how that requirement is fulfilled in a way that responds proportionately to both local and cross-boundary housing pressures. As such, the Plan is cannot be considered to be positively prepared, justified, and effective.
- 2.11 Given the disproportionate lack of land allocated for housing in the most sustainable settlements such as Haywards Heath, by definition the Council's preferred spatial strategy cannot make the effective or efficient use of land. To make effective use of land would be to optimise the use of existing services, facilities and infrastructure in the larger settlements, to optimise active travel

and 20-minute neighbourhoods as well as improving services, facilities and infrastructure in the most cost-effective way.

- 2.12 Local Plan Table 2a (page 41) has been re-ordered below to show the number of allocated plots being proposed by the Council in order of magnitude for each settlement and the Council's settlement category as a point of reference.

Settlement	Plot Allocations	Category
Sayers Common	2393 plots	Cat 3 - Medium Village
Burgess Hill	1708 plots	Cat 1 - Town
Copthorne	1500 plots	Cat 2 – Larger Village
Crawley Down	387 plots	Cat 2 – Larger Village
Haywards Heath	226 plots	Cat 1 - Town
Bolney	200 plots	Cat 3 – Medium Village

- 2.13 It is clear from the above distribution that the number of new plots allocated to Haywards Heath is not proportional to the category of settlement and that the Council are not favouring locating new development allocations in their most sustainable larger settlements.
- 2.14 It is the Council's responsibility, in accordance with the aims and objectives of the Local Plan to deliver sustainable development. The hierarchy of movement, which seeks to ensure that people walk or cycle, then use public transport and only where such opportunities do not exist fall back on car travel, is key to achieving sustainable development. Locations such as the land at Old Wickham lane, Haywards Heath offer an obvious opportunity to allocate sustainable housing sites. As such, the scale and level of growth in the District Plan cannot be considered to be planned positively, effectively or justified.
- 2.15 The distribution of development should also consider the wider housing need within the HMAs. Of particular relevance is Crawley and Brighton & Hove.

- 2.16 Despite there being a significant unmet need in Brighton & Hove DC and the statement by Brighton and Hove DC in the SoCG that it does not agree with the prioritisation of any additional new houses (above the Mid Sussex housing need) going to North West Sussex HMA, the Council has only allocated proportionate development at Burgess Hill and not Haywards Heath, which sites in both the North West Sussex HMA/FEMA and Coastal West Sussex HMA/FEMA.
- 2.17 In strategic terms, the spatial strategy does not adequately reflect the functional relationship between Mid Sussex’s Category 1 towns and adjoining housing market areas.
- 2.18 As set out in Crest’s Examination Statement 2026 on Matter 1 – Housing Requirement, the only alternatives considered by the Council were individual submitted sites.
- 2.19 No reasonable alternative strategies were considered to test alternative growth options to consider meeting some or all of unmet need from neighbouring authorities. This is a fundamental flaw in the District Plan and as it cannot be considered to be positively prepared, justified, effective or consistent with national policy.
- 2.20 In circumstances where the evidence demonstrates substantial unmet need across the housing market areas and where reasonable alternative spatial strategies have not been fully tested, the Inspector may consider whether Main Modifications are necessary to ensure the Plan is positively prepared and justified.
- 2.21 Such modifications could include:
- A reassessment of reasonable alternative spatial growth options within the Sustainability Appraisal;
 - A reconsideration of the distribution of development to ensure Category 1 settlements are proportionately favoured;

- The allocation of additional deliverable and sustainable sites in locations such as Haywards Heath;
- A clear linkage between the housing requirement (including any unmet need allowance) and the spatial distribution strategy.

2.22 If such modifications cannot reasonably be secured, then the spatial strategy, as currently drafted, would struggle to meet the tests of soundness.

Assessment of Potential Site

2.23 Crest Nicholson fully supports the Council's 15 Strategic Objectives as set out in pages 28, 29 and 30 of the Local Plan.

2.24 It is clear, however, that the Council, in its assessment of potential development sites has not used its own Strategic Objectives to inform its site selection methodology. SSP1 Site Selection Methodology looked at the 14 criteria employed to assess site suitability and constraints, but the approach missed the opportunity to assess potential allocation sites against the Council's 15 Strategic Objectives.

We have set out below a matrix style approach assessing Land North of Old Wickham Lane, Haywards Heath against the Council's 15 Strategic Objectives. The failure to align site selection with the Council's own Strategic Objectives further illustrates the disconnect between the stated spatial strategy and its implementation.

<p>Strategic Objective 1 – To create and maintain easily accessible high quality green and blue infrastructure in the right places to encourage active travel, improve physical and mental health, support biodiversity, and address climate change mitigation and adaptation.</p>	<p>Old Wickham Lane Objective 1 Response – With 69% of the site retained for green and blue infrastructure in the latest masterplan, showing extensive pedestrian links to local services, has significant potential to maximise the benefits to future residents, support biodiversity and address climate change.</p>
<p>Strategic Objective 2 – To promote development that embodies the 20-minute neighbourhood principles and makes best use of resources to increase the sustainability of communities within Mid Sussex, and its ability to adapt to climate change</p>	<p>Old Wickham Lane Objective 2 Response – The site is ideally placed within immediate surrounds of a tier 1 settlement with local access to a range of facilities, services and employment.</p>
<p>Strategic Objective 3 – To promote well located and designed development that reflects the districts distinctive towns and villages, retain their separate identity and character and prevents coalescence.</p>	<p>Old Wickham Lane Objective 3 Response – The site is very well located, surrounded by built form within settlement limits and does not impact on settlement coalescence.</p>
<p>Strategic Objective 4 – To protect valued landscapes for their visual historical and biodiversity qualities.</p>	<p>Old Wickham Lane Objective 4 Response – The site is not covered by any form of landscape designation</p>
	<p>and SHELAA comments observe the site is well contained within the landscape.</p>
<p>Strategic Objective 5 – To protect valued characteristics of the built environment for the historical and visual qualities.</p>	<p>Old Wickham Lane Objective 5 Response – The latest framework plan and heritage assessment work together to minimise any potential for heritage impact or impacts on the local built environment. Crest Nicholson and other local developments have been permitted using similar buffer zones to those shown in the masterplan and the developer is willing to undertake appropriate mitigations to minimise any impact in heritage assets.</p>
<p>Strategic Objective 6 – To ensure that development is accompanied by necessary infrastructure in the right place to support development of sustainable communities. This includes provision of efficient and sustainable transport networks.</p>	<p>Old Wickham Lane Objective 6 Response – The site is not large enough to create specific infrastructure issues but s106 contributions would be provided to mitigate any impacts and support local services. The site is already located in a tier 1 sustainable settlement with excellent non motorised user links to a full range of local services and facilities.</p>
<p>Strategic Objective 7 – To promote a place which is attractive to a full range of business and where local enterprises thrive.</p>	<p>Old Wickham Lane Objective 7 Response – The site is a residential proposal with new residents supporting the local economy. Development at the principal settlements in the district such as Haywards Heath will continue to generate thriving, prosperous and vibrant economy.</p>
<p>Strategic Objective 8 – To provide opportunities for people to live and work within their communities, reducing the need for commuting, including through good digital connectivity.</p>	<p>Old Wickham Lane Objective 8 Response – The site offers excellent non motorised and public transport links to the current community with access to modern digital connections.</p>
<p>Strategic Objective 9 – To create and maintain town and village centres that are vibrant, attractive and successful and that meet the needs of the community.</p>	<p>Old Wickham Lane Objective 9 Response – Additional housing would support local services within Haywards Heath which are highly accessible to the site.</p>

Strategic Objective 10 – To support and strong and diverse rural economy in the villages and countryside	Old Wickham Lane Objective 10 Response – The site is adjacent to a tier 1 town, one of the most sustainable settlements in the district. This type of location should support housebuilding allowing selected and appropriate development in the rural area only where required.
Strategic Objective 11 – To support and enhance attractiveness of Mid Sussex as a visitor destination.	Old Wickham Lane Objective 11 Response – The site does not impact on areas which attract visitors such as the AONB. Allowing development at Haywards Heath will reduce pressure on rural and AONB
	locations which could impact on the attractiveness of these areas to visitors.
Strategic Objective 12 – To support sustainable communities which embody the 20 minute neighbourhood principles and are complete compact and well connected, safe, healthy and inclusive.	Old Wickham Lane Objective 12 Response – The site is ideally placed within immediate surrounds of a tier 1 settlement with good local access to a range of facilities, services and employment.
Strategic Objective 13 – To provide the amount and type of housing that meets the needs of all sectors of the community	Old Wickham Lane Objective 13 Response – The site has the potential to deliver a range of family housing and affordable housing.
Strategic Objective 14 – To create environments that are accessible to all members of the community	Old Wickham Lane Objective 14 Response – The site has excellent links to neighbouring land and Haywards Heath facilities and services allowing enhanced accessibility over less well located development allocations.
Strategic Objective 15 – To create places that encourage a healthy and enjoyable lifestyle by the provision of a first class cultural and sports facilities, informal leisure space and the opportunity to walk, cycle or ride to common destinations.	Old Wickham Lane Objective 15 Response – The site offers extensive informal leisure spaces to benefit new residents and the existing community with good opportunities to walk or cycle to common destinations.

2.25 When using either the Council’s stated methodology or assessing Old Wickham Lane against the 15 Strategic Objectives it is clear that the site scores well and should be positively considered for allocation.

2.26 The Land North of Old Wickham Lane Haywards Heath also fully aligns with the ‘updated District Plan Strategy’ set out on page 33 of the Local plan, which seeks to:

- 1) protect the High Weald AONB now National Landscape
- 2) make effective use of land
- 3) plan growth at existing sustainable settlements and

- 4) seek opportunities for extensions that enhance sustainability of existing settlements.

2.27 In summary, the spatial strategy under-allocates growth in the most sustainable settlements, does not demonstrate that reasonable alternative growth distributions were properly tested, and does not clearly respond to cross-boundary housing pressures. As currently structured, it cannot be said to represent the most appropriate strategy when considered against reasonable alternatives.

Summary on Matter 5

2.28 The spatial strategy:

- Under-allocates growth to Category 1 settlements
- Fails to demonstrate that higher growth options were tested
- Does not clearly align with the housing requirement issues raised under Matter 1
- Does not optimise sustainable development patterns
- Does not adequately reflect housing market geography.

2.29 For these reasons, it is not justified or positively prepared.