



HEARING STATEMENT ON BEHALF OF RIVERDALE LAND

Mid Sussex District Plan 2021-2040 Examination

Matter 7: Site Allocations – DPSC3: Land to the South of Reeds Lane, Sayers Common

Whether the Plan adequately lays the framework for the sustainable development of DPSC3

Introduction

This statement is submitted on behalf of Riverdale Land in response to Matter 7 of the Inspector's Matters and Issues, which asks whether the Plan adequately lays the framework for the sustainable development of DPSC3.

Riverdale supports the allocation of DPSC3 and the Council's vision for sustainable growth at Sayers Common. The Plan provides a sound foundation for the sustainable development of this site, supported by comprehensive policy requirements addressing urban design, transport, community facilities, employment, countryside protection, biodiversity, heritage, and infrastructure delivery.

However, Riverdale respectfully submits that the framework's effectiveness would be enhanced through modifications to Policy DPSC3. In particular:

- The Regulation 18 version of the Plan identified that opportunities to improve connectivity and masterplanning between the eastern and western parcels of DPSC3, by inclusion of further land parcels on the southern boundary, should be investigated. This investigation was not undertaken, and the framework would be strengthened by completing it.
- The viability and deliverability of shared infrastructure is directly correlated with the scale of development, and the framework would be enhanced by policy recognition that sustainable development supporting infrastructure delivery should be considered favourably.



This statement addresses each of the Inspector's questions in turn, identifying where the framework is sound and where modifications would enhance its effectiveness.

(a) How good urban design would be created, including good building design, legible layouts, attractive streets and open spaces, active frontages, the integration of sustainable transport and climate change mitigation

Policy Framework

The Plan establishes clear and robust design expectations for DPSC3 through Policy DPSC GEN (Significant Site Requirements), which mandates that development progress in accordance with an allocation-wide Masterplan, Design Code, Infrastructure Delivery Strategy, and Phasing Plan informed by community engagement. The Significant Site Requirements require development to support a vibrant and inclusive community embodying the local living and 20-minute neighbourhood principles of a complete, compact, and well-connected neighbourhood.

The Berkeley Latimer Masterplan Framework Document establishes a comprehensive design framework based upon five Place Pillars: Nature in Harmony, Connected Living, Place Integrity, Active Movement, and Healthy Homes. These pillars embed design principles that support vision-led movement and connectivity, respect existing character and setting, and deliver healthy homes supporting a diverse and thriving community.

Integration of Sustainable Transport

The Inspector's question (a) expressly asks how the integration of sustainable transport would be achieved. Riverdale notes that the integration of sustainable transport is fundamentally a masterplanning matter: movement networks must be woven into the urban fabric from the outset to deliver legible, permeable, and attractive routes that encourage walking, cycling, and public transport use.

The Berkeley Latimer Masterplan Framework establishes a central movement spine and active travel corridors that will provide the primary sustainable transport structure for DPSC3. However, the effectiveness of this integrated approach is constrained by the spatial separation of the eastern and western parcels of the allocation.

The Regulation 18 version of the Plan expressly identified that *'opportunities to improve connectivity and master planning between the eastern and western parcels of the site, by inclusion of further land parcels on the southern boundary, should be investigated.'* This recognition reflects the inherent logic that genuinely integrated sustainable transport requires physical connection between the component parts of the allocation.

Under the submitted Plan, sustainable transport integration between the eastern and western parcels relies upon:

- The existing road network; or
- Public rights of way crossing intervening land.

Neither option delivers the seamless, legible, and attractive sustainable transport integration that would be achieved through comprehensive masterplanning of land connecting the two parcels. The absence of such a connection means that residents of the western parcel seeking to access the neighbourhood centre, employment, and community facilities in the eastern parcel by sustainable modes would be required to use routes that are less direct, less legible, and less attractive than a fully integrated masterplan would deliver.

Opportunities for Enhancement

Riverdale respectfully submits that the framework for sustainable transport integration would be materially strengthened by completing the investigation identified at Regulation 18 stage. Such development would enable:

- A continuous, legible active travel corridor integrated into the masterplan from the outset;
- Direct, attractive walking and cycling routes between the western parcel and the neighbourhood centre, school, and employment areas in the eastern parcel;
- A coherent movement hierarchy that prioritises sustainable modes across the entire settlement rather than within separate parcels;
- Enhanced permeability supporting the 20-minute neighbourhood vision; and
- A unified design approach to streets, open spaces, and active frontages that crosses parcel boundaries rather than terminating at them.

Riverdale submits that Policy DPSC3 should be amended to recognise that proposals for sustainable development on adjacent land will be supported where they would enhance the integration of sustainable transport across the allocation, consistent with the approach expressly identified for investigation at Regulation 18 stage and the 20-minute neighbourhood principles underpinning the spatial strategy.

(b) The implications for the wider transport network (including the impact on nearby communities) and how necessary mitigation measures would be delivered

Policy Requirements

The Plan requires DPSC3 to deliver a layout that prioritises sustainable and active modes of travel, providing safe and convenient routes for walking, wheeling, and cycling through the development and linking with existing and enhanced networks beyond. Policy DPSC3 specifically requires:

- Support for delivery of a shared route with Significant Site allocation DPSC1 to Burgess Hill town centre.
- Integration of green travel corridors for cycle and pedestrian access throughout, with potential for Reeds Lane to become a pedestrian and cycle priority Quiet Lane.
- Two transport mobility hubs are located close to the neighbourhood and local centres.

Transport Assessment

The Sustainability Appraisal confirms that these measures would be likely to improve sustainable travel choice and provide new facilities for the local community, reducing the need to travel. A positive effect on climate change and transport (SA Objective 10) is recorded, alongside benefits to economic regeneration and growth through improving sustainable access to town centres and local employment opportunities.

Connectivity

The Statement of Common Ground establishes an indicative movement framework that includes enhanced links to Reeds Lane, London Road (B2118), and wider PRoW connections. Policy DPSC GEN requires development to prioritise sustainable travel modes,

deliver mobility hubs, and provide safe and convenient active travel routes connecting to existing networks and key destinations.

Riverdale supports these policy requirements, which provide an appropriate framework for sustainable transport provision within each development parcel. However, Riverdale notes that the Regulation 18 version of the Plan expressly identified that *'opportunities to improve connectivity and master planning between the eastern and western parcels'* should be investigated. The Council did not undertake this investigation prior to submission of the Plan.

Connectivity Between Eastern and Western Parcels

The eastern and western parcels of DPSC3 are spatially separated. Under the submitted Plan, connectivity between these parcels would rely upon:

- The existing road network; or
- Public rights of way crossing intervening land.

Neither option provides the direct, legible, and attractive active travel connection that would be achieved through comprehensive masterplanning of land connecting the two parcels. The absence of such a connection represents a missed opportunity to deliver a truly integrated settlement, where residents of the western parcel can access the neighbourhood centre, employment, and community facilities in the eastern parcel via safe, direct, and attractive routes that do not require use of the public highway.

Enhanced Connectivity Through Comprehensive Development

Sustainable development on land adjoining the southern boundaries of DPSC3 would enable:

- A continuous active travel corridor connecting the eastern and western parcels, significantly improving permeability and legibility;
- Enhanced pedestrian and cycle access to the neighbourhood centre from both parcels;
- Integration of mobility hub provision across a larger catchment, improving viability and accessibility;

- Extension of the PRow network, creating attractive recreational routes and improving access to the wider countryside; and
- A more coherent and comprehensive movement framework consistent with the 20-minute neighbourhood principles underpinning the spatial strategy.

Riverdale respectfully submits that the framework would be materially strengthened by completing the investigation identified at Regulation 18 stage and recognising that sustainable development on land connecting the eastern and western parcels would enhance transport connectivity for both new and existing residents. Policy DPSC3 should be amended to provide that proposals for sustainable development on adjacent land will be supported where they would enhance connectivity between the eastern and western parcels, consistent with the approach expressly identified for investigation at Regulation 18 stage.

(c) The implications for the impact on, and provision of, social and community facilities (such as schools and health facilities) and how necessary new facilities would be funded and provided

On-Site Provision

The Plan establishes that DPSC3 will deliver significant social and community infrastructure, including:

- A new all-through 2FE (expandable to 3FE) primary and 4FE (expandable to 6FE) secondary school with Early Years and Special Support Centre provision.
- A Neighbourhood centre with library, café, retail, co-working space, employment, and potential healthcare.
- Extra Care housing provision.
- Play areas and other outdoor provision.

Accessibility and 20-Minute Neighbourhood Principles

The Objectives for Growth at Sayers Common require services and facilities within DPSC3 to be central and accessible to the settlement as a whole, providing opportunities to meet day-to-day needs within walking distance, consistent with the 20-minute neighbourhood and Local Living principles.

Viability and Deliverability

The Berkeley Latimer Infrastructure Delivery Strategy demonstrates that infrastructure delivery at Sayers Common is viable, subject to coordinated delivery across all allocations and the equalisation of contributions through the Sayers Common Equalisation Approach.

Riverdale notes, however, that infrastructure viability at Sayers Common faces material pressures. Per-unit infrastructure costs are trending towards £20,000-£25,000, reflecting the significant investment required in education, healthcare, sustainable transport, and community facilities to serve the new community. The viability of delivering this infrastructure, and the scope to provide enhanced facilities, depends directly on the scale of development generating section 106 contributions.

A larger development quantum at Sayers Common would:

- Spread fixed infrastructure costs across a greater number of units, reducing per-unit burden and improving overall viability;
- Generate additional section 106 contributions, providing greater certainty that infrastructure will be delivered in full and on time;
- Support the delivery of enhanced facilities, such as expanded healthcare provision or additional community space, that might otherwise be at the margins of viability; and
- De-risk the infrastructure delivery programme by reducing reliance on contributions from any single development parcel.

Riverdale respectfully submits that the framework would be strengthened by recognition that sustainable development on land adjoining the Sayers Common allocations, which would support the viability and timely delivery of shared infrastructure, should be considered favourably. This approach accords with the principle that comprehensive, coordinated development enhances infrastructure delivery—a principle the Council itself endorses through the Sayers Common Equalisation Approach.

(d) The implications for access to retail and employment centres

Neighbourhood Centre Provision

The Plan requires DPSC3 to provide a Neighbourhood centre towards the eastern part of the site with a range of community facilities including library, café, retail, co-working space, employment, and potential healthcare, with a local centre in the western part offering further community facilities. The inclusion of employment land within DPSC3 supports balanced communities and opportunities for local working, reducing the need to travel.

Employment Allocations

The take-up and long-term viability of employment floorspace is enhanced by a larger local labour market and customer base. E Class uses, which include offices, light industrial, research and development, and retail and café uses, are particularly sensitive to catchment size as they depend upon accessible workforce, local custom, and integration with residential communities. The 5,000-9,000sqm range provides flexibility, but the extent to which the upper end of this range is viable, and the diversity of employment offer that can be sustained, is directly influenced by the scale of the surrounding residential population.

Extended Catchment

The scale of development proposed across DPSC3 to DPSC7 will contribute to establishing the critical mass necessary to sustain viable local services and employment opportunities consistent with 20-minute neighbourhood principles.

Riverdale notes that the long-term viability of neighbourhood centres and local services is enhanced by larger walkable catchment populations, which provide greater resilience and reduce the risk of service withdrawal during economic fluctuations. The Berkeley Latimer Masterplan's vision for a genuine 20-minute neighbourhood, with residents able to meet daily needs within a short walk, is strengthened by comprehensive development that maximises the population within walking distance of the neighbourhood centre.

The evidence base supporting 20-minute neighbourhood principles indicates that local services-including convenience retail, healthcare, and community facilities-benefit from catchment populations at the upper end of viability thresholds rather than the minimum. A larger catchment supports a wider range of services, more frequent public transport provision, and greater diversity of local employment opportunities, all of which contribute to reducing car dependency and enhancing quality of life for residents.

Riverdale respectfully submits that the framework would be strengthened by recognition that sustainable development on land adjoining the Sayers Common allocations, which would extend the walkable catchment of the neighbourhood centre and support the long-term viability of local services, should be considered favourably.

(h) The funding and delivery of necessary infrastructure and other necessary mitigation measures

Infrastructure Delivery Framework

The Plan establishes a comprehensive framework for infrastructure funding and delivery through Policy DPI1 (Infrastructure Provision) and Policy DPI2 (Planning Obligations). Development will be permitted where it is supported by, and coordinated with, the delivery and maintenance of infrastructure to meet the additional need arising from the proposal.

Significant Site Requirements

The Plan requires Significant Sites to prepare a site-wide Infrastructure Delivery Strategy demonstrating that the development will deliver, in a timely manner, sufficient infrastructure to cater for the needs of the proposed development as a whole and also mitigate to an acceptable level the effect of the whole development upon the surrounding area and community. Critical and essential infrastructure including transport schemes, education and neighbourhood centres must be delivered at the earliest opportunity to mitigate the impacts of the development and encourage maximum patronage to ensure long-term viability.

Sayers Common Equalisation Approach

The Council, in collaboration with West Sussex County Council and other infrastructure providers, is developing an equalisation approach to secure developer contributions and deliver the necessary infrastructure across all Sayers Common allocations. This approach is being agreed in liaison with all landowners and site promoters for the proposed allocations and in accordance with the Sayers Common Statement of Common Ground.

A Sayers Common Liaison Group has been established, led by Berkeley Latimer, providing an open and constructive forum for local councillors, community representatives, the Council and site promoters to share views and exchange information.

Viability and Delivery Considerations

The Sayers Common Equalisation Approach provides a framework for coordinating developer contributions across all allocations. However, the viability and deliverability of shared infrastructure is directly correlated with the scale and comprehensiveness of development. Per-unit infrastructure costs trending towards £20,000-£25,000 create viability pressures that would be eased by a larger development quantum generating additional section 106 contributions.

Riverdale submits that the framework would be strengthened by policy recognition that proposals for sustainable development on land adjoining the Sayers Common allocations, which would support the delivery of infrastructure serving the allocations, should be considered favourably. This would accord with the Regulation 18 recognition that connectivity between the eastern and western parcels should be investigated and would provide additional certainty that infrastructure will be delivered in a timely manner.

As a fallback, Riverdale respectfully submits that Policy DPSC3 should be amended to clarify that proposals for sustainable development on adjacent land will be considered favourably where they would support and enhance the delivery of infrastructure and services serving the allocation. This approach is consistent with the Council's own recognition at Regulation 18 stage and would represent positive planning.

Conclusion

The Plan provides a sound foundation for the sustainable development of DPSC3, supported by comprehensive policy requirements addressing urban design, transport, community facilities, employment, countryside protection, biodiversity, heritage, and infrastructure delivery.

However, Riverdale respectfully submits that the framework's effectiveness and resilience would be enhanced through modification to Policy DPSC3 to recognise that proposals for

sustainable development on adjacent land will be supported where they accord with and reinforce the objectives and vision for Sayers Common. This approach would:

- Complete the investigation identified at Regulation 18 stage regarding connectivity between the eastern and western parcels;
- Enhance the viability and deliverability of shared infrastructure through additional development contributions;
- Provide additional deliverable housing supply within an established growth location, contributing to plan resilience; and
- Accord with the comprehensive and coordinated approach to development at Sayers Common that the Plan itself promotes.

Riverdale recognises that the Inspector has indicated that time will not be allocated to omission sites in the hearings. The modifications proposed in this statement do not seek to promote an omission site but rather to complete the investigation that the Council itself commenced at Regulation 18 stage and to strengthen the policy framework for sustainable development at Sayers Common. This approach is consistent with the Inspector's indication that the overall soundness of the spatial strategy will be scrutinised.

For the reasons set out above, Riverdale respectfully submits that the Plan's framework for sustainable development at DPSC3 is capable of being made sound through the modifications proposed in this statement and in Riverdale's Matter 1, Matter 2, Matter 5, and Matter 6 Statements.