

## **Mid Sussex District Plan Examination**

### **Hearing Statement – Matter 6: The selection of sites for allocation in the plan**

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On behalf of B.Yond Homes Ltd (formerly Rydon Homes)

(Response ID: 1189677)

February 2026

## 6. The selection of sites for allocation in the plan

### The rationality and effectiveness of the site selection process.

#### a) The soundness of the process which led to the inclusion of site allocations in the plan and the exclusion of other sites, including the consideration of mitigation measures to address constraints

1. As set out in our representations submitted at both the Regulation 18 and Regulation 19 consultation stages, we consider that the methodology for site selection, which has determined the level growth at existing settlements, has the following flaws:
  - Being unduly reliant on, in particular, Landscape Character Assessments that are not site specific and, instead, cover wide areas of land;
  - Not fully considering the potential for mitigation against the issues identified e.g. could an appropriate buffer be provided, or taking full account of concept masterplans provided for sites where mitigation is outlined;
  - In assessing walking distances to existing services, not including and accounting for all existing footpaths/routes (or the potential to connect into existing routes), or considering the qualitative aspects of those routes (e.g. whilst there is a footpath, are parents likely to use it to walk their children to school if it is alongside a road with 60mph speed limit); and
  - Not factoring in potential benefits, aside from the provision of housing, that a site could offer e.g. an extension to a country park – the planning balance.
2. Whilst we have not been exhaustive in our review of all the Council's site assessments, it is suggested that the matters identified for Hurstpierpoint, a tier 2 settlement, are likely to apply across the district resulting in a more constrained view of site deliverability. Therefore, in our view, the higher order settlements in the settlement hierarchy, including Hurstpierpoint, are considered to have greater sustainability merits and growth potential than the outputs of the Council's site selection process would suggest.
3. As such, potential sources of housing supply at sustainable settlements across the district, such as Little Park Farm at Hurstpierpoint, have been unnecessarily and inappropriately excluded.
4. The Council has not therefore been exhaustive in the level of growth that can be provided at Principle 3 of the Spatial Strategy – the existing sustainable settlements of the district – before considering the Principle 4 option of 'Opportunities for extensions, to improve sustainability of existing settlements'.

## b) The rationale behind the selection of the strategic and larger site allocations

5. The NPPF, at paragraph 73, clearly provides scope for new strategic scale development to be delivered and therefore the principle is not necessarily questioned. However, as we have outlined in our Hearing Statement to Matter 5, we question the rationale of being reliant on such a high proportion of the proposed new housing coming from strategic scale allocations.
6. With regard to the rationale of the specific strategic allocations, the NPPF is clear that such allocations should meet a number of caveats and requirements for delivery, which include:
  - being well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes); and
  - ensuring that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment).
7. In this regard, we do not contest the rationale behind the strategic allocation DPSC1 located adjoining a Tier 1 settlement such as Burgess Hill, particularly so given development allocations already committed to the north of Burgess Hill. However, with the anticipated delivery trajectory of this committed development north of Burgess Hill overlapping with that of DPSC1, it is questioned as to whether there will be an element of saturation in the localised housing market around Burgess Hill, with so much housing anticipated to be delivered in a relatively small area of the district, that delivery rates will actually be lower than those currently anticipated.
8. With regard to DPSC2 Crabbet Park, our previous Regulation 19 representations set out our concerns as to its locational rationale – the site is stated as being an urban extension located at Copthorne, a lower order centre in the settlement hierarchy stated in the Plan. However, the site does not actually adjoin the settlement and is instead separated by woodland. It is therefore questioned as to how well the proposed community will be visually and physically linked to Copthorne. Instead, the community is likely to be isolated.
9. Equally, with regard to Crawley, the site of DPSC2 is similarly visually and physically separate. The M23 demarcates the eastern boundary of Crawley, and this is further enhanced by a significant buffer of existing ancient woodland, parkland and water features. It is accepted that some areas proposed for residential development would be located, ‘as the crow flies’ only a short distance from the existing built-up edge of Crawley and would surround the existing Crabbet Park House complex and Holiday Inn hotel, but visually and physically it would be distinctly separate. It cannot therefore be considered to be well located and designed in accordance with the requirements of the NPPF.
10. Notwithstanding the above, our main concerns are in relation to the proposed strategic allocation at Sayers Common. It comprises one sizeable land allocation, DPSC3, but the expansion of Sayers Common should be

considered collectively with the wider proposed allocations of DPSC4 to DPSC7 inclusive with total development comprising just over 2,500 dwellings.

11. The largest allocation (DPSC3) is, itself, made up of two land parcels and the smaller of the two is less than ideally located in relation to the main service centre of Sayers Common; it appears somewhat remote from the remainder of the proposed allocation and the existing village itself. The Submission Plan lists Sayers Common as having high growth potential and proposes to provide significant growth at, what is, a lower order Category 3 Village, but the basis for this conclusion is unclear from the evidence base provided. In reviewing the Site Selection Proformas, it is apparent that whilst DPSC3 performs well on a number of the planning constraints, negative impacts for landscape and in relation to Listed Buildings are stated. Access to the main service centre also scores negatively. Other, smaller, sites have been discounted for comparable negative impacts, but yet DPSC3 remains.
12. In addition, in relation to the access to a primary school, health centre and retail, the main land parcel only scores positively as these are anticipated to be provided for on-site. It would otherwise score poorly, as is evidenced by the fact that the smaller allocations (DPSC4 to DPSC7) all score negatively in terms of access to community facilities; only DPSC5 scored neutrally against access to education as the primary school in Albourne is within the 20 minute walking distance. The physical distance is not disputed, but the route that small children would have to take is along the side of a road with a 60 mph speed limit, is likely to discourage walking.
13. The delivery trajectory in the Sayers Common Statement of Common Ground (ref: S1) shows that the smaller parcels (DPSC4 to DPSC7) are to come forward first as Phase 1, ahead of commencement of the main allocation DPSC3 and in advance of delivery of the community infrastructure facilities proposed, all of which are in DPSC3. Most of these smaller allocations (DPSC4 to DPSC7) proposed for the Sayers Common, are already being pursued, either with the submission of EIA Screening Requests (DPSC7) or with live planning applications (DPSC5 and DPSC6), totalling over 500 dwellings. This level of development is far in excess of that allocated to other Tier 3 settlements and indeed, Tier 2 settlements such as Hurstpierpoint, and therefore clearly conflicts with the Plan in that regard.
14. In addition, the sustainability of the Sayers Common location as a whole is questioned in relation to its access to the main settlements of the district. A Sustainable Access Review Technical Note by SK Transport Planning accompanied our representations at the Regulation 19 stage. It considered that Sayers Common is a village divorced from the main settlements of Mid Sussex, and the A23 physically limits easy access to the east on foot and by cycle. Whilst a cycle route from the village is being promoted by the site promotion teams in Sayers Common this route will negotiate dark, unlit rural lanes between the village and Burgess Hill. For many residents that will not be an attractive sustainable mode of travel; they will simply drive from the village to one of the settlement areas.

15. The Technical Note concludes that whilst the strategy to promote a ‘sustainable settlement’ in the village is laudable, in reality Sayers Common is too distant and disconnected to ensure any level of confidence that this will truly be a sustainable community and residents will be able to have less reliance on the private car than living in an alternative development either within or adjacent to an existing settlement in the borough.
16. Furthermore, what fails to be recognised in proposing a sustainable community at Sayers Common is that it is not simply an extension of Sayers Common, but a merging of Sayers Common with High Cross and Albourne (narrow green buffer is shown on the Illustrative Masterplan in the Sayers Common Statement of Common Ground – ref: S1). This would be in direct conflict with Policy DPC2: Preventing Coalescence and Strategic Objective 2 in the Consultation Plan which seek to protect the separate identities of the towns and villages in the district and prevent coalescence. The proposed allocation cannot therefore be considered to be well located or designed, as required by the NPPF.
17. The rationale for the strategic allocation at Sayers Common (DPSC3 to DPSC7) does not meet the requirements of paragraph 74 of the NPPF and is fundamentally unsound. Especially so, when there are alternative, deliverable, non-strategic sites which could be allocated within the Plan.

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