



RESPONSE STATEMENT

Project: Mid Sussex District Plan

Title: Comment on Site Selection Methodology Date: 13.03.26

Introduction

This document has been prepared by Lucid Planning Ltd on behalf of Crest Nicholson, who has an interest in the land to the north of Old Wickham Lane, Haywards Heath (SHELAA Ref. 988). This document is prepared in response to the 'Post Hearing- Site Selection Methodology Review' (MS-12) produced by MSDC on 6th March 2026.

Overall, we are supportive of expanding the site assessment criteria to be used by the Council to find further appropriate residential site allocations, to include revisiting of those sites that were previously excluded. As detailed below, however, there are a number of areas where there seems to have been misinterpretation of the advice offered by the Inspector; additional matters that need to be considered and further detail required on how issues will be weighted, resulting in the appropriate granular assessment and justification that the Council is targeting.

Settlement Hierarchy

Bullet 4 of page 3 appears at odds with what was discussed at Matters 4 and 5 of the Examination Hearing, with the suggestion that the Inspector indicated that principles 3 and 4 be put on an even footing. In reality the Inspector appeared to support the settlement hierarchy and the cascade approach, but acknowledged that this should not be the only consideration in looking to deliver positive planning.

It remains the case that higher tier settlements are by definition more sustainable in terms of access to employment, services, facilities and transport hubs, including railway stations, whilst acting as the main service centres for the smaller settlements.

In this context, if a situation arose whereby a similar sized site could be delivered in association with an existing sustainable Category 1 settlement, with existing infrastructure, this should be favoured over a settlement requiring substantial support through provision of new infrastructure and facilities in a lower tier settlement where there would be inherent cost and timing issues, giving rise to increased uncertainty of delivery.

Further Issues to Consider

Although the site selection methodology is being enhanced, it is considered that there are a number of issues which need to be specifically recognised or the intended approach expanded upon.

A point discussed on numerous occasions at the Examination Hearings was the national direction of travel, as evidenced through the December 2025 Draft National Planning Policy Framework. In particular, the methodology should have increased regard to the **support of active travel** and accordingly seek to position development close to existing railway stations.

There are two railways running through the district, with a total of 6 stations, one of which is in National Landscape at Balcombe. The others are East Grinstead; Haywards Heath; Burgess Hill (all Category 1 settlements), Wivelsfield and Hassocks (Category 2 settlement).

With regard to bullet 1 under paragraph 10, the methodology should be explicit in the expectation that the selection of further sites to address the unmet housing need of neighbouring authorities should be located in a way so as to fall within the **relevant HMA area**, whilst also being proximate to sustainable travel options. It should be recognised that Haywards Heath falls within, and therefore has potential to serve the needs of, both the Northern West Sussex and Brighton and East Sussex HMA's.

As discussed during Matters 4 and 5, there is also a need to have increased regard to **providing housing proximate/ connected to key existing employment areas**. In recognising this, regard should also be had to key employment areas which might sit directly outside of the district, such as those at Crawley and Gatwick Airport. It can be noted that Haywards Heath station provides the shortest rail travel times (15mins and 12mins respectively) to these areas.

Weighting of Issues

Through the Examination Hearing sessions it was acknowledged that there was a need to consider the weighting of different issues when seeking to arrive at a positively planned spatial solution. The Inspector used examples of protection of landscape setting and non designated landscape elements compared to the imperative to address housing need.

Although it is inferred that this balancing will be done, there is a need for further detail within the methodology on the broad approach to weighting of matters to provide confidence and certainty on the approach to be followed and any strategy arrived at.

Engagement and Efficiency of Examination Process

The fact that the Council is to engage with site owners/ promoters again is welcomed. That said, although completion of the proforma and associated detail will be useful, it is considered that additional targeted dialogue would be beneficial.

From the methodology it would appear that the proforma will pave the way for production of a 'long list' with accompanying 'explanation of why site is or is not considered suitable'. It is only at this point (para 13) that the interested parties will be aware of the assessment results and given the opportunity to 'fact check' what is stated. It is suggested that it would be more beneficial if prior to the sites being ruled out, the Council engage with promoters to highlight any outstanding concerns and allow the production of any final targeted detail which may serve to enable the site to be taken forward and thus ensure that the correct/ robust decision is taken. It is noted that the Council is unlikely to seek to address any complications noted given its limited resources (para 7).

More Detail

The methodology highlights that a 'granular explanation' (paragraph 13) is to be produced for each site. The need for a clear, consistent and detailed justification is recognised, although from the steps detailed it is difficult to see where the level of 'granular' information and assessment will be secured from. Although the general approach is encouraging there is a lack of information provided on the suite of extended issues to be considered and the approach to securing positive planning in the light of challenging housing numbers.

The Council is encouraged to look to try and find ways that a site can be designed to work with mitigation rather than looking for an excuse to discount it.