



Hearing Statement - Matter 3: Vision, Objectives and Spatial Strategy

Mid Sussex District Council – Examination in Public

Prepared on behalf of Miller Homes Ltd

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Basis of Report

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1.0 Introduction

- 1.1 This statement has been prepared by SLR Consulting Ltd on behalf of Miller Homes Ltd in respect of the Mid Sussex District Plan (2021 – 2039) Examination in Public. The Statement focuses on questions raised by the Inspector in their MIQs in relation to Matter 3: Vision, Objectives and Spatial Strategy.
- 1.2 By way of background, Miller Homes has an interest in land at Colwell Farm ('the site'), which is located on the eastern edge of Haywards Heath and has capacity to deliver up to 80 new homes on the edge of one of the district's most sustainable settlements. The location of the site is shown in Appendix 1.



2.0 Vision, Objectives and Spatial Strategy

2.1 Matter 3 of the Inspectors MIQs seeks to explore the following issues:

1. Whether the Spatial Vision and Objectives for Mid Sussex Council are justified, effective, consistent with national policy and positively prepared;
and
2. Whether the Spatial Strategy is justified, positively prepared, effective, and consistent with national policy.

2.2 14no. questions have been asked by the Inspector on these issues, and the following provides answers to the ones most relevant to our client's interests:

Issue 1

Q30. Does the Spatial Vision for the 2018 District Plan remain relevant?

2.3 The adopted spatial strategy set out in the 2018 District Plan focuses development towards the three main towns within the district (Burgess Hill, East Grinstead and Haywards Heath), with proportionate growth elsewhere. This overarching strategy for development is supported, as it is logical that the largest and most sustainable existing settlements take the majority of future growth.

2.4 It is disappointing therefore that the Submission Plan fails to continue this strategy and instead focuses on a revised strategy which is based on 'four principles' rather than proposing a clear spatial strategy. It is surprising that the revised strategy does not allocate any significant growth in Haywards Heath, which is not only one of the district's main three settlements (defined as a place with a comprehensive range of facilities and services) but is also located outside areas of key constraint including the High Weald National Landscape (AONB) and the South Downs National Park. This position is not satisfactorily justified in our view, is not consistent with national policy, and is **not therefore supported**.

2.5 The Submission Plan focuses the vast majority of allocated units through the three new strategic sites (comprising a total of approximately 4,700 units). None of these strategic sites are situated within the top tier settlements of Haywards Heath or East Grinstead, and by comparison only 226 additional dwellings are allocated at Haywards Heath over the entire plan period.



- 2.6 This compares to allocations made in the Plan at Ansty which is a small village (classified as a Category 4 settlement) with an allocation in the emerging plan of 75 dwellings; and Bolney, a Category 3 settlement with 200 dwellings allocated. Both Bolney and Ansty are incomparable in terms of the access to the vast services and facilities at Haywards Heath, including a mainline train station connecting the town directly to London and Brighton.
- 2.7 Fundamental errors are therefore raised with the proposed growth strategy (which is based on principles rather than a clear spatial strategy), with insufficient weight attributed to the benefits of locating growth in existing sustainable locations (such as Haywards Heath) which is a fundamental objective of the Framework.

Q32. Is the Plan period justified, effective and consistent with national policy in particular paragraph 22 of the Framework? Should it be extended, if so, why?

- 2.8 The plan period is 2021-2039, noting the NPPF requires strategic policies to look ahead over a minimum 15-year period from adoption (paragraph 22). The Council's most recent Local Development Scheme (January 2024) expects the plan to be adopted by December 2024 but given that Stage 1 matters are due to be heard at EiP in late October 2024, and a timetable for Stage 2 matters has not been published yet, it is unrealistic to assume that the plan will be adopted by the end of 2024.
- 2.9 In the best-case scenario of adoption in early/mid 2025, the plan period would be looking ahead to less than the minimum period which fails to meet the minimum requirements of the Framework. Accordingly, it is considered that the plan period should be extended by at least a further year (to 2040), which would therefore require additional sites to be allocated to address the additional requirement of 1,090 homes that an extra year in the plan period would result in.

Issue 2

Q33. Chapter 6 of the Plan relates to the District Plan Strategy. However, there is no explicit strategy within the Plan as submitted rather four principles and a distribution of development based on commitments, and existing and proposed allocations. Is there an overall spatial strategy which sets out the pattern, scale and design quality of places and makes sufficient provision for development and infrastructure as required by paragraph 20 of the



Framework? If so, how would this strategy influence decision- making, and has it been positively prepared, justified, and effective?

Q35. Is this strategy sufficiently clear to decision-makers, developers, and local communities as to where the majority of new development including infrastructure will be located? Is it consistent with the policies of the Plan?

- 2.10 As per the answer to Q30 (above), the proposed growth strategy in Chapter 6 is based on four 'principles' which is not a clear spatial strategy and is and open to interpretation about which areas of the district are best suited for additional growth. The Plan does not sufficiently justify why this strategy is appropriate and simply states '*there is limited growth potential at East Grinstead, Haywards Heath and AONB settlements*' without offering sound reasons why this is.
- 2.11 Our contention is there are suitable, available and deliverable sites close to these settlements, such has the land in our client's control at Haywards Heath. Given the significant unmet needs in both HMAs of which Mid Sussex is a part, the Council should be looking at every opportunity to allocate sites for housing in sustainable locations like Haywards Heath.

Q36. How were the settlements defined as different categories and how did the Council decide on the scale and level of growth attributed to the different areas/settlements in the Plan? Is this justified?

- 2.12 The settlement hierarchy (as shown in Table 1 of the Submission Plan) rightly shows the three main towns within the district as Category 1 Settlements, and this is not in dispute.
- 2.13 It is surprising however, that whilst Haywards Heath and East Grinstead are identified as two of the district's three most sustainable settlements, Chapter 6 of the Plan claims that these settlements have 'limited' further growth opportunities and have consequently not been allocated any significant development sites. The Plan fails to justify this, particularly where these settlements are not constrained by landscape designations, and both have mainline railway stations connecting to London and other key destinations making them incredibly sustainable and desirable locations for growth.
- 2.14 The four key principles descried on page 33 of the Submission Plan which seek to direct growth within the district; all in our view, support the continued sustainable growth of Haywards Heath, which is a settlement not within or bordering the High



Weald or National Park, and is an existing settlement with opportunities to extend to improve sustainability.

- 2.15 Whilst it is agreed that the allocation of 2,393 homes at Sayers Common is likely to be required to meet future identified housing needs, this is not an existing sustainable location when compared to settlements such as East Grinstead and Haywards Heath and will require major new infrastructure to be delivered before any housing units can be completed.
- 2.16 The large-scale strategic development sites identified should be complimented by additional, medium-scale allocations within or on the edges of existing sustainable towns to ensure homes are delivered without delay. By allocating medium-scale sites in and around existing settlements such as Haywards Heath, development is far more likely to come forward early in the plan period as no major new infrastructure is required to be built out first. These sites would provide greater certainty of delivery, and lower risk.

Q37. How does the spatial strategy and the distribution of development relate to neighbouring settlements outside of the District such as Crawley to the north?

- 2.17 The Submission Plan allocates a large strategic site at Copthorne (1,500 homes) which will help to meet unmet needs arising from Crawley to the north, but more emphasis needs to be placed on the significant unmet needs and constrained nature of authorities to the south (particularly Brighton and Lewes). The spatial strategy should be revisited to place a greater focus on growth in the southern part of the Mid Sussex district in order to meet the cross-boundary needs of neighbouring authorities in the Coastal areas.

Q38. Is the strategy and distribution of development consistent with paragraph 105 of the Framework which states that the planning system should actively manage patterns of growth and focus significant development in locations which are, or can be made sustainable and paragraph 124 of the Framework which references the need to achieve appropriate densities so as to optimise the use of land in their area?

- 2.18 Note – the above reference to paragraph 105 of the Framework should read 109.



- 2.19 As noted previously, in order to ensure that enough homes are delivered within the plan period, reliance on large strategic allocations (such as allocations in Sayers Common, Copthorne and Burgess Hill) must be complimented by additional medium-sized sites allocated in and around the districts' most sustainable settlements including East Grinstead and Haywards Heath.
- 2.20 One of the key objectives of the Local Plan is to implement the concept of 20-minute neighbourhoods, which the Submission plan notes as including the towns of Burgess Hill, Haywards Heath and East Grinstead. The emerging Local Plan states that the concept of 20-minute Neighbourhoods and 'Local Living' forms an important part of the site selection process which was used to determine the most suitable and sustainably located sites for allocation. This demonstrates the further suitability of Haywards Heath as a suitable location for growth where most locations on the edge of the settlement would meet the 20-minute neighbourhood requirement.

Q39. How have the constraints within the District, such as the High Weald Area of Outstanding Natural Beauty and the setting of the South Downs' National Park influenced the strategy of the Plan?

- 2.21 The significance of the High Weald and National Park has rightly been identified by the Council, and these constraints must be reflected in the overarching development strategy. It is therefore surprising that more focus has not been placed on settlements such as Haywards Heath which are outside of these designations to accommodate more growth, particularly in the context of additional growth that is needed to address the shortfall of the wider HMAs, and the need to find further housing sites to address the additional need arising from the extension to the plan period to 2040 that is required.
- 2.22 The sites that have been selected for allocation in the Submission Plan largely sit outside these landscape designations, albeit some are located within the AONB and some on the edge of the National Park (such as those in Hassocks and Burgess Hill) thereby affecting its setting. Whilst the AONB boundary is located close to the northern edge of Haywards Heath, the southern end of the town is neither in proximity to the AONB or the National Park, and (given the sustainability of the site and its geographical proximity to Lewes district) would therefore be a suitable location to target further growth to help meet unmet needs whilst avoiding adverse impact on designated landscapes.



Q40. To what extent was the preferred combination of options 1 and 2 chosen on the basis of a justified and proportionate evidence base?

- 2.23 The focus in the Sustainability Appraisal on Option 2 (growth across settlements with existing facilities) combined with elements of Option 1 (proportionate growth of existing settlements where available) has led to the Council's growth strategy which is based on a set of principles rather than a clear spatial strategy. The strategy to focus growth on existing settlements is agreed, but it is unclear how this aligns with the proposed strategic allocations which include a new settlement of 2,393 dwellings at Sayers Common (a Category 3 'medium village'), and only a total of 226 new dwellings at Category 1 Haywards Heath.

Q41. Does the spatial strategy look sufficiently further ahead, particularly in relation to larger developments that go beyond the Plan period, such as DPSC1: Land to the West of Burgess Hill/ North of Hurstpierpoint; DPSC2: Land at Crabbet Park and DPSC3: Land to the south of Reeds Lane, Sayers Common?

- 2.24 The key focus within the Submission Plan on the allocation of three large-scale strategic sites poses a significant risk around delivery within the plan period. Whilst these sites are likely to be required in the long-term to help to meet significant undersupply across the wider region, there is a big risk that completions will not be quick, and the trajectory will slip as a result. As such, to provide for more certainty in the short term, more focus should be placed on the allocation of medium sized sites with less reliance on the delivery major up-front infrastructure, and which are quick to commence and will offer more certainty in delivery early in the plan period.

Q43. Are any main modifications necessary for soundness, if so, why?

- 2.25 In order to make the plan sound, the plan period must be extended by one year to 2040 to meet the minimum 15-year requirement of paragraph 22 of the Framework.
- 2.26 In addition, additional allocations for housing development should be included to address unmet need arising from the wider HMAs, as well as need arising from the requirements to extend the plan period by one year to 2024. These additional allocations should be medium scale sites in and around the unconstrained

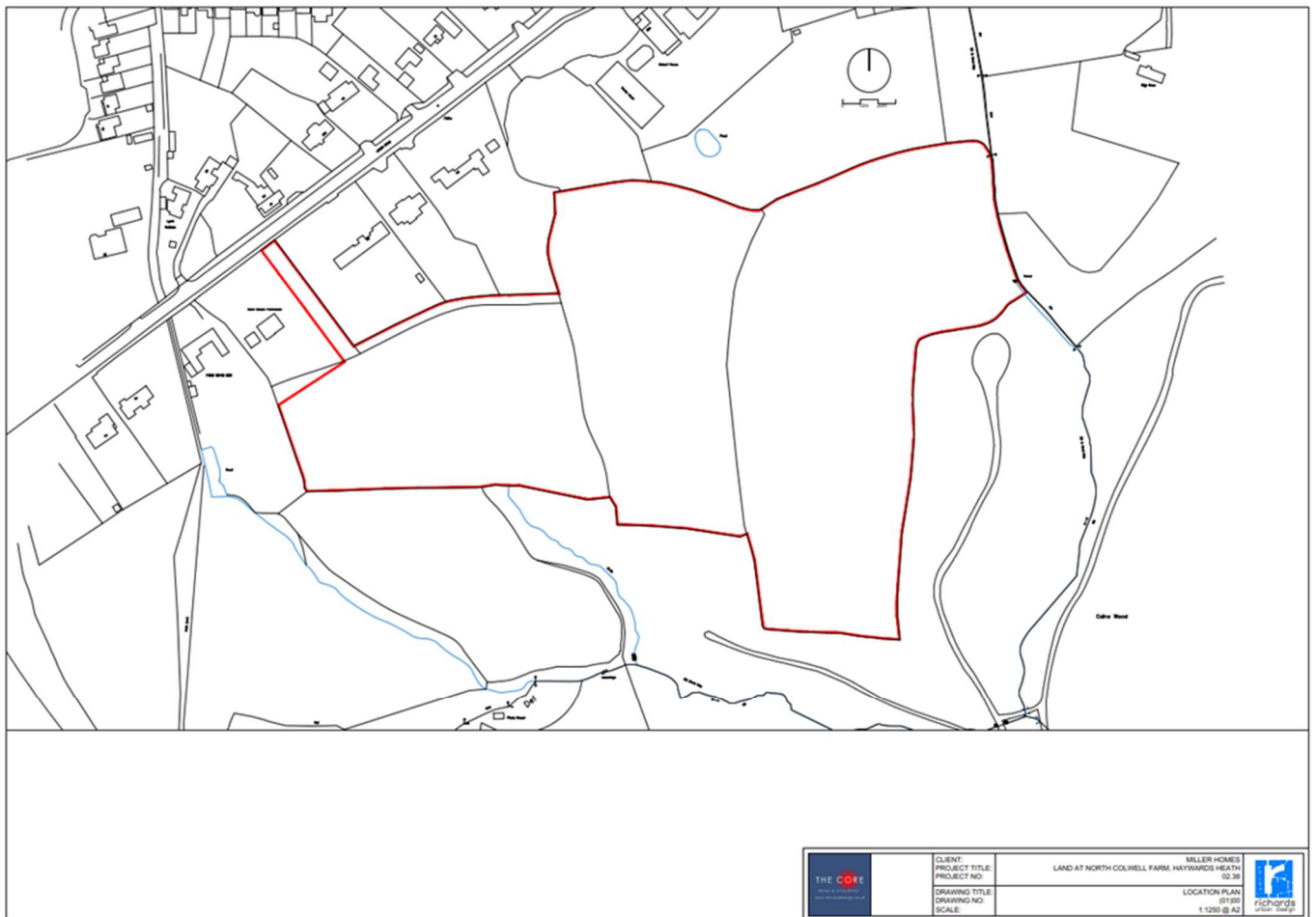


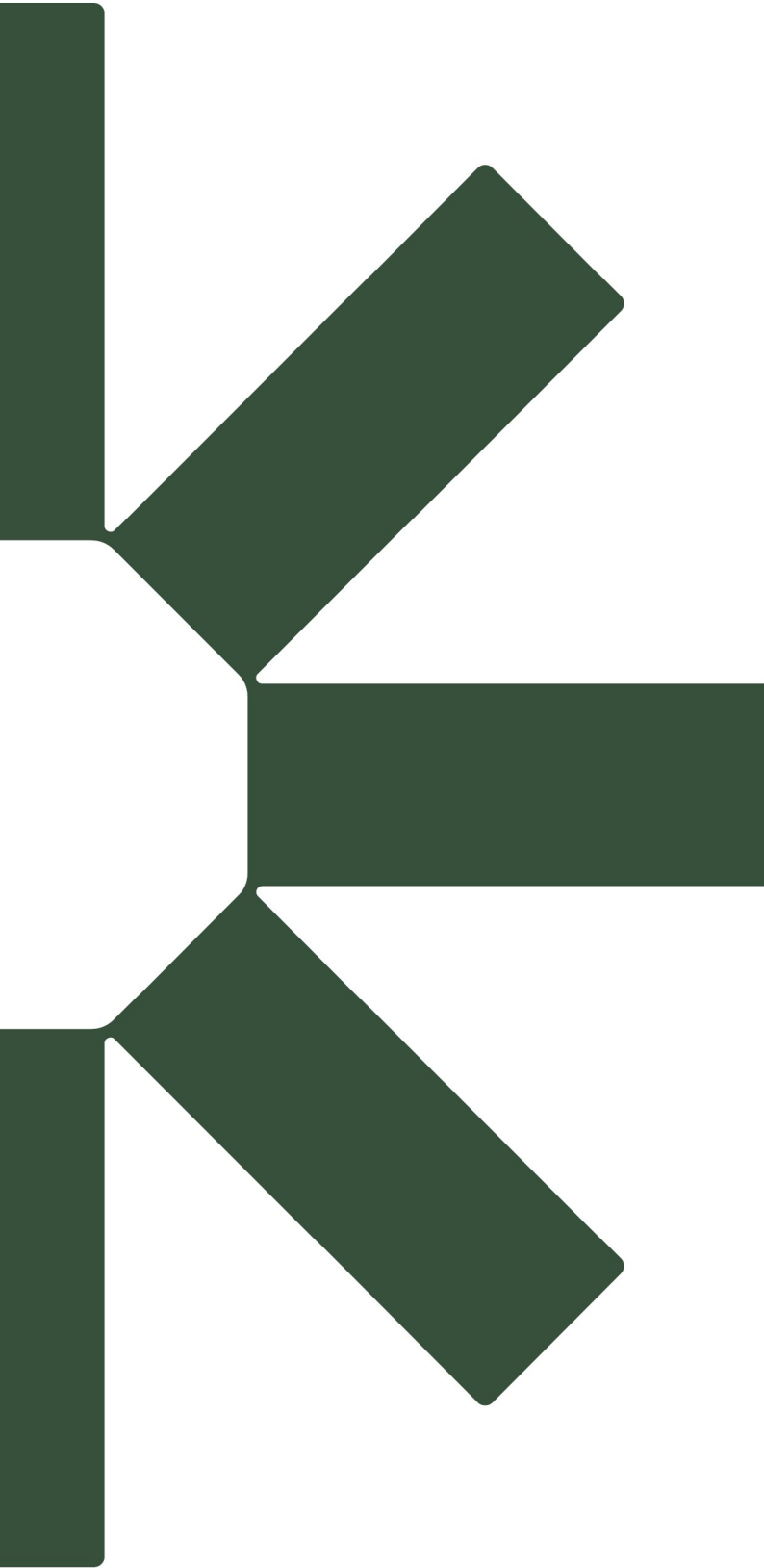
settlements of East Grinstead and Haywards Heath in order to ensure development comes forward without delay and in sustainable locations in accordance with the Council's settlement hierarchy and national policy.

- 2.27 The overarching growth strategy needs to be reviewed, to provide a clearer spatial strategy that reflects the preferred options of the Sustainability Appraisal. Allocations need to reflect the spatial strategy and in addition to the identified strategic scale sites, allocations should include additional medium scale housing sites in and around key towns, that can be delivered early on in the plan period.



Appendix A Colwell Farm, Haywards Heath: Site Location Plan





Making Sustainability Happen