



**Mid Sussex Local Plan Examination:
Response to Matter 3**
Haywards Heath Golf Course

Boyer

Prepared on behalf of Croudace Homes Ltd | September 24

REPORT CONTROL

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Primary Author	Christopher Roberts / Daniel Gresswell-Nunn
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1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Boyer on behalf of Croudace Homes Ltd ('Croudace'), in response to the Inspector's Stage 1 Matters, Issues, and Questions ('MIQs'), in relation to the examination of the submitted Mid Sussex District Plan Review (the 'Local Plan' / 'Plan').
- 1.2 Boyer has prepared this statement in response to 'Matter 3: Vision, Objectives and Spatial Strategy', as identified in Examination Document ID_004 – Matters Issues and Questions – Stage 1, published August 2024. It should be read in conjunction with our submissions with respect to the other identified Matters.
- 1.3 The Hearing Statement has been prepared with respect to the promotion of the land at Haywards Heath Golf Course, over which Croudace holds a specific land interest. Our comments respond only to those questions pertinent to our client's interest.
- 1.4 Representations were submitted to the Council's Regulation 19 Consultation on behalf of Haywards Heath Golf Club Ltd., submitted by DMH Stallard. Croudace's interest over the land has been formalised following the Regulation 19 consultation.

2. RESPONSE TO MATTER 3: VISION, OBJECTIVES AND SPATIAL STRATEGY

Issue 2: Whether the Spatial Strategy is justified, positively prepared, effective, and consistent with national policy?

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?

- 2.1 Contributing to the achievement of sustainable development is, as set out in the NPPF (December 2023) at paragraph 7, the purpose of the planning system, and is therefore necessary to be *consistent with national policy*.
- 2.2 The Plan's Spatial Strategy is guided by several principles, which together seek to direct development toward places that are either currently sustainable in their own right, or can be made sustainable as part of a strategic development proposal.
- 2.3 In this regard, the spatial strategy (albeit expressed in a dispersed manner) in part seeks to direct development toward the higher-order settlements in order of sequential preference. The direction of development toward the most sustainable settlements is a central doctrine in the achievement of sustainable development, as indeed is recognised in the Plan.
- 2.4 The location of a greater proportion of development at the Borough's highest tier settlements is clearly a foundational component of an approach that is capable of achieving '*sustainable development*'. Notwithstanding, Haywards Heath (one of the District's highest-order and most sustainable settlements) is set to deliver just +1,230 new homes up to 2039, an annual average of just ~68 homes per annum over the 18-year period. Of these, some 1,005 (82%) comprise already 'committed' development.
- 2.5 At Table 33 of the Local Plan (and justifying the absence of future planned higher levels of growth at Haywards Heath), it is explained there is limited potential for further growth at Haywards Heath, with it being stated at paragraph 37 of the Plan that; "*The availability of sites which continue to be capable of accommodating sustainable growth has become much more limited, particularly at East Grinstead and Haywards Heath and larger villages*".
- 2.6 As explained in our responses to Matter 1 and Q38 below) following the material change in position regarding the availability of Haywards Heath Golf Centre, there is now a main candidate site available for additional strategic development at Haywards Heath – the Land at Haywards Heath Golf Course. The Council's accepts in the Site Selection Conclusions Paper that there are "no showstoppers" to the site's redevelopment. Nonetheless, the paper goes onto explain that the site was screened out during the final stage of consideration on

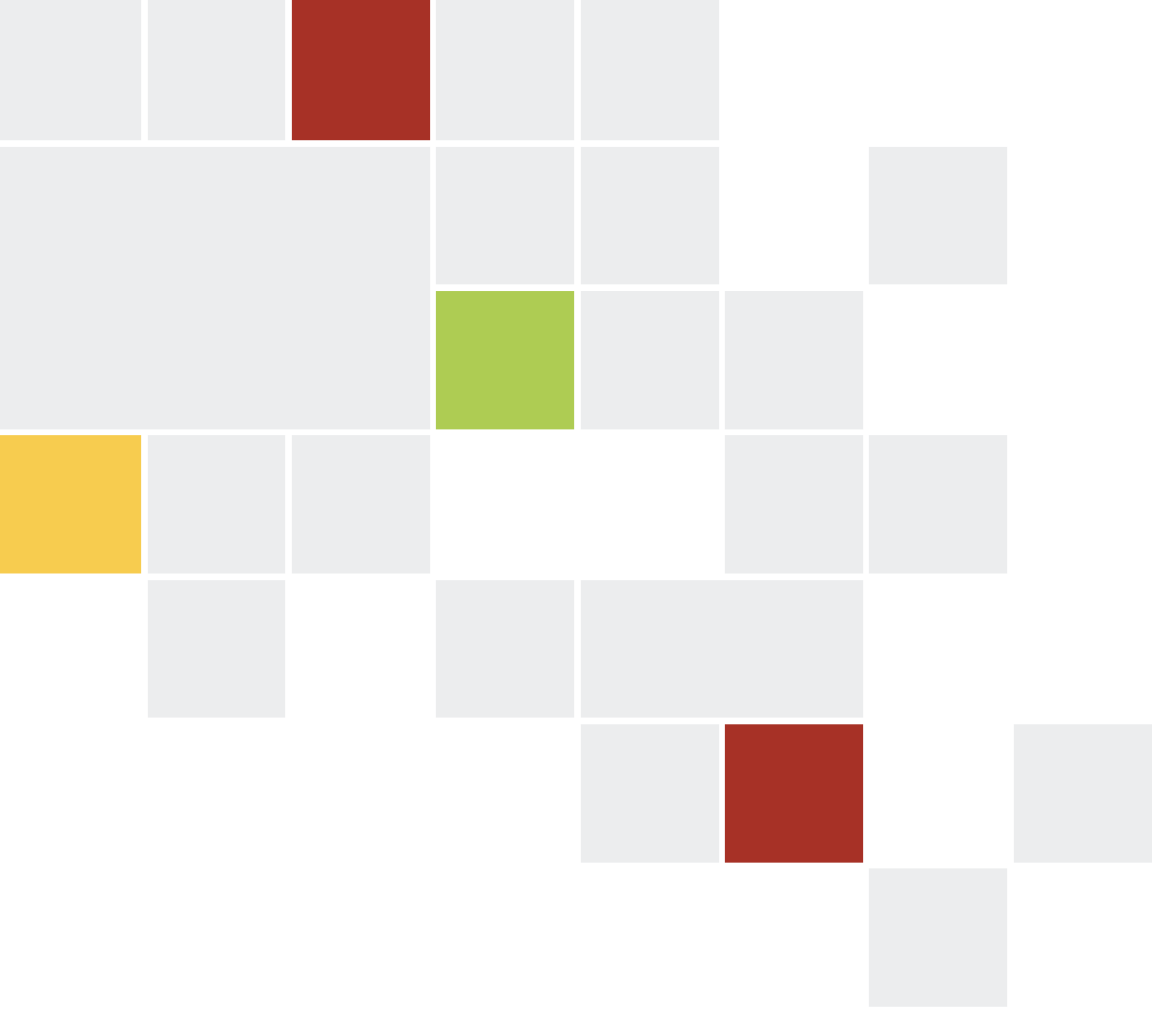
the basis of the Council's view that residential development at this location would not conform with '20-minute neighbourhood' principles. However, the availability of walkable services can be improved through the provision of additional community infrastructure and services at the site (indeed, the land was promoted on this basis). The potential to render a location more sustainable through new facilities and infrastructure (i.e., 'policy on') is indeed an approach employed on other sites included in the submitted Plan, such as Land West of Burgess Hill (DPSC1) or Land at Crabbet Park (DPSC2).

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?

- 2.7 Consistent with our response to question 37 (and our Statement on Matter 1), Croudace considers there to be a degree of discrepancy between the assessment of Land at Haywards Heath Golf Course and sites/areas that are proposed for allocation.
- 2.8 In this respect, the SA and Site Selection Conclusions Paper has approached Haywards Heath Golf Course on the basis that it is proposed only for residential development, with no supporting infrastructure or mix of uses that would improve its locational sustainability. It therefore scores less favourably in the final evaluation, because it is also judged to lie beyond a 20-minute walk of key day-to-day services.
- 2.9 This is seen in the overall judgement expressed in the Site Selection Conclusions Paper, which after stating that there are no "showstoppers" in terms of environmental or technical constraints, states;
- 'However, this site is not well connected to the services and facilities of Haywards Heath and will be reliant on the private car. Therefore, site does not support the delivery of sustainable communities which is a key part of the District Plan Strategy. Other more sustainable sites are available for development'*
- 2.10 In contrast, the proposals for growth at such as Land West of Burgess Hill (DPSC1) or Land at Crabbet Park (DPSC2) are evaluated more favourably precisely because of the identified potential to provide new services and infrastructure, or to link into planned provision.
- 2.11 As described in our Statement for Matter 1, Croudace is somewhat surprised by the Council's assessment, as Haywards Heath Golf Course was promoted to include homes alongside a shop, public house, community facilities and accessibility improvements. This would allow for sustainable growth to the north of Haywards Heath, consistent with the 20-minute Neighbourhood principles that the Plan seeks to embed within its overall strategy.
- 2.12 Indeed, the assessment is more surprising still, when it is remembered that Hayward Heath Golf Course has long been considered one of relatively few sites that could sustainably accommodate strategic scale residential-led development (at a tier 1 settlement). This view was apparent during the examination of the current (adopted) District Plan 2014 – 2031, and

again during the preparation and examination of the Site Allocations DPD. Fundamentally, the site is large enough to facilitate effective place-making and achieve development that reduces reliance on travel by private car.

- 2.13 In any case, it is our understanding that the underlying issue is not so much the site's locational sustainability and the potential to improve upon the baseline. Rather, as Council's officers have acknowledged, an allocation has not been forthcoming at this site mainly because of previous doubts around the ability to secure vacant possession and hence its availability for development. This issue has now been overcome through new legal arrangements, which include a 'Deed of Surrender' that allows for redevelopment in the event that a suitable planning permission is granted.
- 2.14 Accordingly, we would invite the Council (and by extension the Inspector) to give serious consideration to the potential for Haywards Heath Golf Course in the event this may assist the submitted Plan to proceed hereon.



Crowthorne House, Nine Mile Ride, Wokingham, RG40 3GZ | 01344 753 220
wokingham@boyerplanning.co.uk | boyerplanning.co.uk

Boyer