

Matter 3: Vision, Objectives and Spatial Strategy

Issue 1: Whether the Spatial Vision and Objectives for Mid Sussex Council are justified, effective, consistent with national policy and positively prepared?

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

30.1 The spatial vision of the 2018 District Plan is still relevant and reflects national government guidance in terms of its approach to sustainable development and the desire where possible, to improve the social, economic and environmental well-being of the District; as well as its aspiration to maintain, and where possible, improve the quality of life for all, now and in the future.

Q31. Are the Plan objectives which have been identified relevant; justified; and consistent with National Policy?

31.1 Yes.

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?

32.1 We note the plan period currently extends to 2039 i.e. 14 years post adoption, assuming adoption in 2025. To be consistent with the aims and objectives of the NPPF (September 2023)¹, especially para 22, the plan period should run till 2040, again assuming adoption in 2025; a position we note MSDC accept in their schedule of proposed mods (DP2).

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?

33.1 Chapter 6 of the Plan identifies four principles that are to direct future growth in the district. These are:

1. Protection of the High Weald AONB.
2. Making effective use of land.
3. Growth at existing sustainable settlements where it continues to be sustainable to do so.
And
4. Opportunities for extensions, to improve sustainability of existing settlements.

¹ Given para 230 of the NPPF December 2023, and the fact the MSLP was at Reg 19 in Jan 2024, we note the NPPF Sept 2023 applies

33.2 Pages 34 – 39 look to explain how these guiding principles have sought to direct growth as proposed within the Submission Plan. Policy DPSC GEN looks to address the strategic requirements of the significant sites, before policies DPSC 1, 2, 3 deal with site specifics. The principles that enshrine the spatial strategy are thus evident within the plan, albeit not spelt out in one policy. This could however be rectified by introducing an additional policy which explicitly sets out the spatial strategy so as to avoid any confusion.

Q34. Does the spatial strategy make the effective use of land including previously developed land?

34.1 Page 35 of the Submission Local Plan explains how the plan is promoting the efficient use of land, including previously developed land. It explains that an Urban Capacity Study (UCS) was commissioned to assess the potential quantum of new housing that could be delivered from brownfield sites, thereby contributing towards the district's housing need. The findings of the UCS (H3) indicate that there is potential for approximately 466 new homes on sites identified in the settlements surveyed in the study, and that this reflects a mid-point estimate of development potential on the physically identifiable sites and is in addition to those sites already identified and accounted for through the emerging Local Plan. It also advises that a further 104 homes might come forward on an annual basis across the district through windfall development on smaller sites and through other sources: with the majority of this potential existing within the Category 1 settlements of Burgess Hill, East Grinstead and Haywards Heath.

34.2 The findings of the UCS are reiterated in the Housing Supply and Trajectory Topic Paper (H4), whilst the SA at pA-8, in reviewing the Spatial Options, indicates that although Option 5 (Prioritise development on brownfield land) performs well against the SA objectives, it would not be suitable to meet housing need alone since there are limited brownfield sites available within the reasonable alternatives identified following the site selection process. Indeed, it *'would not come close to meeting the district's housing need in full.'*

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?

35.1 The Key Diagram on p42 of the Submission Plan is clear as to the locations of the proposed allocations / sustainable communities. It is then the site specific policies that set out the infrastructure requirements associated with each allocation, with section 7 of the IDP explaining what is required, where, and who will be funding this, under what policy (where relevant) and when; the latter point being something we understand the updated IDP will clarify.

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?

No Comment

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?

37.1 Appendix 1 of DC4 shows diagrammatically where development has taken place on the boundary with Crawley through existing commitments, and where growth is planned through the Submission Local Plan. In addition, the draft policies map (DP3), together with the plans included in chapter 15 of the Submission Local Plan², show how the development of Crabbet Park interrelates with the neighbouring settlement of Crawley.

37.2 Section 6 of DC4 explains that the three authorities that make up the NWS HMA commissioned consultants to prepare an “At Crawley” study in 2009 which explored a range of site options for development in and around Crawley. The study concluded that there were three locations with development potential:

- North East Sector (1,750 – 2,250 dwellings) – within Crawley
- Crabbet Park (2,100 – 2,700 dwellings) – within Mid Sussex
- West of Ifield (2,590 – 3,300 dwellings) – within Horsham

37.3 As set out in section 6 of DC4 the North East Sector was granted permission in 2011 for 1,900 dwellings and therefore has contributed to Crawley’s housing supply; West of Ifield is a proposed allocation within the submission draft Horsham Local Plan (policy HA2), and is capable of accommodating 3,000 dwellings, of which 1,600 are anticipated to be delivered within the plan period to 2040; and Crabbet Park is a proposed allocation within the submission draft Mid Sussex District Plan (policy DPSC2). As also set out in DP4, the site is allocated for 2,000 dwellings, with approximately 1,500 being developable within the plan period to 2040.

37.4 In the context of the above, CBC in their Submission Local Plan (Jan 2023) when talking about Crawley’s Unmet Housing Needs, refer to development adjacent to Crawley, and explain at para 2.32 that potential urban extensions to Crawley may include extensions to the east and/or west of the borough boundary. Figure 2 goes on to identify Planned Development Adjacent to Crawley, whilst Para 12.40 goes on to advise that ‘*opportunities for urban extensions immediately adjoining Crawley’s borough boundaries will continue to be explored with Crawley’s neighbouring authorities, taking into account the issues set out in paragraphs 12.17-12.23 above*’; and Paras 12.17 – 12 of the submission draft Crawley Local Plan set out a series of ‘Key Considerations’ CBC consider applications for urban extensions on or close to Crawley’s administrative borough boundaries should have regard to.

37.5 MSDC are we know working closely with CBC to ensure the issues they have raised are addressed by any future development at Crabbet Park, including future integration with Crawley.

37.6 Whilst CBC appear to see the proposed development at Crabbet Park as meeting their unmet needs, this is not, we understand, MSDC position, as they see the site providing for the needs of Mid Sussex first and foremost.

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

² See in particular pages 167 – 169.

paragraph 124 of the Framework which references the need to achieve appropriate densities so as to optimise the use of land in their area?

38.1 Section 9 of the NPPF looks to promote sustainable transport. Para 104 advises that: *'Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.'*

38.2 Para 105 indicates that the planning system should actively manage patterns of growth in support of these objectives; and that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

38.3 The spatial strategy and distribution of development promoted in the submission local plan is in our opinion consistent with para 105 of the NPPF, with the plan looking to promote growth at existing sustainable settlements where it continues to be sustainable to do so, and utilising opportunities to facilitate the extension of existing settlements where this would improve sustainability. The policy approach adopted to the 'Significant Sites' is such that locationally they provide an opportunity to deliver the sustainable expansion of existing communities and to improve upon the sustainable modes of transport that already exist in these areas to help enhance links between the proposed allocations and the wider area.

38.8 Turning to the issue of densities and the optimisation of the use of land, we note that para 124 of the NPPF advises that Planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- b) local market conditions and viability;*
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- d) the desirability of maintaining an area's prevailing character and setting...*

38.9 Para 125 goes on to indicate that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances para 125 suggests that:

a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;

uld be inappropriate;

b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and.....

38.10 In the context of the above we note that p35 of the Submission Plan addresses the issue of how the plan is seeking to promote the efficient use of land. Whilst it does not identify minimum or maximum densities, this approach reflects that adopted in the current plan (BD1), and whilst Wates have no objection *per se* in the introduction of a minimum density requirement, the housing numbers proposed on each site are - when considered in the context of the developable areas - already generating quite high densities.

38.14 We also note that para 8 of the Brighton and Hove SoCG (DC5) advises that ‘*The capacities of the selected sites are considered on a site by site basis taking into consideration a range of factors including densities, landscape, heritage and environmental constraints. The capacity within the proposed allocation is approximate. There will be opportunities to consider increasing capacities subject to detailed consideration of design and landscape issues at the planning application stage.*’

38.15 Given the above it would in our opinion be better to leave the site capacity issue to the detailed planning application stage so as not to prejudice a site promoter’s ability to look to deliver more if it is reasonable to do so – thus potentially enhancing the council’s overall supply.

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?

No Comment

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

No Comment

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?

41.1 If the plan period is extended to 2040 (see response to Q32) then given the trajectory set out in appendix 6 of the Housing Supply and Trajectory Topic Paper (H4) all 1,350 dwellings proposed at DPSC1: Land to the West of Burgess Hill / North of Hurstpierpoint will

have been built out. Likewise, all 2,000 dwellings proposed on DPSC3: Land to the south of Reeds Lane, Sayers Common will have been built out. The only site that would extend beyond the plan period would be DPSC2: Land at Crabbet Park, which is identified as delivering 1,500 dwellings before the end of the plan period assuming this is extended to 2040, with 500 beyond.

Q42. What reasonable alternative options were considered as part of the Plan's preparation and why were they discounted?

No Comment

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

No Comment