



# THAKEHAM

## Mid Sussex District Council District Plan 2021 – 2039 Examination

### Matter 3 Hearing Statement – Vision, Objectives and Spatial Strategy

September 2024

#### Regulation 19 Response IDs:

- 1189800
- 1191281
- 1187538
- 1187734
- 1191000
- 1191190
- 1191219
- 1191735

#### **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?

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

Yes. The 2018 District Plan spatial strategy focused development towards the three towns (Burgess Hill, East Grinstead and Haywards Heath) and encouraged proportionate growth at other settlements to meet local needs and support the provision of local services. This reflects the level of services and facilities, including sustainable transport infrastructure, at the largest settlements in Mid Sussex, including the large villages and those in the most sustainable locations.

We would suggest that the spatial ‘vision’ therefore remains relevant.

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

Yes. The District Plan objectives are underpinned by the three priority themes of National Policy: environment, economy and social. Within these overarching objectives, MSDC has identified detailed objectives which underpin the Local Plan and site allocations.

32. 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?

It is considered the District Plan period is justified, effective and consistent with national policy in particular paragraph 22 of the National Planning Policy Framework (NPPF).

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

33. 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?*

This is largely for the Council to answer.

However, as noted above, the 2018 District Plan spatial strategy, carried forward into the submitted District Plan, focused development towards the three towns - Burgess Hill, East Grinstead and Haywards Heath. It is appropriate that MSDC continues to focus on these localities, where sufficient appropriate sites exist – such as Burgess Hill.

However, the spatial strategy also continues to recognise the sustainability of other settlements in the District, such as Hurstpierpoint and Pease Pottage which have a range of services and facilities and are capable of accommodating further growth.

In Thakeham's opinion, the spatial strategy has sought to focus growth at areas where there is potential to accommodate growth and in the most sustainable locations; this is reflected in the allocation of land west of Burgess Hill (DPSC1).

The Plan identifies areas found to have 'potential for proportionate growth', which include:

- Burgess Hill
- Cuckfield
- Crawley Down
- Ashurst Wood
- Albourne
- Bolney
- Pease Pottage
- Scaynes Hill

The Plan strategy has reflected the findings of this evidence base, and the distribution and scale of the sites allocated for development accords with this. However, it also recognises that there are also opportunities for limited expansion of sustainable settlements such as Hurstpierpoint, and this is reflected in the allocation of land at Kemps (Policy DPA12), which is of a scale appropriate to the locality.

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

Yes.

Mid Sussex is a largely rural district, with only approximately 12% within designated Built-Up Area boundaries. Consequently, opportunities for utilising brownfield land to meet the housing needs of the district are limited. MSDC therefore appropriately recognises the need to plan for appropriate greenfield release.

*35. 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?*

The spatial strategy is sufficiently outlined in Chapter 6 of the Plan, which Thakeham consider to be clear and concise.

*36. 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?*

Mid Sussex has a distinctive settlement pattern, containing three main towns (Burgess Hill, East Grinstead and Haywards Heath) and a large number and wide variety of villages, some of which benefit from a range of services and facilities, including public transport and access to employment (such as Hurstpierpoint and Pease Pottage), all of which could support further growth.

A settlement hierarchy has been developed which identifies five categories of settlement within Mid Sussex. This is based on an assessment of their facilities, characteristics and functional relationships with their surrounding areas. This is outlined within Table 1 of the Plan. This approach is consistent with the adopted Local Plan.

It is considered justified, that Burgess Hill, as the largest of the settlements in Mid Sussex and arguably one of the least constrained, accommodates growth, through the allocation of Land West of Burgess Hill (DPSC1).

However, we strongly believe that the category of settlement for Pease Pottage should be reconsidered and elevated in the hierarchy, given the multitude of facilities and amenities which have recently been delivered in the settlement, including:

- Primary School;
- An enhanced bus service to the village;
- Community owned shop and café;
- Commercial development to the east of the A23;
- Hospice;
- Locally Equipped Area of Play;
- Enhanced permeability with additional footpaths into Tilgate Park (Crawley);
- New public open green space;
- Pease Pottage Community Hall; and
- Soon to be delivered, Landscaped recreation area beyond Finches Field.

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

The Local Plan identifies a hierarchy of settlements which are within the District boundaries, and there is merit to this approach which is reflective of most Local Plans and has been accepted as appropriate through the Examination of the adopted District Plan. However, the approach underplays the sustainability of Pease Pottage as a highly sustainable settlement which benefits from its proximity to Crawley, one of the largest towns in the County and adjacent to Gatwick Airport.

As set out in Thakeham's Regulation 19 representations, Pease Pottage has a range of local services and facilities which support the local community, including those delivered as part of the recent Woodgate development - a local shop, café and Primary School and extension of the Fastway bus service into the village. We submit that the Council's settlement hierarchy, and therefore the spatial strategy, should reflect the sustainability of Pease Pottage as a highly sustainable settlement on the edge of Crawley.

This position needs to be tested through the EiP process as to whether there is strong enough support in the Plan for meeting the needs of Crawley in appropriately located settlements.

*38. 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?*

Paragraph 105 of the NPPF 2023 requires that the planning system actively manages patterns of growth in support of the transport objectives set out in paragraph 104, namely that development should promote sustainable modes of travel, including the promotion of walking, cycling and the use of public transport whilst limited the potential for impacts on the transport network.

We submit that the strategy and distribution of housing is broadly consistent with paragraph 104 and 105 particularly the allocation of Land West of Burgess Hill (DPSC1) which is located on the edge of Burgess Hill, a highly sustainable location. Furthermore, through the implementation of sustainable travel options, including 'Burgess Bikes', and the inclusion of infrastructure on site, such as a new school and a neighbourhood centre, means that the development of the site is both in a sustainable location for new development but also delivers against the day to day needs of new residents, thus reducing the need to travel.

Further detail on the promotion of sustainable and active travel, in relation to the Land west of Burgess Hill, is set out in our Regulation 19 representations and our Matter 4 Hearing Statement.

With reference to our response to Q37, there is potential for housing to be accommodated in the north of the District, close to Crawley in locations such as Pease Pottage. This would recognise the sustainability of Crawley in meeting the needs of local residents, including significant public transport. Pease Pottage now benefits from the extension of Fastway, delivering another bus service to Crawley but now also Gatwick Airport. Overall, we consider that the Plan sets an appropriate strategy for the delivery of housing, however, as submitted in our Regulation 19 representations, there should be further recognition given to the sustainability of Pease Pottage, including links to Crawley, through the settlement hierarchy.

*39. 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?*

The further growth potential identified within the draft Plan, is based on four key principles. The first key principle is "Protection of the High Weald AONB". This principle seeks to avoid new development within this designation 'where possible' and therefore the Area of Outstanding Natural Beauty (AONB) is identified as an absolute constraint which directly influenced the strategy of the Plan. We would submit that the AONB needs to be approached more flexibly and on a case by case basis, this may unlock further sites.

The Council's current approach creates a barrier to the assessment of land within the AONB which may not contribute towards the special characteristics of the AONB and may be capable of delivering against development needs in the most sustainable locations. For example, land to the south of Pease Pottage is located immediately adjacent to the M23/A23 motorway and its associated urbanising features such as the road itself, noise, lighting, signage and a large bridge over the motorway. The site is also well located on the edge of Pease Pottage, and for the reasons set out in our Regulation 19 representations, and contained herewith, MSDC has artificially excluded a site in a highly sustainable location on the edge of Crawley and on land that no longer makes a valuable contribution towards the AONB.

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

This is for Council to evidence.

*41. 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?*

Land to the West of Burgess Hill/North of Hurstpierpoint (DPSC1) is located on the edge of Burgess Hill, the largest of one of three Towns in the District. This is considered to be a highly sustainable location for development, which would reflect Option 1 as set out in the Sustainability Appraisal (SA) 2024. There is no reason to consider that the sustainability of the location within a spatial strategy would change beyond the Plan period.

Furthermore, the anticipated housing trajectory for DPSC1 demonstrates the entire development would be delivered within the Plan period.

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

This is for the Council to evidence.

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

As per our representations at Regulation 19 stage, we submit that the Council's settlement hierarchy should be amended to reflect the sustainability of Pease Pottage, as a sustainable settlement in its own right, but also as a settlement adjacent to, and with good public transport links to, Crawley.