

## Mid Sussex District Plan Examination Hearings, October 2024

Matter 3: Vision, Objectives and Spatial Strategy

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

*Inspector's Questions para 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 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?*

Statement by Dr Ian Gibson BSc, PhD, FInstPhys

Respondent Reference : #1190441

### Summary

The revised spatial strategy has not been positively prepared. The Council has not undertaken an audit of the progress towards completion of the spatial strategy set out in the Mid Sussex District Plan 2014-2031 before adopting an alternative spatial strategy.

### Existing Spatial Strategy, District Plan 2014-2031

The spatial strategy of the present Mid Sussex District Plan 2014-2031 is set out in paragraphs 3.18 to 3.20 and Policies DP4 and DP6 of the Plan. The strategy allocates development based on existing settlement size and sets a minimum requirement for each settlement for the full Plan period (reproduced in Appendix 1). The minimum requirement represents sustainable development for a settlement within the Plan Period.

### The January 2022 Draft Regulation 18 District Plan 2021-2038

In January 2022 the Council published and immediately suspended a draft District Plan 2021-2038 for Regulation 18 Consultation<sup>1</sup>. The explanation given by the then Leader of the Council for the suspension was that the suspension was to allow the Council to write to the then Secretary of State to ask for the District's housing targets to be reset to reflect the environmental and infrastructure constraints of Mid Sussex.

The draft Plan 2021-2038 set out an update to the Spatial Strategy based on four key principles:

- Making effective use of land (brownfield sites, sites already allocated in the adopted Plan and Made Neighbourhood Plans, and sites to be allocated

---

1

<https://midsussex.moderngov.co.uk/documents/s11252/APPENDIX%201%20District%20Plan%202038%20SCH%20P.pdf>

- Growth at existing sustainable settlements where it continues to be sustainable to do so
- Opportunities for urban extensions to improve sustainability of existing settlements which are currently not sustainable
- Protection of Designated landscapes (such as AONB)

The settlement hierarchy of the current Plan was carried forward into the draft Plan 2021-2038 with expanded descriptions (Table 1).

<b>Category</b>	<b>Settlement characteristics and function</b>	<b>Settlements</b>
<b>Category 1 - Town</b>	Settlement with a comprehensive range of employment, retail, health, education leisure services and facilities. These settlements will also benefit from good public transport provision and will act as a main service centre for the smaller settlements.	Burgess Hill East Grinstead Haywards Heath
<b>Category 2 - Larger Village</b>	Larger villages acting as Local Service Centres providing key services in the rural area of Mid Sussex. These settlements serve the wider hinterland and benefit from a good range of services and facilities, including employment opportunities and access to public transport.	Copthorne Crawley Down Cuckfield Hassocks Hurstpierpoint Lindfield
<b>Category 3 - Medium Village</b>	Medium sized villages providing essential services for the needs of their own residents and immediate surrounding communities. Whilst more limited, these can include key services such as primary schools, shops, recreation and community facilities, often shared with neighbouring settlements.	Albourne Ardingly Ashurst Wood Balcombe Bolney Handcross Horsted Keynes Pease Pottage Sayers Common Scaynes Hill Sharpthorne Turners Hill West Hoathly
<b>Category 4 - Small Village</b>	Small villages with limited services often only serving the settlement itself.	Ansty Staplefield Slaugham Twineham Warninglid
<b>Category 5 - Hamlets</b>	These small settlements have very limited or no services.	Hamlets such as: Birch Grove Brook Street Hickstead Highbrook Walstead

Table 1. Settlement hierarchy, January 2022 Draft Regulation 18 District Plan 2021-2038

The draft Plan 2021-2038 identified communities with higher potential for further growth based on the location of deliverable/sustainable sites with potential for allocation within the Strategic Housing and Employment Land Availability Assessment (SHELAA). The potential of settlements for further growth as set out in the draft Plan 2021-2038 is shown in Table 2.

This assessment took no account of the completions between 2014 and 2021, and did not carry forward any undelivered housing from the minimum requirement identified for each settlement. This undelivered housing amounts in total to 561 homes over 9 settlements (see Appendix 2). Restricting the allocations to only SHELAA sites means that the draft Plan 2021-2038 was effectively developer-led and takes no account of the views of local communities.

Limited Further Growth Potential	Potential for Proportionate Growth	High Growth Potential
East Grinstead	Burgess Hill	Copthorne (Crabbet Park)
Haywards Heath	Cuckfield	Sayers Common
Hassocks	Crawley Down	Ansty
Hurstpierpoint	Ashurst Wood	
Lindfield	Albourne	
Ardingly	Bolney	
Balcombe	Pease Pottage	
Handcross	Scaynes Hill	
Horsted Keynes		
Turners Hill		
West Hoathly		
Sharpthorne		
Twineham		

	Settlement within the High Weald AONB
	Settlement contains a "Significant Site" with potential

Table 2 : Potential for further growth at settlements, January 2022 Draft Regulation 18 District Plan 2021-2038

The draft Plan 2021-2038 also proposed to allocate four significant sites, delivering a total of 5,850 homes in the Plan period. The size and location of the significant sites means that the new communities created will be serviced by new infrastructure such as roads, schools health centres and shops. This contrasts with the site allocations on the basis of 'proportionate growth' which will place increased demands on the already over-stretched services of the communities concerned.

## **The Draft District Plan 2021-2039**

The Council published a revised draft District Plan 2021-2039 for Regulation 18 Consultation in October 2022<sup>2</sup>, even though the reduction in the District's housing targets sought by the then Leader in January had not been realised.

The significant changes compared to the January draft were that the Plan Period was extended by one year and the allocation of a significant site at Ansty was dropped and the 1,600 new homes that it was expected to deliver were re-distributed over the remaining three significant sites. Severe impacts on the local road network were cited as the reason for removing the Ansty allocation. It is difficult to believe that the road network around Ansty is a reason for reducing development compared to the problems of traffic congestion on the A264/A22 corridor and local roads in the North of the District. The Inspector is asked to explore this in the sessions dealing with Transport and to consider visiting the area.

The settlement hierarchy of the draft Plan 2021-2038 is carried forward into the draft Plan 2021-2039. The proposed Plan allocations are reproduced in Table 3, including the commitments carried over from the current Plan, but there is no equivalent information on completions by settlement since 2014, or any analysis of the impact on individual communities of that growth.

## **Soundness of the Approach**

The failure to undertake an audit of the progress under the current spatial strategy before adopting an alternative spatial strategy is contrary to best practice.

The new strategy moves the focus for development to communities that are considered to have 'Potential for Proportionate Growth'. The identification of communities which are considered to have 'Potential for Proportionate Growth' needs to be supported with a definition of 'Proportionate Growth' and evidence for the level of growth which might be considered to be sustainable for each community listed. In this respect, Crawley Down has just 2 shops and a pharmacy in the village centre, no spare school places, a health centre in special measures and no village pub. It is difficult to understand why this is considered a good place to target 'Proportionate Growth' of 400 new homes (an increase of over 20%).

The failure to undertake an audit has resulted in communities like Copthorne and East Grinstead (Appendix 2), that have already delivered more than their minimum requirement for the 2014 to 2031 period, being required to take more housing while other communities, such as Cuckfield, that have not met their 2014 to 2031 minimum requirement are now not required to fulfil that requirement, or to take any housing in the 2021 to 2039 Plan Period. It is not acceptable that the draft Plan makes no reference to, and no attempt to justify, these adverse impacts arising from the change in spatial strategy

---

<sup>2</sup> <https://midsussex.moderngov.co.uk/documents/g3112/Agenda%20frontsheet%2018th-Oct-2022%2019.00%20Scrutiny%20Committee%20for%20Planning%20Economic%20Growth%20and%20Net%20Ze.r.pdf?T=0>

Settlement	Commitments (at 1st April 2023)	District Plan 2021 – 2039 Allocations	Total Housing Supply 2021 - 2039
Albourne	88	0	88
Ansty	16	75	91
Ardingly	42	0	42
Ashurst Wood	99	8	107
Balcombe	33	0	33
Bolney	40	200	240
Burgess Hill	5,169	1,708	6,877
Copthorne	260	1,500	1,760
Crawley Down	124	387	511
Cuckfield	85	0	85
East Grinstead	1,408	45	1,453
Handcross	71	0	71
Hassocks	726	25	751
Haywards Heath	1,005	226	1,230
Hickstead	0	0	0
Horsted Keynes	55	0	55
Hurstpierpoint	13	90	103
Lindfield	224	0	224
Pease Pottage	217	0	217
Sayers Common	85	2,393	2,478
Scaynes Hill	21	30	51
Sharpthorne	47	0	47
Slaugham	8	0	8
Staplefield	1	0	1
Turners Hill	64	0	64
Twineham	10	0	10
Warninglid	5	0	5
West Hoathly	5	0	5
<b>TOTAL</b>	<b>9,921</b>	<b>6,687</b>	<b>16,607</b>

Table 3 Commitments and Allocations for each settlement in draft Plan 2021-2039

Furthermore, the actual proposed allocations are themselves inconsistent with the proposed spatial strategy as evidenced by the unequal allocations for Crawley Down (387 homes) and Cuckfield (0 homes) when both are of similar size and both are assessed as having 'Potential for Proportionate Growth'.

## Conclusions

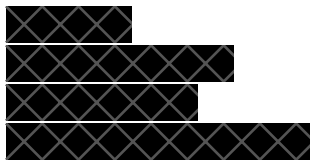
The failure to undertake an audit of the spatial strategy of the current District Plan 2014-2031 has prejudiced communities like Crawley Down and Copthorne that have delivered significant growth in the first 7 years of the Plan.

The failure to quantify the basis for designating a settlement as having '*potential for further growth*' and to set a target for sustainable growth for each settlement has resulted in allocations which are of an inappropriate scale for the settlements concerned.

The reliance on the SHELAA to identify sites for allocation has resulted in a draft Plan 2021-2039 which is developer-led and takes no account of the views of the local communities.

These deficiencies are not addressed by the Modifications.

Dr Ian Gibson BSc, PhD, FInstPhys



## Appendix 1: Minimum Requirement by Settlement in the District Plan 2014-2031

Cat.	Settlement	Minimum Requirement over Plan Period (Based on stepped trajectory)	Minimum Requirement to 2023/24 (Based on 876dpa)	Commitments / Completions <sup>3</sup> (as at April 1st 2017)	Minimum Residual from 2017 onwards (accounting for commitments and completions)
1	Burgess Hill	5,697	3,351	5,697	N/A
	East Grinstead	2,445	1,020	1,300	1,145
	Haywards Heath	2,511	1,403	2,385	127
2	Cuckfield	320	125	120	200
	Hassocks	882	519	882	N/A
	Hurstpierpoint	359	211	359	N/A
	Lindfield <sup>4</sup>	571	190	31	540
	Copthorne	437	228	388	49
	Crawley Down <sup>5</sup>	437	228	388	49
3	Albourne	57	21	16	41
	Ardingly	73	31	44	29
	Ashurst Wood	102	60	102	N/A
	Balcombe	79	34	49	30
	Bolney	113	48	64	49
	Handcross <sup>6</sup>	0	0	0	N/A
	Horsted Keynes	69	25	16	53
	Pease Pottage <sup>6</sup>	929	546	929	N/A
	Sayers Common	63	27	40	23
	Scaynes Hill <sup>4</sup>	462	272	462	N/A
	Turners Hill	167	71	96	71
	West Hoathly	43	21	36	8
	Sharpthorne	43	21	54	N/A
4	Ansty	54	32	54	N/A
	Staplefield	3	2	3	N/A
	Slaugham <sup>6</sup>	0	0	0	N/A
	Twineham	25	9	6	19
	Warninglid <sup>6</sup>	0	0	0	N/A
		<b>15,940</b>	<b>8,496</b>	<b>13,501</b>	<b>2,439</b>

<sup>3</sup>Commitments here defined as Allocations within the District Plan, Neighbourhood Plans, Small Scale Housing Allocations DPD (2008) and planning permissions.

<sup>4</sup>Note that Lindfield and Scaynes Hill (Lindfield Rural) are currently within the same Neighbourhood Plan area (the Lindfield and Lindfield Rural Neighbourhood Plan). A number of commitments/completions shown above at 'Scaynes Hill' are adjacent to the built-up-area of Lindfield.

<sup>5</sup>Note that Copthorne and Crawley Down form Worth parish, therefore these figures should be read in conjunction with one another.

<sup>6</sup>The required minimum provision at Pease Pottage (Slaugham Parish) is significantly greater than other settlements within Category 3 due to the allocation and subsequent permission granted for 600 homes within this settlement. Due to this, the other settlements within Slaugham Parish (Handcross, Slaugham and Warninglid) will not be required to identify further growth through the Plan process on top of windfall growth although may wish to do so to boost supply.

Appendix 2. Housing Completions and Commitments by Settlement. The undelivered Minimum Requirements from the District Plan 2014-2031.

	Completions 2021/22	Completions 2020/21	Completions 2019/20	Completions 2018/19	Completions 2017/18	Completions 2016/17	Completions 2015/16	Completions 2014/15	Communal Completions	Total Completions	Min Req 2014-2031	Commitments April 2022	Undelivered Min Req	% of DP target at Apr 2031
Albourne	1	1	1	1	1	1	4	7		17	57	47		112%
Ansty & Staplefield	1	21	9	3	19	42	42			137	54	76		394%
Ardingly	5	1	6	1	12	25		2		52	73	35		119%
Ashurst Wood	7	6	1	5	2	1	2	11		35	102	96		128%
Balcombe	21	1	13	5	3			2		45	79	31	3	96%
Bolney	5	1	2	5	4	1		1		19	113	50	44	61%
Burgess Hill	169	139	260	205	184	133	73	116	5	1284	5697	5181		113%
Crawley Down	47	3	15	2	39	61	82	26		275	437	134	28	94%
Copthorne	74	102	19	4	4	1	4			208	437	365		131%
Cuckfield	4	2	1	9	7	20	16	43	2	104	320	70	146	54%
East Grinstead	89	179	66	68	135	227	208	159	12	1143	2445	1755		119%
Hassocks	66	108	77	13	3	17	32	9		325	882	782		126%
Haywards Heath	289	185	360	217	277	213	259	173	21	1994	2511	1020		120%
Horsted Keynes	1	2	1	1	1	1		1	11	19	69	5	45	35%
Hurstpierpoint & Sayers Common	73	31	71	49	61	58	31	36	33	443	422	166		144%
Lindfield		65	56	34	46	57	87	1		346	571		225	61%
Lindfield Rural (Scaynes Hill)	70	50	1	4	3	2	6	25		161	462	302		100%
Slaugham (Pease Pottage, Warninglid)	192	180	122	39	63	61	29	26		712	929	759		158%
Turners Hill		24	27	6	2			2		61	167	64	42	75%
Twineham		4	2	3	1					10	25	6	9	64%
West Hoathly (+ Sharpthorne)		11	7		2	1		1		22	86	45	19	78%
<b>Total</b>	<b>1114</b>	<b>1116</b>	<b>1117</b>	<b>674</b>	<b>869</b>	<b>922</b>	<b>875</b>	<b>641</b>	<b>84</b>	<b>7412</b>	<b>15938</b>	<b>10989</b>	<b>561</b>	