

# Mid Sussex District Plan Examination

## Matter 3: Vision, Objectives and Spatial Strategy

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

### **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?**

1. No – the scale and level of growth attributed to existing settlements is not justified.
2. The settlement hierarchy set out at Page 40 of the Submission draft Regulation 19 District Plan is clear, but how the scale of growth which has been allocated to each of these settlements in accordance with the hierarchy is not justified and is fundamentally flawed.
3. Our representations submitted at both the Regulation and Regulation 19 consultation stages explained why we consider that the methodology for site selection, which has determined the level growth at existing settlements, is unduly reliant on, in particular, Landscape Character Assessments that are not site specific. Higher order settlements in the settlement hierarchy, including Hurstpierpoint, are considered to have greater sustainability merits and growth potential than the outputs of the Council's site selection process would suggest.
4. As such, potential sources of housing supply at sustainable settlements across the District, such as Little Park Farm at Hurstpierpoint, have been unnecessarily and inappropriately excluded (it is anticipated that site specific discussions, including omission sites, will be the subject of Stage 2 Examination sessions in due course).
5. The Council has not therefore been exhaustive in the level of growth that can be provided at Principle 3 of the Spatial Strategy – the existing sustainable settlements of the District – before considering Principle 4 options.

### **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?**

6. No – the strategy is not consistent with paragraph 105 of the Framework.
7. The strategy of growth set out on page 33 of the Plan sets out four principles in planning for the delivery of further growth. The need for protection of the High Weald AONB / National Landscape and making efficient use of land (Principles 1 and 2) are not disputed and accord with the Framework.
8. However, the way in which Principles 3 and 4 translate into the levels of growth provided for, or the specific site allocations, do not accord with the Framework, specifically paragraph 105. As outlined in our response to Question 36, above, the Council has not been exhaustive in locating the maximum amount of development at the most sustainable locations within the District. Instead, it has relied on the allocation of three significant sites, one of which in particular - DPSC3 to DPSC7 Sayers Common, a lower order Tier 3 settlement in the Council's own settlement hierarchy – cannot be considered to be a location which is or can be made sustainable.
9. The proposal for Sayers Common comprises one sizeable land allocation, DPSC3, together with the wider proposed allocations of DPSC4 to DPSC7 inclusive, with total development comprising just under 2,400 dwellings. However, it appears from the developer submissions provided as part of the evidence base to the Plan, that the five allocations which make up the 'sustainable community' are being pursued separately with no co-ordination as to overall cohesive delivery. The largest allocation (DPSC3) is, itself, made up of two land parcels, with the smaller of the two

poorly located in relation to the main service centre of Sayers Common; being remote from the remainder of the proposed allocation and the existing village itself.

10. The submitted Plan identifies Sayers Common as having high growth potential and proposes to provide significant growth at, what is, a lower order Category 3 Village in the Council's own settlement hierarchy. However, the basis for this conclusion is fundamentally flawed and wholly unclear from the Council's evidence base. We note, for example, that 'access to the main service centre' scores negatively in the Council's Site Selection Conclusions Paper, Appendix 3 Proformas (Document Ref: SSP1).
11. Our representations at the Regulation 19 consultation stage included a Sustainable Access Review Technical Note which demonstrated that Sayers Common is a village divorced from the main settlements within Mid Sussex, and the A23 physically limits easy access to the east on foot and by cycle. This Technical Note concludes that the village is too distant and disconnected to provide any level of confidence that this will truly become a sustainable new community, or that residents will be able to have less reliance on the private car than would be the case if development was instead located adjacent to an existing sustainable settlement in the borough – such as Hurstpierpoint.
12. Accordingly, the proposed spatial strategy and distribution cannot be considered to accord with paragraph 105 of the Framework and is unsound.

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