



**Mid Sussex Local Plan Examination:  
Response to Matter 1**  
Haywards Heath Golf Course

**Boyer**

Prepared on behalf of Croudace Homes Ltd | September 24

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**REPORT CONTROL**

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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 ('DPR' / Local Plan).
- 1.2 Boyer has prepared this statement in response to Matter 1: 'Legal and Procedural Requirements', as identified in Examination Document ID\_004 – Matters Issues and Questions – Stage 1, published August 2024.
- 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 ISSUE 1

### Issue 1: Whether the Plan has been prepared in line with the relevant legal requirements and procedural matters?

#### Sustainability Appraisal

**Q5: Has the plan been subject to Sustainability Appraisal ('SA'), including a report on the published plan, which demonstrates, in a transparent manner, how the SA and Site Selection Methodology (SSP1) have influenced the evolution of the plan making process. For example, could I be directed to where the sites have been ranked against each other as referenced in paragraph 36 of SSP1? What if anything is the cut off threshold? Have the requirements for Strategic Environmental Assessment been met?**

- 2.1 Croudace makes no broader comment on the sequencing and ranking of potential sites for allocation across the District as a whole. However, Croudace disputes certain aspects of the assessment of Haywards Heath Golf Course (site ID 503), which is identified in the Sustainability Appraisal ('SA', November 2023) (at Table 4.1) as a reasonable alternative which could accommodate around 700 homes<sup>1</sup>.
- 2.2 Specifically, on the one hand the SA concludes that the site represents a sustainable option for allocation, with the Stage 3 Assessment in the Site Selection Conclusions Paper also stating that there are no "showstoppers" in terms of transport modelling or significant impacts / effects on the Stonepound Crossroads AQMA, or adverse impacts on the Ashdown Forest.
- 2.3 Yet, the subsequent judgement in the Site Selection Conclusions Paper is that;
- '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'.*
- 2.4 Croudace disagrees with this overall conclusion, which appears to largely derive from the assessment of the site as not lying within a 20-minute walk of a wide range of existing services to ensure residents can meet their day-to-day needs.
- 2.5 However, given the size of the site (and as set out in the Regulation 19 representations), there is clearly potential for a residential development to be brought forward in conjunction with new community facilities, a local shop, public house, and education facilities (if there were a clearly identified need for such), in addition to public transport and accessibility improvements.

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<sup>1</sup> The site could in fact accommodate around 800 dwellings in view of a larger available landholding.

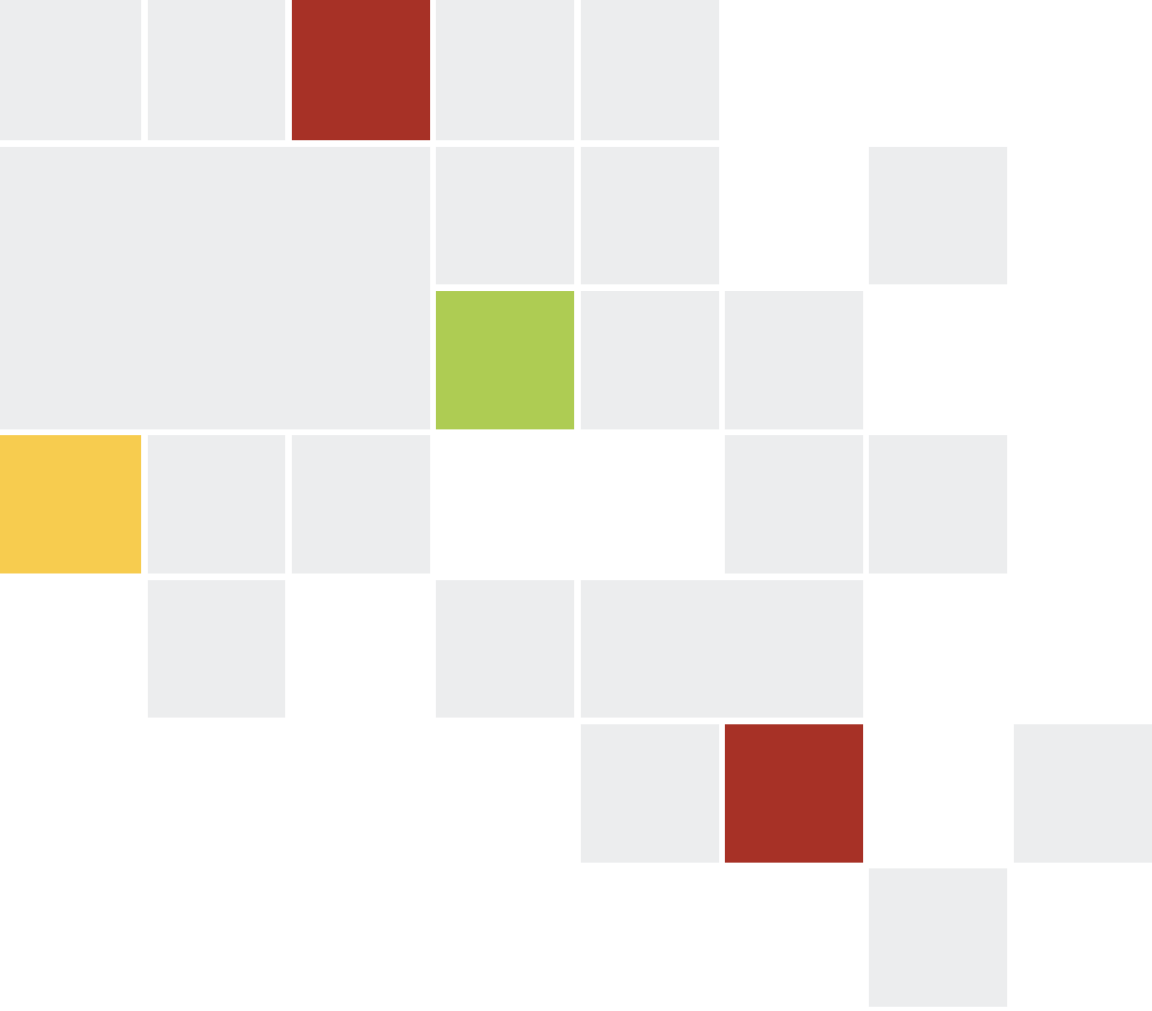
- 2.6 Put simply, the size of the site brings with it a latent potential to enhance its sustainability, consistent with the principles of the NPPF Chapter 9, and the general requirement set out in NPPF paragraph 11 that all Plans promote a sustainable pattern of development. However, this possibility is not reflected fully in the SA evaluation of the site or the Council's overall conclusions in respect of site selection.
- 2.7 In contrast, the possibility of improving a site's sustainability *is* considered in relation to the proposals at Crabbet Park (DPSC2), wherein the Council identifies the potential for new provision in support of the strategic residential growth envisaged there.
- 2.8 The SA and overall evaluation of Haywards Heath Golf Course is also somewhat surprising, as the site has long been recognised by the Council as one of relatively few sustainable sites that can accommodate strategic scale residential-led development (at a tier 1 settlement). This was indeed acknowledged, by the Council, during the examination of the current (adopted) District Plan 2014 – 2031. Similarly, the site was also included within 'Option C', which represented the high-growth reasonable alternative option during the preparation and examination (in 2020 – 2021) of the Site Allocations DPD and scored highly in the related SA evaluation.
- 2.9 Officers have advised that, rather than matters of sustainability, the primary reason the site (which has been promoted, at intervals, since 1988) has not been allocated for redevelopment, related to concerns around its actual availability for development. Specifically, the Council had not been satisfied that vacant possession could be guaranteed and (by extension) it was not clear that a developer had been (or could be) engaged by the landowner to deliver the site. There was then a concern that the site could not meet the test set on in NPPF paragraph 69, which requires the availability of land for development to taken into account in the site identification / selection process.
- 2.10 However, this position has changed. As set out in the Regulation 19 Stage representations, legal arrangements are now in place to enable the site's redevelopment, in the event that a satisfactory planning consent is secured. It is precisely because of this agreement that Croudace (an established regional housebuilder) has undertaken to promote the site on behalf of the landowner and to build it out if consent is secured.
- 2.11 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.

**Q7. Have all reasonable alternatives been considered in terms of spatial strategy, policies, and sites including increases in density or housing numbers?**

- 2.12 Croudace recognises that the Local Plan proports to meet the baseline LHN figure and this is welcomed. However, the changes envisaged in the Government’s recent consultation on proposed revisions to the NPPF and Standard Method, are likely to be pertinent to Mid Sussex and the wider NWSHMA in the immediate future. This, coupled with the position set out by the Inspector’s examining the Crawley Local Plan, highlights how the submitted Local Plan only goes so far to address housing needs within the HMA – it is not the end of the story.
- 2.13 Accordingly, a ‘review mechanism’ should be introduced into policy (within the Local Plan), to future proof the Plan in view of the future circumstances highlighted above. The wording should set out clear dates for the preparation of an immediate Local Plan Review and the consequences should those timescales not be met. Bedford Borough Council’s Local Plan 2030 provides an example of such a review mechanism, which Croudace would advocate is replicated within the Local Plan.
- 2.14 For reference, in the Bedford Local Plan 2030 ‘Policy 1 – Reviewing the Local Plan 2030’ provides that:
- ‘The Council will undertake a review of the Local Plan 2030, which will commence no later than one year after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies in the Local Plan 2030 which are most important for determining planning applications for new dwellings will be deemed to be ‘out of date’ in accordance with paragraph 11 d) of the National Planning Policy Framework 2019’.*
- 2.15 This example review policy was included within the Bedford Local Plan 2030 due to similar circumstances, wherein the NPPF (2019) was adopted during the plan-making process, which introduced the Standard Method. The Local Plan should be amended to introduce a similar review mechanism to ensure the new NPPF is taken into account swiftly.
- 2.16 In addition, attention is also drawn to the conclusions of the Inspector examining the Mole Valley Local Plan 2020-2039. In this case the Inspector, at proposed Main Modification MM2, states that;
- “...the Council will undertake an early review of the plan, to be completed before the third anniversary of the adoption of the plan, to ascertain whether more housing capacity is deliverable or developable.”*
- 2.17 In setting out these very clear timescales, the Mole Valley Inspector considered an early review to be necessary to;

*“....put in place measures to enable LHN to be met over the Plan period, if appropriate. SoCG with HMA partners and adjoining authorities will ensure effective cross boundary co-operation to meet housing need continues”*

- 2.18 This is not a situation dissimilar to that in Mid Sussex and the Inspector approach offers another salient example which could be applied to the Plan.



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