

Dear Sir/Madam

Mid Sussex District Plan (2021 - 2040) - Main Modifications

Representation of Hassocks Parish Council in Relation to Main Modifications MM60 and MM71

Hassocks Parish Council (the parish council) considers that the proposed Main Modifications MM60 and MM71 to the submission Mid Sussex District Plan (sMSDP) do not satisfy the tests of soundness set out in the National Planning Policy Framework (NPPF). In our view, neither modification is justified nor consistent with national policy. If they were to be accepted as modifications, then the plan itself would become unsound.

The parish council therefore asks the Inspector to reject the modifications, neither of which is necessary to achieve a sound plan.

Background to Hassocks, the submission Local Plan and the Main Modifications

Hassocks is a large village in Category 2 of the sMSDP settlement hierarchy. It has grown significantly over the last few years through allocations in successive local plans. These include a development of 500 houses by Taylor Wimpey which is now almost complete on land immediately to the south of the MM71 proposal (on a site allocated as 'land north of Clayton Mills' but now called 'Ockley Park').

The parish council has participated constructively with the earlier stages of consultation by Mid Sussex. We were satisfied with the proposals in the sMSDP which were arrived at following careful analysis and evidence gathering. It is deeply frustrated that the Main Modifications propose profound change and a 'growth at any cost' approach so late in the day. That is not the way to plan for genuinely sustainable development.

Throughout our engagement in the plan-making process, two issues have been of particular concern. Firstly, the increasing pressure placed on local infrastructure and services caused by the scale of development already permitted. We have seen substantial growth without commensurate improvements in the quality or accessibility of healthcare, recreational facilities or public transport. That has had a detrimental effect on all of our residents, whether they live in existing or new homes. Secondly, the very real possibility of coalescence with Burgess Hill to the north. Maintaining the identity of Hassocks as a separate settlement has been an objective of successive local plans. The allocation of the land north of Clayton Mills in the 2014–2021 District Plan

was extremely controversial precisely because of the perceived impact on the gap between the settlements.

These issues, and many others, were carefully considered by Mid Sussex as it prepared the sMSDP. Reflecting the preferred growth strategy and previous development pressures, only one additional housing site was identified in Hassocks. Both MM60 and MM71 were assessed and rejected for inclusion in the plan, primarily because of the effect they would have of bringing Hassocks and Burgess Hill closer together. We now find that Mid Sussex has set aside those concerns without adequate justification or explanation.

We acknowledge that it is the Inspector who has insisted that Mid Sussex incorporates a large additional number of houses at this very late stage in plan-making. Nevertheless, we find it incomprehensible that Mid Sussex has ignored its own previous assessments and proposes the inclusion of these two large sites, reversing the outcome of previous consultation and engagement.

This is not a sound approach to plan-making because these allocations are made for no other reason than to meet a numerical target imposed by the Inspector. They are not justified on any other basis and would not promote sustainable development. For that reason, they are not sound and should not be included in the plan to be adopted.

Proposed Modification MM60: Land west and east of Malthouse Lane, Burgess Hill (allocation of 750 dwellings)

The southern extent of Burgess Hill is clearly defined by its ring road, Jane Murray Way. This contains development and provides a boundary between the urban area and countryside. Only appropriate uses, such as the Burgess Hill burial ground, exist in the gap between town, Hassocks and Hurstpierpoint.

To date, the well-planned expansion of Burgess Hill to the north and west (the so-called 'Northern Arc') has ensured that the gap between the settlements to the south can be conserved. That is sustainable, long-term planning. MM60 erodes that principle without any consideration of the consequences.

MM60 proposes that 54 acres of countryside, essentially unconnected to Burgess Hill, are to be urbanised. This land is not a logical extension of the built-up area boundary. It has only a tenuous vehicular link to Burgess Hill town centre. Furthermore, it invites future development south of the town without obvious constraints. It is, quite simply, urban sprawl of the worst kind. This is tacitly recognised in policy requirement 15, which says that proposals must:

Provide an appropriate landscape buffer to the western and southern edges of the site to minimise the perception of coalescence with Hassocks and Hurstpierpoint.

The truth is that such a buffer will simply be a very narrow strip compared with the broad area of countryside that exists at the moment. Unfortunately, this will do nothing to soften the impact of the development as a whole, which is introduced into the countryside south of Burgess Hill with no consideration of its long-term impact. The very real prospect of further erosion of the gap in later plans would undermine even this.

MM60 would also mean additional growth in the local population of some 2,000 people without the reasonable prospect of any increase in supporting infrastructure. The warm words of the policy requirement for ‘flexible retail, cultural and health facilities’ will not be fulfilled because the development is, ironically, too small in scale for these to be commercially viable or to meet the criteria of service providers. Residents would be car dependent, as acknowledged in the July 2026 site appraisal, which scores the site ‘negative’ as a service centre, for access to primary education and primary health care. Nor has consideration been given to related infrastructure issues, in particular the supply of drinking water in an area where water pressure is already an issue for residents and no improvements appear to be scheduled.

Development on this scale and significance cannot be justified simply on the basis of ‘it had to go somewhere.’ MM60 as a proposal has no context or coherent place making purpose. It would have a significant adverse impact by reducing the important gap between Burgess Hill and communities to the south and is neither justified nor consistent with national policy.

Proposed Modification MM71: Land west of Ockley Lane (allocation of 250 dwellings)

Both the adopted district plan policy DP13: Preventing Coalescence, and the sMSDP Policy DPC2: Preventing Coalescence highlight the need to retain the separate identities and characteristics of towns and villages in the district.

Policy DP11 of the adopted plan allocated the land immediately to the south of MM71 for development. That policy contained a requirement that the development:

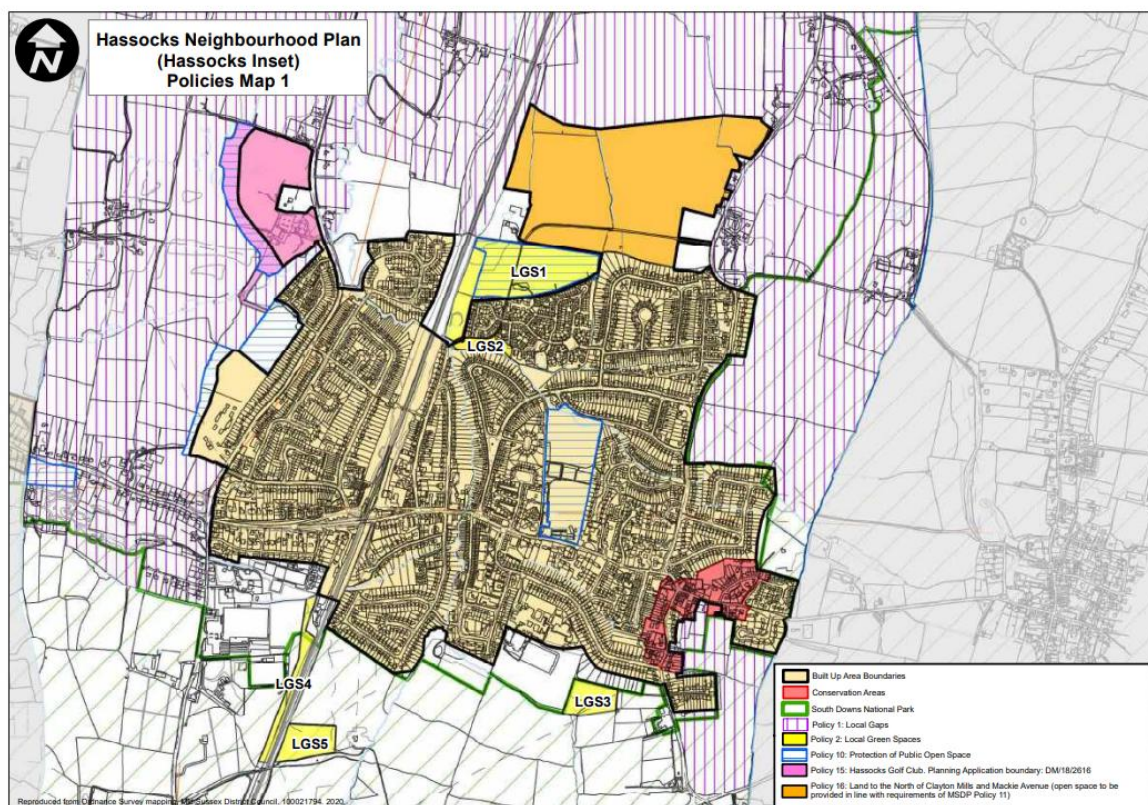
Incorporate a greenspace buffer on the northern boundary. This will form a strong defensible boundary to prevent coalescence with Burgess Hill and retain the separate identity and amenity of the two settlements. Land within this buffer will be transferred, with the Parish’s agreement, to the Parish Council;

The wording of that policy clearly reflects the evidence collected at the time. Nothing has subsequently changed, and the gap was to be preserved in the sMSDP before the Inspector's intervention. Mid Sussex now proposes to breach this 'strong defensible boundary' by allocating MM71 in a fashion which clearly cannot be justified based on its previous site assessments.

Policy DPC2 of the sMSDP recognises that:

The individual towns and villages in the district each have their own unique characteristics. It is important that their separate identity is maintained. When travelling between settlements people should have a sense that they have left one before arriving at the next.

Policy 1 of the Hassocks Neighbourhood Plan¹ identifies a local gap between Keymer/Hassocks and Burgess Hill and only allows for development where it is necessary for agricultural use, or it provides for previously approved housing schemes. This is shown in Policies Map 1 of the neighbourhood plan.



¹ Made in June 2020

We appreciate that this policy cannot, in a legal sense, prevent an allocation being made in the sMSDP. What it should do, however, is remind the Inspector of the impact and consequences of doing so, and provide evidence of the long-standing commitment that it should not happen.

An additional 250 homes to the north of the existing built-up area boundary represents a major intrusion into what should be retained as a local gap. Were MM71 to be approved, the result would be a perceptible reduction in spatial and visual separation between settlements – the very thing that previous plans and previous Inspectors have agreed should be avoided.

The wording of MM71 makes some attempt to address this issue by retaining the open character of the three northernmost fields in perpetuity. Whilst we do of course support this, we are far from convinced that the wording of the policy would secure it as an objective. Is it proposed that the developer enter into some form of legal agreement that would prevent a future planning application being made? If so, how would that be legally justified or operable? In our view, the fact that Mid Sussex considers such a requirement to be necessary demonstrates just how vulnerable and threatened any remaining gap will be. It does not, however, propose a mechanism by which it can be protected. On that basis, the policy is neither effective nor consistent with national policy and cannot be considered sound.

A further 250 homes north of the village, in addition to the 500 houses already under construction, will create significant additional pressure on the rural road network and Hassocks village centre. Although the highway implications may have been modelled at a very high level, the practical implications are apparent to our residents on a daily basis. Vehicles heading south will have to either drive through the village centre towards Stonepound Crossroads or down Lodge Lane, which is a narrow country road.

The plan acknowledges:

The district is experiencing issues of congestion on the road network leading to traffic related air quality issues at Hassocks, with monitoring at other locations in the district such as East Grinstead. Bus services in rural areas are limited and high frequency services in the three main towns are lacking.²

An Air Quality Management Area at Stonepound Crossroads in the centre of Hassocks was made in 2012. By December 2024 air quality had improved sufficiently for this to be revoked but additional traffic through the village will contribute to a worsening of air

² DPT1 Supporting Text pg. 110.

quality once again. It would also have a detrimental effect on the ability of residents to easily access shops and community buildings.

To address this, the policy requirements should reflect the need to make highways improvements as follows:

Provide, unless otherwise agreed with the Highways Authority, a redesigned junction at Keymer Road (2116) to Lodge Lane, a roundabout at the Lodge Lane to New Road (B2112) junction and traffic lights at the Clayton Hill / B2116 junction.

And:

Improve pedestrian and cycling connectivity to Hassocks/Keymer and nearby bus stops by providing a footway and cycle path on Ockley Lane and a signalised crossing to provide access to southbound bus routes if this can be agreed with the Highway Authority.

An obvious mechanism to reduce the impact of car-based travel would be to encourage the use of public transport, as supported by sMSDP policies DPT1: Placemaking and Connectivity and DPT3: Active and Sustainable Travel. It is therefore disappointing to see the lack of additional services generated by recent new development, or any attempts by service providers to encourage patronage. As new development is permitted at an ever-increasing distance from local facilities, it becomes less and less likely that it will meet the sustainable development objectives set out in the NPPF. The parish council believes that a requirement for the existing bus service to be routed into the development so that bus stops are more accessible would be a reasonable measure to improve accessibility.

If the site is to be considered deliverable, the Inspector should also satisfy himself as to how a safe access is to be achieved. None of the site assessments carried out has provided any supporting information. Ockley Lane narrows significantly at the point where the site boundary abuts the highway and it is not clear to the parish council how a suitable junction can be formed. Since this is an issue which goes to the heart of deliverability it should be resolved before MM71 can be considered for inclusion in the plan.

The other impacts of further development on the village, including domestic water supplies, access to health and other community services and the maintenance of a sense of village identity are not addressed in the supporting evidence. No primary school is currently planned for the Ockley Park development (despite land being set aside) and no additional community facilities seem likely to be provided either. This

part of the village risks becoming a single large estate of houses devoid of any supporting infrastructure.

The proposal of more development via MM71 is neither justified by evidence gathered at earlier stages of plan making nor would it lead to a sustainable development form of development in accordance with national policy. It would not be sound and should be rejected.

Summary and Conclusion

The parish council considers that MM60 and MM71 both represent a fundamental and unjustified departure from the spatial strategy and evidence base that underpinned the sMSDP. Both sites have previously been assessed and rejected because of their impact on the separation between Hassocks, Burgess Hill and neighbouring communities. Their late inclusion would erode established settlement gaps, weaken long-standing policies designed to prevent coalescence, and place further pressure on infrastructure, services, highways and sustainable transport provision.

The proposed modifications are therefore not justified by the available evidence and are not consistent with the objectives of sustainable development set out in national policy. They appear to have been advanced to meet a numerical housing requirement rather than because they represent appropriate, coherent or sustainable allocations. In each case the policy wording also fails to provide sufficient certainty that the remaining settlement gaps, landscape buffers, open land, transport links and supporting infrastructure would be secured or protected in practice.

For these reasons, Hassocks Parish Council respectfully asks the Inspector to reject Main Modifications MM60 and MM71. The parish council submits that the District Plan can and should proceed without these allocations, and that doing so would better reflect the evidence, previous consultation, the adopted development plan framework and the principles of sound plan making.

If the Inspector decides to hold any further hearings that touch on either of these two sites the parish council wishes to be given the opportunity to participate.

Yours faithfully

Frances Gaudencio
Chair, Hassocks Parish Council