

MS05: The Spatial Strategy

Hearing Statement
February 2026



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5. The Spatial Strategy

The effectiveness and soundness of the proposed distribution of new development in meeting social, economic and environmental objectives, whether it will achieve more than the sum of its parts and whether it will amount to positive planning.

a) Whether the plan's apportionment of development to larger and smaller settlements and freestanding allocations, and to different sizes of site, is effective in ensuring delivery and in meeting community needs

- 5.1. The Plan's apportionment of development is effective in ensuring delivery and in meeting community needs.

Adopted Spatial Strategy

- 5.2. The adopted District Plan [B1] set out a vision for Mid Sussex, focussing on the development of sustainable communities, protecting and enhancing the environment and promoting economic vitality. Adopted policy DP4: Housing reflects the vision by setting out the distribution of housing growth across this district. This spatial strategy focussed the majority of development at Burgess Hill due to its potential to deliver sustainable communities, with the remaining growth distributed proportionately to settlements according to their position in the settlement hierarchy.
- 5.3. A Site Allocations Development Plan Document [B2] (the 'Sites DPD') was adopted in 2022. The purpose of the Sites DPD was to allocate additional sites to meet the identified residual housing need set out in the adopted District Plan. The sites and quantity of development in the Sites DPD were distributed to settlements consistent with the adopted District Plan spatial strategy.
- 5.4. In reviewing the District Plan, the Council's priority was to seek to distribute growth consistent with the adopted District Plan spatial strategy.

Reviewing the Spatial Strategy

- 5.5. As described in the Submission District Plan (p.32), the review process sought to determine whether the adopted spatial strategy could be relied on to cater for the extended plan period to 2039 (now 2040) and increased housing need.
- 5.6. The Settlement Sustainability Review (2015) [ENV16] provides the evidence for the established Settlement Hierarchy. The Review undertook an assessment of the characteristics and function of each settlement in the district. This included an assessment of the local services, such as education, employment, retail and public transport links. The principles and findings of the Settlement Sustainability Review remain relevant with any changes not

materially affecting the categorisation of each settlement. Therefore, the hierarchy established in the adopted District Plan remains relevant and the starting point for distributing growth.

- 5.7. The Council's spatial strategy for the submitted District Plan is based on the suitability and sustainability of sites promoted for consideration, as concluded by a robust site selection process and testing against the evidence base, including the Sustainability Appraisal (SA), Habitats Regulations Assessment (HRA) and transport modelling.
- 5.8. The spatial strategy and identification of sites for allocation has not been constrained by any ceiling on the number required. The Council has carried out a capacity-led assessment and identified all those sites which it considers can be developed without significant conflict with national policy with the aim of meeting housing need (both local and neighbouring unmet need) as far as possible. The spatial strategy, and consequently the amount of local housing need and unmet need that can be met in the district has therefore been informed by a "bottom-up", capacity-led approach.
- 5.9. The Council conducted a call-for-sites and prepared the Strategic Housing and Employment Land Availability Assessment (SHELAA) [SSP4/5]. It assessed these sites against the Site Selection Methodology [SSP1] to establish a pool of suitable and sustainable sites to choose from for allocation.
- 5.10. The Potential Growth at Settlements is set out on page 33 of the Submission District Plan. This presents the quantity and yield from sites that reached the latter stages of the site selection process [SSP2/SSP3] as described in Matter 6.
- 5.11. The process concluded that:
- Some areas of the district such as Sayers Common (Category 3) and Copthorne (Category 3) had higher potential for growth than others, however these locations did not reflect the adopted District Plan spatial strategy.
 - Whilst there is still growth potential at Burgess Hill, it was not possible to distribute development proportionately to the other Category 1 settlements East Grinstead and Haywards Heath due to limited suitable sites. Notwithstanding this, the Council has sought to maximise new homes at these settlements where they have performed well against the site selection criteria.
 - Some settlements (e.g. Cuckfield and Lindfield in Category 2 and nine settlements in Category 3) had no sites that reached Stage 3 of the site selection process – either because no sites were promoted at these locations or they were rejected based on the selection criteria at earlier stages.
- 5.12. Therefore, the Council concluded that it would not be possible to continue to rely on the adopted District Plan spatial strategy for the additional growth required for the District Plan review. A proportionate approach would not be possible as there was a mismatch between where growth was required and the location of suitable and sustainable sites.

5.13. As a result, the Submission District Plan sets out an updated Strategy (p.33) to deliver sustainable growth in the district to meet local housing need and maximise opportunities to contribute towards unmet need arising from neighbouring areas.

1. Conservation and Enhancement of the High Weald AONB and South Downs National Park¹

2. Making effective use of land

3. Growth at existing sustainable settlements where it continues to be sustainable to do so

4. Opportunities for extensions, to improve sustainability of existing settlements

5.14. Principle 1 reflects National Planning Policy which is clear that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks and National Landscapes and their high level of protection. The Council places great importance on this as nearly 50% of the district is within the High Weald National Landscape (AONB). This principle does not preclude small-scale development, however the scale and extent should be limited.

5.15. Principle 2 continues the adopted District Plan objective to support maximising opportunities for brownfield development, and to make effective use of all land, be it brownfield or greenfield. This accords with national policy.

5.16. Principle 3 reflects the spatial strategy of the adopted District Plan in supporting growth at sustainable settlements. As set out above, this is the Council's first preference, however, it is recognised that some sustainable settlements have either no or limited further growth potential. It would not be possible to meet local housing need and contribute towards need arising elsewhere on this basis alone.

5.17. The Council could have stopped at this point. However, recognising its responsibilities to meet local housing need and to contribute as far as possible to meeting unmet need arising in neighbouring areas, the Council took a proactive approach to identifying alternative strategy options.

5.18. Principle 4 has therefore been added. This supports growth at settlements that are not currently sustainable (e.g. only have a limited range of services) but where the scale of development will provide services and infrastructure to meet the needs of both the existing and new community (e.g. provision of education, health, retail and employment) that means they are capable of being made sustainable.

¹ as per proposed modification M6 [DP2]

5.19. The four strategy principles have informed the location and quantum of growth proposed in the Submission District Plan.

Apportionment of Growth

5.20. As the Submitted District Plan forms a review of the adopted District Plan, and plan periods overlap, much of the proposed housing supply set out in **Policy DPH1: Housing** has already been planned for. In total, 12,161 dwellings of the 20,616 total housing supply in submitted policy DPH1: Housing² were committed (and/or completed) against the adopted District Plan strategy. They are therefore in accordance with the third Strategy principle “Growth at existing sustainable settlements where it continues to be sustainable to do so”. This therefore formed the starting point for the District Plan review.

5.21. The allocations proposed in the Submission District Plan and scale/distribution of growth are led by the new plan strategy to maximise growth in accordance with principle 3, then seek opportunities in accordance with principle 4. The selection and distribution of sites is also informed by the evidence base - especially the consideration of:

- location of deliverable/sustainable sites identified in the Strategic Housing Land Availability Assessment (SHELAA)
- the environmental constraints (e.g. High Weald AONB)
- infrastructure constraints (e.g. highways network)

5.22. The Site Selection Methodology [[SSP1](#)] explains the robust and transparent site assessment process, which informed decisions in respect to the Plan’s spatial strategy and site allocations. The site selection process was developed to determine the most sustainable and developable sites, which ensured that site selection was consistent with the principles of sustainable development and consistent with the policies in the NPPF. This process established a pool of suitable sites to inform the Council’s approach to allocations. Further detail on the rationale of site selection process is set out in Matter 6 response [MS06]

Sustainable Communities

5.23. Chapter 15 of the Submitted District Plan sets out seven allocations that support the principle of Sustainable Communities. They provide a quantum of growth that will support provision of new services and facilities to meet day-to-day needs. This will enable these communities to be as self-sustaining as possible. All sites are located adjacent to existing settlements. The Council does not define any of them as freestanding allocations.

5.24. **DPSC1: Land to the west of Burgess Hill / North of Hurstpierpoint** is located on the western boundary of Burgess Hill, a Category 1 settlement where a range of services and facilities exist.

² This relates to the figures at submission stage. Updated figures (set out in MS-TP2) are 12,315 commitments out of 21,241 total housing supply

The allocation proposes 1,350 dwellings alongside on-site facilities such as education, neighbourhood centre, leisure and retail. This site is proposed for allocation due to its highly sustainable location.

- 5.25. **DPSC2: Land at Crabbet Park** is entirely within Mid Sussex district and does not immediately adjoin a Mid Sussex settlement so could be described as a freestanding allocation. However, it is adjacent to Crawley, separated by the M23. The allocation proposes 2,000 dwellings alongside on-site facilities such as education, community buildings, leisure and retail. The Council recognises the unmet need position established at Crawley and has worked with its Housing Market Area neighbours to seek solutions (such as the ‘at Crawley’ joint evidence and other mechanisms as set out in the agreed Statement of Common Ground [DC2]). Crabbet Park was identified as a potential site option ‘at Crawley’, the Council considers that its strategic location will assist in providing homes near to where the need is arising.
- 5.26. **DPSC3 – DPSC7: Sayers Common** is a collection of five sites totalling 2,516 dwellings, ranging from 26 dwellings (DPSC4) to 2,000 dwellings (DPSC3). The Submitted District Plan sets a vision and strategy for these sites (page 170) so that growth here is brought forward holistically. This approach has been agreed by a Statement of Common Ground between the five site promoters [S1 and S2]. This quantum of development will support provision of on-site facilities such as primary and secondary education, community buildings, neighbourhood centre, leisure and sports in a location which has limited local services. Focussing growth at this location is therefore in accordance with Principle 4 of the plan strategy to seek opportunities to improve the sustainability of existing settlements.

Site Allocations

- 5.27. The remaining site allocations DPA1 – DPA17 have been allocated based on their performance against the site selection methodology, in-combination testing such as SA/HRA/transport modelling, and consistency with the plan strategy.

Distribution

- 5.28. Tables 2a and 2b (page 41) of the submitted District Plan set out the commitments for the whole Plan period by settlement and parish. These tables show that while some settlements are not allocated development in this Plan, there continues to be planned growth at those settlements by way of previous allocations not yet completed and sites with planning permission. Therefore, when looking at overall housing supply from all sources, there is a good spread of development district wide consistent with the settlement hierarchy. This ensures that community needs are being met, both in rural areas and larger settlements.
- 5.29. Table 1 sets out the most up-to-date position, accounting for updated supply figures set out in MS-TP2 and ordered by Settlement Category. This shows development spread across all settlements, broadly in accordance with the Settlement Hierarchy.

Table 1: Growth Distribution

Category	Settlement	Commitments	District Plan Allocations	Total Housing Supply	
1	Burgess Hill	4686	1,776	6463	8,569
	East Grinstead	1112	45	1158	
	Haywards Heath	722	226	948	
2	Copthorne	12	1,950	1962	3,165
	Crawley Down	100	416	516	
	Cuckfield	67	0	67	
	Hassocks	465	25	490	
	Hurstpierpoint	14	0	14	
	Lindfield	116	0	116	
3	Albourne	86	0	86	3,420
	Ardingly	43	0	43	
	Ashurst Wood	71	8	79	
	Balcombe	32	0	32	
	Bolney	18	200	218	
	Handcross	72	0	72	
	Horsted Keynes	56	0	56	
	Pease Pottage	22	0	22	
	Sayers Common	38	2,516	2554	
	Scaynes Hill	20	30	50	
	Sharpthorne	151	0	151	
	Turners Hill	57	0	57	
	West Hoathly	0	0	0	
	Warninglid	3	0	3	
4	Ansty	16	70	86	101
	Staplefield	2	0	2	
	Slaugham	7	0	7	
	Twineham	3	0	3	
	Warninglid	3	0	3	
TOTAL		7,991	7,262	15,253	15,253

Types and Sizes of Site

- 5.30. The Strategic Housing Market Assessment [H1] indicates that a range of dwelling types and sizes are required to meet the needs of residents. The submission District Plan allocates a range of site sizes. This ranges from the three significant sites (DPSC1, DPSC2, DPSC3) which will contribute towards achieving Sustainable Communities to smaller allocations DPA1-DPA17. The larger sites will be able to accommodate a wider range of dwelling sizes and types due to their scale. They will also make provision for more specialist accommodation such as older persons/specialist accommodation, self-custom build plots and provision for gypsy and traveller accommodation.
- 5.31. The site allocations DPA1 – DPA17 range from 8 – 350 dwellings in size. These sites vary from previously developed town centre sites, which will deliver higher density flatted developments,

to small sites at the edge of small village locations which will deliver a different product offer. Table 2 shows the mixed range of scales (as defined in the Site Selection Methodology [SSP1]) and typologies.

Table 2: Site Size Classification

Ref	Site	Settlement	Yield	Classification
DPA1	Batchelors Farm	Burgess Hill	26	Small Scale
DPA2	Land south of Apple Tree Close, Janes Lane	Burgess Hill	25	Small Scale
DPA3	Burgess Hill Station	Burgess Hill	375	Large Scale
DPA4	Land off West Hoathly Road	East Grinstead	45	Small Scale
DPA5	Land at Hurstwood Lane	Haywards Heath	36	Small Scale
DPA6	Land at Junction of Hurstwood Lane and Colwell Lane	Haywards Heath	30	Small Scale
DPA7	Land east of Borde Hill Lane	Haywards Heath	60	Medium Scale
DPA8	Orchards Shopping Centre	Haywards Heath	100	Medium Scale
DPA9	Land to west of Turners Hill Road	Crawley Down	379	Large Scale
DPA10	Hurst Farm, Turners Hill Road	Crawley Down	37	Small Scale
DPA11	Land rear of 2 Hurst Road	Hassocks	25	Small Scale
DPA12	Land west of Kemps	Hurstpierpoint	90 ³	Medium Scale
DPA13	The Paddocks, Lewes Road	Ashurst Wood	8	Small Scale
DPA14	Land at Foxhole Farm	Bolney	200	Medium Scale
DPA15	Ham Lane Farm, Ham Lane	Scaynes Hill	30	Small Scale

³ As explained in MSTP-02, the Council is minded to remove this allocation

DPA16	Land west of North Cottages and Challoners	Ansty	30	Small Scale
DPA17	Land west of Marwick Close	Ansty	40	Small Scale

Ensuring Effective Delivery

- 5.32. National policy recognises the contribution that small and medium sized sites can make to meeting the housing requirement of an area, and that such sites are capable of quicker delivery than large sites. By allocating sites at a range of scales, this provides robustness in the housing trajectory.
- 5.33. Small and medium sized sites are likely to achieve planning permission quicker, have fewer on and off-site preparation works, and be completed sooner. This will support housing delivery in the short-medium term and form an important part of the district's housing trajectory (as set out in the Council's response to Matter 2).
- 5.34. Larger sites, including the three significant sites, are likely to have longer lead-in times. However, once consented and commenced, they form a consistent source of supply across the plan period, particularly in the medium/longer term. This is reflected in the housing trajectory, including the proposed step-up in housing requirement in the 6th year post-adoption (as described in the Council's response to Matter 1).
- 5.35. The Council is therefore confident that, by proposing a range of site sizes, delivery will be effective across the plan period.
- 5.36. In addition to delivery of the sites, the Submitted District Plan has an effective approach in securing delivery of infrastructure. This includes requirements for the provision of on-site and off-site infrastructure in the allocation policies themselves, which has been informed by the Infrastructure Delivery Plan [IV1, IV4, IV6].
- 5.37. The Infrastructure chapter of the Submitted District Plan sets out the approach and policies for the provision of infrastructure to support development. For smaller sites, this is more likely to be via developer contributions (secured by Section 106) to support localised mitigation and improvements to local services and facilities to support the additional growth. For the larger sites, including sustainable communities, this will be via delivery of on-site infrastructure.

Meeting Community Needs

- 5.38. The apportionment of growth district-wide, consistent with the updated spatial strategy, will ensure community needs for housing, including affordable housing, will be facilitated at all settlements. The allocation of a site on the border of Crawley will assist in addressing a proportion of unmet need arising there.

- 5.39. The provision of new/expanded facilities to accommodate new development will similarly have wider community benefits. For instance, the provision of new infrastructure at Sayers Common will mitigate the impacts of the development and provide new services and facilities that will benefit the existing community, such as through sustainable access to education, community buildings and leisure, as well as new residents. This will enable day-to-day needs to be met locally and reduce the need to travel by private car.

b) The relationship between the spatial strategy and transport objectives, transport infrastructure and transport constraints

5.40. The Spatial Strategy had been informed by a robust understanding of national and local transport objectives, transport infrastructure and transport constraints, which is reflected in the transport evidence base (Mid Sussex Transport Study Scenario 6 Report [T9] and Mid Sussex Transport Study Update [T10]) produced to support the submitted District Plan.

Transport objectives

5.41. The Strategic Objectives in relation to transport are:

- To create and maintain easily accessible high quality green and blue infrastructure in the right places to encourage active travel, improve physical and mental health, support biodiversity and address climate change mitigation and adaptation.
- To promote development that embodies the 20 minute neighbourhood principles and makes the best use of resources and increases the sustainability of communities within Mid Sussex, and its ability to adapt to climate change.
- To ensure that development is accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This includes as a priority the provision of efficient and sustainable transport networks.
- To provide opportunities for people to live and work within their communities reducing the need for commuting, including through good digital connectivity.

5.42. The Council has sought to address the transport objectives through the development of the spatial strategy. The approach taken seeks to facilitate a reduction in the **need to** travel by private car, focusing development on locations that are or can be made sustainable. In line with the adopted West Sussex County Council Local Transport Plan (2022-2036) [T14], the submitted District Plan takes a vision-based approach to transport planning and prioritises the development of sustainable transport solutions that reflect the rural nature of the district.

Transport Infrastructure and Constraints

5.43. The West Sussex Local Transport Plan [T14] identifies existing constraints in the transport network in Mid Sussex. These include:

- travel dominated by car;
- public transport and active travel modes are not seen as viable options for many journeys;
- issues of congestion on the road network;
- bus services in rural areas are limited; and
- high frequency services in the three main towns are lacking.

5.44. The Infrastructure Delivery Plan [IV1, IV4 and IV6] identifies a number of key issues relating to transport. These are:

- The A23, A264 / A22 corridor through East Grinstead and A272 experience congestion during peak periods, this can lead to rat-running on less suitable routes to avoid congestion, with congestion also occurring within these alternative routes, notably at the B2110/B2028 crossroads at Turners Hill.
- Traffic congestion within Burgess Hill is concentrated on the two bridges over the Brighton Main Line.
- The cycle network is mainly on the highway, is discontinuous and does not meet users' needs.

Transport Evidence and Alignment with Spatial Strategy

5.45. In assessing the transport implications of planned growth, the transport evidence has been developed in accordance with Circular 01/2022. This is confirmed in the Memorandum of Understanding (MoU) with National Highways (NH) [DC17], West Sussex County Council Highway Authority (WSCC HA) [DC14], the Statement of Common Ground (SoCG) prepared with WSCC HA [DC15] and the SoCG with NH [DC19].

5.46. The MSDC Transport Study [T10] tests six development scenarios (results for Scenarios 3 – 6 are published, 1-2 were for model calibration only), which assess the potential impacts of the Plan on the transport network, from the earliest stages of plan making and throughout the development of the Plan. The Transport Study shows that a large number of junctions experience a significant or severe delay in the reference case, before any impacts from District Plan growth are accounted for [T9, Table 5, page 21].

5.47. The Site Selection Methodology [SSP1] explains the robust and transparent site assessment process, which informed the Plan spatial strategy and proposed site allocations. The site selection process was developed to determine the most sustainable and developable sites, which ensured that site selection was consistent with the principles of sustainable development and consistent with the policies in the NPPF.

5.48. Stage 2 of the Site Selection process excluded those sites that would not contribute to a sustainable pattern of development. The sites were excluded where they would have little or no access to public transport and would be reliant on private cars to access services. It was considered that these sites would not represent sustainable development as set out in the NPPF. This approach recognises the rural nature of Mid Sussex and prevents development that is isolated and disconnected from existing settlements. It also acknowledges that small, isolated sites would not be able to deliver sufficient infrastructure to support the day-to-day needs of the community and limit the need to travel or be capable of offering a genuine choice of transport modes, as required by NPPF, para 105. This approach is explained in detail in [SSP1] paragraphs 20 – 24.

- 5.49. In contrast, [SSP1] recognises that “sites of a significant scale can act as ‘stand-alone’ settlements supported by on-site infrastructure and services which could enable them to be self-sufficient and deliver sustainable places ([SSP1], paragraph 22). Therefore, specific consideration was given to sites with a proposed yield of 1,000 dwellings or more (the Significant Sites). This is consistent with the NPPF, Paragraph 105, which states “significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”.
- 5.50. The assessment of Significant Sites is explained further in [\[SSP2\]](#) at paragraphs 3.3 – 3.38 and sets out the types of infrastructure, mix of uses and community facilities on-site. Policy requirements have been developed in consultation with the Significant Site promoters and stakeholders such as West Sussex County Council, to ensure each development makes provision for essential infrastructure. Each development includes a mix of uses with a neighbourhood centre to support the day to day needs to the community without the need to travel significant distances, and a transport hub to support sustainable travel, all within a layout which prioritises active and sustainable travel in accordance with paragraph 105 of the NPPF.
- 5.51. In consultation with WSCC HA, the Significant Site promoters have developed site specific Mobility Strategies ([Site Allocations Evidence Library](#)) which detail the sustainable travel strategy for delivery of each site. In preparing the Mobility Strategies, Significant Site promoters have engaged with WSCC HA and transport infrastructure providers including local bus providers, car / bike share / hire businesses to develop a package of sustainable travel measures to demonstrate they achieve the model share split expected are deliverable. Smaller sites have less impact on the transport network compared to large sites but opportunities are taken to seek sustainable travel on a more limited scale.
- 5.52. The Spatial Strategy seeks to direct growth to existing sustainable settlements and through extensions to existing settlements where sustainability can be improved. This approach will deliver the overarching strategic objectives of the Plan that relate to transport.
- 5.53. **Sustainable expansion of an existing sustainable settlement** (strategy principle 3) provides the critical mass to support viable sustainable travel solutions and improve active travel connectivity, reducing the need to travel by car and reducing the district’s carbon footprint.
- 5.54. The Plan recognises that there are **existing settlements that are less sustainable** (strategy principle 4) but have the potential for growth at a scale which can provide the infrastructure and services which will meet the needs of the new, as well as the existing community.
- 5.55. The approach to expanding existing settlements will support delivery of 20-minute neighbourhood principles by increasing housing density and creating compact and well-connected places, investing in and expanding existing sustainable and active travel links, enabling residents to easily access a range of services that meet their day to day needs either by active travel modes or public transport. The Plan also supports home working and the many

associated benefits it can bring to our communities in terms of supporting local businesses and services, reducing the need to travel by car.

- 5.56. As explained in [MS-TP1](#) it has been agreed with NH and WSCC HA that the monitor and manage approach will be the primary mechanism to demonstrate that any impacts arising from the development within the District Plan can be managed satisfactorily. Neither party has outstanding concerns on the quantum or location of growth proposed in the Plan that cannot be mitigated. The Transport Infrastructure Management Group (TIMG) was established in 2025, the purpose of which is to oversee the monitoring and delivery of development in Mid Sussex with regards to transport.

c) Whether the spatial strategy takes an appropriate approach, at the strategic level, towards climate change mitigation, countryside protection, environmental protection, flood risk and heritage

- 5.57. The spatial strategy of the Submission District Plan takes an appropriate approach, at the strategic level, towards climate change mitigation, countryside protection, environmental protection, flood risk and heritage. The approach adopted for each topic is set out in the sub-sections below.
- 5.58. At the strategic level, the submitted District Plan sets out how sustainable development will be delivered. Chapter 3, Achieving Sustainable Development, sets out how the Plan will contribute to the achievement of sustainable development as required by the NPPF. The Plan embeds the 17 UN Sustainable Development Goals and sets out the policies within the plan to contribute to them.
- 5.59. The Sustainability Appraisal (SA) [DP7, Table 2_1] identifies the Environmental Characteristics and Challenges for achieving sustainable development in Mid Sussex. The Plan seeks to address the environmental challenges, including a suite of policies relating to sustainability.

Climate Change mitigation

- 5.60. The submitted District Plan has considered climate change mitigation both in developing the spatial strategy and accompanying proposed site allocations and in preparing the policies against which development proposals will be assessed:
- 5.61. **Spatial strategy:** The spatial strategy seeks to locate development at existing sustainable settlements, where this continues to be sustainable to do so and by creating new sustainable communities, where the sustainability of existing settlements can be improved. The sustainability Appraisal [DP7], (Section A, page 94) assessed the alternative four principles for growth against the SA objectives, which included consideration of climate change. The application of the 20-minute neighbourhood principles for Significant Sites is key to reducing the need to travel by car, delivering complete, compact and well-connected communities which provide facilities and services to support the majority of day-to-day needs. An option to focus growth at new settlements was rejected in part due to its negative impact on climate change as it would not have the same benefits as the above approach.
- 5.62. **Policies: Policy DPS1: Climate Change** is a strategic policy that sets out the principles that development should adopt to tackle climate change through both climate change mitigation and adaptation. It seeks to:
- reduce carbon (and other greenhouse gas) emissions is a key aspect of climate change mitigation
 - support renewable and low carbon energy schemes

- prioritising active travel
- maximising carbon sequestration

5.63. Climate change adaptation is also important for improving resilience to the impacts of climate change and the Plan seeks to achieve this by minimising vulnerability from overheating and flood risk through the design of developments and the application of the following policies:

- **DPSC2: Sustainable Design and Construction** requires development to contribute to the reduction of carbon emissions and increase resilience to climate change and improve sustainability.
- **DPS4: Flood Risk and Drainage** requires development to be designed to minimise vulnerability from the effects of climate change.
- **DPN1: Biodiversity, Geodiversity and Nature Recovery** and **DPN2: Biodiversity Net Gain** require development to achieve a net gain in biodiversity and contribute to ecological networks.

Countryside Protection

- 5.64. National policy is clear that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks and Areas of Outstanding Natural Beauty (AONBs) which have the highest status of protection (NPPF Sept 2023, paragraph 176).
- 5.65. The 15 Strategic Objectives of the plan guide the strategy and policies of the Plan. Strategic Objective 4 concerns protection of valued landscapes and Objective 5 relates to protecting the valued characteristics of the built environment [[DP1](#), page 28].
- 5.66. The spatial strategy sets out how the strategic objectives will be achieved and is based on four key principles. The first principle of the Submitted District Plan is 'Protection of the High Weald AONB' [[DP1](#), page 33].
- 5.67. In relation to areas for potential for future growth, the Plan explains that given the environmental and infrastructure constraints within parts of the district, some areas have higher potential for growth than others [[DP1](#), page 32]. This has led to the proposed distribution of housing [[DP1](#), page 41].
- 5.68. Landscape is included as an environmental constraint in the site selection criteria [Site Selection Methodology, [SSP1](#)]. As explained in the Site Selection Methodology, Stage 2 of the site selection process is a detailed assessment of the SHELAA sites. This includes three steps by which sites can be rejected resulting in a final shortlist of sites for further testing at Stage 3. This ensures that only the most suitable, sustainable and deliverable sites are proposed for allocation. Sites that were deemed to have a 'Very Negative' impact on the High Weald AONB are 'showstoppers' at Stage 2(b). This means that sites with the

greatest constraints were excluded from further assessment as they do not represent sustainable development or accord with the requirements of national policy.

- 5.69. Two background papers [[ENV6](#) and [ENV7](#)] have been prepared to assess: the impact of potential housing sites on the High Weald AONB; and whether the proposed site allocations could be considered to be major development in accordance with paragraph 177 of the NPPF. Background paper [[ENV8](#)] assesses the impact of potential housing sites on the setting of the South Downs National Park. These background papers informed the site selection process.
- 5.70. The outcome of the site selection assessment is three proposed site allocations within the High Weald AONB which total 57 dwellings (plus older persons' accommodation):
- **DPA4: Land off West Hoathly Road, East Grinstead** – Up to 45 dwellings
 - **DPA13: The Paddocks, Lewes Road, Ashurst Wood** – 8-12 dwellings
 - **DPA19: Land at Hyde Lodge, Handcross** – Provision of older persons' accommodation.
- 5.71. This principle for protection of protected landscapes is carried forward in the Plan in the following policies:
- **DPC4: High Weald Area of Outstanding Natural Beauty** seeks to manage the scale and extent of development in the protected landscape and ensure permitted development conserves and enhances landscape
 - **DPC5: Setting of the South Downs National Park** seeks to ensure development in the setting does not cause detriment to the National Park.
- 5.72. The Major Development in the High Weald AONB background paper [[ENV7](#)] concludes that none of these proposed site allocations constitute major development in the High Weald AONB.
- 5.73. Outside of the protected landscape, the countryside is an asset that is highly valued and the primary objective of the District Plan is to secure its protection by minimising the amount of land taken for development. The Site Selection criteria assessed sites outside the protected landscape, for their capacity for change in landscape terms for development. Whilst no site outside the protected landscape could achieve a 'very negative' rating at stage 2(b), the assessment did identify those sites which are most sensitive in landscape terms (as informed by landscape capacity studies [[ENV18](#), [ENV19](#), [ENV20](#)]). No sites were ruled out solely due to its landscape impact, if outside the protected landscape. This would have meant giving the same weight to protected and non-protected landscape. Whilst development in the countryside cannot be avoided if the Council is to meet its housing needs, the approach enables development to be directed to sites with the greatest potential for change in landscape terms.

- 5.74. The second principle of the plan strategy is ‘making effective use of land’ This includes maximising opportunities for brownfield sites and ensuring that the full potential of a site is considered when proposals are put forward. This will maximise development within the built-up areas, reducing the pressure to develop countryside sites.

Environmental Protection

- 5.75. The District Plan is accompanied by a Habitats Regulations Assessment (HRA) [DP10], the objective of the HRA is to identify any aspects of the Plan that may have a significant effect, or an adverse effect on the integrity of the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC).
- 5.76. The Plan strategy was tested through the HRA by an in-combination assessment of the sites proposed for allocation in the submission District Plan. In conclusion, the air quality modelling highlighted that there will be no adverse effects on the integrity of the Ashdown Forest SPA/SAC, both alone and in-combination.
- 5.77. Policy DPC6: Ashdown Forest supports the strategic solution for recreational pressure on the Ashdown Forest. This policy requires provision of sustainable identification and delivery and financial contributions to SAMM. Provided the requirements of this policy are met, any potential adverse effects of the Plan on the Ashdown Forest SPA/SAC regarding recreational pressure can be excluded.
- 5.78. The Sustainability Appraisal identifies the Environmental Characteristics and Challenges for Mid Sussex to achieve sustainable development [Table 2-1 page 10]. The Plan seeks to address the environmental challenges, including a suite of policies that protect and enhance the environment including Chapter 8: Sustainability, Chapter 9: Natural Environment and Green Infrastructure and Chapter 10: Countryside.
- 5.79. At the strategic level, the spatial strategy has been informed by the evidence base, including Sustainability Appraisal. The Sustainability Appraisal considered five options for growth [Table A-3] and assessed potential impacts against the sustainability objectives. At the strategic level the SA identifies negative impacts for a number of environmental objectives. However, this impact is refined through the site selection process, where individual site characteristics are taken into account.
- 5.80. Landscape, flood risk, trees, biodiversity and heritage are included as environmental constraints in the site selection criteria [Site Selection Methodology, [SSP1](#)]. As explained in the Site Selection Methodology, Stage 2 of the site selection process is a detailed assessment of the SHELAA sites. This includes three steps by which sites can be rejected resulting in a final shortlist of sites for further testing at Stage 3. This ensures that only the most suitable, sustainable and deliverable sites are proposed for allocation.
- 5.81. Sites that were deemed to have a ‘Very Negative’ impact on these environmental constraints are ‘showstoppers’ at Stage 2(b). Sites that scored a ‘negative impact’ on a single or multi

criteria were not automatically ruled out from further assessment. This would have meant that the same weight would have been given to absolute constraints and constraints that were not capable of mitigation. It has been the case that sites have been ruled at stage 2(C) due to a combination of ‘negative impacts’ which together make the site unsuitable for development. This means that sites with the greatest constraints were excluded from further assessment as they do not represent sustainable development.

Flood Risk

- 5.82. Flood risk was considered from an early stage in the preparation of the Submitted District Plan to ensure development is directed away from areas at risk of flooding. This is reflected through the evidence base: **The Site Selection Methodology** [SSP1]: criteria 2 of the site selection criteria ensures that sites affected by significant areas of flooding or where historic flood events would affect the developability of the site were excluded at an early stage in the process. **The Sustainability Appraisal process** [DP7, DP8, DP9]: SA objective 5 on flooding and surface water flooding assessed the likelihood of the spatial strategy options and the proposed allocations to reduce the risk to people, properties, the economy and the environment of flooding from all sources.
- 5.83. The **Strategic Flood Risk Assessment** (SFRA) (levels 1 and 2) [ENV11 and ENV15] and the **Sequential and Exception Flood Risk Test** [ENV12] demonstrate that sites allocated for development in the plan are the most preferable in flood risk terms (i.e. the site with the lowest risk of flooding) and, where necessary, they have met the Exception Test which was informed by the Level 2 SFRA [ENV15]. This takes into account all sources of flood risk.
- 5.84. The Environment Agency has confirmed in the agreed Statement of Common Ground [DC16] that it has validated the SFRA (levels 1 and 2) and that they have been prepared in accordance with the NPPF and PPG. The Environment Agency agrees that the proposed site allocations are supported by proportionate evidence base and as far as its remit for flood risk is concerned, it has not encountered any critical uncertainties regarding the allocation of sites that would cause the District Plan to be unsound.
- 5.85. In March 2025 the Environment Agency updated its flood risk data and a new National Flood Risk Assessment (NaFRA2). These updates provide policy and decision makers with more accurate data. The Environment Agency expects to regularly provide updates to its flood risk data.
- 5.86. The Council has reviewed the flood risk data for the proposed site allocations in light of the new Environment Agency data. Analysis indicates that whilst there have been some minor changes to the extent of flood risk (mainly surface water rather than risk from rivers and seas), the majority of the proposed site allocations have a reduced flood risk. The conclusions from the data released in March 2025 are that the overall flood risk for the proposed site allocations is not significantly different to those made in the SFRA. Importantly the latest data has not

altered the level of flood risk on sites that are proposed for allocation in the submission District Plan.

Heritage

- 5.87. The Strategic Objectives of the Plan, include protecting valued characteristics of the built environment for the historical and visual qualities. The heritage assets of the district include over 1,000 listed buildings, 25 Scheduled Ancient Monuments and 36 conservation areas.
- 5.88. The SA includes an objective relating to Cultural heritage: To protect, enhance, and make accessible for enjoyment, the district's historic environment [DP7 Table3-6], page 30]. The SA states that impact on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset [paragraph 3.4.9, page 49]. Table 4-2 (page 60) sets out the summary of the sustainability appraisal of the spatial options, with the conclusion for heritage either negligible or uncertain in relation to cultural heritage objective. A more granular assessment at site level is required to fully understand the impact.
- 5.89. The Site Selection Criteria set out in the **Site Selection Methodology [SSP1]** includes three criteria in relation to heritage and identifies the source of the information for the assessment of SHELAA sites. These are: Criteria 5: Listed Building, Criteria 6 Conservation Area and Criteria 7: Archaeology
- 5.90. The detailed heritage assessments and conclusions for each SHELAA site are set out in **Appendices 3 and 4 of the Site Selection Conclusions Paper [SSP2]**. Appendix 1 of this document sets out the comments received from the Council's Conservation Officer which have informed the site selection conclusions.
- 5.91. None of the site allocations have been scored a Very Negative Impact on listed buildings, conservation areas or archaeology. Any site which had a Very Negative Impact for these criteria would have been rejected at Stage 2(b) – Showstoppers.
- 5.92. The Submitted District Plan includes the following heritage-focused non-strategic policies to ensure that heritage considerations are taken into account during the determination of planning applications:
- **Policy DPN5: Historic Parks and Gardens** seeks to protect the character, appearance and setting of a registered park or garden.
 - **Policy DPB2: Listed Buildings and Other Heritage Assets** requires development to preserve or enhance listed buildings and the contribution made by their settings.
 - **Policy DPB3: Conservation Areas** requires development in conservation areas to preserve or enhance its special character and appearance