EXAMINATION OF THE MID SUSSEX DISTRICT PLAN 2021-2039

Matter 7 continued: MM72, MM73 and MM75, College Lane, Hurstpierpoint

Hearing statement on behalf of College Lane Action Group (CLAG) and Keep Hurst a Village (KHAV)

HEARING DATE : 5 November 2026, A.M

Spokesperson: Dara Jafari

1. Introduction

1. This hearing statement sets out the concerns shared by many residents of Hurstpierpoint about the additional housing allocations under MM72, MM73 and MM75 on land East of College Lane.

2. MM72 is the largest allocation with an indicative 75 new dwellings, although the site promoter has recently applied for planning permission for 100 dwellings on the southern section of that site (reference DM/26/2433). MM73 and MM75 are smaller sites (9 and 35 dwellings respectively) but lie directly north of MM72. We refer to documents in support of the MM72 planning application as they are recent relevant evidence about the likely impacts of allocation.

3. Our principal case is that MM72 should be deleted from the plan prior to adoption, as it is not consistent with national planning policy (NPPF September 2023), nor is its inclusion in the plan based on proportionate evidence as explained in this statement. We also consider that MM75 should be deleted although the case for that is less strong as it was not part of the 2014 refused application detailed below. We remain neutral about the smallest allocation.

Local Gap

4. MM72 is in a sensitive location outside the settlement boundary and within the Hurstpierpoint and Hassocks Local Gap (Policy DP13 'Preventing Coalesence' of the local plan 2014-2031, and policy C3 Neighbourhood Plan 2015-2031). In 2014, a called-in appeal[1] against refusal of planning permission for 81 dwellings and associated infrastructure on the same site was refused, solely due to incursion of development into the Local Gap. The Secretary of State agreed with the Inspector's conclusions:

[1] APP/D3830/V/14/2211499, see link to document at end of this statement.

"The long established Local Gap is already particularly narrow and vulnerable in the vicinity of the application site, so that the proposal fails to satisfy the environmental dimension of sustainable development as set out in the Framework" (para 24)

5. Although that decision was made under the preceding (2004) version of the local plan, and an earlier version of the Framework, the Neighbourhood Plan remains the same and the local plan still contains a policy against settlement coalescence. The Local Gap has not been reduced further since the appeal decision. The environmental dimension of sustainable development in the Framework remains the same.

6. We submit to the Inspector that loss of part of the Local Gap is a critical issue in deciding whether the MM72 allocation (alone or together with MM73 and MM75) should be deleted to ensure the soundness of the plan.

2. Housing target range

7. We note NTS6 and NTS7 of the Sustainability Appraisal Main Modifications Report (DP16) which explains that the Council reappraised four options (A to D) of between 1,000 dpa and 1,450 dpa. Option B (1,200 dpa) would meet MSDC housing needs and 50% of Crawley Borough Council's unmet housing needs, whereas the Council's preferred Option C (1,300 dpa) would meet MSDC's housing needs and 100% of Crawley's needs.

8. The Council acknowledges that options B and C "perform similarly" but has concluded that Option C is preferred "because it meets a higher level of unmet need which is a key criteria and a national priority". We do not dispute that housing provision is a national priority, however it does not override every other soundness consideration including consistency with national planning policy in delivering sustainable development - which includes the environmental component - as identified by the Secretary of State in the 2014 called-in appeal.

9. Given the figures above, allocation MM72 could be deleted from the plan without significantly affecting housing growth over the plan period.

10. The remainder of this document addresses the Inspector's agenda items in order and explains why we submit that the additional allocations MM72, MM73 and MM75 do not conform to national policy.

3. Inspector's Agenda item A: Movement

Relevant national policies: NPPF 11(a); 31 and 32; 35(b), (c) and (d); 104 and 105; and 110 and 111.

Access points

11. The access point to MM72 will be directly off College Lane. It is highly likely that MM73 would be accessed separately, also from College Lane, using the existing access point2. While this is only indicative, the Design and Access Statement for the recent planning application does not envisage any access between MM72 and MM73 or MM75 to the north as can be seen on the extract3 below :



12. In terms of pedestrian access there are footways along both sides of College Lane between the likely site entrance and the Village centre, however there is no footway on the eastern side of the carriageway turning north out of the site towards Hurstpierpoint College. It is understood that the promoter/developer intends to provide an additional footway north of the proposed site access4 but it is not clear for what distance.

13. There are no formal cycle lanes along College Lane. North of the development but before reaching Hurstpierpoint College, the lane narrows and there are no road markings, footways, or walkable verges as can be seen from Google Maps, below :

[2] MM73 supporting statement
[3] D&A part 1, pdf p.8 'Thakeham's Vision'
[4] Transport Assessment para 7.1.8



Effect on the road network and cumulative traffic

14. I live approximately 30 metres from College Lane and use it daily. Residents represented by Keep Hurst a Village and the College Lane Action Group experience high volumes of traffic on College Lane, Hurst Wickham, Hassocks Road, Hurst Road and the High Street at school and commuter periods.

15. Longstanding local concerns are reflected in the Neighbourhood Plan which identifies traffic congestion, pedestrian safety and parking concerns around College Lane and Hurst Wickham as can be seen below:

7.1 Overview:

Opinion Surveys in the Parish since 2006, including the background work undertaken as part of the Hurstpierpoint Transportation Plan (2006), have revealed the following significant traffic and transport concerns:

- Traffic congestion and pedestrian safety in the High Street, Hurstpierpoint;
- On-street parking congestion in the High Street and around Trinity Road, Hurstpierpoint;
- Traffic congestion and speeding issues in the southern part of Cuckfield Road, Hurstpierpoint, particularly south of the junction with Fairfield Crescent;
- Traffic speeds and numbers of HGV's in London Road, Sayers Common;
- Traffic speeds and pedestrian safety in Chalkers Lane, between the junction with Cuckfield Road and Hurstpierpoint College;
- Traffic congestion, pedestrian safety and parking in College Lane, Hurst Wickham. Hurstpierpoint.

16. MSDC's own work acknowledges that Hurstpierpoint High Street suffers congestion and can bottleneck at certain times, as does College Lane. We appreciate that the Inspector is considering the allocation rather than the planning application, however the latter is a useful indication of how the site would impact the road network in reality. The Transport Assessment[5] for 100 homes forecasts 701 two-way vehicle movements per day and 67 movements in each morning and evening peak hour, approximately one additional vehicle every

[5] 5.3.5s

minute. It assumes 89 per cent of site traffic routes south towards the College Lane, Wickham Hill and Hassocks Road junction. Applying the applicant's own trip rates[6] consistently, the increase from 75 to 100 dwellings equates to about 175 additional two-way movements per day and about 17 additional movements in each peak hour.

17. We note para 110(d) of the NPPF 2023 which says that in plan-making it should be ensured that any significant impacts on the transport network (in terms of capacity and congestion) or on highway safety, can be cost effectively mitigated to an acceptable degree. This requires a realistic and proportionately evidenced assessment of the likely impacts, which the local plan evidence base is lacking.

18. Examination document MS-TP5 (In-combination testing – conclusions) which tested the development scenario of the Additional District Plan Sites including MM72,MM73 and MM75 (para 3.5) is relevant to this issue. Junction S8 at Hassocks (Stonepound) was one of the three junctions identified as meeting the 'severe' impact criteria by WSCC at the plan Submission stage. This junction is on the driving route between College Lane and Hassocks Station. In the statement of common ground (DC15) it was agreed that the "*solution and mitigation will focus on improving safety and active travel in these locations to reduce traffic passing through severely impacted locations (rather than increasing junction capacity)* ..."

19. Following updated sensitivity testing, the Stonepound junction remains severe and mitigation remains focused on improving safety and active travel (MS-TP5, para 4.12). The 33 bus runs along this route but only around once an hour; this is not likely to be an attractive alternative to driving. We note that in MS-TP5 at 4.13 the Council considers that policy text in support of additional public transport services through the Stonepound junction will be required in relation to the new sites in Hurstpierpoint. However, it is not clear what mitigation in terms of reduced car trips or queuing times is actually achievable.

20. At 4.24 of MS-TP5 it is said that the County Council has reviewed further information to "ensure" that the "degree of exceedance of the severity criterion remains proportional to the impact of the sustainable transport mitigation to be delivered". We consider that this falls far short of ensuring that the 'severe' impact on this junction can be cost-effectively mitigated to an acceptable degree – contrary to NPPF 110(d) – especially given that further analyses are required by the highway authority (4.26).

[6] From the Transport Assessment , Tables 5.1 to 5.4

Road safety and mitigation measures

21. The applicant's own Stage 1 Road Safety Audit7 identified problems with site access8 for larger vehicles, and other safety issues for which mitigation is proposed. We are more concerned with the dangers posed by the additional cars from the allocated sites adding to the traffic pressure on College Lane and in the Village centre, particularly the High Street.

22. The promoter/developer's audit observation itself was limited to 10:00 to 10:30 on 13 July 2026. It recorded minimal traffic and no pedestrians or cyclists. That was outside commuter peaks and school arrival and departure periods, and Hurstpierpoint College was already on summer holiday. It is therefore not representative of the conditions residents experience at busy times during the school term.

Sustainable travel and the footpath network, and ability to deliver policy requirements

23. MM72 requires pedestrian and cycle connections towards Sites 582 (MM73), and 1172 (MM75), a shared-use path along College Lane "to allow access to bus stops on Wickham Hill and access to College" and a cycle connection to BW8C.

24. The connections to MM73 and MM75 are not shown on the vision statement for MM72, nor in the Design and Access Statement for the recent planning application. The allocations policy texts envisage a coherence between the sites when built out, but this is not borne out in the site-specific evidence as it stands.

25. We have particular concerns about the ability to delivery a shared use path along College Lane to allow access to College i.e. to the north of the allocation sites, given that the lane narrows and there are no footways or verges on either side currently.

4. Inspector's Agenda item B: Village character, heritage and the countryside

Relevant national policies : NPPF 11(a); 31 and 32; 35(b) and (d); 174 and 175; and 189 and 190.

Effect on the separate identity of settlements

26. The importance of maintaining the distinct identity of settlements and preventing coalescence is acknowledged in the Sustainability Appraisal9 objectives 4 and 8 (Table 1), as well as EP policy DPC2.

[7] Transport Assessment Appendix 6, section 3
[8] *Insufficient carriageway space at junctions, accesses or on bends may cause sudden braking and unexpected obstruction resulting in potential rear end shunts or side swipe type collisions*
[9] DP16

27. As set out in the introduction, the Secretary of State's refusal of 81 dwellings on the MM72 site in 2014 acknowledges the important contribution of that site to the Hurspierpoint/Hassocks gap as identified by the appeal Inspector :

> 13.22 During cross-examination, it was accepted for the applicant that the site has a role in preventing coalescence, albeit qualified as being a limited role. I recognise, in this regard, that neither the built development proposed, nor the application site as a whole, would entirely 'fill' the gap between the built up edges of the two settlements and the proposal would not, of itself, result in coalescence in that regard. However, the site does extend up to the boundary between the two settlements, as defined by Belmont Lane. Although the parkland/wildlife corridor would provide a buffer between the houses proposed and Belmont Lane, the development would, nevertheless, erode the Gap at what is already its narrowest, and thus its most sensitive, point, the gap between the built up edges of the settlements being as little as 900 metres at this point. **In my view, that erosion of the Gap would permanently impair the character of this part of the Local Gap, and thus the amenity and setting of Hurstpierpoint and Hassocks.**
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> 13.23 With regard to paragraph 109 of the Framework, it is clear from the representations at application stage, and in response to the call in, as well as the number of residents who attended the Inquiry itself, that local people greatly value this green area of open countryside on the edge of Hurstpierpoint and want to preserve its status as a Local Gap, which has been protected from development for many years. **In my opinion, the Gap has served, and continues to serve a useful and much valued planning purpose**. I consider that the increase in built development here, at the edge of the settlement, would result in a small but nevertheless significant diminution of this part of the Local Gap: physically, it would reduce forever the amount of land available to form the separation function: visually it would introduce built form onto currently open and undeveloped land, reducing the openness of this part of the Gap.

The appeal Inspector concluded at para 13.56 :

> All in all, I am of the view that, whilst the site provides a valuable opportunity to contribute to the District's housing requirements, the scheme is unacceptable in terms of its impact on the Local Gap. Given that the development proposed would take place within what is already a particularly narrow part of the Gap, that harm is serious enough to significantly and demonstrably outweigh the scheme's benefits and brings it into conflict with the development plan and the Framework taken as a whole.

28. The importance of the site to the Local Gap is not explicitly addressed in the Council's sustainability appraisal despite the clear finding of non-accordance with the Framework in the 2014 appeal decision. We submit that nothing has changed to make the allocation accord with national policy now. Allocating the site is not in accordance with para 174 of the NPPF 2023 which says that planning policies should recognise the intrinsic character and beauty of the countryside, nor does it accord with the environmental objective of sustainable development.

Effect on heritage assets

29. The effect of the College Lane allocated sites have the potential to impact on the setting of Wickham Farmhouse at 14 College Lane, and the Hurst Wickham Conservation Area but we accept that the level of harm to heritage significance would be low.

Countryside and Wildlife

30. The MM72 site has long been a greenfield site and a valued part of the countryside at the edge of Hurstpierpoint. This is specifically recorded in the 2014 appeal Inspector's decision. If the site remains in the plan, it will undermine the rural character of the settlement edge not only by introducing housing development but by adding to traffic congestion on local roads and introducing more artificial light as well as more general human activity in a relatively tranquil area. This is inconsistent with para 175 of the NPPF 2023 which says that plans should allocate land with the least environmental or amenity value when consistent with other policies in the Framework.

5. Inspector's Agenda item C: Infrastructure

Relevant national policies: NPPF 11(a); 20(b) to (d); 31, 32 and 34; and 35(a) to (d).

31. The evidence on utilities and deliverability of MM72 and to a lesser extent MM73 and MM75 is thin. We note again the developer/promoter's Stage 1 Road Safety Assessment which identifies potential difficulties with site access for larger vehicles, which it seems cannot be easily mitigated without making physical changes to the access, which would involve works to the ditch and hedgerow on either side.

6. Conclusion

32. We do not dispute that Mid Sussex must plan positively for housing. The issue is whether the plan would be sound if it included the MM72 allocation.

33. On highway impacts, there is evidence of significant congestion at the Stonehouse junction but no evidence that appropriate mitigation can be ensured. There is very little evidence that the increased risks to pedestrians and cyclists on College Lane, especially the northern section leading to College, have been properly thought through.

34. On Village character and the countryside, the 2014 appeal decision has largely been ignored. While all greenfield sites contribute to openness to some degree, MM72 is the only additional site where the planning impacts of development have already been assessed and found to be contrary to the environmental component of sustainable development in the Framework.

35. We therefore ask the Inspector to delete MM72 to ensure the soundness of the plan. If that is not considered appropriate, then at minimum the allocation policies should be reworded so that the three College Lane sites

are subject to a co-ordinated policy on car, pedestrian and cycle access between the three sites and to the wider road and rights of way network.

Document references

[1] Inspector Guidance Note IDJB-13, 25 September 2026. Source link

[2] Inspector Hearing Agenda IDJB-15, 25 September 2026. Source link

[3] September 2023 National Planning Policy Framework. Source link

[4] MM72 Main Modification policy, 75 dwellings on 5.3 ha. Source link

[5] MS-16 Site Selection Response to Fact Check, June 2026. Source link

[5A] MS-TP5 – In combination testing – Conclusions, July 2026 Source link

[6] DM/26/2433 Planning Statement, 100 dwellings. Source link

[7] DM/26/2433 Transport Assessment. Source link

[8] DM/26/2433 Residential Travel Plan. Source link

[9] DM/26/2433 Landscape and Visual Impact Assessment. Source link

[10] DM/26/2433 Design and Access Statement. Source link

[11] Secretary of State decision, College Lane, 4 September 2014. Source link

[12] MS-13 Impact of Traffic on Hurstpierpoint High Street, March 2026. Source link

[13] Made Hurstpierpoint and Sayers Common Neighbourhood Plan. Source link

[14] DM/26/2433 Historic Environment Desk-Based Assessment, 24 September 2026. Source link