MS-07c:
Sites Added by the draft Main Modifications –
High Weald National Landscape, Pease Pottage and Handcross (MM88, MM89, MM90 and MM91)

Hearing Statement
October 2026

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Sites Added by the draft Main Modifications – High Weald National Landscape, Pease Pottage, Handcross

National Landscape: general matters

a. National Landscape

National Landscape: strategic-level exceptional circumstances and the public interest

1. Nearly 50% of Mid Sussex District is within the High Weald National Landscape (the legal designation is Area of Outstanding Natural Beauty; AONB). Relevant authorities including the Council and the Planning Inspectorate have a statutory duty to 'seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty' (section 85 of the Countryside and Rights of Way Act 2000 as amended).

2. The Council takes its responsibilities in relation to the High Weald National Landscape seriously and works closely with the High Weald National Landscape Partnership to conserve and enhance the protected landscape. The Council has been mindful throughout the District Plan process of its duties towards the High Weald National Landscape and this is reflected in the first principle of the spatial strategy for the District Plan: 'Conservation and enhancement of the High Weald AONB and South Downs National Park'.

3. The Inspector's interim conclusions following the Hearings earlier in 2026 required the Council to test an 'overall housing target in the range of 1,200 to 1,300 dwellings per annum, which includes a substantial component for the unmet housing needs of adjacent authorities' [IDJB-12]. As set out in the **Post-Hearings – Site Selection Methodology Review** [MS-12], the Inspector considered that the application of 'showstopper' constraints needed to be reviewed during the re-appraisal of sites. This included the way in which weight given to the protection of National Landscapes was balanced against potential benefits. **MS-12** goes on to highlight the Inspector's comment that whilst the NPPF may mean that sites in this 'showstopper' category face 'strong headwinds', the question of whether there is a 'strong reason' to reject them requires consideration of the particularities of the individual site including any benefits that could potentially arise from its development.

4. The Council has sought to meet the Inspector's request (as documented elsewhere in the Examination Library: MS-12, MS-TP4 and MS-TP5) to contribute to meeting some of the unmet needs of neighbouring authorities. In order to meet this overall housing target, the Council has concluded that the sites at Pease Pottage and Handcross perform well against the site selection criteria and methodology as a whole [SSP8] and should be allocated. Notwithstanding the harm to the Protected Landscape from development of these sites, the sites at Pease Pottage and

Handcross offer the benefit of contributing towards the unmet housing need of Crawley close to where the need arises as well as provision of community facilities [SSP8, Appendix 2].

5. An assessment of major development in the High Weald National Landscape has been prepared [ENV22]. Nine of the additional 35 sites that were subject to Main Modifications consultation are within the High Weald National Landscape and three sites are determined to be major development (MM88, MM89, MM90). The Council has previously provided the policy context and its conclusions regarding the proposed site allocations in the High Weald National Landscape when setting out the results of the in-combination testing [MS-TP5].

6. The issue of major development, exceptional circumstances and the public interest test in paragraph 177 of the NPPF (September 2023) refers to considering applications for development and planning permission. Whilst the implications of this paragraph are not explicit for plan-making, legal advice for the South Downs National Park (as set out in ENV22, page 15) concluded that if an assessment of major development is undertaken at the plan-making stage, it would help to reduce the risk that an allocated site is undeliverable at the planning application stage because it cannot meet the major development test as set out in the NPPF. Therefore, as set out in **MS-TP5**, the Council has sought to satisfy itself that in principle an exceptional circumstances case could be made for the three sites that are determined to be major development, noting that any final judgement on this remains for the planning application stage, and will be dependent on the form and details of the scheme brought forward.

7. The exceptional circumstances and public interest test as set out in the NPPF (September 2023) are as follows:

> *177. When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development[60], other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:*
>
> *a) the need for the development, including in terms of any national considerations and the impact of permitting it, or refusing it, upon the local economy;*
>
> *b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
>
> *c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*
>
> *[60] For the purposes of paragraphs 176 and 177, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.*

8. Whilst the District Plan is being examined under the policies of the September 2023 version of the NPPF, paragraph 177 of the September 2023 version of the NPPF is carried forward into Policy N4: Protected Landscapes of the August 2026 version of the NPPF. The policy position is the same albeit there are minor changes to the wording in terms of the phrasing of the paragraph. Notwithstanding that, the fundamental policy test remains the same: Policy N4(2) sets out that proposals for major development within Protected Landscapes should be refused other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. In its response to the consultation for the new NPPF, the government is clear there is a strong presumption against major development in Protected Landscapes and that the exceptional circumstances and public interest test remains a two-limbed test[1]. That is, that both exceptional circumstances and the public interest test need to be demonstrated. This is important because Policy N4 is a national decision-making policy and will apply at the planning application stage.

9. In her letter of the 18 August 2026 to Chief Planning Officers, the Chief Planner reiterates that the new NPPF 'makes clear that major development in Protected Landscapes should be refused other than in exceptional circumstances, alongside the existing statutory protection for their landscape and scenic beauty'[2]. Also relevant is Planning Practice Guidance which confirms that National Landscapes are unlikely to be suitable for accommodating unmet needs from neighbouring areas (emphasis added)[3]:

> *How should development within National Parks, the Broads and Areas of Outstanding Natural Beauty be approached?*
>
> *The National Planning Policy Framework makes clear that the scale and extent of development in these areas should be limited, in view of the importance of conserving and enhancing their landscapes and scenic beauty.* ***Its policies for protecting these areas may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process, and they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas.*** *Effective joint working between planning authorities covering designated and adjoining areas, through the preparation and maintenance of statements of common ground, is particularly important in helping to identify how housing and other needs can best be accommodated.*
>
> *[...]*
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> *Paragraph: 041 Reference ID: 8-041-20190721*
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> *Revision date: 21 07 2019*

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[1] National Planning Policy Framework consultation - government response

[2] Planning Newsletter from the Chief Planner to Chief Planning Officers (18 August 2026, page 3): Planning update newsletter (18 August 2026).

[3] https://www.gov.uk/guidance/natural-environment#landscape

10. It appears to be common ground from the representations received to the Main Modifications consultation that MM88, MM89 and MM90 have rightly been determined to be major development. The issue is, therefore, whether at the plan making stage, strategic level exceptional circumstances and the public interest test can be demonstrated for the proposed site allocations. The Council is aware that some parties do not consider that exceptional circumstances and the public interest test can be demonstrated at the plan-making stage.

11. As set out in **MS-TP5** and **ENV22**, the main justification for concluding exceptional circumstances and the public interest test are capable of being demonstrated at the planning application stage is to contribute to meeting the unmet needs of Crawley. The exceptional circumstance is the Inspector's request to meet some of the unmet needs of Crawley and the public interest test is that the sites will deliver affordable housing and as larger sites can also provide community benefits in the form of a new community building/ village hall, bowling green and allotments (MM88) and outdoor sports provision (MM90).

12. Taking each of the three NPPF bullets in paragraph 177 in turn, the Council is of the view they can be satisfied at the plan-making stage.

a) The need for development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy

13. The **Statement of Common Ground between the Council and Crawley Borough Council** [DC6] sets out that Crawley's Local Plan would only accommodate 42% of its housing need over the plan period. This leaves a total unmet need figure of 7,505 dwellings to be accommodated within the wider housing market area. Crawley Borough Council's Regulation 19 response to the Submission District Plan, explains that the emerging Crawley Borough Local Plan confirms that strategic sites adjacent to Crawley, to the east and/or west, could be an appropriate way in which to meet Crawley's housing needs. As set out in **MS-TP5**, accommodating homes on these major development sites (alongside the contribution from Horsham) would enable the housing needs of the North West Sussex Housing Market Area to be met in full, enabling Mid Sussex to make a valuable contribution to addressing both market and affordable housing needs in the area. As set out in the **Post Hearing Policy Modifications and Updates** [MS-17], whilst the Council is fully cognisant of the affordable housing issues with Crawley borough, the Council has carefully considered the potential to increase the affordable housing requirement to 40% but concluded at this time that based on the **Viability Update Note** [IV9], retaining an affordable housing requirement of 30% will provide more certainty in deliverability terms. Therefore, the remaining route for Mid Sussex to contribute to addressing some of Crawley's affordable housing needs is by delivery of additional new development, which will in turn will include affordable housing provision.

14. The Council's **Statement of Common Ground with Crawley Borough Council** [DC6a] explains that Mid Sussex District Council and Crawley Borough Council have agreed in principle a 50/50 share of affordable housing nomination rights on DPSC2: Crabbet Park. This therefore sets a precedent for how these sites could make a contribution to the unmet affordable need arising

from Crawley. This would include making a significant contribution to unmet affordable housing need arising from Crawley.

15. In a previous situation, the reasons for granting permission for the Woodgate development at Pease Pottage were similar. In the consideration of the NPPF tests for major development, the committee report for DM/15/4711 referred to the provision of housing to contribute towards meeting the unmet needs of Crawley, limited alternative sites of that scale, and landscaping that could moderate any visual impact. Also, in this situation, the benefit of the provision of on-site infrastructure was given weight.

b) The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way

16. As set out in **MS-TP5**, the Council is of the view that the most sustainable way to accommodate the unmet needs of Crawley residents is to seek to locate development close to where the need is arising. Alternative sites within or outside the High Weald National Landscape or as a series of smaller sites within the High Weald National Landscape may not offer the most sustainable locations to access local services and facilities along with contributing to unmet need where it arises. A thorough site selection process has been undertaken including a review following the Hearings earlier in 2026 [SSP8]. In terms of other sites at settlements close to Crawley, there are no further sites at Copthorne or Crawley Down (outside of the High Weald National Landscape) that were found to be suitable for allocation, beyond those already identified.

c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated

17. Whilst the three sites determined to be major development will significantly extend the current Category 3 (Medium Village) settlements into what is currently open countryside within the designated High Weald National Landscape, the larger sites can enable community infrastructure to be delivered on site. The site at Handcross (MM88) would seek to relocate and upgrade existing facilities and the site at Pease Pottage (MM90) would provide sports provision.

18. To help mitigate the detrimental effect on the environment and the Protected Landscape, all three policies (MM88, MM89 and MM90) include a requirement for a landscape-led design approach that is informed by a LVIA. In addition, there is a requirement to utilise the High Weald AONB Management Plan and its supporting documents to ensure an appropriate layout, design, boundary treatments and landscaping. These documents are a material consideration in the planning process and include guidance in relation to urban design, dark skies and soft landscaping. These documents are specific to the High Weald National Landscape context and adherence to the guidance will ensure that a future proposed scheme is tailored to the site context and factors in the landscape characteristics that comprise the core components of the natural beauty of the High Weald National Landscape. Furthermore, there is reference within Policies MM88, MM89 and MM90 to site-specific landscape characteristics that will need to be taken into account, for example, ancient woodland and ponds. These policy requirements

included at the plan-making stage will need to be incorporated by schemes at the planning application stage to demonstrate how conservation and enhancement of the landscape characteristics have been maximised.

19. On this basis, the Council is of the view that strategic-level exceptional circumstances and public interest test can be demonstrated.

Pease Pottage and Handcross

20. Pease Pottage and Handcross are located on the western boundary of Mid Sussex District to the south of Crawley. Both villages lie on the A23 road corridor which provides north-south connections through the district, south to Brighton and north to Crawley and via the M23 to London beyond. Both Pease Pottage and Handcross are Category 3 – Medium Village settlements which provide day-to-day essential services for residents.

21. The proposed site allocations (MM88, MM89, MM90 and MM91) have been introduced at the Main Modifications stage of the District Plan Examination in response to the Inspector's request for the Mid Sussex District Plan to make a contribution towards meeting some of the unmet needs for Crawley. It is the Council's view that the most sustainable way to accommodate the unmet needs of Crawley residents is to seek to locate development close to where the need is arising.

22. All of the proposed site allocations at Pease Pottage and Handcross (MM88, MM89, MM90 and MM91) are within the High Weald National Landscape which is a Protected Landscape in national planning policy. The village of Pease Pottage (within the existing defined built-up area boundary) though is outside the AONB designation. Three of the proposed site allocations (MM88, MM89 and MM90) are determined to be major development within the Protected Landscape. Therefore, further consideration needs to be given at the plan-making stage to any exceptional circumstances and whether development would be in the public interest as set out in the requirements in national policy.

MM88: Land West of Truggers, Handcross

a. Impact on the National Landscape

Degree of wider visibility / sense of enclosure

23. The context for the impact on the High Weald National Landscape in terms of visibility and enclosure is set out in the Statement of Significance in the **High Weald AONB Management Plan** [ENV5] which explains that the 'pattern and landscape setting of dispersed historic settlements enriches its natural beauty, with small, irregular fields and pasture, hedgerows and ancient woodlands interspersed with the rich clay-tiled roofscapes of historic buildings' (page 16). Glimpsed and long views are an important characteristic of the High Weald National Landscape and feature in the description of 'Aesthetic and Perceptual Qualities' (one of the core components that articulate the natural beauty of the High Weald National Landscape).

24. The High Weald Housing Design Guide[4] (November 2019) referred to in criterion 6 of Policy MM88 is a supporting document to the High Weald AONB Management Plan and is a material consideration in the planning process. It states that the 'relationship of new housing development to its 'parent' community, in terms of siting, scale, and response to setting, is very important if it is to feel genuinely integrated into that village or town, rather than simply an imported, 'bolted-on' housing estate' (page 10). The High Weald Housing Design Guide usefully provides guidance on understanding a site's context, siting development in the landscape and understanding topography as well as more detailed urban design guidance. In particular, it sets out that 'new development should be good enough to be seen, not justified on the basis that existing or proposed planting will screen it from view' (page 11). The design and layout of the site will need to be landscape-led reflecting High Weald character and responding to the historic pattern and character of settlements in the form, layout, grain and massing of development; and using high quality architecture.

25. Site MM88 is well enclosed. Horsham Road and Truggers bound the site on its southern and south-eastern boundary, there is woodland to the north and a tree belt on its eastern boundary beyond which is the A23. The site is clearly visible from the existing properties along the southern boundary of the site but it has limited wider visibility due to the current boundary treatments and intervening vegetation. The site will become more visible from Horsham Road with the creation of the proposed access since there will be some loss of the hedgerow fronting Horsham Road.

26. Given the proximity and visibility of adjacent residential development, a sensitive landscape-led layout and design of the site has the potential to integrate the scheme into the village of Handcross. This can be strengthened by criterion 3 of Policy MM88 which requires pedestrian access in the central southern part of the site using the existing access point. This will provide closer connectivity to the village centre than the proposed vehicular access.

27. Criterion 5 of Policy MM88 and DPC1: Protection and Enhancement of the Countryside require a Landscape and Visual Impact Assessment (LVIA) that will need to inform the site design and layout, and any mitigation requirements. Use of the High Weald AONB Management Plan and its supporting documents referenced in criterion 6 of Policy MM89 will also provide guidance to ensure an appropriate layout, design, boundary treatments and landscaping.

28. The Council is of the view that the site is well enclosed and has limited wider visibility.

Existing urbanising influences

29. As set out in **ENV22**, the site is to the north-west of Handcross and adjoins the historic settlement pattern. The site's southern boundary is contiguous to the existing defined built-up area boundary. The site borders a row of properties and restaurant (in the listed former public house) on its southern boundary and residential properties within 'Truggers' at the eastern end.

[4] https://www.midsussex.gov.uk/media/0sxklfsy/high-weald-housing-design-guide.pdf

Whilst walking across the site, the built form of residential development along the B2110 Horsham Road is visible. Access to the site is proposed to be taken from Horsham Road which currently has a footpath on its northern side as well as street lighting further into Handcross. The site is to the west of the A23 and at the far east of the site, vehicles can be seen through the boundary vegetation and road traffic noise can be heard.

30. Overall, the site has a rural experience from its location at the western end of Handcross, but it feels connected to the village of Handcross given existing residential development is visible and its proximity to the site along the southern boundary. Therefore, as set out in the above paragraphs, there are existing urbanising influences for this site.

Effect on ancient woodland and protected tree

31. 'Woodland' is one of the eight core character components that articulate the natural beauty of the High Weald National Landscape. The **High Weald AONB Management Plan** [ENV5] describes why woodland is an important character component (page 32):

> *'The High Weald AONB is characterised by the great extent of woodland including ancient woods, gills and shaws, the product of traditional long-term management. The nationally important assemblage of ancient woodland in the High Weald has immense wildlife, landscape and historical value, while the wider cumulative visual character of trees and hedgerows dividing small irregular fields is fundamental to the verdant nature and appearance of the landscape.'*

32. As set out in **ENV22**, there is woodland, both ancient woodland and priority habitat (deciduous woodland), immediately to the north of the site. There is a Tree Preservation Order on an oak tree within the site to the rear of the former Royal Oak Public House.

33. Priority habitat (deciduous woodland) has been identified in addition to ancient woodland. Priority habitat is a habitat of principal importance in England included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006. The priority habitat (deciduous woodland) within the site is also designated ancient woodland. There is also priority habitat (deciduous woodland) adjacent to the site on the south-eastern boundary.

34. The West Sussex Local Nature Recovery (LNRS) (June 2026) states that 'designated sites, irreplaceable and priority habitats are our core areas for nature around which future action can be based'[5]. Ancient woodland is an irreplaceable habitat. The West Sussex LNRS regards a measure of success for Priority W1 (to enhance existing woodland habitats) as ancient, irreplaceable and priority woodland being managed to improve ecological function and quality of habitat for woodland species. Measure M1.8 is to bring priority woodland into positive

[5] West Sussex LNRS Part 2 – Priorities, Measures and the Local Habitat Map.pdf

conservation management to support woodland species and enhance its ecological condition and resilience.

35. Development of the site has the potential to directly and indirectly impact on the ancient woodland, priority habitat and other trees, for example, through construction activities, fragmentation and loss of connectivity, disturbance to wildlife, and unmanaged public access.

36. Criteria 8, 9 and 10 of Policy MM88 set out site-specific requirements for ancient woodland and the protected tree. Together, these criteria endeavour to prevent loss and damage to existing ancient woodland (and priority habitat (deciduous woodland)) and the protected tree and to meet the objectives of the West Sussex LNRS. They also aim to ensure the design and layout of the proposed scheme incorporates trees and woodland and maintains their long-term protection.

37. In addition to the site-specific policy requirements, any future application will need to comply with national planning policy and guidance including the Natural England and Forestry Commission standing advice[6]. Development would also need to comply with District Plan Policy DPN4: Trees, Woodland and Hedgerows, which sets out the requirements for providing a buffer to trees, woodland and hedgerows. This includes expecting applicants to demonstrate, through an assessment, that the distance and size of a buffer zone is appropriate.

38. The Council is satisfied that there are sufficient requirements within national policy and guidance, the District Plan and High Weald National Landscape guidance along with best practice to appropriately address the effect of development on ancient woodland and protected trees.

Effect on wildlife

39. Development of the site will need to comply with relevant national and local policy and guidance including for protected species. The proposed scheme should also incorporate measures to protect and enhance biodiversity as well as take opportunities to recover nature, as set out in Policy DPN1: Biodiversity, Geodiversity and Nature Recovery. This could include the provision of green infrastructure and biodiversity features such as swift bricks, hedgehog highways and wildflower planting. Careful consideration of lighting proposals can also help to minimise impacts on species such as bats and nocturnal insects. These actions would help to meet some of the priorities set out in the West Sussex Local Nature Recovery Strategy.

40. Criteria 8, 9, 10, 11 and 12 of Policy MM88 are all requirements to carefully consider impacts on habitats and consequently species. These include an ancient woodland buffer, retaining and enhancing hedgerows, a watercourse buffer, retaining and enhancing the pond, and consideration of any direct and indirect impacts to the Local Wildlife Site to the north.

[6] Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK

41. The Council is satisfied that there are sufficient requirements within national policy and guidance, the District Plan and High Weald National Landscape guidance along with best practice to appropriately address the effect of development on wildlife.

Proposed land use arrangements including open space and buffering

42. In addition to requirements set out in **Appendix 5: Developer Contributions of the Mid Sussex District Plan** [DP1], Policy MM88 specifies on-site provision of allotments, public open space, and natural, semi-natural and amenity green space. Criteria 5 and 6 of Policy MM88 require a landscape-led design and a Landscape and Visual Impact Assessment (LVIA) and use of the High Weald AONB Management Plan and its supporting documents to ensure an appropriate layout, design, boundary treatments and landscaping. This is to ensure the development conserves and enhances the High Weald National Landscape.

43. Criterion 8 of Policy MM88 sets out the approach to an ancient woodland buffer. This will also need to be provided in accordance with national guidance. Criterion 11 of Policy MM88 requires an appropriate buffer to the adjacent watercourse.

44. The requirements included in Policy MM88 will support other District Plan policies that set out requirements in relation to green and blue infrastructure (DPN3); trees, woodland and hedgerows (DPN4); and character and design (DPB1). The site will also need to meet national biodiversity net gain requirements. The High Weald Housing Design Guide referred to in criterion 6 of Policy MM88 provides guidance on locating meaningful public realm and multi-functional green space.

45. Therefore, Policy MM88 sets out the policy requirements which will ensure open space and green infrastructure are brought forward as part of the proposed scheme. The Council is satisfied there are sufficient requirements within national policy and guidance, the District Plan and High Weald National Landscape guidance along with best practice to ensure the proposed scheme meets the required standards.

b. Site location in relation to employment and social infrastructure

Accessibility to employment, retail, social and community facilities

46. Handcross is a Category 3 – Medium Village settlement. This is defined as a medium-sized village providing essential services for the needs of its own residents and immediate surrounding communities. Whilst more limited, these can include key services such as primary schools, shops, recreation and community facilities, often shared with neighbouring settlements.

47. The site assessment for the **Site Selection Conclusions** (SSP8, Appendix 1) notes the site as having an 'Negative' score for access to a Main Service Centre, a 'Neutral' score for a primary school, a 'Positive' score for a health centre and a 'Very Positive' score for access to retail.

48. Main employment, retail and social facilities are generally going to be provided by nearby towns such as Haywards Heath, Crawley and Horsham. However, the day-to-day needs of future residents are capable of being met at Handcross, for example, primary education, health services, everyday sports and recreation, community facilities and local retail.

49. There are community facilities in Handcross including a public house, restaurant, village hall and recreation ground. The National Trust Nymans Estate is in Handcross to the east of the A23. This is also a Registered Park and Garden.

50. To maximise accessibility to local services, criterion 4 of Policy MM88 requires improvements to the walking and cycling environment.

51. Policy MM88 specifies on-site provision of community buildings, bowling green (relocated and enlarged from its existing location), allotments and a play area. In particular, a core community hub will be created within the site to act as a focal point and to include new facilities and car parking. This on-site provision will improve and enhance the current facilities in Handcross. Criteria 19, 20 and 21 of Policy MM88 provide further detail.

52. The Council is of the view that the requirement for on-site provision of community facilities is a key benefit to the proposed site allocation and supports the reasons for identifying this site as a proposed allocation.

53. However, as raised in its Main Modifications consultation representation, the Council notes that Slaugham Parish Council would prefer the bowling green and village hall to remain in its present location in the centre of the village to retain its accessibility by non-car modes of transport. The Parish Council considers that if the existing facilities need to be upgraded, then this would be best delivered on the existing site. The site promoter states it is committed to working with Slaugham Parish Council and the Community Land Trust to deliver community facilities on this site.

54. The Council does not intend to make any changes to the current policy wording in relation to community facilities and instead considers that this matter can be addressed at planning application stage if necessary. Should the on-site provision of community facilities (village hall and bowling green) not come forward, then the Council would require a financial contribution towards improvements and expansion of existing infrastructure, either the current community facilities or other facilities in the locality. However, development of this site provides the opportunity for new, modern and energy efficient facilities. New facilities on this site may be better placed for the future population of Handcross taking into account the residential development of this site and the development plan and neighbourhood plan allocations to the south at St. Martin Close.

MM89: Land at Pease Field, Pease Pottage

MM91: Land north of Former Golf House, Horsham Road, Pease Pottage

a. Impact on the National Landscape

Degree of wider visibility / sense of enclosure

55. The context for the impact on the High Weald National Landscape in terms of visibility and enclosure is set out in the Statement of Significance in the **High Weald AONB Management Plan** [ENV5] which explains that the 'pattern and landscape setting of dispersed historic settlements enriches its natural beauty, with small, irregular fields and pasture, hedgerows and ancient woodlands interspersed with the rich clay-tiled roofscapes of historic buildings' (page 16). Glimpsed and long views are an important characteristic of the High Weald National Landscape and feature in the description of ''Aesthetic and Perceptual Qualities' (one of the core components that articulate the natural beauty of the High Weald National Landscape).

56. The High Weald Housing Design Guide[7] (November 2019) referred to in criterion 6 of Policy MM88 is a supporting document to the High Weald AONB Management Plan and is a material consideration in the planning process. It states that the 'relationship of new housing development to its 'parent' community, in terms of siting, scale, and response to setting, is very important if it is to feel genuinely integrated into that village or town, rather than simply an imported, 'bolted-on' housing estate' (page 10). The High Weald Housing Design Guide usefully provides guidance on understanding a site's context, siting development in the landscape and understanding topography as well as more detailed urban design guidance. In particular, it sets out that 'new development should be good enough to be seen, not justified on the basis that existing or proposed planting will screen it from view' (page 11). The design and layout of the site will need to be landscape-led reflecting High Weald character and responding to the historic pattern and character of settlements in the form, layout, grain and massing of development; and using high quality architecture.

57. The site allocation policy (criterion 2 of Policy MM89 and criterion 4 of Policy MM91) and DPC1: Protection and Enhancement of the Countryside require a Landscape and Visual Impact Assessment (LVIA) that will need to inform the site design and layout, and any mitigation requirements. Use of the High Weald AONB Management Plan and its supporting documents referenced in criterion 3 of Policy MM89 and criterion 5 of Policy MM91 will also provide guidance to ensure an appropriate layout, design, boundary treatments and landscaping.

[7] https://www.midsussex.gov.uk/media/0sxklfsy/high-weald-housing-design-guide.pdf

58. The Council is of the view that the two sites MM89 and MM91 are well enclosed and have limited wider visibility.

MM89: Land at Pease Field, Pease Pottage

59. The site (MM89) is well enclosed and has limited wider visibility. There are glimpsed views of the site from the Scout campsite and access road adjacent to the northern boundary.

60. The site promoter has provided a Landscape and Visual Technical Note [MM89-1]. This notes that (page 15):

> *'The Site is strongly enclosed on all sides by mature vegetation, including dense woodland blocks, mature tree belts and clumps of trees (which separated the former fairways when the land was in use as a golf course). Further visual enclosure is provided by the recent built development which lies to the east and south. This means that the Site is very well screened and, other than the residential roads immediately adjoining the Site, the Site is screened from view from the surrounding area.*
>
> *'Overall, the site has a very high level of visual containment and, for a site of this size, has an exceptionally low level of visibility from the surrounding area.'*

61. The Council agrees with that conclusion.

MM91: Land North of Former Golf House, Horsham Road, Pease Pottage

62. The site (MM91) is well enclosed and has limited wider visibility due to the wooded boundaries on the north and west of the site and residential development to the east of the site. The visibility of the site will increase as a result of the proposed access connecting to Foresters Way. Built form may also be more visible from Horsham Road than the current situation.

63. The site promoter has provided a Landscape and Visual Impact Assessment (LVIA) [MM91-1]. The LVIA notes that 'intervisibility between the site and surrounding areas is generally low and confined to near views within the immediate surrounding area. There are no distant views of the site' (page 57).

64. The Council agrees with that conclusion.

Existing urbanising influences

65. The existing context for the sites is proximity to urbanising influences especially when compared to some of the smaller villages in rural areas of the High Weald National Landscape. It is notable that the settlement of Pease Pottage (the existing built-up area boundary) is outside the High Weald National Landscape designation.

66. For MM89, as set out in **ENV22**, the site is to the west of Pease Pottage on land previously used as a golf course which is itself a man-made/urbanising feature. The site borders a relatively

recent housing development on its southern boundary. There are existing urbanising influences in: the village of Pease Pottage to the east and south; a golf course to the west; the M23/A23 to the east; a cemetery to the north; and telecommunications equipment to the west. Overall, there are nearby existing urbanising influences for this site.

67. For MM91, as set out in **ENV22**, the site is to the west of Pease Pottage. It is currently in employment use and the building has surrounding open space, so much of the site is previously developed land. Development of the site would extend the settlement to the north to the rear of existing built form. The site is contiguous to the current defined built-up area boundary and as such, this is an existing urbanising influence. Connections to the village will be improved as a result of the development (criteria 2 and 9). The site is well enclosed though with a strong woodland boundary to the north and west. Along with the partly-developed nature of the site, there are existing urbanising influences in: the village of Pease Pottage to the east; a golf course to the west; the M23/A23 to the east; and telecommunications equipment to the west. Overall, there are nearby existing urbanising influences for this site.

Effect on ancient woodland and protected trees

68. 'Woodland' is one of the eight core character components that articulate the natural beauty of the High Weald National Landscape. The **High Weald AONB Management Plan** [ENV5] describes why woodland is an important character component (page 32):

> *'The High Weald AONB is characterised by the great extent of woodland including ancient woods, gills and shaws, the product of traditional long-term management. The nationally important assemblage of ancient woodland in the High Weald has immense wildlife, landscape and historical value, while the wider cumulative visual character of trees and hedgerows dividing small irregular fields is fundamental to the verdant nature and appearance of the landscape.'*

69. For MM89, as set out in **ENV22**, there is ancient woodland and priority habitat (deciduous woodland) within the site on its south-west boundary. There is also ancient woodland and priority habitat (deciduous woodland) adjoining the eastern boundary and adjoining the north of the site. There are also trees within the site.

70. For MM91, as set out in **ENV22**, there is woodland, both ancient woodland and priority habitat (deciduous woodland) within the site on its northern and western boundaries. There is also priority habitat (deciduous woodland) adjacent to the site on the south-eastern boundary. There are also trees within the site.

71. Priority habitat (deciduous woodland) has been identified in addition to ancient woodland. Priority habitat is a habitat of principal importance in England included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006. The priority habitat (deciduous woodland) within the sites is also designated ancient woodland.

72. The West Sussex Local Nature Recovery (LNRS) (June 2026) states that 'designated sites, irreplaceable and priority habitats are our core areas for nature around which future action can be based'[8]. Ancient woodland is an irreplaceable habitat. The West Sussex LNRS regards a measure of success for Priority W1 (to enhance existing woodland habitats) as ancient, irreplaceable and priority woodland being managed to improve ecological function and quality of habitat for woodland species. Measure M1.8 is to bring priority woodland into positive conservation management to support woodland species and enhance its ecological condition and resilience.

73. Development of the site has the potential to directly and indirectly impact on the ancient woodland, priority habitat and other trees, for example, through construction activities, fragmentation and loss of connectivity, disturbance to wildlife, and unmanaged public access.

74. To safeguard these valuable habitats, criteria 4, 5 and 6 of Policy MM89 and criterion 6 of Policy MM91 set out site-specific requirements for ancient woodland and trees. Together, these criteria endeavour to prevent loss and damage to existing ancient woodland and priority habitat (deciduous woodland) and to meet the objectives of the West Sussex LNRS. They also aim to ensure the design and layout of the proposed scheme incorporates trees and woodland and maintains their long-term protection.

75. In addition to the site-specific policy requirements, any future planning application will need to comply with national planning policy and guidance including the Natural England and Forestry Commission standing advice[9]. Development would also need to comply with District Plan Policy DPN4: Trees, Woodland and Hedgerows, which sets out the requirements for providing a buffer to trees, woodland and hedgerows. This includes expecting applicants to demonstrate, through an assessment, that the distance and size of a buffer zone is appropriate.

76. The Council is satisfied that there are sufficient requirements within national policy and guidance, the District Plan and High Weald National Landscape guidance along with best practice to appropriately address the effect of development on ancient woodland and protected trees.

Effect on water bodies

77. 'Natural Systems (Geology, Soils, Water and Climate)' is one of the eight core character components that articulate the natural beauty of the High Weald National Landscape. The **High Weald AONB Management Plan** [ENV5] highlights that the High Weald landscape has 'a high density of ponds, five times higher than the national average, with a wide range of pond types' (page 21).

78. For Policy MM89, as set out in **ENV22**, there is a pond adjacent to the north-west corner of the site and another pond adjacent to the south-west corner of the site. There is a watercourse

[8] West Sussex LNRS Part 2 – Priorities, Measures and the Local Habitat Map.pdf

[9] Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK

crossing the eastern part of the site and running on a north-south alignment. There are other watercourses and ponds in the vicinity of the site.

79. For Policy MM91, as set out in **ENV22**, there is a pond in the north-west corner of the site, however, this is not likely to be within the developable area as it sits within the ancient woodland. There are watercourses and other ponds in the vicinity of the site.

80. Criterion 7 of Policies MM89 and Policy MM91 requires the ponds and watercourses within and crossing the site to be considered in the site drainage strategy to avoid direct and indirect impacts. The pond and watercourse should be integrated into the design of the scheme.

81. The Council is satisfied that there are sufficient requirements within national policy and guidance, the District Plan and High Weald National Landscape guidance along with best practice to appropriately address the effect of development on water bodies.

Effect on wildlife

82. Development of the site will need to comply with relevant national and local policy and guidance including for protected species. The proposed scheme should also incorporate measures to protect and enhance biodiversity as well as take opportunities to recover nature, as set out in Policy DPN1: Biodiversity, Geodiversity and Nature Recovery. This could include the provision of green infrastructure and biodiversity features such as swift bricks, hedgehog highways and wildflower planting. Careful consideration of lighting proposals can also help to minimise impacts on species such as bats and nocturnal insects. These actions would help to meet some of the priorities set out in the West Sussex Local Nature Recovery Strategy.

83. Criterion 6 of Policy MM89 requires that the proposed scheme should retain existing trees and incorporate strong ecological corridors to ensure connectivity for the ancient woodland (Pease Pottage Shaw) and priority habitat (deciduous woodland) on the south-east boundary so that it does not become isolated and surrounded by built development.

84. Criteria 6 and 7 of Policy MM91 requires that the proposed scheme considers the ancient woodland, priority habitat and pond.

85. The Council is satisfied that there are sufficient requirements within national policy and guidance, the District Plan and High Weald National Landscape guidance along with best practice to appropriately address the effect of development on wildlife.

Proposed land use arrangements including open space and buffering

86. In addition to requirements set out in **Appendix 5: Developer Contributions of the Mid Sussex District Plan** [DP1], Policies MM89 and MM91 specify on-site provision of natural, semi-natural and amenity green space. Criteria 2 and 3 of Policy MM89 and criteria 4 and 5 of Policy MM91 require a landscape-led design and a Landscape and Visual Impact Assessment (LVIA) and use of the High Weald AONB Management Plan and its supporting documents to ensure an

appropriate layout, design, boundary treatments and landscaping. This is to ensure the development conserves and enhances the High Weald National Landscape.

87. Criterion 4 of Policy MM89 sets out the approach to an ancient woodland buffer. This will also need to be provided in accordance with national guidance. Criteria 5 and 6 relate to the provision of ecological corridors and retaining existing trees; this will also act as open space on the site. Criterion 9 ensures regard is had to the existing informal paths crossing the site in the layout of the scheme by providing attractive accessible routes.

88. Criterion 6 of Policy MM91 sets out the approach to an ancient woodland buffer. At the moment, the open grassland acts as buffer between the employment building and the ancient woodland. Although it is recognised that this grassland will be lost, the impacts of a reduction in this current buffer will need to be carefully considered in a proposed scheme and a new enhanced buffer will need to be provided in accordance with national guidance. This new buffer to the ancient woodland will need be maintained and safeguarded to prevent unauthorised vehicle parking or other uses that could damage the buffer which acts a transition habitat to the ancient woodland.

89. The requirements included in Policies MM89 and MM91 will support other District Plan policies that set out requirements in relation to green and blue infrastructure (DPN3); trees, woodland and hedgerows (DPN4); and character and design (DPB1). The site will also need to meet national biodiversity net gain requirements. The High Weald Housing Design Guide referred to in criterion 3 of Policy MM89 and criterion 5 of Policy MM91 provides guidance on locating meaningful public realm and multi-functional green space.

90. Therefore, Policies MM89 and MM91 set out the policy requirements which will ensure open space and green infrastructure are brought forward as part of the proposed scheme. The Council is satisfied there are sufficient requirements within national policy and guidance, the District Plan and High Weald National Landscape guidance along with best practice to ensure the proposed scheme meets the required standards.

b. Access and transport

Access points and impact on the highway network

MM89: Land at Pease Field, Pease Pottage

91. Criterion 1 of Policy MM89 sets out the Council's requirements in relation to access. Suitable vehicular access should be provided from Horsham Road via Foresters Way. The site promoter has provided a site boundary plan [MM89-2] which shows the same access point.

92. For clarity, a minor modification has been proposed by the site promoter to criterion 10 of Policy MM89 which the Council supports. This proposed modification would align the criterion with the similar requirement in criterion 9 of Policy MM91.

"Integrate the development with the site to the west (MM91) to provide vehicular, cycling and pedestrian connectivity between the two sites and to connect to Horsham Road via Foresters Way."

93. A further minor modification is proposed to provide clarity for criterion 11 of Policy MM89 as follows.

"Integrate the development to provide pedestrian connectivity with the residential area to the south-east of the site at Brougham Lane and Hansom Way."

94. Policy MM89 sets out a number of requirements in relation to the highway network including providing suitable access to the development, bus service improvements and provision of walking and cycling routes. These measures are intended to improve accessibility to local services and facilities by sustainable modes of transport and reduce reliance on the private car.

MM91: Land North of Former Golf House, Horsham Road, Pease Pottage

95. Criteria 1 and 9 of Policy MM91 set out the Council's requirements in relation to access. Suitable vehicular access should be provided from Horsham Road. The existing access from Horsham Road (in Horsham District) will be utilised for the employment use and the residential access will be a new access point onto Foresters Way which then connects to Horsham Road. The site promoter has provided a site boundary plan [MM91-2] which shows the same two access points.

96. For clarity, a minor modification has been proposed by the site promoter to criterion 1 of Policy MM91 which the Council supports.

"Provide suitable access from Horsham Road via Foresters Way and retain the existing access from Horsham Road (in Horsham District) for the employment use."

97. Policy MM91 sets out a number of requirements in relation to the highway network including providing suitable access to the development and walking and cycling improvements. These measures are intended to improve accessibility to local services and facilities by sustainable modes of transport and reduce reliance on the private car.

98. In addition to the site specific policy requirements there are a number of policy requirements in the District Plan relating to transport including DPT1 which requires development that is likely to generate significant amounts of movement and/or have a significant impact on the transport network to provide a Transport Assessment/Statement, Sustainable Transport Strategy and Travel Plan to identify appropriate mitigation measures to manage demand and minimise the need for new and improved transport infrastructure as part of the monitor and manage process and demonstrate how development will be accompanied by the necessary sustainable infrastructure to support it and to accord with the requirements of the NPPF.

99. The **Infrastructure Delivery Plan** (October 2026) [IV10] sets out the infrastructure requirements for each site which includes either on-site, off-site or financial contributions towards mitigation measures towards new or improved provision on the road network. As a result, the allocation is

anticipated to mitigate impacts on the local highway network and encourage a modal shift towards more sustainable forms of travel.

Bus connections

100. For both MM89 and MM91, the site assessment for the **Site Selection Conclusions** (SSP8, Appendix 1) notes the site as having an 'Fair' score for Bus Service.

101. There are bus stops in Pease Pottage by The Black Swan public house which is approximately 540m to the east of the site from the proposed access along Horsham Road.

102. Criterion 13 of Policy MM89 requires the walking and cycling environment along Horsham Road to be enhanced to improve connections and safe access to the nearby bus stops. Criterion 14 requires bus service improvements. These are transport infrastructure requirements identified by West Sussex County Council Highways as set out in the **Infrastructure Delivery Plan** [IV10]. These projects are identified to be developer funded and will be delivered in the short term (less than five years).

103. To provide flexibility, a minor modification is proposed to criterion 14 of Policy MM89 as follows:

> "Where necessary and appropriate to do so, provide bus service improvements to include increased frequencies and ~~Provide~~ additional bus stops on Horsham Road, and/or make a proportionate contribution towards sustainable transport measures including bus service provision."

104. Criterion 2 of Policy MM91 requires improvements to walking and cycling provisions along Horsham Road (c. 200m) to connect to the existing footway to allow access to the village of Pease Pottage. This is a transport infrastructure requirement identified by West Sussex County Council Highways as set out in the **Infrastructure Delivery Plan** [IV10]. This project is identified to be developer funded and will be delivered in the short term (less than five years).

105. Bus service improvements will be important in the development of these two sites to encourage a reduced reliance on car journeys. The policy requirements include bus service and connectivity improvements which will serve residents of the new development.

Cycling and walking arrangements

106. National and local policy supports active travel routes to reduce reliance on the private car as well as providing benefits for physical and mental health.

107. Policy MM89 includes several requirements to improve walking and cycling (to include wheeling). These are criteria 9, 10, 11, 12 and 13. These requirements will upgrade the existing public rights of way network and informal paths, enhance the walking and cycling environment, and improve pedestrian connectivity to nearby services and facilities. The **Infrastructure Delivery Plan** [IV10] also lists improvements to the walking and cycling environment to be funded by the developer and delivered in the short term (less than five years).

108. To provide flexibility, a minor modification is proposed to criterion 12 of Policy MM89 as follows:

> "~~Improve~~ Provide a contribution for improvements to the existing public rights of way network ~~including footpath COL/1545/2~~ to provide connections to Buchan Country Park and improvements to paths within Buchan Country Park."

109. Policy MM91 includes several requirements to improve walking and cycling (to include wheeling). These are criteria 2, 3 and 9. These requirements will upgrade the existing public rights of way network, enhance the walking and cycling environment, and improve pedestrian connectivity to nearby services and facilities. The **Infrastructure Delivery Plan** [IV10] also lists improvements to the walking and cycling environment to be funded by the developer and delivered in the short term (less than five years).

c. Site location in relation to employment and social infrastructure

Connections to employment, retail, social and community facilities

110. Pease Pottage is a Category 3 – Medium Village settlement. This is defined as a medium-sized village providing essential services for the needs of its own residents and immediate surrounding communities. Whilst more limited, these can include key services such as primary schools, shops, recreation and community facilities, often shared with neighbouring settlements.

111. The site assessment for the **Site Selection Conclusions** (SSP8, Appendix 1) notes the site as having an 'Negative' score for access to a Main Service Centre, primary school, health centre and a 'Neutral' score for access to retail. This is because these services are generally more than a 20-minute walk based on the current footpath/cycle network.

112. Main employment, retail and social facilities are generally going to be provided by nearby towns such as Haywards Heath, Crawley and Horsham. There are community facilities in Pease Pottage including a public house, community centre and recreation ground. Within the recent Woodgate development to the east of the M23/A23 is a primary school, village shop and hospice. The Pease Pottage motorway service station also has retail and food and drink outlets.

113. To maximise accessibility to local services, criteria 11, 13 and 14 of Policy MM89 set out requirements for bus service improvements, active travel routes and enhancements to the walking and cycling environment. The **Infrastructure Delivery Plan** [IV10] also lists improvements to the walking and cycling environment to be funded by the developer and delivered in the short term (less than five years).

Impact on Crawley infrastructure

114. As included in its representation during the Main Modifications consultation, Crawley Borough Council is concerned that development of the site could lead to additional pressure on services and facilities in Crawley as well as impacts on traffic and transport, flooding and drainage and air quality. Crawley Borough Council considers that the cumulative impacts of the site, along

with the other sites within Pease Pottage, Crabbet Park, the developments proposed in Horsham district through the Horsham District Local Plan and the Gatwick Northern Runway project have not been fully tested or understood in relation to their impacts on Crawley's infrastructure services and facilities.

115. As the nearest main town, future residents of the site are likely to access services and facilities in Crawley. However, the day-to-day needs of future residents are capable of being met at Pease Pottage, for example, primary education, everyday sports and recreation, community facilities and local retail. The higher level services such as larger retail, sports provision (such as a swimming pool) and entertainment such as a cinema will be met by Crawley. Therefore, the usage of services and facilities in Crawley is likely to be more limited. Furthermore, the requirements of Policy MM89 to improve public transport and active travel routes (criteria 13 and 14) will help to reduce reliance on the private car to access nearby services and facilities thus alleviating any pressure on the highway network. The transport study (Scenario 7 Modelling and Results Technical Note) [T18a] includes analysis of some junctions in close proximity to Crawley, including the M23/Junction 11 southbound slip (N28) and Horsham Road/B2114 Brighton Road (N24). These junctions flag as Significant in both the original and relaxed threshold junction hotspot analysis, however, any significant or severe impacts on the highway network are able to be mitigated and addressed through the Council's monitor and manage strategy.

116. As is the current practice, Crawley Borough Council will continue to be engaged on the precise nature of any potential impacts on Crawley infrastructure and to explore options for mitigation or to increase capacity. At any future planning application stage, discussions can also be held with Crawley Borough Council to determine the most appropriate use of infrastructure contributions collected through section 106. For example, with the Woodgate development at Pease Pottage to the east of the M23/A23, highways improvements and active travel routes were provided to alleviate any transport issues including congestion and to create better connections to Crawley. The formal sport contribution secured from the Woodgate development is to be expended on projects at Hemsleys Recreation Ground in Pease Pottage and/or the K2 Leisure Centre in Crawley. The library contribution secured is for the refurbishment of Broadfield Library in Crawley.

MM90: Land to the West of Woodhurst Farm, Old Brighton Road South, Pease Pottage

b. Impact on the National Landscape

Degree of wider visibility / sense of enclosure

117. The context for the impact on the High Weald National Landscape in terms of visibility and enclosure is set out in the Statement of Significance in the High Weald AONB Management Plan [ENV5] which explains that the 'pattern and landscape setting of dispersed historic settlements enriches its natural beauty, with small, irregular fields and pasture, hedgerows and ancient woodlands interspersed with the rich clay-tiled roofscapes of historic buildings' (page 16). Glimpsed and long views are an important characteristic of the High Weald National Landscape and feature in the description of Aesthetic and Perceptual Qualities (one of the core components that articulate the natural beauty of the High Weald National Landscape).

118. The High Weald Housing Design Guide[10] (November 2019) referred to in criterion 4 of Policy MM90 is a supporting document to the High Weald AONB Management Plan and is a material consideration in the planning process. It states that the 'relationship of new housing development to its 'parent' community, in terms of siting, scale, and response to setting, is very important if it is to feel genuinely integrated into that village or town, rather than simply an imported, 'bolted-on' housing estate' (page 10). The High Weald Housing Design Guide usefully provides guidance on understanding a site's context, siting development in the landscape and understanding topography as well as more detailed urban design guidance. In particular, it sets out that 'new development should be good enough to be seen, not justified on the basis that existing or proposed planting will screen it from view' (page 11). The design and layout of the site will need to be landscape-led reflecting High Weald character and responding to the historic pattern and character of settlements in the form, layout, grain and massing of development; and using high-quality architecture.

119. The site is enclosed with likely limited long views due to the current boundary treatments and intervening vegetation. The village of Pease Pottage to the north is not visible and nor is the A23 apart from the immediate vicinity along Old Brighton Road South. However, when walking along the footpath that crosses the site, the whole site to the north and south of the footpath can be seen at various points.

120. The site promoter has provided a Landscape Technical Note with its Main Modifications consultation response. This considers that the 'boundaries of the site are defined by well-established hedgerows and woodlands to the north, west and south with significant tree lines and hedges along roads' (page 4).

[10] https://www.midsussex.gov.uk/media/0sxklfsy/high-weald-housing-design-guide.pdf

121. A sense of enclosure may also be provided by criteria 5 and 6 of Policy MM90 which require development of the site to integrate and enhance the existing field boundary vegetation and to retain and strengthen the existing woodland connectivity on the western boundary of the site to avoid fragmentation. This has been included as a policy requirement to address impacts to biodiversity and to promote ecological connectivity rather than being used to ensure the development is screened from the wider landscape (albeit the policy requirement might do this as well).

122. The Council is of the view that the site is enclosed and has limited wider visibility.

Existing urbanising influences

123. As set out in **ENV22**, the site is to the south of Pease Pottage in open countryside. Whilst walking the footpath across the site, the settlement of Pease Pottage to the north is not readily apparent due to the intervening trees and woodland and so the site does not feel connected to the village. The site is to the west of the A23, which whilst a busy thoroughfare, its influence quickly diminishes when walking the footpath across the site from the west to the east. Noise from the A23 is apparent on Old Brighton Road South (the eastern boundary of the site) but the site takes on a rural feel only a little distance from the A23. The presence of the A23 does not reduce the high landscape value of the site given its location within the High Weald National Landscape.

124. The site promoter has provided a Landscape Technical Note with its Main Modifications consultation response. This considers that the 'high degree of woodland cover confers a sense of separation despite the close proximity of the edge of Cawley to the north and the A23 to the east' (page 7).

125. The **High Weald AONB Management Plan** [ENV5] is clear that '*all* of the AONB is important; any areas perceived as 'degraded' should be seen as opportunities for enhancement of natural beauty contributing positively to the purpose of designation and objectives of the Management Plan' (page 16). The Management Plan is also clear that 'urbanising' development can lead to an erosion of rurality and tranquillity which are important features of the 'Aesthetic and Perceptual Qualities' core character component.

126. However, the existing context for the site is proximity to urbanising influences especially when compared to some of the smaller villages in rural areas of the High Weald National Landscape. It is notable that the settlement of Pease Pottage (the existing built-up area boundary) is outside the High Weald National Landscape designation. For site MM90, there are existing urbanising influences in: the village of Pease Pottage to the north; MacNaughton Hall community centre to the north-east; Finches Field Recreation Ground to the north; the A23 to the east; and on the eastern side of the A23, commercial and industrial units although these are not visible from the site.

127. Overall, the site currently has a rural experience from its location within the countryside, but as set out in the above paragraphs, there are nearby existing urbanising influences for this site.

Effect on ancient woodland and protected trees

128. 'Woodland' is one of the eight core character components that articulate the natural beauty of the High Weald National Landscape. The **High Weald AONB Management Plan** [ENV5] describes why woodland is an important character component (page 32):

> *'The High Weald AONB is characterised by the great extent of woodland including ancient woods, gills and shaws, the product of traditional long-term management. The nationally important assemblage of ancient woodland in the High Weald has immense wildlife, landscape and historical value, while the wider cumulative visual character of trees and hedgerows dividing small irregular fields is fundamental to the verdant nature and appearance of the landscape.'*

129. As set out in **ENV22**, there is ancient woodland within the site in the north-west, north-east and south-west corners. There is also ancient woodland on the western boundary of the site. There are also trees and hedgerows within the site, including veteran trees.

130. Priority habitat (deciduous woodland) has been identified in addition to ancient woodland. Priority habitat is a habitat of principal importance in England included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006. The priority habitat (deciduous woodland) within the site is also designated ancient woodland. There is also priority habitat (deciduous woodland) adjacent to the site on the south-eastern boundary.

131. The West Sussex Local Nature Recovery (LNRS) (June 2026) states that 'designated sites, irreplaceable and priority habitats are our core areas for nature around which future action can be based'[11]. Ancient woodland is an irreplaceable habitat. The West Sussex LNRS regards a measure of success for Priority W1 (to enhance existing woodland habitats) as ancient, irreplaceable and priority woodland being managed to improve ecological function and quality of habitat for woodland species. Measure M1.8 is to bring priority woodland into positive conservation management to support woodland species and enhance its ecological condition and resilience.

132. Development of the site has the potential to directly and indirectly impact on the ancient woodland, priority habitat and other trees, for example, through construction activities, fragmentation and loss of connectivity, disturbance to wildlife, and unmanaged public access.

133. To safeguard these valuable habitats, criteria 6, 7 and 28 of Policy MM90 set out site-specific requirements for ancient woodland and trees. Together, these criteria endeavour to prevent loss and damage to existing ancient woodland and priority habitat (deciduous woodland) and to meet the objectives of the West Sussex LNRS. They also aim to ensure the design and layout of

[11] West Sussex LNRS Part 2 – Priorities, Measures and the Local Habitat Map.pdf

the proposed scheme incorporates trees and woodland and maintains their long-term protection.

134. In addition to site-specific policy requirements, any future planning application will need to comply with national planning policy and guidance including the Natural England and Forestry Commission standing advice[12]. Development would also need to comply with District Plan Policy DPN4: Trees, Woodland and Hedgerows, which sets out the requirements for providing a buffer to trees, woodland and hedgerows. This includes expecting applicants to demonstrate, through an assessment, that the distance and size of a buffer zone is appropriate.

135. The Council is satisfied that there are sufficient requirements within national policy and guidance, the District Plan and High Weald National Landscape guidance along with best practice to appropriately address the effect of development on ancient woodland and protected trees.

Effect on water bodies

136. 'Natural Systems (Geology, Soils, Water and Climate)' is one of the eight core character components that articulate the natural beauty of the High Weald National Landscape. The **High Weald AONB Management Plan** [ENV5] highlights that the High Weald landscape has 'a high density of ponds, five times higher than the national average, with a wide range of pond types' (page 21).

137. As set out in **ENV22**, there is a pond within the site on the western boundary and a watercourse in the same location that flows from the site to the west. There are other watercourses and ponds in the vicinity of the site.

138. Criterion 8 of Policy MM90 requires the pond and watercourse within the site to be considered in the site drainage strategy to avoid direct and indirect impacts. The pond and watercourse should be integrated into the design of the scheme.

139. The Council is satisfied that there are sufficient requirements within national policy and guidance, the District Plan and High Weald National Landscape guidance along with best practice to appropriately address the effect of development on water bodies.

Effect on wildlife

140. Development of the site will need to comply with relevant national and local policy and guidance including for protected species. The proposed scheme should also incorporate measures to protect and enhance biodiversity as well as take opportunities to recover nature, as set out in Policy DPN1: Biodiversity, Geodiversity and Nature Recovery. This could include the provision of green infrastructure and biodiversity features such as swift bricks, hedgehog highways and wildflower planting. Careful consideration of lighting proposals can also help to minimise

[12] Ancient woodland, ancient trees and veteran trees: advice for making planning decisions – GOV.UK

impacts on species such as bats and nocturnal insects. These actions would help to meet some of the priorities set out in the West Sussex Local Nature Recovery Strategy.

141. Criterion 29 of Policy MM90 refers to the site being within a recognised wildlife corridor (Weald to Waves) as identified in the West Sussex Local Nature Recovery Strategy and development of the site should contribute to its aims and objectives. Weald to Waves[13] is a landscape-scale nature recovery initiatives that seeks to establish a 100-mile nature corridor across Sussex, connecting fragmented landscapes to boost biodiversity, capture carbon, enhance food production and enrich the rural economy.

142. The Council is satisfied that there are sufficient requirements within national policy and guidance, the District Plan and High Weald National Landscape guidance along with best practice to appropriately address the effect of development on wildlife.

Proposed land use arrangements including open space and buffering

143. In addition to requirements set out in **Appendix 5: Developer Contributions of the Mid Sussex District Plan** [DP1], Policy MM90 specifies on-site provision of outdoor sports; parks and gardens; and natural, semi-natural and amenity green space.

144. Criteria 3 and 4 of Policy MM90 require a landscape-led design and a Landscape and Visual Impact Assessment (LVIA) and use of the High Weald AONB Management Plan and its supporting documents to ensure an appropriate layout, design, boundary treatments and landscaping. The design and layout of the site should retain the existing field pattern to identify the development parcels and street network (criterion 5). This is to help ensure the High Weald context and landscape character is taken into account in the proposed scheme.

145. Criterion 6 and 7 of Policy MM90 set out the approach to woodland connectivity including incorporating an ancient woodland buffer. Buffers to the ancient woodland will be required in accordance with national policy and guidance and a buffer to the watercourse should also be incorporated into the design and layout of the site. Criteria 27 and 28 relate to green infrastructure provision and criterion 29 relates to the site being within a recognised nature recovery corridor (Weald to Waves).

146. The requirements included in Policy MM90 will support other District Plan policies that set out requirements in relation to green and blue infrastructure (DPN3); trees, woodland and hedgerows (DPN4); and character and design (DPB1). The site will also need to meet national biodiversity net gain requirements. The High Weald Housing Design Guide referred to in criterion 4 of Policy MM90 provides guidance on locating meaningful public realm and multi-functional green space.

[13] Weald to Waves | Connecting nature across Sussex

147. The illustrative masterplan provided by the site promoter (MM90-1) shows a network of ecological corridors that structure the proposed open space provision and development parcels that frame and define a series of open spaces.

148. Therefore, Policy MM90 sets out the policy requirements which will ensure open space and green infrastructure are brought forward as part of the proposed scheme. The Council is satisfied there are sufficient requirements within national policy and guidance, the District Plan and High Weald National Landscape guidance along with best practice to ensure the proposed scheme meets the required standards.

c. Access and transport

Access points and impact on the highway network

149. Criteria 1 and 2 of Policy MM90 set out the Council's requirements in relation to access. Suitable vehicular access should be provided from the east from Old Brighton Road South which itself is accessed from Horsham Road in Pease Pottage village (criterion 1). In addition, bus access and any requirements for emergency access should also be provided from Old Brighton Road South (criterion 2). As part of the design of the proposed scheme, the public realm should be enhanced to improve the visual approach to the development and to create a welcoming gateway from Old Brighton Road South (accessed from Horsham Road) (criterion 9).

150. The Council notes the illustrative masterplan provided by the site promoter (MM90-1) shows a proposed access to the north-west of the site from Grouse Road (also itself accessed from Horsham Road at the junction with Forest Road). The Council does not support this proposed access from Grouse Road given its likely harmful impacts on the High Weald National Landscape. It would significantly urbanise what is currently an attractive rural lane with long views over the hedgerows and across the fields to the east and west. Furthermore, the proposed access is within Horsham District and given it would cross an existing field, it would open up the remaining intervening fields between the site and Grouse Road to further development that would also potentially be harmful to the High Weald National Landscape. Since any development to the west of the site would be within Horsham District, Horsham District Council will also need to assess its impact on the High Weald National Landscape.

151. Principally though, as access to the site from Grouse Road is within Horsham District and so the Council cannot allocate this area within the Mid Sussex District Plan, the delivery of the site could be at risk should Horsham District Council not approve the access or it later proves to be unfeasible. Retaining the requirement for access to be from Old Brighton Road South using an existing route provides confidence in the delivery of the site and ensures the site is accessible.

152. Policy MM90 sets out a number of requirements in relation to the highway network including providing suitable access to the development, providing active travel routes, bus service improvements, and provision of walking and cycling routes. These measures are intended to improve accessibility to local services and facilities by sustainable modes of transport and reduce reliance on the private car.

153. In addition to the site specific policy requirements there are a number of policy requirements in the District Plan relating to transport including DPT1 which requires development that is likely to generate significant amounts of movement and/or have a significant impact on the transport network to provide a Transport Assessment/Statement, Sustainable Transport Strategy and Travel Plan to identify appropriate mitigation measures to manage demand and minimise the need for new and improved transport infrastructure as part of the monitor and manage process and demonstrate how development will be accompanied by the necessary sustainable infrastructure to support it and to accord with the requirements of the NPPF.

154. The Infrastructure Delivery Plan (October 2026) [IV10] sets out the infrastructure requirements for each site which includes either on-site, off-site or financial contributions towards mitigation measures towards new or improved provision on the road network. As a result, the allocation is anticipated to mitigate impacts on the local highway network and encourage a modal shift towards more sustainable forms of travel.

Bus connections

155. The site assessment for the **Site Selection Conclusions** (SSP8, Appendix 1) notes the site as having an 'Excellent' score for Bus Service.

156. There are bus stops in Pease Pottage by The Black Swan public house which is approximately 720m to the north of the site along Old Brighton Road South.

157. Criterion 20 of Policy MM90 requires the provision of bus service improvements to include consideration of re-routing or extending services to serve the site. This is a transport infrastructure requirement identified by West Sussex County Council Highways as set out in the **Infrastructure Delivery Plan** [IV10] which lists re-routing, new bus stops and increased frequency of routes 4, 6 and 271. This is to be identified to be developer funded and will be delivered in the short term (less than five years).

158. The illustrative masterplan provided by the site promoter (MM90-1) shows that the 'street networks within the site have been organised to allow for a bus 'loop' with opportunities to accommodate an extension of existing services through the site'.

159. Bus service improvements will be important in the development of a site of this scale to encourage a reduced reliance on car journeys. The policy requirements include bus service improvements which will serve residents of the new development and there is also the opportunity to enhance the current level of bus service.

Cycling and walking arrangements

160. National and local policy supports active travel routes to reduce reliance on the private car as well as providing benefits for physical and mental health.

161. Policy MM90 includes several requirements to improve walking and cycling (to include wheeling). These are criteria 14, 15, 16, 17, 18 and 19. These requirements will upgrade the existing public rights of way network, enhance the walking and cycling environment, and improve pedestrian connectivity to nearby services and facilities. The **Infrastructure Delivery Plan** [IV10] also lists improvements to the public rights of way network and walking and cycling provisions to be funded by the developer and delivered in the short term (less than five years).

162. To provide flexibility, a minor modification is proposed to criterion 15 of Policy MM90 as follows:

> "~~Improve~~ Provide a contribution for improvements to the existing public rights of way network ~~including footpath COL/1545/2~~ to provide connections to Buchan Country Park and improvements to paths within Buchan Country Park."

163. To provide clarity across the requirements of Policy MM90, minor modifications are proposed to criterion 16 with the subsequent deletion of criterion 18 as follows.

> Criterion 16
>
> "Enhance the walking and cycling environment along Old Brighton Road South to improve connections and safe access to the nearby bus stops, ~~and~~ Pease Pottage village to the north and Woodgate Primary School to the east of the A23/M23."
>
> Criterion 18
>
> "~~Upgrade the existing pedestrian and cycle links along Old Brighton Road South to Pease Pottage and Woodgate Primary School to the east of the A23/M23.~~"

164. The illustrative masterplan provided by the site promoter (MM90-1) also makes reference to these policy requirements by showing upgraded pedestrian and cycle links to connect the site with Pease Pottage and Woodgate Primary School (in the Woodgate development to the east of the M23/A23). Active travel routes are proposed to be integrated with the existing public rights of way network.

d. Site location in relation to employment and social infrastructure

Connections to employment, retail, social and community facilities

165. Pease Pottage is a Category 3 – Medium Village settlement. This is defined as a medium-sized village providing essential services for the needs of its own residents and immediate surrounding communities. Whilst more limited, these can include key services such as primary schools, shops, recreation and community facilities, often shared with neighbouring settlements.

166. The site assessment for the **Site Selection Conclusions** (SSP8, Appendix 1) notes the site as having an 'Negative' score for access to a Main Service Centre, primary school, health centre and a 'Neutral' score for access to retail. This is because these services are generally more than a 20-minute walk based on the current footpath/cycle network.

167. Main employment, retail and social facilities are generally going to be provided by nearby towns such as Haywards Heath, Crawley and Horsham. There are community facilities in Pease Pottage including a public house, community centre and recreation ground which is adjacent to the site. Within the recent Woodgate development to the east of the M23/A23 is a primary school, village shop and hospice. The Pease Pottage motorway service station also has retail and food and drink outlets.

168. To maximise accessibility to local services, criteria 16, 17, 18, 19 and 20 of Policy MM90 set out requirements for bus service improvements, active travel routes and enhancements to the walking and cycling environment.

169. As set out in Policy MM90, the site will also provide community benefits by providing on-site sports provision in the form of an enclosed 4G pitch and two covered padel courts, and a new cricket square on the existing playing field at Finches Field. There will also be upgrades to MacNaughton Hall to incorporate a small café/ community shop.

Impact on Crawley infrastructure

170. As included in its representation during the Main Modifications consultation, Crawley Borough Council is concerned that development of the site could lead to additional pressure on services and facilities in Crawley as well as impacts on traffic and transport, flooding and drainage and air quality. Crawley Borough Council considers that the cumulative impacts of the site, along with the other sites within Pease Pottage, Crabbet Park, the developments proposed in Horsham district through the Horsham District Local Plan and the Gatwick Northern Runway project have not been fully tested or understood in relation to their impacts on Crawley's infrastructure services and facilities.

171. As the nearest main town, future residents of the site are likely to access services and facilities in Crawley. However, the day-to-day needs of future residents are capable of being met at Pease Pottage, for example, primary education, everyday sports and recreation, community facilities and local retail. The higher level services such as larger retail, sports provision (such as a swimming pool) and entertainment such as a cinema will be met by Crawley. Therefore, the usage of services and facilities in Crawley is likely to be more limited. Furthermore, the requirements of Policy MM90 to improve public transport and active travel routes (criteria 16, 19 and 20) will help to reduce reliance on the private car to access nearby services and facilities thus alleviating any pressure on the highway network. The transport study (Scenario 7 Modelling and Results Technical Note) [T18a] includes analysis of some junctions in close proximity to Crawley, including the M23/Junction 11 southbound slip (N28) and Horsham Road/B2114 Brighton Road (N24). These junctions flag as Significant in both the original and relaxed threshold junction hotspot analysis, however, any significant or severe impacts on the highway network are able to be mitigated and addressed through the Council's monitor and manage strategy.

172. It is proposed to have ongoing discussions with Crawley Borough Council to discuss the precise nature of any potential impacts on Crawley infrastructure and to explore options for mitigation or to increase capacity. At any future planning application stage, discussions can also be held with Crawley Borough Council to determine the most appropriate use of infrastructure contributions collected through section 106. For example, with the Woodgate development at Pease Pottage to the east of the M23/A23, highways improvements and active travel routes were provided to alleviate any transport issues including congestion and to create better connections to Crawley. The formal sport contribution secured from the Woodgate development is to be expended on projects at Hemsleys Recreation Ground in Pease Pottage and/or the K2 Leisure Centre in Crawley. The library contribution secured is for the refurbishment of Broadfield Library in Crawley.