Mid Sussex District Plan 2021-2039 Hearing Statement for Matter 7 Continued: Sites Added by the Draft Main Modifications

Statement on behalf of A2Dominion

October 2026

Turley

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A2DS3001

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1. Introduction

1.1 This Statement has been prepared on behalf of A2Dominion to the Mid Sussex District Plan Review Examination (Matter 7 Continued: Sites Added by the Draft Main Modifications).

1.2 A2Dominion is promoting an area to the west of Pease Pottage within Mid Sussex District for a residential development which is capable of helping to address the District's own needs, as well as those unmet housing needs arising from the neighbouring authority of Crawley Borough.

1.3 The land promoted by A2Dominion to the west of Pease Pottage is referred to in these representations as 'Pease Field', with the potential to accommodate 150 – 200 dwellings as has been assessed in the SHELAA under reference 674. An agreement in principle is in place with landowners south of the site (who are separately promoting land within their control – SHELAA site 219) to enable an existing access road to be extended northwards (and into site 674). The Pease Field is proposed as an additional allocation in the Mid Sussex District Local Plan through Main Modification 89 'Land at Pease Field, Pease Pottage'.

1.4 In the material published in association (i.e. documents SSP7 and SSP8) the combined site is assessed (alongside land extending to Horsham Road) as site 1188. The wider combined site is a proposed allocation by virtue of Main Modification MM89.

2. Pease Pottage and Handcross

National Landscape: General Matters MM88, MM89 and MM90

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

2.1 The Inspector's interim conclusions required the Council to revisit its housing strategy, increase the housing requirement and identify additional sites capable of contributing towards unmet housing needs, most notably Crawley. A comprehensive reassessment of available opportunities was completed, with a number of additional sites (35) being subjected to assessment and testing.

2.2 We note the Council's document MS-TP5: In-Combination Testing - Conclusions addresses the matter of exceptional circumstances, having regard to paragraph 176 of the NPPF. We note, and expand on these below:

- The need (a) for the development is clearly demonstrated. Whilst Crawley has an unmet need to its Local Housing Need, this masks a broader issue. Evidence prepared in support of the Crawley Borough Local Plan highlights the level of affordable housing need in the Borough, highlighting that an updated SHMA found the affordable housing need in Crawley equated to a total of 739 affordable homes per year, of which 563 (76%) dwellings were needed as rented affordable homes, and 176 (24%) dwellings were needed to be provided for affordable home ownership. The need for the development is reinforced in document ENV22[1] in light of the quantum of development, including in the context of providing for unmet needs.

- The Council clearly recognises the merits of planning for those needs as close as possible to where they arise (b) and that this approach would not be achieved by addressing those needs using sites further afield. In our submission, there is a clear and compelling set of socio-economic reasons which justify addressing unmet needs close to where they arise. This approach helps to minimise the need to travel (especially for employment); helps to maintain social and community cohesion (providing housing for groups close to their existing communities for example). Document ENV22[2] recognises that it may 'theoretically' be possible to locate development elsewhere, but that comment must be seen in the context that *"The Council considers that the most sustainable way to accommodate the unmet needs of Crawley is to seek to locate development as close as possible to the location where the need is arising."*

- Thirdly, the Council recognises that the allocation policies are supported by evidence and by requirements to ensure that effects are avoided or minimised. ENV22[3] notes the use of the site as a former golf course, and the limited public views.

[1] Major Development in the High Weald National Landscape Paper, page 115
[2] Ibid, page 115
[3] Major Development in the High Weald National Landscape Paper, page 116

2.3 We agree with the conclusion in ENV22 that exceptional circumstances exist to support the proposed allocation.

2.4 Unmet needs are not an abstract issue. Crawley is a sub-regional hub (a place with a significant range of services, facilities and job opportunities, but also a very significant unmet housing need, and even more acute unmet affordable housing need). Meeting its needs is fundamental to the housing needs of the community and economic success.

2.5 The issue extends beyond identifying additional housing land within Mid Sussex and reflects a strategic planning challenge that cannot be resolved within individual authority boundaries. Identifying suitable and sustainable locations to accommodate unmet need is therefore an important component of a sound development strategy across the area.

2.6 Failing to meet these needs, particularly for affordable housing, would worsen affordability pressures, displace households to more distant locations and increase commuting. This would conflict with sustainable development objectives and undermine economic growth associated with Crawley and its employment opportunities.

2.7 The Council's evidence shows that allocating land within the National Landscape is not a matter of convenience but follows consideration of alternatives and responds to a strategic need that cannot otherwise be met in Crawley. The exceptional circumstances case should therefore be considered in the context of meeting housing and affordable housing needs, supporting the sub-regional economy and directing growth to sustainable locations.

2.8 While landscape impacts must be considered, Site 1188 is not representative of the wider qualities for which the High Weald National Landscape is designated. Balanced against the strategic housing, affordable housing and economic benefits, and the site's limited contribution to the National Landscape's defining characteristics, the allocation represents a proportionate and justified response to a strategic planning issue with a compelling public interest case.

2.9 Objections referring to alternative sites outside the National Landscape do not undermine this conclusion. The NPPF does not require the absence of such alternatives before land can be allocated within a National Landscape. MSDC has considered those alternatives and exercised its planning judgement in concluding that allocation within the National Landscape is justified in the circumstances.

MM89: Land at Pease Field, Pease Pottage

a. Impact on the National Landscape

- **degree of wider visibility / sense of enclosure**
- **existing urbanising influences**
- **effect on ancient woodland and protected trees**
- **effect on water bodies**
- **effect on wildlife**
- **proposed land use arrangements including open space and buffering**

2.10 The Site's relationship with the High Weald National Landscape has been assessed through the Landscape and Visual Technical Note submitted to MSDC in June 2026. The assessment concludes that, although within the designated landscape, the Site is an atypical parcel that makes only a limited contribution to the qualities for which the National Landscape is valued.

2.11 The Site comprises former golf course land that has been substantially modified and is closely related to the settlement edge of Pease Pottage. Strongly contained by mature woodland, tree belts and surrounding development, it makes only a very limited contribution to the High Weald's core character components, including its historic settlement pattern, routeways, fieldscapes, heathland and wider perceptual qualities.

Degree of Wider Visibility / Sense of Enclosure

2.12 A key consideration is the effect of development on the wider appreciation of the National Landscape. The Landscape and Visual Technical Note demonstrates that the Site is highly visually contained, with mature woodland, tree belts and existing development limiting views into and out of the Site. Public visibility is restricted to short sections of adjoining residential streets, with no long-distance views from the wider landscape.

2.13 The Technical Note concludes that the proposed development would not be discernible from publicly accessible viewpoints within the wider landscape and that visibility beyond the immediate vicinity would be negligible. The Site therefore differs from more open areas of the High Weald where long-distance views are a defining characteristic.

2.14 As a result, landscape effects would be highly localised and contained to the Site and its immediate surroundings, with the wider character and appreciation of the National Landscape remaining largely unchanged.

Existing Urbanising Influences

2.15 The Site is not an isolated rural parcel. It adjoins recent residential development and the settlement edge of Pease Pottage, within an area influenced by major transport

and urban infrastructure, including the M23, A264, existing neighbourhoods, a cemetery, scout camp and golf course.

2.16 The Technical Note identifies that tranquillity is already influenced by nearby roads and settlement edges, while light spill from Crawley means the Site is not located within an area of dark skies. The Site therefore lacks the remote or undeveloped characteristics associated with much of the wider High Weald National Landscape and is not representative of its defining qualities.

2.17 In landscape terms, the proposed development would form a logical extension to the existing settlement rather than encroachment into a remote or unspoilt part of the National Landscape.

Effect on Ancient Woodland and Protected Trees

2.18 Ancient woodland is present both adjacent to and within parts of the Site. However, the development framework has been specifically designed to retain all ancient woodland. The Technical Note confirms that the areas of ancient woodland would remain unaffected by development and that appropriate buffering can be incorporated into the scheme design.

2.19 Furthermore, the proposals provide opportunities to deliver positive woodland management and enhancement measures. These include the removal of inappropriate non-native species, the planting of additional native woodland and the introduction of long-term management arrangements to improve woodland condition. Such measures would strengthen this component of the National Landscape rather than diminish it.

2.20 The evidence also confirms that development can be designed to retain key trees and hedgerows and that doing so would not materially reduce the capacity of the Site.

Effect on Water Bodies

2.21 The Site contains ponds and minor watercourses which, although previously identified as constraints, can be retained and integrated within the development framework. As a result, the Site's underlying sandstone geology and characteristic hydrological features would remain unaffected.

2.22 The proposals provide opportunities to enhance existing water features through improved management, ecological improvements, and integration with sustainable drainage and green infrastructure. The Technical Note concludes that impacts on the National Landscape's natural systems would be minor, with enhancement secured through future management. Existing ponds, watercourses and other key environmental features can be retained and protected within the development framework, ensuring effects remain localised and limited.

Effect on Wildlife

2.23 The Site comprises former golf course land and does not contain heathland or other nationally significant habitats associated with the High Weald. Ecological surveys, including a Preliminary Ecological Appraisal, wintering bird surveys, dormouse surveys and an Ecological Technical Note (June 2026), have been undertaken.

2.24 Located on the edge of Pease Pottage, the Site contains areas of ancient and Priority Habitat deciduous woodland and is well connected to the wider woodland network. Surveys identified no potential for significant effects on internationally designated sites, with the nearest statutory designations being Buchan Hill Ponds SSSI, Target Hill Park LNR and Broadfield Park LNR.

2.25 Ecological assessments confirm that, with appropriate mitigation and management, the Site's ecological constraints can be addressed through development. There is no evidence of unacceptable impacts on wildlife interests, while significant opportunities exist for ecological enhancement. The Technical Note concludes that effects on the National Landscape's core character components would be negligible and that habitats, woodland cover and green infrastructure could be strengthened across the Site.

Proposed Land Use Arrangements Including Open Space and Buffering

2.26 The illustrative framework responds to the Site's environmental constraints, showing how development can be accommodated while retaining and enhancing key landscape assets. Existing woodland, ancient woodland, ponds, watercourses and important vegetation are retained and protected through a comprehensive green infrastructure network.

2.27 The framework provides substantial open space, woodland buffers, native planting and enhanced habitat connectivity. The Technical Note concludes that, with appropriate design, development would have negligible impacts on the core character of the High Weald National Landscape and offers opportunities for enhancement. The Site is a well-contained, relatively low-sensitivity location where effects would be localised and mitigated through landscape retention and enhancement. The allocation would deliver housing, affordable housing, biodiversity net gain, green infrastructure and sustainable growth while conserving and enhancing natural beauty. As one of the least harmful opportunities available to meet development needs, the Site presents a strong public interest case for allocation.

b. Access and transport

- **Access points and impact on the highway network**
- **Bus connections**
- **Cycling and walking arrangements**

Access Points and Impact on the Highway Network

2.28 The existing junction of Foresters Way and Horsham Road will provide access to the site. Foresters Way will be extended northwards into the Site as shown in iTransport drawing ITB14036-GA-027J at **Appendix 1**.

2.29 Agreement is in place between the relevant landowners to enable the extension of the access road through the site, using land under the combined promoters' control. The proposed access accords with relevant design standards and Site MM89 Policy Requirement 1. It can be delivered by planning condition.

2.30 MM89 Policy Requirement 4 seeks an appropriate buffer for the ancient woodland, noting the proximity of the access road to it. The access arrangement shows a reduced carriageway width in the vicinity of the access and maintains a clearance to the ancient woodland and its associated buffer, in accordance with the Policy Requirement.

2.31 The Mid Sussex Transport Model: Scenario 7 assesses the traffic impacts arising from the additional 35 allocation sites, including MM89, on the Mid Sussex highway network. The latest modelling does not identify any 'severe' impacts locally.

2.32 A comprehensive Transport Assessment, including junction capacity testing based on up to date traffic surveys, would accompany any future planning application so as to demonstrate that any traffic impacts can be appropriately mitigated across the local highway network.

2.33 The scope of the traffic assessment will be informed by pre-application discussions with WSCC. The assessment will take account of a sustainable transport strategy aimed at minimising the site's traffic impact. The proposal will comply with Chapter 13 of the NPPF

2.34 The site access is deliverable and the proposal will not result in unacceptable or 'severe' highway impacts.

Bus Connections

2.35 The Site benefits from good public transport accessibility, particularly in relation to Crawley.

2.36 The nearest bus stop at The Black Swan is approximately 600 metres from the Site (8 minute walk). This benefits daily from services to Crawley, Brighton, Haywards Heath, Burgess Hill and Hassocks. with a typical frequency of one bus every two hours.

2.37 Additional bus stops on Brighton Road are located approximately 850 metres from the Site (12 minutes walk) They benefit from further (24 hour) services to Crawley, with a weekday frequency of up to five per hour. The journey time to the town centre / railway station is around 16 to 19 minutes.

2.38 Development offers the opportunity to develop a robust sustainable transport strategy including improvements to local bus stops (in line with Policy Requirement 14) and / or services. This will be explored further through pre-application discussion with WSCC. Such improvements can be secured by planning condition, implemented via S278 agreement.

2.39 Policy Requirement 14 specifically seeks new bus stops on Horsham Road. No services operate on that road. However, A2Dominion would be willing to deliver new or improved bus stops wherever they would improve access to existing services.

2.40 The site has good accessibility by bus and development at the site provides opportunities to improve bus travel as part of a sustainable transport strategy – particularly to retail, employment, leisure and education facilities in Crawley.

Cycling and Walking Arrangements

2.41 The area surrounding the site benefits from an extensive network of walking and cycling connections to both Pease Pottage and Crawley. A wide range of day to day facilities can be reached comfortably on foot or by cycle within Pease Pottage and Crawley.

2.42 There is a cycling route between the Site and Crawley town centre that is largely traffic-free and offers a shorter route to Crawley than by car (drivers leaving the site will need to route southwards to Horsham Road). The cycle route passes the east of the site along Old Brighton Road and forms part of a route to Crawley.

2.43 Non-vehicular connections to the site are proposed eastwards from the site to the Old Brighton Road cycling route as well as to the surrounding residential areas - in order to minimise walking and cycling distances compared with driving. In addition, connections westwards are also proposed to bridleway 1545 and footpath 1546, within land also controlled by A2Dominion, to provide for connections to Buchan Country Park. Further connections will also be provided to the edge of Site MM91 to the west. Thes connections accord with Policy Requirements 9 to 12. On site routes will be secured through an agreed masterplan while off-site connections can be secured by planning condition.

2.44 A sustainable transport strategy will explore opportunities to improve sustainable travel connections to the local area. A development of 150 - 200 homes will provide an opportunity for significant enhancements. This will include walking routes to the bus stops in line with Policy Requirement 13. Such improvements can be secured by planning conditions and secured via S278 agreement.

c. Site location in relation to employment and social infrastructure

- **connections to employment, retail, social and community facilities**
- **impact on Crawley infrastructure**

2.45 The Site benefits from close proximity to a broad range of day-to-day services and facilities that can be accessed by sustainable modes of transport as set out in our answer to (b).

2.46 Crawley is the principal service centre for the area. Crawley town centre can be reached by cycle in around 17 minutes or via direct bus services in around 16 to 19 minutes.

2.47 Crawley provides a substantially larger range of facilities than any Main Service Centre within Mid Sussex, including retail, employment, secondary / further education, a hospital and GP practices. It also provides a railway station, for wider connectivity.

2.48 Crawley is also a major economic centre for West Sussex, the Gatwick Diamond and the wider South East. The proposed Gatwick Northern Runway project is expected to generate around 14,000 jobs. In this context, the site is well located to provide housing for people accessing these new employment opportunities.

2.49 The Site is therefore exceptionally well positioned to provide residents with access to employment, retail and social infrastructure opportunities through sustainable travel choices, without the need to travel further afield.

Relationship with Crawley and Employment Opportunities

2.50 Crawley is the primary destination for employment, shopping, leisure and service trips generated by future residents. As noted previously, Crawley, including in particular its town centre and hospital, can be accessed via cycle routes and high frequency bus services.

2.51 In this respect, the Site is uniquely placed not only to contribute towards Mid Sussex's housing needs but also to support the workforce requirements of the wider Crawley economic area.

Impact on Crawley Infrastructure

2.52 The relationship between the proposed allocation and infrastructure within Crawley is a strategic matter that falls primarily within the responsibility of the local planning authorities through the plan-making process.

2.53 However, the impact on Crawley's transport infrastructure will be robustly assessed in a Transport Assessment, which will include a traffic study, the scope of which will be agreed through pre-application discussions with WSCC. A sustainable transport strategy will acceptably mitigate transport impacts to ensure the site can come forward in a sustainable manner. Impacts on infrastructure will not be an impediment to development of the site.

Appendix 1: Site Access Drawing

KEY:

SITE BOUNDARY

5.5m CARRIAGEWAY AND 2.0m FOOTWAY

5.5m CARRIAGEWAY AND 2.0m FOOTWAY

AREA OF ANCIENT WOODLAND

ANCIENT WOODLAND 15m BUFFER

Give way to oncoming vehicles

MINIMUM 0.5m WIDE MARGIN

3.1m WIDE PRIORITY GIVE WAY ARRANGEMENT

Priority over oncoming vehicles

PEDESTRIAN CROSSING WITH DROPPED KERBS AND TACTILE PAVING

AGREEMENT REACHED BETWEEN LAND OWNERS TO PROVIDE ACCESS BETWEEN THE SITES

Ppg Sta

Sub Sta

Pond

FORESTERS WAY

SCALE BAR @ 1:1000

0 10 25 50 100

REV	DATE	BY	DESCRIPTION	CHK	APD
J	13.10.26	SH	MINOR AMENDMENTS	MS	MS
I	27.05.26	JD	DRAWING HAS BEEN UPDATED	MS	MS
H	17.03.26	TA	DRAWING HAS BEEN UPDATED	SGa	MS
G	21.09.23	MM	BOUNDARIES UPDATED	MS	MS
F	09.06.23	MM	SITE ACCESS ROAD REALIGNED THROUGH PINCH POINT	MS	MS
E	21.03.23	PH	BOUNDARY AMENDED AND UNREGISTERED LAND ADDED TO KEY	MS	MS
D	12.12.22	JB	SITE ACCESS ROAD AMENDED	MS	MS
C	17.11.22	SH	BOUNDARIES UPDATED	MS	MS
B	17.11.22	MM	AMENDMENTS TO SAFEGUARDED LAND	MS	MS
A	28.06.22	JD	SITE ACCESS ROAD AMENDED	MS	MS

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STATUS: FOR INFORMATION

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TITLE: POTENTIAL VEHICLE ACCESS ARRANGEMENTS AVOIDING ANCIENT WOODLAND BUFFER

PROJECT: LAND AT PEASE FIELD

DRAWN:	CHECKED:	APPROVED:
JD	MS	MS

PROJECT No:	SCALE @ A2:	DATE:
ITB14036	1:1000	26.04.22

DRAWING No: ITB14036-GA-027 REV: J

T:\Projects\14000 Series\14036\ITB Land west of Pease Pottage\Tech\Acad\Transport Drawings\Working Drawings\GA\ITB14036-GA-027.dwg

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