

MS-TP5: In-Combination Testing - Conclusions

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Contents

.....	0
1. Introduction	2
2. Evidence Base Updates	4
High Weald National Landscape	4
Site Selection Conclusions – Fact Check.....	8
3. In-Combination Testing	9
Approach	9
Development Scenario	9
4. Transport Assessment	11
Updates to Reference Case.....	11
Scenario 7 – Results.....	12
Merge Diverge Analysis	14
Conclusion.....	15
5. Infrastructure.....	18
6. Habitats Regulations Assessment.....	19
7. Sustainability Appraisal	21
Appraisal of Housing Requirement Options	21
Appraisal of Policies – Main Modifications	22
Appraisal of Sites – Reasonable Alternatives.....	22
Sustainability Appraisal – Conclusion.....	23
8. In-Combination Testing Conclusion	24
Conclusion.....	24
Site Allocations	24
Settlement Hierarchy	27
Next Steps	29

MS-TP5: In-Combination Testing Conclusions

1. Introduction

- 1.1. Hearing sessions on the submitted District Plan were held in February/March 2026 which focussed on the housing requirement, housing supply, spatial strategy, site selection and proposed site allocations.
- 1.2. Following the close of these hearings, the Inspector wrote to the Council (IDJB-012) with his interim conclusions and action points.
- 1.3. These were, in summary:
 - The Plan Period shall be 2021 – 2040, reflecting the additional year proposed by the Council at Submission.
 - The appropriateness of the Local Housing Need (LHN) starting point was confirmed – 999 dwellings per annum (dpa) from 2025 onwards with figures for past plan period years reflecting the LHN at that time.
 - To increase the housing requirement to include a specific number of homes to meet a proportion of neighbour’s unmet needs – principally at Crawley but also having regard to the south coast.
 - To aim for an overall housing requirement of 1,200 – 1,300dpa
 - To give consideration to the need for headroom i.e. the theoretical excess of housing supply over housing requirement, and recalculate windfall.
 - To test the Council’s ability to meet a requirement towards the upper end of that range through the identification of additional housing sites.
 - To identify the additional sites using a revised Site Selection Methodology [MS-12] as a guide, with the reasons for selecting or rejecting sites clearly justified.
- 1.4. MS-12 set out the stages the Council agreed to follow to identify additional sites. This comprised information gathering from site promoters, a review of all previous site assessments and reconsideration of the potential for mitigation and positive planning benefits that would arise. The Council also considered how, individually or collectively, sites could contribute towards unmet need arising in neighbouring areas, how they could support local services as well as promoting sustainable patterns of travel, and enhance delivery by providing for a range of site sizes.

- 1.5. On 15th May 2026, the Council published **MS-TP4: Housing – Post Hearings Update** and **SSP7: Site Selection Review – Initial Conclusions**. These recorded the Council’s consideration of the above factors to arrive at a ‘long list’ of sites for further testing as well as updates to housing need and supply figures to reflect the most up-to-date information.
- 1.6. The ‘long list’ comprised 35 sites that total 4,063 dwellings. When added to completions, existing commitments and site allocations in the Submission District Plan, this would mean the Council would be planning within the range identified by the Inspector.
- 1.7. The site assessments were subject to a fact-check with site promoters, where they were asked to notify the Council of any factual errors in the site assessments. Section 3 of this Topic Paper sets out the Council’s response to this exercise.
- 1.8. The 35 sites were then subject to in-combination testing. The testing was based on the total quantum of planned growth to understand the collective impact of District Plan proposed development on the following:
- **Transport** – to assess the combined impact of development on the transport network, the development scenario has been modelled in the Council’s Strategic Transport Model.
 - **Infrastructure** – to assess the combined impact of development on strategic infrastructure such as education, health and utilities, the Council has engaged with strategic infrastructure providers to establish shortfalls and mitigation measures.
 - **Sustainability** – as required by legislation, the Council has updated its Sustainability Appraisal (incorporating Strategic Environmental Assessment) to assess reasonable alternative site options individually and in-combination.
 - **Protected Sites (Habitats Regulations Assessment)** – the development scenario has been assessed by the Council’s Habitats Regulations Assessment consultant to establish impacts and potential mitigations on designated protected sites.
- 1.9. This Topic Paper sets out the results of the in-combination testing. It also summarises further technical work undertaken in respect of sites proposed for allocation in the National Landscape as well as additional related updates to the sites and/or evidence base. The Topic Paper also confirms the additional sites the Council proposes to allocate in the emerging District Plan as a result of this further assessment and technical work.

2. Evidence Base Updates

High Weald National Landscape

2.1. Nine of the additional 35 sites are within the High Weald National Landscape (the legal designation is Area of Outstanding Natural Beauty; AONB). National planning policy is clear that great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes which have the highest status of protection in relation to these issues (paragraph 189 of the NPPF). The Council also has 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). These responsibilities have been kept in mind during the preparation of the District Plan and the in-combination testing.

2.2. In addition, in the presumption of sustainable development, paragraph 11 b) i) of the NPPF includes National Landscapes as it sets out:

11 b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

- i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
- ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

2.3. Furthermore, Planning Practice Guidance confirms that (emphasis added):

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.

All development in National Parks, the Broads and Areas of Outstanding Beauty will need to be located and designed in a way that reflects their status as landscapes of the highest quality.

Where applications for major development come forward, paragraph [190] of the Framework sets out a number of particular considerations that should apply when deciding whether permission should be granted.

Paragraph: 041 Reference ID: 8-041-20190721

Revision date: 21 07 2019

- 2.4. Whilst the Planning Practice Guidance sets out that NPPF policies may mean it is not possible to meet objectively assessed needs and that National Landscapes are unlikely to be suitable for accommodating unmet needs due to the great weight afforded to them, it does not rule out the possibility. The Inspector for the District Plan has asked the Council to help address the unmet needs of Crawley and (as discussed below), there are reasons that if that particular unmet need is to be met then it would mean that sites in the National Landscape would be required.
- 2.5. To ensure that the nine sites within the HWNL have been fully considered in relation to the legal and policy framework for National Landscapes (including the statutory duties in the Countryside and Rights of Way Act 2000 (as amended) and the National Planning Policy Framework), a major development assessment has been undertaken. This considers the national planning policy requirements for major development and whether the nine sites could be regarded as major development at the planning application stage (paragraph 190 of the NPPF).
- 2.6. The Council published an initial assessment of whether the nine sites within the High Weald National Landscape constituted major development. This initial assessment is documented in Table 2 of SSP7 – with three sites potentially identified as major development.
- 2.7. Since then, the Council has undertaken a more detailed assessment. There are two stages to the major development assessment:
- Stage 1 – Determining major development, and
 - Stage 2 – Consideration of major development.
- 2.8. If, at the Stage 1 assessment, a proposed site allocation is determined to be major development, then it proceeds to the Stage 2 assessment which is the consideration of major development. A major development paper has been prepared that sets out the methodology and assessment outcomes and will be published ahead of the Main Modifications consultation.
- 2.9. The major development assessment concludes that six of the nine sites are not determined to be major development:

Table 1: HWNL Not Major Development

SHELAA ID	Site Address	Stage 1 Conclusion
1175	Land at Brambletye School, Lewes Road, Ashurst Wood	NOT MAJOR DEVELOPMENT
28	Area south of Redbridge Lane at junction with London Road, Balcombe	NOT MAJOR DEVELOPMENT
165	Land south of Oldlands Avenue (Vintens Nursery), Balcombe	NOT MAJOR DEVELOPMENT
1024	Land at Brook House Farm, Turners Hill Road, East Grinstead	NOT MAJOR DEVELOPMENT
1181	Land east of West Hoathly Road, East Grinstead	NOT MAJOR DEVELOPMENT
818	Land north of the Former Golf House, Horsham Road, Pease Pottage	NOT MAJOR DEVELOPMENT

- 2.10. Three sites were determined to be major development at Stage 1. A Stage 2 assessment has been undertaken for each site.

Table 2: HWNL Major Development

SHELAA ID	Site Address	Stage 1 Conclusion
181	Land west of Truggers, Handcross	MAJOR DEVELOPMENT
603	Land to the west of Woodhurst Farm, Old Brighton Road South, Pease Pottage	MAJOR DEVELOPMENT
1188	Land at Pease Field, Pease Pottage	MAJOR DEVELOPMENT

- 2.11. Paragraph 190 of the NPPF requires that when considering applications for development within National Landscapes, permission should be refused for major development other than in exceptional circumstances. National policy or guidance is not explicit about the implications of this for plan-making where site allocations which would comprise major development in the National Landscape are proposed.
- 2.12. However, legal advice for the South Downs National Park 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, the Council has sought to satisfy itself that in principle an exceptional circumstances case could be made for the three additional 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.
- 2.13. To aid the Council in reaching a judgement as to whether an exceptional circumstances case is capable of being demonstrated, it has had regard to bullets a to c in paragraph 190 of the NPPF, which for ease of reference are:

“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”.

2.14. Taking each of the bullets in turn, the Council is of the view they can be satisfied at plan-making stage in respect of the three proposed site allocations as follows:

- a) As set out in Section 1, the Council has been seeking to identify additional site allocations in response to the direction from Inspector Bore to seek to meet 50% of Crawley’s unmet needs. The current and previous Governments have declared a national housing crisis which is particularly acute in the South East of England. Accommodating homes on these 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.
- b) The Council is firmly of the view that the most sustainable way to accommodate the unmet needs of Crawley residents is to seek to locate development as close as possible to those locations where need is arising. The three sites identified as major development are all located very close to Crawley. The sites identified can start delivering as and when required to meet arising needs. Whilst it would theoretically be possible to locate the development elsewhere in the District, the Council has judged that locating the development outside the National Landscape or as a series of smaller sites within the High Weald National Landscape will not result in the same level of community benefits a larger site can bring. Such community benefits would only arise alongside the development.
- c) The major development assessment and the site allocation policies are supported by technical landscape evidence. This ensures that relevant policy requirements are included within the site allocations policies – thereby providing the Council with a suitable framework for ensuring detrimental effects are avoided or minimised. This reflects that the scheme(s) must be designed to meet the principles in the High Weald AONB Management Plan and its supporting documents, which the Council has adopted as its policy of managing land in the High Weald National Landscape. Policy requirements are also included for the three sites in respect of landscape and recreational opportunities which schemes at planning application stage will need to demonstrate how they have been maximised.

2.15. In this way, through the major development assessment and the site allocation policy requirements, the Council has sought to ensure that any development of the nine sites within the High Weald National Landscape will avoid or minimise harm to the protected National

Landscape as well as ensuring that its statutory duty to conserve and enhance the natural beauty of the High Weald National Landscape is met.

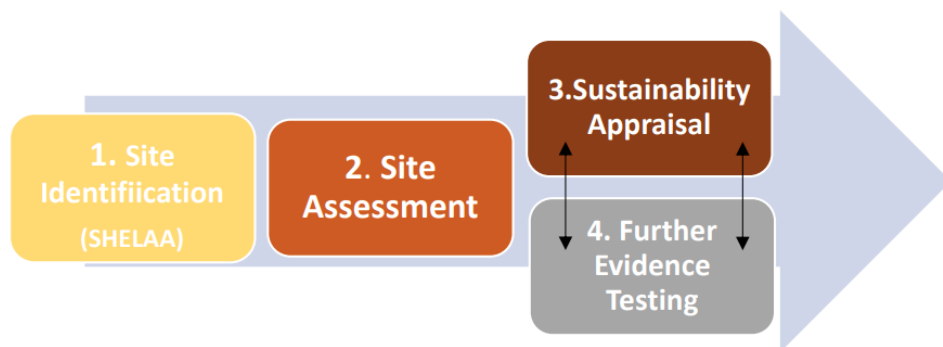
Site Selection Conclusions – Fact Check

- 2.16. Following the publication of the Council’s SSP7: Site Selection Review – Initial Conclusions report on the 15th May, and in accordance with the methodology agreed with the Inspector [MS-12], a two-week fact checking exercise took place. Site promoters were invited to identify factually incorrect information in SSP7. Approximately 40 responses were received.
- 2.17. The Council reviewed the responses and identified those that required a change to the site assessments and conclusions. The full summary of the initial review of responses is set out in the Council’s Site Selection – Response to Fact Check [MS-16] which was published in June 2026 ahead of in-combination testing commencing.
- 2.18. The majority of corrections required to site assessments were to reflect changes in yield, site area, site boundaries or references. Amendments to issues such as access and availability were also made if site promoters submitted sufficient evidence to the Council as part of the fact check exercise. Updated Site Selection Conclusions papers, including site assessment appendices, will be added to the examination library ahead of the Main Modifications consultation.
- 2.19. The fact check exercise did not identify any additional sites for in-combination testing. As a result of this work, the 35 sites originally identified progressed to testing.

3. In-Combination Testing

Approach

3.1. The Site Selection Methodology [SSP1] sets out a staged process to site selection.



3.2. Stages 1 and 2 of the process involve identifying and assessing sites against a series of site selection criteria. Both the original Site Selection Methodology [SSP1] and review [MS-12] explain that sites are assessed on an individual basis. In other words, their performance (both positive and negative) against site selection criteria is based on the impact of that site on its own.

3.3. The methodology and subsequent review explains that in-combination testing would be required (Stages 3 and 4). This involves assessing a combination of sites (a ‘development scenario’) so that holistic impacts can be assessed. For example, whilst a site may perform positively or have little impact on its own, there may be negative impacts when considered alongside another site in the vicinity. Similarly, some sites may not realise as many benefits on their own, however a collection of sites in the vicinity may give rise to positive impacts e.g. by providing critical mass to ensure new infrastructure is delivered.

3.4. The Council previously carried out in-combination testing ahead of Submission stage. This exercise has now been repeated, using the same approach, to assess the impact of meeting an increased housing requirement.

Development Scenario

3.5. The testing has been based on the following scenario:

- **Submission District Plan Sites** – e.g. the 24 sites proposed for allocation in the Submission version of the plan, including any changes to yield since, including those resulting from the review process.
- **Additional District Plan Sites** – e.g. the 35 sites identified by the Council that would meet the Inspector’s identified range of 1,200-1,300 dwellings per annum.

- 3.6. In addition, existing commitments (i.e. planning permissions, existing allocations in the previously adopted District Plan/Site Allocations DPD/Neighbourhood Plans are also an important factor. These sites form part of the baseline modelling, particularly for transport and infrastructure assessments.
- 3.7. It is a matter of professional judgement as to whether the development scenario is deliverable or not. This is based on professional planning judgement supported by the advice by subject matter experts who have carried out and/or engaged in the in-combination testing process.
- 3.8. The following sections of this Topic Paper set out further details and conclusions from this work.

4. Transport Assessment

- 4.1. As part of the in-combination testing to explore whether a higher housing requirement is possible, the Council commissioned transport consultants Systra to undertake a number of tasks including additional model runs to assess impacts on the highway network associated with higher growth. The tasks and the results of the in-combination testing relating to transport are set out below. This builds upon the work Systra carried out to support the Submission District Plan.

Updates to Reference Case

- 4.2. At the hearing sessions in March 2026, it was agreed with West Sussex County Council (WSCC) that the Scenario 6 Reference Case used as the basis for the transport modelling for the Submitted District Plan should be updated. The updated Reference Case has been prepared in close liaison and in agreement with WSCC. The update includes updated background growth levels and a number of new commitments (and associated mitigation schemes) since the Scenario 6 Reference Case (2024) relating to the following:
- Gatwick Green employment site, Crawley;
 - Gatwick Airport DCO northern runway proposals;
 - Imberhorne Farm planning permission, East Grinstead (DM/23/2699);
 - Land west of Turners Hill Road planning permission, Crawley down (DM/25/0014) and DM/25/0016); and
 - Hurst Farm, Haywards Heath (DM/22/2272).
- 4.3. In addition to the updated Reference Case, it was agreed with WSCC that an impact of Covid assessment would be undertaken to interpret the robustness of existing Mid Sussex District Plan forecasts and how Covid has impacted upon this. For this, traffic data for pre- and post-Covid periods has been analysed and compared against the current model forecasting assumptions. A comparison of traffic flows for 2019 has been compared against the 2025 post Covid position.
- 4.4. The comparison confirms that there has been a reduction in traffic flow between 2019 to 2025, predominantly due to the result of behavioural change following the Covid pandemic but also due to local changes impacting on network capacity e.g. transport scheme implementation.
- 4.5. Within Mid Sussex, for the sites included, there is a 4% reduction in total flow in the AM peak hour and 6% reduction in the PM peak hour. For individual sites, the changes range from +28% to -17% in the AM peak hour and ranges from +16% to -17% in the PM peak hour.
- 4.6. What the analysis shows is that there is a slightly higher percentage reduction within Mid Sussex District compared to surrounding areas outside the district, which may be an indicator of the types of trips being taken in the district being more susceptible to post Covid flow change patterns such as working from home.

- 4.7. Whilst Covid can be considered a driver of flow pattern change in the local and wider area, there are a number of transport infrastructure schemes, development and other factors that may also be influencing pattern change and these factors are already accounted for in the forecast models.

Scenario 7 – Results

- 4.8. At Submission stage, the Strategic Transport Assessment [T10] Scenario 6 identified three junctions which met the severe criteria identified by WSCC - an increase in Ratio of Flow to Capacity (RFC) of 3% or more to 95% or more and increase in delay of 30 seconds or more to 2 minutes or more.. These junctions were as follows:

- **N8:** B2110/B2028, Turners Hill
- **C7:** A272/B2036, Ansty
- **S8:** A273 / B2116, Hassocks (Stonepound)

Table 3: Scenario 6 - Severe

ID	Area	Junction	Number of Junction Arms meeting 'Severe' Criteria		Total over capacity demand	Average change in delay (secs)
			AM	PM		
N8	Turners Hill	B2110 / B2028 Turners Hill	1	0	83	58
C7	Ansty	A272 / B2036	0	1	90	59
S8	Hassocks	A273 / B2116 Hassocks (Stonepound)	1	0	22	65

- 4.9. In relation to the identification of these junctions as severe, West Sussex County Council confirmed in the Statement of Common Ground (September 2024) [DC15] that *“It is understood, however, that the extent of the exceedance of the agreed threshold for severe is not that great and there is a reasonable prospect of a solution emerging.”* Agreement was also made within the Statement of Common Ground that *“...the solution and mitigation will focus on improving safety and active travel in these locations to reduce traffic passing through the severely impacted locations (rather than increasing junction capacity) and the impacts of other users. This is due to a combination of physical and environmental constraints as well as the position of the roads passing through these junctions in the County Council’s network hierarchy i.e. not on the county’s SRN. Mitigation will be through a combination of a reduction of overall vehicular traffic alongside encouraging diversion of longer trips onto more strategic highway routes.”*
- 4.10. As a result of the additional 35 sites identified on the long list for further testing, an additional six junctions have been identified as severe. These junctions are as follows:

- **N7:** B2028 Turners Hill Road / Wallage Lane, Crawley Down
- **N104:** B2114 Brighton Road / Bellevue Farm Road, Pease Pottage
- **N105:** A2220 Copthorne Common Road / Old Hollow, Copthorne
- **C6:** B2036 / Ardingly Road, Whitemans Green, Cuckfield
- **S35:** A23 / B2118, Sayers Common
- **S105:** Jane Murray Way / West End Farm Avenue, Burgess Hill

Table 4: Scenario 7 - Severe

ID	Area	Junction	Number of Junction Arms meeting 'Severe' Criteria		Total over capacity demand	Average change in delay (secs)
			AM	PM		
N7	Crawley Down	B2028 Turners Hill Road / Wallage Lane	1	0	0	74
N8	Turners Hill	B2110 / B2028 Turners Hill	1	0	0	74
N104	Crawley	B2114 Brighton Rd/Bellevue Farm Rd	1	0	0	55
N105	Copthorne	A2220 Copthorne Common Rd / Old Hollow	1	0	0	311
C6	Cuckfield	B2036 / Ardingly Road, Whitemans Green	1	0	0	56
C7	Ansty	A272 / B2036	0	1	100	70
S8	Hassocks	A273 / B2116 Hassocks (Stonepound)	1	0	0	109
S35	Sayers Common	A23 / B2118 Sayers Common	1	0	0	156
S105	Burgess Hill	Jane Murray Way / W End Farm Ave	1	0	0	86

- 4.11. Systra have run a sensitivity test using Relaxed Thresholds based on thresholds used in other Local Plan transport modelling which identifies severe as an increase in RFC of 5% or more to 95% or more and an increase in delay of 1 minute or more to 2 minutes or more. The purpose of this sensitivity test was to see how marginal the identified severe junctions are.
- 4.12. As a result of the sensitivity test, only three of the nine identified severe junctions remain severe. These junctions are N105 (A2220 Copthorne Common Rd / Old Hollow); S8 (Stonepound); and S35 (A23/B2118, Sayers Common. Two of these junctions are directly related to Significant Sites - DPSC2 Crabbet Park and DPSC3-7, Sayers Common where there is mitigation proposed to reduce any impacts. With regards to Stonepound, a mitigation strategy for this location has already been agreed with WSCC as set out in paragraph 4.9 and the Statement of Common Ground.
- 4.13. It should be noted, in relation to the Stonepound junction, that the arm that flags in both Scenario 6 and Scenario 7 is the B2116 Hurst Road in the AM period. The analysis shows that

for this arm there is an increase of 2.1% V/C between the Scenario 6 and Scenario 7 differences to the Reference Case, and a 46 second change in delay increase. The County Council considers that policy text supporting additional public transport services through the junction as well as active travel interventions will be required at sites which generate traffic in this area. This would include the new sites in Hurstpierpoint, to the north of the village up to the Malthouse Lane site near Burgess Hill, at Hassocks, as well as all of the original and proposed Sayers Common sites in line with the contents of the Sayers Common movement strategy, which is to be updated to include the newly allocated sites. Flexible and proportional wording will be required to make allowance for the difference in site sizes and locations between the sites and practical difficulties in pooling contributions from smaller sites towards services or interventions which may only be deliverable after the larger sites are in a position to lead on delivery. MSDC will also include such mitigations in the IDP.

- 4.14. In relation to the impacts at Junction N105 the County Council considers that the assignment of traffic generated by the strategic site at Crabbet Park is not the most realistic representation of the access arrangements likely to be offered by the site promoters which can be achieved within the Mid Sussex strategic model. On this basis the County Council requires a sensitivity test to be completed and outputs provided so that a position can be established based on forecasting which the County Council considers representative of the likely access strategy on the ground sufficient to form robust transport evidence.

Merge Diverge Analysis

- 4.15. The Transport Assessment for the submitted District Plan included Merge Diverge analysis for relevant A23 Strategic Road Network (SRN) junctions (as identified in the Statement of Common Ground with National Highways (October 2024) [DC19]). This analysis has been extended to also include the four additional merges and diverges for M23 Junction 11 due to the spread of sites and a number of them being located in and around Pease Pottage. The junctions that have been analysed, have been agreed with National Highways. For clarity, the junctions subject to updated Merge Diverge analysis to account for the long list of sites are as follows:

- M23 Junction 11 NB merge
- M23 Junction 11 NB diverge
- M23 Junction 11 SB diverge
- M23 Junction 11 SB merge
- The A23/B2110 Northbound merge (Handcross)
- The A23/A2300 northbound diverge (Burgess Hill)
- The A23/A2300 northbound merge (Burgess Hill)
- The A23/A2300 southbound diverge (Burgess Hill)
- The A23/A2300 southbound merge (Burgess Hill)

- The A23/B2118 northbound merge (Sayers Common)
 - The A23/B2118 southbound diverge (Sayers Common)
- 4.16. The Merge Diverge analysis looks at actual and demand flows, number of lanes, mean maximum queues, V/C and delays per junction merge / diverge. The District Plan Scenario 7 (with the additional 35 sites) has been compared with the previous Scenario 6 results, for the above junctions, to provide a comparison between the two.
- 4.17. This exercise shows that there is a relatively minor level of increase of flow between Scenario 7 and Scenario 6 with several junctions experiencing a 4% or lower increase in traffic flows on the mainline, and the highest % mainline increase being 7%. It also shows that the slip road increases are relatively low with the majority below 5%. Higher slip road increases are observed on the M23 Junction 11 Northbound merge and around Sayers Common at the A23/B2118, however it is considered that the increases associated with the M23 Junction 11 may partially be due to the Reference Case additional sites rather than the District Plan sites; and the absolute flow increase associated with the A23/B2118 is still low given the low total flow volume on the slip roads.
- 4.18. The outputs of the work point to relatively modest levels of increase between the District Plan and the Reference Case scenarios and the lower difference between the current and previous version of the District Plan sites with an additional 35 sites included. The level of flow increase, alongside the low levels of reported delay suggest that the additional 35 sites are not having a significant impact on the operation of the SRN.

Conclusion

- 4.19. Before the hearings, the position of West Sussex County Council (Highways) (WSCC) and National Highways (NH) were agreed in Statements of Common Ground (SoCG). This was based on the position at that time, and in relation to the sites proposed in the Submission District Plan.
- 4.20. The WSCC SoCG [DC15] confirmed agreement that:
- The extent of exceedance in the Scenario 6 testing of the agreed threshold for severe was not that great at the three sites then identified, therefore there is a reasonable prospect of a solution emerging.
 - Solutions and mitigation will firstly focus on improving safety, public transport and active travel in 'severe' locations rather than increasing junction capacity on local non-strategic roads.
 - Mitigation will be through a combination of a reduction of overall vehicular traffic alongside encouraging diversion of longer trips onto more strategic highway routes.

- A vision led approach would be taken, particularly in relation to the significant sites (1,000+ dwellings).
- A ‘monitor and manage’ approach will be used to monitor actual demand on the network alongside delivery and occupation of developments and delivery of highways and sustainable transport network interventions. A Transport Infrastructure Management Group (TIMG) will keep this under review as part of the process.

4.21. The NH SoCG [DC19] and follow-up note [AP-016] confirmed agreement that:

- Towards the end of the local plan period traffic flow are forecast to exceed design capacity at some of the merges and diverges of junctions on the A23, In some cases, this occurs both in the reference case and Local Plan case (i.e. are pre-existing capacity issues). In other cases, Local Plan growth causes design capacity to be exceeded. In any event, the Local Plan growth typically contributes only a small amount of traffic growth on the A23.
- There are mitigation solutions possible, although actual need is uncertain due to the inherent difficulty of accurately predicting future travel behaviours.
- The ‘monitor and manage’ approach is endorsed as the primary mechanism to observe, influence and react to actual travel behaviour change. In this way, the highway authorities are content that impacts arising from development can be managed satisfactorily. This is on the basis that design capacity exceedances are likely to arise towards the end of the plan period, and are only partly attributable to Local Plan growth. Therefore, the monitor and manage approach would be a satisfactory way of dealing with the matter.

4.22. The Council has engaged closely with both WSCC and NH and presented the initial Scenario 7 results. The revised in combination testing, with the additional 35 sites, has now shown 9 severe impact hotspots in transportation terms, as opposed to 3 severe impact hotspots in the previous Scenario 6 testing, and while 8 of these can be addressed by further mitigations, one requires further sensitivity testing.

4.23. Both WSCC and MSDC have indicated that, subject to completion of the transport study work in respect of this location, the agreed positions set out in the SoCG are still valid and may not change as a result of the 35 additional sites. However, WSCC has requested further analysis relating to the access arrangements for Crabbet Park to ensure that action to resolve the forecasted impact at the junction of A2220 Copthorne Common Road with Old Hollow (Junction N105 in the Transport Study) would not result in replicating this issue elsewhere on the highway network.

4.24. The County Council has also reviewed further information regarding the Scenario 7 impacts at the A273/B2116 Stonepound Crossroads junction at Hassocks (Junction S8 in the Transport study) to ensure that the degree of exceedance of the severity criterion remains proportional to impact of the sustainable transport mitigation to be delivered. The County Council has

concluded that, while there is an additional impact at Junction S8, it remains at a scale which can be addressed by additional sustainable transport interventions from the new site allocations within and to the west and north of Hurstpierpoint as well as at Hassocks.

- 4.25. Whilst there will be further analysis of the results emerging from the Transport Study, this is likely to inform approaches towards mitigation which can be included in the Infrastructure Delivery Plan (IDP) and monitored by the TIMG in due course. Updated Statements of Common Ground can be prepared to confirm this.
- 4.26. The Council is therefore satisfied that, in transport terms:
- The position reached by WSCC and NH prior to examination hearings in 2026 demonstrated that there were no objections to the sites in the Submission District Plan, and that there were satisfactory arrangements and measures to mitigate impacts on the highways network.
 - Whilst the addition of a further 35 sites has led to an increased number of junctions classed as 'severe' on WSCC's Network, subject to the further analyses required by the County Council the overall impact remains capable of adequate mitigation, and alongside planning obligations the monitor and manage approach remains the most appropriate mechanism for delivering the infrastructure and service improvements needed to mitigate the impacts.
 - Subject to the completion of these additional analyses, there are as yet no evidenced reasons to reject any of the 35 additional sites, and the quantum and location of development proposed does not cause concerns from a highways perspective at the plan-making stage (recognising that more detail will be provided, and mitigation will be determined, at application stage).
- 4.27. Updated Statements of Common Ground between the Council and WSCC/NH will be progressed to capture the above. The updated transport evidence will be added to the examination library ahead of Main Modifications consultation.

5. Infrastructure

- 5.1. As part of the in-combination testing for infrastructure, the Council engaged with strategic infrastructure providers to seek information from them as to the potential effects arising from the long list of sites. Infrastructure providers were supplied with a package of documents, including a list of the additional sites, maps of the sites, the anticipated yield and trajectory of these sites. Details of the proposed site allocations included in the Submitted District Plan were also provided, together with any updated yield and trajectory information, consistent with the information published by the Council on 15 May in MS-TP4.
- 5.2. Infrastructure providers were asked to review the information and identify any infrastructure requirements arising from the additional sites, both individually and in-combination with the site allocations already proposed in the Submitted District Plan. Providers were advised that their responses would inform an update to the Council's Infrastructure Delivery Plan (IDP).
- 5.3. The Council sought responses from the following infrastructure providers and stakeholders:
- West Sussex County Council
 - MSDC Internal Teams
 - NHS
 - Network Rail
 - Sussex Police
 - Southern Water
 - Thames Water
 - South East Water
 - UK Power Networks
 - Southern Gas Network
 - National Grid
 - Environment Agency
- 5.4. Based on responses received and through ongoing engagement with providers on the IDP, no significant infrastructure constraints were identified within Mid Sussex that would affect the selection of sites for allocation. A number of additional infrastructure projects and mitigation requirements were identified, which will inform updates to the IDP and, where necessary, revisions to existing site allocation policies and/or the preparation of new policy requirements. The IDP will be published alongside the Main Modifications.
- 5.5. The Council also engaged with Town and Parish Councils where the additional sites are located. The Town and Parish Councils were invited to update the Council with their local infrastructure needs and identify potential infrastructure projects that could be supported by the proposed sites. The results of this engagement are presented in Appendix 1 of the updated IDP.

6. Habitats Regulations Assessment

- 6.1. A Habitats Regulations Assessment (HRA) has been undertaken to examine the effects of the emerging Mid Sussex District Plan, in combination with other plans and projects, on internationally important wildlife sites. The HRA first has a screening stage to examine the policies and allocations in the Plan to determine if there would be a negative effect on an internationally important wildlife site (the ‘likely significant effect’ test) and, if relevant, a more detailed analysis is undertaken (the ‘appropriate assessment’) to determine if there would be an adverse effect on the integrity of the internationally important wildlife site.
- 6.2. The HRA is an iterative process and several HRAs have already been completed for the submitted District Plan.
- [\[DP10\]](#) HRA: Main Report (including Non-Technical Summary) (Submission)
 - [\[DP11\]](#) HRA: Main Report and [\[DP12\]](#) Non-Technical Summary (Regulation 19)
 - [\[DPA13\]](#) HRA: Main Report and [\[DP14\]](#) Non-Technical Summary (Regulation 18)
- 6.3. The relevant internationally important wildlife sites for the District Plan are the Ashdown Forest Special Protection Area (SPA) and the Ashdown Forest Special Area of Conservation (SAC). The HRA has identified that the potential impacts arising from the emerging District Plan that are likely to have a significant effect on Ashdown Forest are recreational disturbance to protected breeding birds from an increase in visitors to Ashdown Forest and atmospheric pollution affecting the heathland habitat from increased traffic and associated nitrogen deposition.
- 6.4. It should be noted that as a result of Natural England issuing a Withdrawal Statement on the 31st October 2025 confirming that its Water Neutrality Position Statement of September 2021 had been withdrawn, the HRA no longer needs to assess the impacts of the emerging District Plan on the Arun Valley SPA, SAC and Ramsar site.
- 6.5. Updated air quality modelling accounting for the additional sites has been undertaken using the outputs from the updated transport modelling (Scenario 7) to analyse key pollutants shown to affect ecosystems and whether the updated housing distribution in the emerging District Plan would result in a negative impact on the Ashdown Forest SAC. The initial review of the traffic data for the air quality modelling leads to a reasonable level of confidence that the additional quantum of growth does not materially adversely affect HRA issues beyond the Submission District Plan with regards to air quality impacts on the Ashdown Forest SAC.
- 6.6. In terms of recreational pressure on the Ashdown Forest SPA, the additional sites within the 7km zone of influence will need to provide mitigation in line with the strategic solution and as set out in Policy DPC6: Ashdown Forest SPA and SAC. The strategic solution is a co-ordinated approach in partnership with other local authorities and the Conservators of Ashdown Forest that allows mitigation to be funded collectively. Natural England, the statutory nature conservation body, supports the strategic solution for the Ashdown Forest SPA. The mitigation

is Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM) which is a well-established mitigation approach for recreational pressure. The initial review is that the conclusions of the Submission HRA remain valid with regards to the impact of recreational pressure on the Ashdown Forest SPA and SAC.

- 6.7. The District Plan is likely to have significant effects on some European sites and for some impact pathways, however, when assessed further in the HRA and with mitigation measures as necessary, there is a reasonable level of confidence at this stage to say that the conclusions of the Submission HRA remain valid and that the District Plan will not adversely affect the integrity of European sites and their qualifying features, either alone, or in combination.
- 6.8. The updated HRA reflecting changes to the Plan since Submission (including the additional sites) will be published ahead of the Main Modifications consultation.

7. Sustainability Appraisal

- 7.1. A Sustainability Appraisal (SA) is a legal requirement and important part of the plan-making process. Its role is to promote sustainable development by assessing the extent to which the emerging Plan will help to achieve environmental, economic and social objectives when compared against all reasonable alternative options.
- 7.2. The District Plan was accompanied by a SA at Regulation 18 [DP8] and Regulation 19 [DP7] stages. Both document the assessment of strategy, policies and sites to identify the extent to which sustainable development is likely to be achieved. Both confirmed that the District Plan will have a largely positive effect, to varying degrees, against many of the SA objectives. Whilst some negative impacts are likely to arise for environmental objectives, the District Plan seeks to minimise and mitigate these and balance them against the positive impacts – especially against social and economic objectives.
- 7.3. The Council has prepared an updated SA for Main Modifications stage. As it is an iterative process, it builds upon the findings in previous versions. The Main Modifications SA appraises the modifications to the plan that have emerged throughout the examination process. This includes:
- Re-appraisal of options for the housing requirement, based on the initial conclusion that this should be higher than that proposed at submission stage
 - Re-appraising policies which are subject to a Main Modification, to identify whether the modification would materially change the previous conclusion reached
 - Appraisal of reasonable options for housing sites, reflecting the re-assessments carried out in accordance with the revised methodology [MS-12] and the initial conclusion that additional sites would be required.

Appraisal of Housing Requirement Options

- 7.4. At Submission stage, the Sustainability Appraisal assessed two distinct options:
- Option 1: Housing Requirement Approach: meet the housing requirement calculated for Mid Sussex
 - Option 2: High Growth Approach: identify sites above and beyond the housing requirement
- 7.5. As a result of the Inspector's findings at the hearing sessions, the Council has now tested a range of growth options. This includes meeting Mid Sussex need alone (999dpa), varying levels of contribution towards unmet need (1,200dpa and 1,300 dpa) through to a higher growth option (1,450dpa).

- 7.6. As housing provision increases, positive benefits increase in terms of providing homes within Mid Sussex to meet the district's need, and unmet need from other authorities. However, negative impacts also get worse as the housing number increases, particularly on environmental objectives. This is to be expected, as this was a conflict (between the aim of the policy and aim of the sustainability objective) detected within the Sustainability Framework in the methodology of the Submission Sustainability Appraisal.
- 7.7. The Council is mindful that meeting housing need and encouraging economic growth are particularly important, as this reflects national policy. The appraisal confirms that a housing requirement of circa 1,300 strikes the balance between achieving these aims, whilst minimising negative impacts on environmental objectives.

Appraisal of Policies – Main Modifications

- 7.8. The Submission District Plan Sustainability Appraisal appraised the District Plan policies alongside a range of reasonable alternatives for each policy.
- 7.9. The Main Modifications SA re-appraises the policies that are subject to a Main Modification where the change may result in the policy representing a different option to that appraised at Submission, or where it is likely to alter the scoring of the policy against the sustainability objectives. For those policies that remain unchanged since Submission, or with little change, no re-appraisal has been undertaken.
- 7.10. As a result of the Main Modifications to the relevant policies, the vast majority largely showed no impact on the sustainability objectives and therefore, the scoring remain unchanged from the Submission SA. For the small number of policies where scores have changed, the majority had a more positive impact compared to the policies appraised at Submission Stage.

Appraisal of Sites – Reasonable Alternatives

- 7.11. The Submission District Plan Sustainability Appraisal documented the performance of a range of housing sites against the sustainability objectives. It appraised all sites that had reached Stage 3 of the Site Selection Methodology – this was the threshold by which the Council determined a site was a 'reasonable alternative'.
- 7.12. The Main Modifications SA adds to this by including sites now reaching Stage 3 as a result of the revised methodology (MS-12). It also includes any new sites submitted to the Council post-Submission that reach Stage 3.
- 7.13. The Main Modifications SA sets out the appraisal of each site on an individual basis. It also sets out the cumulative (i.e. in-combination) impacts. It reaches the same conclusion as the Submission SA – positive impacts are anticipated on social and economic objectives, and negative impacts on environmental objectives. Overall, the positives outweigh the negatives, and mitigation (through policies in the District Plan) will minimise negative impacts.

- 7.14. Therefore, when appraising the development scenario and considering reasonable alternatives, the development scenario performs well and demonstrates that sustainable development can be achieved.

Sustainability Appraisal – Conclusion

- 7.15. The SA has considered the overall impact of delivering a higher housing requirement (1,300 dpa) and identified that, whilst there are likely to be negative environmental impacts, there are policies within the District Plan that will help to minimise these. There are positive social benefits likely to arise, particularly the very positive impact of providing new homes to meet need and provision of new social infrastructure such as education, health and community facilities. The same conclusion was reached at Regulation 19 stage; the increased housing requirement and additional site allocations has not altered this conclusion.
- 7.16. The District Plan policies were re-appraised where a Main Modification had been made. As a result of this, the SA confirms that for the vast majority of these policies, the modifications resulted in no impact to their effects against the sustainability objectives. Where changes to the appraisal scores did occur, most indicated more positive sustainability effects compared with those identified at the Submission stage.
- 7.17. In relation to sites, these have been assessed on an individual basis as well as reviewing the impacts in-combination with one another. The SA concludes that the development scenario performs well against the SA objectives and will likely contribute towards sustainable development when compared to alternative approaches.
- 7.18. As per regulations, the SA will be subject to consultation at the same time the Main Modifications are published (see Next Steps in section 8).

8. In-Combination Testing Conclusion

Conclusion

- 8.1. The Council carried out a thorough site assessment process in accordance with the agreed methodology [MS-12]. The Council committed to identify sufficient sites to meet the 1,200 – 1,300 dwellings per annum range identified by the Inspector and to test whether this was deliverable. The Council identified an additional 35 sites which were proposed for further testing based on their performance against the site selection criteria, consistency with the spatial strategy, and contribution (individually or collectively) towards the delivery of wider social and economic benefits including unmet need arising in neighbouring areas.
- 8.2. As set out in previous sections, the sites have now been assessed on an in-combination basis. This has enabled the Council to understand how the sites (both in the submitted District Plan and the additional 35 sites) work collectively, where both positive and negative impacts arise, and (where negative) how these could be minimised.
- 8.3. In assessing sites for potential allocation, the Council has been mindful of the requirements in the NPPF, particularly paragraph 11. In accordance with MS-12, the Council has paid particular attention to the positive planning benefits of site allocations and weighed these in the balance against adverse impacts.
- 8.4. After carefully reviewing the conclusions of the in-combination assessments (as documented in previous sections), the Council is confident that the development scenario (24 Submission District Plan sites + 35 additional sites) is capable of delivery. Whilst negative impacts arise, the Council is of the view that these can be minimised and mitigated, and that benefits outweigh negatives.

Site Allocations

- 8.5. As a result of the conclusions reached following in-combination testing, the Council proposes the following site allocations (Table 5). These include the original 24 sites in the Submission District Plan and the additional 35 sites following hearings. The table shows any updates to yields as a result of re-assessment work and further testing.
- 8.6. Amendments to policy wording for the original sites, and the inclusion and policy wording for the additional sites will be proposed as Main Modifications. Main Modifications can only be made to make the plan ‘sound’ and legally compliant and are subject to agreement by the Inspector, following a 6-week public consultation and additional hearings if required.

Table 5: Site Allocations (Submission and Main Modifications)

Ref	Site	Settlement	Yield
Category 1 - Towns			
DPSC1	Land to the West of Burgess Hill and North of Hurstpierpoint	Burgess Hill	1,350
DPA1	Batchelors Farm, Burgess Hill	Burgess Hill	26
DPA2	Land south of Apple Tree Close, Janes Lane, Burgess Hill	Burgess Hill	25
DPA3	Burgess Hill Station	Burgess Hill	375
1105	Land east and west of Malthouse Lane	Burgess Hill	750
DPA4	Land off West Hoathly Road, East Grinstead	East Grinstead	45
961	1-5 Queens Walk and 22-26 London Road	East Grinstead	100
1024	Land at Brook House Farm, Turners Hill Road	East Grinstead	45
1060	Land north of Hill Place Farm, Turners Hill Road	East Grinstead	50
1181	Land east of West Hoathly Road	East Grinstead	20
DPA5	Land at Hurstwood Lane, Haywards Heath	Haywards Heath	36
DPA6	Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath	Haywards Heath	30
DPA7	Land east of Borde Hill Lane, Haywards Heath	Haywards Heath	117
DPA8	Orchards Shopping Centre, Haywards Heath	Haywards Heath	100
680	Field rear of North Colwell Barn, Lewes Road	Haywards Heath	9
844	Land at North Colwell Farm, Lewes Road	Haywards Heath	80
988	Land to the North of Old Wickham Lane	Haywards Heath	49
1136	Land at Lunce's Hill, Fox Hill	Haywards Heath	14
Category 2 – Larger Villages			
DPSC2	Land at Crabbet Park	Copthorne	1,950
990	Courthouse Farm, Common Road	Copthorne	86
DPA9	Land to west of Turners Hill Road	Crawley Down	430
DPA10	Hurst Farm, Turners Hill Road	Crawley Down	
686	Land r/o The Martins (south of Hophurst Lane)	Crawley Down	150
DPA11	Land rear of 2 Hurst Road	Hassocks	25
1137	Land west of Ockley Lane	Hassocks	250
DPA12	Land west of Kemps	Hurstpierpoint	90
19	Land east of College Lane	Hurstpierpoint	75
582	South of Hurst Wickham Barn, College Lane	Hurstpierpoint	9
1075	Land north of Willow Way and Talbot Mead, Cuckfield Road	Hurstpierpoint	150
1172	Land south of Hurst Wickham Barn, College Lane	Hurstpierpoint	35
575	Land northeast of Hurstpierpoint	Hurstpierpoint	150
29	Land off Snowdrop Lane	Lindfield	50
1006	Land to the north of Lyoth Lane	Lindfield	30
Category 3 – Medium Villages			
1178	Land north of Henfield Road	Albourne	20
775	Grange View House, London Road	Albourne	10
789	Phase 1 Swallows Yard, London Road	Albourne	46
1173	Land east of London Road	Albourne	250
DPA13	The Paddocks, Lewes Road	Ashurst Wood	8

Ref	Site	Settlement	Yield
1175	Land at Brambletye School, Lewes Road	Ashurst Wood	25
28	Area south of Redbridge Lane at junction with London Road	Balcombe	15
165	Land south of Oldlands Avenue (Vintens Nursery)	Balcombe	20
DPA14	Land at Foxhole Farm	Bolney	200
802	Foxhole Farm Buildings, Foxhole Lane	Bolney	20
1191	Land north of Foxhole Farm buildings	Bolney	13
181	Land west of Truggers	Handcross	105
1188	Land at Pease Field	Pease Pottage	196
603	Land to the West of Woodhurst Farm, Old Brighton Road South	Pease Pottage	700
818	Land north of Former Golf House, Horsham Road	Pease Pottage	43
DPSC3	Land to the South of Reeds Lane	Sayers Common	2,000
DPSC4	Land at Chesapeake and Meadow View	Sayers Common	26
DPSC5	Land at Coombe Farm	Sayers Common	210
DPSC6	Land to the West of Kings Business Centre	Sayers Common	80
DPSC7	Land at LVS Hassocks	Sayers Common	210
1124	West House Farm, Henfield Road	Sayers Common	325
786	Land east of Avtrade, Reeds Lane	Sayers Common	75
787	Land at Kingsland Lodge, London Road	Sayers Common	75
DPA15	Ham Lane Farm, Ham Lane	Scaynes Hill	30
Category 4 – Small Villages			
DPA16	Land west of North Cottages and Challoners	Ansty	30
DPA17	Land west of Marwick Close	Ansty	40

Settlement Hierarchy

8.7. The spatial distribution, accounting for all commitments and proposed allocations in the District Plan is as follows:

Table 6: Settlement Hierarchy

Category	Settlement	Commitments	District Plan Allocations (Submission + Main Modifications)	Total Housing Supply	
1	Burgess Hill	4150	2,526	6676	9208
	East Grinstead	1110	259	1369	
	Haywards Heath	728	435	1163	
2	Copthorne	4	2,036	2040	4136
	Crawley Down	99	609	708	
	Cuckfield	67	0	67	
	Hassocks	252	275	527	
	Hurstpierpoint	22	509	531	
	Lindfield	183	80	263	
3	Albourne	87	326	413	5331
	Ardingly	41	0	41	
	Ashurst Wood	69	33	102	
	Balcombe	32	35	67	
	Bolney	18	233	251	
	Handcross	71	105	176	
	Horsted Keynes	55	0	55	
	Pease Pottage	0	939	939	
	Sayers Common	18	3,001	3019	
	Scaynes Hill	21	30	51	
	Sharpthorne	151	0	151	
	Turners Hill	61	0	61	
	West Hoathly	5	0	5	
4	Ansty	13	70	83	97
	Slaugham	7	0	7	
	Staplefield	2	0	2	
	Twineham	3	0	3	
	Warninglid	2	0	2	

- 8.8. The largest amount of growth is directed to the most sustainable category in the hierarchy, the three towns. **Burgess Hill** was the focus for growth in the adopted District Plan, largely due to the strategic allocations at Northern Arc (Brookleigh) for 3,500 dwellings. The amount of growth proposed at **East Grinstead** and **Haywards Heath** is broadly similar, and aside from the two locations containing Sustainable Communities sites (DPSC2: Crabtree Park at Copthorne, and DPSC3-DPSC7 at Sayers Common), greater than any settlements further down the hierarchy.
- 8.9. Category 2 contains the larger villages which act as local service centres, providing key services in rural areas, including to nearby smaller settlements. Levels of growth proposed at **Crawley Down, Hassocks, Hurstpierpoint** and **Lindfield** is greater than at any settlement further down the hierarchy (again, aside from those locations containing sustainable communities, and at Pease Pottage).
- 8.10. Category 3 contains the medium villages which provide essential services for the needs of local residents. Growth proposed in these settlements is generally smaller in scale. The exceptions are at **Albourne, Pease Pottage and Sayers Common**.
- 8.11. Sayers Common includes the Sustainable Communities sites DPSC3-DPSC7 and sites 1124, 786 and 787. These sites provide new community facilities (such as education, health, employment and community buildings) alongside housing in order to provide day-to-day services and facilities close to where people live. This is in accordance with the '20-minute Neighbourhood' principles that the Plan is based on and in accordance with the "Opportunities for extensions, to improve sustainability of existing settlements" strategy principle. Growth proposed at Albourne, the settlement adjacent to Sayers Common, will also benefit from these services and facilities.
- 8.12. Pease Pottage includes three proposed allocations 1188, 603 and 818. As set out elsewhere in this Topic Paper, the Council recognises that these sites are located within the High Weald National Landscape. However, in accordance with the methodology set out in MS-12, the Council has given consideration to the benefits that could potentially arise from their development and not ruled these sites out on their position within the National Landscape alone. Pease Pottage is adjacent to Crawley Borough, where significant unmet housing need exists. The key justification for increasing the housing requirement is to assist Crawley with its unmet need, sites at Pease Pottage would be sustainably located to do so.
- 8.13. Category 4 contains small villages. The principle of allocating sites at Ansty was discussed at the hearings, with the Council justifying their inclusion based on the services and facilities provided at this settlement, the sites being small in scale, and scoring positively during the selection process. Aside from small-scale existing commitments, no further growth is proposed at Category 4.
- 8.14. Overall, the Council strongly believes the spatial distribution of proposed allocations is consistent with the settlement hierarchy and plan strategy as a whole.

Next Steps

- 8.15. The Council will suggest Main Modifications to the Inspector and seek his confirmation that these are required to ensure the plan is legally compliant and sound. The Main Modifications will include a site-specific policy outlining the requirements for each site, including on-site and off-site infrastructure and mitigation. These will be in addition to Main Modifications that have been suggested by the Council and Inspector throughout the examination to date.
- 8.16. Main Modifications will be subject to a 6-week public consultation. Further details will be provided on the examination library.