Mr Charlie Hodgson
[redacted]

15 October 2026

Programme Officer: Ms Charlotte Glancy
c/o Banks Solutions

By email only: bankssolutionsuk@gmail.com

Dear Sir / Madam,

Examination of the Mid Sussex District Plan 2021-2039. Site MM76

This statement supplements my original representation objecting to MM76. I do not repeat the evidence and arguments already made concerning highways, wildlife, infrastructure, heritage, landscape and settlement coalescence. I address only the matters arising from the Inspector's hearing agenda and points requiring clarification following examination of the Council's published evidence.

I do not seek to reopen the overall housing requirement or housing headroom.

1. Village character, heritage and the countryside

I acknowledge that MM76 now includes mitigation. Its policies map identifies a proposed built-up-area boundary, and Policy 2 requires significant natural greenspace along the northern and eastern edges. The promoter's concept masterplan also illustrates up to 150 dwellings at an average density of approximately 30 dwellings per hectare.

The issue is therefore not whether any mitigation has been proposed. It is whether the Council has demonstrated, through consistent and proportionate evidence, that the mapped development envelope and mitigation overcome the landscape, heritage and settlement-separation concerns identified in its own assessments.

Three materially different conclusions appear in the evidence:

1. The promoter's Heritage Technical Note concludes that the development would have no adverse effect on the significance of nearby designated heritage assets.

2. The Council's current individual site assessment states that development would have a significant impact on the nature, setting and outlook of Hurstpierpoint College and on the approach to it from the west. It assesses the resulting less-than-substantial harm as mid/high. It also identifies mid-level less-than-substantial harm to Hurstpierpoint Conservation Area.

3. The Sustainability Appraisal records no or low cultural-heritage effects for MM76.

The Council should explain which conclusion it adopts, why those assessments differ and where the accepted heritage harm has been weighed against the particular public benefits of MM76.
The Council's 2024 South Downs National Park Setting Assessment also found that development would significantly erode the gap between settlements, constitute a significant countryside incursion and completely alter the setting of Hurstpierpoint College. I recognise that this document was not itself a final assessment of allocation suitability and that it concluded that direct effects upon the National Park's setting may be limited. Nevertheless, its findings concerning settlement pattern, landscape capacity and the College's setting remain relevant and have not been expressly withdrawn.

The policies map now provides greater spatial definition than was acknowledged in my original representation. However, the Council should clarify:

- whether all land outside the proposed built-up-area boundary must remain permanently free from housing, roads, drainage structures and other urbanising development;
- how the extent of that boundary was derived;
- what physical and perceived separation would remain between Hurstpierpoint and Hurst Wickham;
- whether the greenspace is intended specifically to preserve settlement separation and heritage setting, rather than principally provide recreation and biodiversity; and
- how its permanent management and protection will be secured.

These are relevant because planting may reduce visibility without necessarily preserving the physical and perceived separation of the settlements or the rural experience of the affected heritage assets.

There is also an apparent policy inconsistency. MM74 expressly requires a Heritage Statement and Landscape and Visual Impact Assessment addressing Hurstpierpoint College and the South Downs. MM75 expressly requires a Heritage Statement addressing Hurst Wickham Conservation Area and Wickham Farmhouse. MM76 contains no comparable requirement, despite the Council's own assessment identifying mid/high heritage harm and negative landscape effects.
The Council should explain the objective basis for that difference.

2. Movement

I rely on the highways and accessibility concerns contained in my original representation and do not repeat them. I acknowledge that cumulative transport testing has been undertaken and that the highway authority has not identified a strategic highway reason for rejecting MM76.
The remaining plan-level issue is whether the sustainable-travel requirements in MM76 are deliverable. The Council should confirm that the land and legal rights necessary to provide the required connections to Hurst Meadows, College Lane, Chalkers Lane, the health centre and Davey Way are available and capable of being secured.

This is particularly relevant because the Council's assessment records walking times exceeding 20 minutes to the GP surgery, primary school and retail facilities, while the promoter relies upon materially shorter routes. The basis for those different conclusions should be explained.

3. Planning permission and soundness

I recognise that MM76 would still require planning permission and that detailed design, drainage, ecological mitigation and highway engineering can properly be addressed at application stage. However, allocation would establish development of approximately 150 homes as acceptable in principle and would count those homes towards the Plan's supply. The plan-making process must therefore establish that there is a reasonable prospect of delivering that capacity within an acceptable development envelope.

A future application should not be required to resolve for the first time:

- which of the Council's conflicting heritage conclusions is correct;
- whether the mapped envelope preserves effective settlement separation;
- whether the residual heritage and landscape harm is acceptable; or
- whether the necessary mitigation is compatible with the stated capacity.

Those are matters going to the justification and effectiveness of the allocation itself.

4. Conclusion and change sought

The Council was entitled to reconsider the site following the Inspector's conclusions on housing need. Increased housing need is a legitimate reason to reconsider previously rejected land. The unresolved question is whether the Council has demonstrated why a site rejected at 150 homes because of coalescence is now acceptable at the same capacity, when its current evidence continues to identify negative landscape effects, significant effects upon the College and mid/high heritage harm.

On the published evidence, the necessary evidential reconciliation and site-specific planning balance have not been clearly demonstrated. MM76 is therefore not presently shown to be justified or effective and should be deleted.

If the Inspector does not consider deletion necessary, MM76 should be modified to require:

1. a Heritage Statement and Landscape and Visual Impact Assessment;
2. express protection of the significance and setting of Hurstpierpoint College and the relevant conservation areas;
3. permanent protection of the land outside the proposed built-up-area boundary from built and urbanising development;
4. an assessment of the physical and perceived settlement separation remaining after development; and
5. a lower capacity if the evidence demonstrates that 150 homes cannot be acceptably accommodated.

These requirements are necessary for soundness rather than merely improvements to the policy.

Yours sincerely,

