

Mid Sussex District Plan 2021- 2039
Matter 5: The Spatial Strategy
Statement on behalf of A2Dominion

February 2026

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Client

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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 5: The Spatial Strategy).

2. Matter 5: The Spatial Strategy

The effectiveness and soundness of the proposed distribution of new development in meeting social, economic and environmental objectives, whether it will achieve more than the sum of its parts and whether it will amount to positive planning.

a) Whether the plan's apportionment of development to larger and smaller settlements and freestanding allocations, and to different sizes of site, is effective in ensuring delivery and in meeting community needs

- 2.1 The Plan is not sound when assessed against the Effectiveness test of the National Planning Policy Framework. The Plan's apportionment of development relies disproportionately on a small number of very large strategic allocations, rather than a balanced range of strategic sites capable of delivering at different scales and speeds. Sites of over 1,000 dwellings are inherently complex, typically require substantial upfront infrastructure, long lead-in times, land assembly, and coordinated delivery across multiple phases, all of which increase uncertainty and delay. This undermines the realism of the housing trajectory and increases the risk that housing will not be delivered as planned, particularly in the early and middle years of the plan period. As a result, such sites rarely contribute meaningfully to housing supply in the early years of the plan, contrary to the NPPF's emphasis on significantly boosting the supply of homes and maintaining a continuous five-year supply.
- 2.2 Furthermore, concentrating a large proportion of the housing requirement on a limited number of allocations lacks flexibility and resilience; any delay or under-performance on a single site would have a disproportionate impact on overall delivery, undermining the Plan's effectiveness. In contrast, the NPPF supports the identification of a broad mix of sites to diversify delivery and provide greater certainty that housing needs will be met.
- 2.3 Whilst there is a role for these large strategic sites within the Plan's overall spatial strategy, this does not negate the importance of moderately sized strategic sites, which can provide a more reliable and continuous source of housing delivery, earlier in the plan period, thereby improving the effectiveness and resilience of the overall housing trajectory. The strategy fails to make adequate provision for such moderately sized strategic sites, such as sustainable urban extensions of around 500–1,000 dwellings, which can deliver meaningful housing numbers, affordable housing and supporting infrastructure within shorter and more reliable timescales. These sites are capable of providing critical mass while remaining flexible and responsive to changing market conditions, thereby improving certainty of delivery. The limited role afforded to such sites reduces the resilience of the Plan and leaves overall housing delivery overly exposed to delay on a small number of large allocations.

- 2.4 Furthermore, the emphasis on large strategic sites weakens the Plan's ability to meet community needs effectively. Small and moderately sized strategic extensions (the land promoted by A2Dominion west of Pease Pottage in Mid Sussex could accommodate around 150 – 200 dwellings) to existing settlements are better able to integrate new development with established services, employment and transport networks, reinforcing sustainable settlement patterns and supporting local communities. As currently drafted, the Plan does not demonstrate that its apportionment by settlement type and site size represents the most effective means of delivering housing over the plan period. A more balanced strategy would therefore better reflect national policy, reduce delivery risk, and improve the Plan's prospects of achieving sustainable and consistent housing delivery throughout the plan period.
- 2.5 In terms of how the Council determined the plan's apportionment of development, we note that there are no documents within the evidence base to explain how the Council has approached the spatial strategy and the distribution of development, beside the five options considered in the Mid Sussex District Plan (Regulation 19) Sustainability Appraisal Environmental Report (November 2023) (Document DP9). There does not appear to be any recognition and then assessment of the fact that Crawley is a very sustainable settlement of sub-regional importance immediately adjacent to the District and which has a very significant unmet need for development (a factor that has been evident throughout the Plan's preparation). In our submission, these matters should have been considered through the LPA's evidence base.
- 2.6 The existence of an unmet need, especially in the context of Crawley and the substantial affordable housing need which is not addressed by that Local Plan, is evidently a 'community need' (using the language of the Inspector's question). This is highlighted by the fact that both Mid Sussex and Crawley (as well as Horsham) are within the North West Sussex HMA.
- 2.7 Yet, Crawley is absent from the spatial strategy and any assessment / explanation as to how growth is distributed.
- 2.8 If there is the potential for a Local Plan to be required to address unmet housing needs, then it follows that the strategy should consider how those needs are met in a sustainable manner.
- 2.9 That has occurred in Mid Sussex before, with the strategic allocation (Policy DP9a) east of Pease Pottage supported on the basis of its relationship to Crawley. The Inspector's Report on the current Local Plan (also Mr Bore) noted:

"52. The strategic sites, which are dealt with in more detail below, demonstrate well that substantial amounts of housing can be provided without harm to character, landscape or heritage. The allocation for about 600 homes at Pease Pottage, which has planning permission, is in the AONB but is a sustainable location and the particular site itself is of lesser landscape quality."

"79. Policy DP9A allocates a site for approximately 600 new homes at Pease Pottage. This is closely related to Crawley, but on the opposite side of the M23, in the AONB, and it already has outline planning permission for housing development."

- 2.10 Once it is established that a Plan is to grapple with unmet housing needs, it is right that the locations of housing to meet that need is addressed. This issue was considered (also by Mr Bore) in South Oxfordshire (where there was a significant unmet housing need arising from Oxford City), with the Local Plan 2035 report stating:

“The plan seeks to meet overall development needs in the right places through a logical and evidence based spatial strategy. The spatial strategy meets Oxford’s unmet housing need close to where it arises in well-chosen sites which encourage sustainable movement.”

- 2.11 We dispute any suggestion that unmet housing needs can simply be addressed anywhere. Although part of the North West Sussex HMA, the needs of Crawley are separately identified and mask a very substantial affordable housing issue. Providing those homes ‘anywhere’ is likely to result in them being provided away from Crawley and the current communities of the occupiers and be further from, and less accessible to, the occupiers’ place of work. Indeed, the evidence submitted with A2Dominion’s Regulation 19 representations on this Local Plan highlighted that the limited capacity for housing within Crawley increased the need for workers to travel in from elsewhere. Inevitably this highlights the additional journey time and is likely to suggest that opportunities are not being taken to address unmet needs in locations which are highly accessible for the needs of residents.
- 2.12 With regard to Pease Pottage (itself identified as a medium village), it is in close proximity to Crawley in contrast to other settlements in the District. It does not appear as though the Council has considered this proximity, and the ability of residents from that community, to access services, facilities, employment or the network of public transport provided by this large town of sub-regional importance. Equally, in the context of a recognised unmet housing need issue, there is no evidence to suggest the Council has considered the role that Pease Pottage can play in meeting needs from the neighbouring authority.
- 2.13 In contrast to those clear sustainability credentials demonstrated by the proximity of Pease Pottage to Crawley, we note that these are not demonstrated by the medium and smaller villages at which the Council has decided to allocate sites for new housing (in addition to those already allocated). We note that none of those other medium and smaller village settlements have any relationship with Crawley to the north of the District and which has very significant unmet housing needs of its own.
- 2.14 The Plan is not consistent with a strategy and distribution of development as set out in paragraph 110 of the Framework which states that the planning system should actively manage patterns of growth and focus significant development in locations which are or can be made sustainable. The Plan is flawed in this context as it directs growth to settlements which are demonstrably less sustainable and has no regard to towns on the District’s boundaries.
- 2.15 The Plan’s constrained spatial strategy and apportionment of development reduces its ability to respond to identified housing needs over the plan period. Paragraph 11 of the NPPF requires plans to positively seek opportunities to meet development needs, while paragraph 61 stresses that housing requirements should be met in full unless there are clear reasons not to do so. A strategy that limits site choice and settlement coverage is

inherently less capable of responding to changing demographic needs, market conditions, and delivery challenges.

b) The relationship between the spatial strategy and transport objectives, transport infrastructure and transport constraints

c) Whether the spatial strategy takes an appropriate approach, at the strategic level, towards climate change mitigation, countryside protection, environmental protection, flood risk and heritage

- 2.16 At a strategic level, the Plan does not take an appropriate approach to climate change mitigation or transport-related emissions. While the Plan acknowledges climate objectives in policy terms, the spatial strategy fails to align growth with the most sustainable locations, contrary to national policy. In particular, the strategy gives insufficient weight to the sub regional role of Crawley as a highly sustainable settlement on the District's boundary, with significant employment opportunities, established public transport infrastructure, and access to higher-order services. The decision to largely exclude Crawley-related growth opportunities, while instead directing substantial development to freestanding large strategic sites and less sustainable settlements, risks increasing reliance on private car travel and longer commuting patterns, particularly in the early and middle years of the plan period.
- 2.17 Freestanding strategic allocations are less likely to offer immediate access to employment, rail stations and frequent public transport, resulting in higher per-capita transport emissions and weaker alignment with climate change mitigation objectives. This approach conflicts with the requirement for plans to actively shape patterns of development to minimise the need to travel and reduce greenhouse gas emissions. By contrast, directing a greater proportion of growth to sustainable locations adjoining Crawley, including moderately sized strategic sites capable of early delivery, would better capitalise on existing infrastructure, shorten journey lengths, and reduce transport emissions across the plan period.
- 2.18 Overall, the spatial strategy does not demonstrate that climate change mitigation has been embedded as a primary driver of site selection and growth distribution. A more effective and policy-aligned approach would recognise Crawley's functional role and sustainability credentials, and use this to inform a spatial strategy that reduces transport emissions, improves accessibility, and delivers development in genuinely sustainable locations rather than relying predominantly on large, more remote strategic sites.
- 2.19 In our submission, we also assert that the constraints of the District have overly influenced the strategy of the Plan and applied the National Landscape designation (formerly AONB) as an 'absolute' constraint when, in reality, there is no such restriction in national planning policy. National policy requires a balance between the protection of valued landscapes and the delivery of sustainable development to meet identified needs. The Plan's approach does not clearly demonstrate that this balance has been struck. Instead, the landscape designation appears to have been elevated above other material considerations, including housing need, settlement sustainability, and deliverability. This is discussed further in our response to Matter 6.

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