

LAND EAST OF ANSTY WAY, CUCKFIELD BYPASS, CUCKFIELD, WEST SUSSEX,
RG17 5AG

MID SUSSEX DISTRICT COUNCIL

SUMMARY PROOF OF EVIDENCE

of Chloe Salisbury

MA (Cantab), MSc, MRTPI

Planning Policy

on behalf of Mid Sussex District Council

Appeal reference: 6002030

LPA reference: DM/23/2866

22 May 2026

1 QUALIFICATIONS, EXPERIENCE AND SCOPE OF EVIDENCE

- 1.1 My name is Chloe Salisbury and I am a member of the Royal Town Planning Institute (MRTPI) and hold a MSc degree in Spatial Planning from University College London.
- 1.2 I am a Director at Arup, one of the UK's largest and most respected multi-disciplinary consultancies. I have worked as part of the Arup planning team since 2007 and have acted as UK Town Planning Leader since 2024. I specialise in plan-making, policy research and evidence base preparation. I am experienced at managing the preparation of plans as well as bringing expertise in the preparation of evidence base documents and policy drafting. I frequently work with Local Planning Authorities to provide support in preparing their Local Plans, including evidence base and policy development and appearing as a witness at Local Plan Examinations.
- 1.3 I have been appointed by Mid Sussex District Council ("The Council") to assist with the Local Plan preparation since April 2024.
- 1.4 I am familiar with the site and wider area and the national, regional and local planning policy.
- 1.5 My evidence relates solely to the emerging District Plan and the implications of this for the proposed development at Ansty. Wider planning issues and the planning balance are assessed in the Proof of Evidence of Phillipa Jarvis (CD 9.1).
- 1.6 By way of background, due to constraints on Council Officers' time, colleagues within the Arup Planning Team drafted the original Case Officer's report to Committee, which concluded with a recommendation for approval. I was not involved in authoring the report. The recommendation was subsequently overturned by Planning Committee.

- 1.7 I have not been commissioned to consider or review the reasons for refusal of the planning application. This is being addressed in the Proof of Evidence of my colleague Phillipa Dale (CD 9.1). My evidence is concerned with providing information to the inquiry on the progress of the emerging District Plan (which may be relevant to the overall planning balance carried out by Phillipa) and evidence of the impact of granting permission on the District Plan process, in particular with regard to national policy on prematurity.
- 1.8 I declare that the evidence set out in my Proof of Evidence for the Appeal is true and follows accepted practice. I confirm that the opinions expressed represent my professional opinion. I understand my duty to the inquiry and have complied with the RTPI Code of Professional Conduct (2023) when preparing my Proof.

2. SUMMARY

- 2.1 In summary, the grant of planning permission through this s.78 appeal would be contrary to the plan-led approach the Government intends to see delivered through the planning system. Paragraph 50 of the NPPF sets out the limited circumstances in which an application can be deemed as premature. I am firmly of the view that both the criteria outlined in paragraph 50 are relevant and applicable in respect of the appeal proposals. Granting permission would undermine the plan-making process by pre-determining decisions about the scale, location and phasing of new development – issues that are central to the emerging District Plan.
- 2.2 As set out in paragraph 4.52 of my Proof, the appeal site has not been included on the Council's 'long-list'. Instead, having applied the agreed site selection methodology (MS-12) (CD 5.36), the Council has selected a suite of sites which it considers can best meet the needs of Mid Sussex and its neighbouring authorities having regard to a range of factors.
- 2.3 Having made these judgements, allowing the appeal at Ansty would undermine the plan-making process. The appeal site is contrary to the views reached by the Council through this process and specifically would pre-determine decisions about the:
- **Scale of development.** As set out in my Proof, Inspector Bore has clearly articulated his expectations regarding the scale of additional residential development the emerging District Plan should seek to meet. That figure is not in dispute. However, Inspector Bore has left it to the Council's discretion to determine the most approximate mix of sites and the relative scale of each one to meet the overall housing requirement. Representors at the District Plan examination have already raised concerns about the Council's over-reliance on significant scale sites to meet housing needs. Therefore, in publishing the long list, the Council gave careful consideration to the size of sites and associated scale of development including how the Council could maximise delivery of development within the next five years of the Plan through the identification of smaller sites. In undertaking that re-assessment the Council has concluded that it can best meet its own needs and its neighbours' needs through allocating mainly small and medium scale sites, alongside two large ones. Therefore, granting an appeal for a significant scale site would pre-determine the Council's approach to meeting identified housing needs.

- **Location of development.** The spatial strategy for the submitted District Plan integrates two distinct strands: principle 3 ('Growth at existing sustainable settlements where it continues to be sustainable to do so') and principle 4 ('Opportunities for extensions, to improve sustainability of existing settlements'). Based on the basket of sites available and accounting for the factors outlined in MS-12 (CD 5.36), the Council has determined that focusing growth in existing sustainable settlements where this aligns with principle 3 represents the most appropriate way to meet the housing requirement outlined by Inspector Bore. It also enables the Council to focus development in those locations closest to where the unmet housing needs from neighbouring authorities arises. Therefore, approving a development which departs from this conclusion would prejudice the Council's ability to distribute development across the District in a manner it considers to be most appropriate.
- **Phasing of development.** The Council's work on site deliverability has demonstrated that when accounting for a more realistic delivery trajectory for the appeal site, it makes a limited contribution to the five year housing land supply.

2.4 Further, since the refusal of the planning application in October 2025, the emerging District Plan has advanced through examination. As a result, the weight that must now be afforded to the relevant policies of the emerging Plan has increased. In addition, the position in respect of five-year housing land supply has shifted – upon adoption of the emerging District Plan, the Council will be able to demonstrate a five year-housing land supply to accommodate its own needs and those of neighbouring authorities - which does not include the appeal site. The appeal site would make a limited contribution to the five-year housing land supply, given anticipated delivery rates.

2.5 I therefore respectfully request that the Inspector dismisses the Appeal.