MM91: Land north of Former Golf House, Horsham Road, Pease Pottage

Hearing Statement – Matter 7 (continued)

Mid Sussex District Plan 2021–2039 Examination
Hearing session: Wednesday 4 November 2026, 14:00
MM89: Land at Pease Field, Pease Pottage (incl MM91)

Prepared by Denton Homes Ltd.
Main Modifications representation – Comment ID: 17073748/7343/1

October 2026

Denton Homes Limited

1. Introduction

1.1 Denton Homes Ltd. controls land north of Former Golf House, Horsham Road, Pease Pottage (MM91). This Hearing Statement has been prepared by Denton Homes Ltd. in response to matters identified in the draft agenda. The site is available now, with delivery anticipated within the first five years following adoption.

1.2 Denton Homes also owns Foresters Way and controls part of the land within the MM89 allocation (Land at Pease Field). The use of Foresters Way to serve MM89 has been agreed with A2Dominion, which is promoting MM89. Denton Homes therefore supports both allocations, which can be delivered together, with access to each secured without reliance on third-party land.

1.3 For reference, the site was subject to a previous planning application for 43 dwellings under application ref. DM/18/1362. That application was refused in 2018, but for very specific reasons which can be summarised as follows:

- **Principle (DP12 / DP15):** the site lay in the countryside outside the built-up area boundary of Pease Pottage and was not supported by a specific policy at a time when the Council could demonstrate a five-year housing land supply. The proposed allocation under MM91 directly resolves this reason.
- **Drainage (DP41):** the proposed surface water strategy relied on mechanically pumping water to an attenuation pond, which was not considered to represent good SuDS design. This was a design matter specific to that scheme rather than an in-principle constraint.
- **Highway safety (DP21):** an updated Road Safety Audit reflecting the intensified use of the access had not been provided. WSCC Highways raised no capacity objection and confirmed there would be no severe residual impact. The outstanding matter was therefore an updated Stage 1 Road Safety Audit, which can readily be provided at application stage.
- **Infrastructure and affordable housing (DP20 / DP31):** no completed section 106 agreement was in place. This was a standard reason given that officers were refusing on other grounds, and the Council's Housing Officer raised no objection to the 30% affordable provision proposed.

2. Impact on the National Landscape

Degree of wider visibility / sense of enclosure

2.1 The previous application (DM/18/1362) was supported by a Landscape and Visual Impact Assessment (LVIA) prepared by Land Management Services (April 2018), the findings of which remain directly relevant to the MM91 allocation. Since 2018, the Golf House development has been built out and the speed limit on Horsham Road reduced, such that the 2018 conclusions are, if

anything, conservative. The viewpoint location plan and visual effects table from the LVIA are included at Appendix 1.

2.2 The site is broadly flat and its surroundings are flat or gently undulating and largely wooded. The ancient and semi-natural woodland at Horsham Corner wraps around the western and northern boundaries of the site and continues to the north-east, providing a strong, permanent and defensible edge. There are no public rights of way within the site.

2.3 The site is visible from very few locations, and only in near views. Of the nine representative viewpoints assessed:

- four (VPs 5 to 8), all on public bridleway 1546 to the west, recorded a neutral effect. All four are of high sensitivity, but the site is entirely screened by woodland, hedging and landform;
- four (VPs 1, 2, 4 and 9) recorded a negligible effect; and
- one (VP 3, at the site entrance on Horsham Road) recorded a negligible to minor beneficial effect.

2.4 On the LVIA's assessment, no viewpoint recorded an adverse visual effect, let alone a significant one (moderate or above under the LVIA methodology).

2.5 The baseline photographs were taken in February and March 2018 and therefore represent a worst-case scenario. Even in winter, the site was entirely screened from VP 4 on Horsham Road, and only filtered glimpses were possible from VP 9 at the northern edge of Pease Pottage.

2.6 In practice, this degree of enclosure is characteristic of the local landscape. The Mid Sussex Landscape Character Assessment (Worth Forest) confirms that woodland and forest cover limits the visual sensitivity of the landscape and confers a sense of intimacy and seclusion, whilst the Horsham District Landscape Character Assessment (St Leonard's Forest) describes a strongly enclosed landscape with confined views. As such, development contained within this woodland framework would be visually self-contained and would not adversely affect views into or out of the National Landscape, consistent with the requirements of Policy DP16.

2.7 The Council's own assessment of the 2018 application reached the same conclusion. Notably, the Committee Report accepted that:

- the site does not currently contribute to the natural character and scenic beauty of the AONB;
- the site has low visual and landscape sensitivity;
- the site is screened to the west and north by ancient woodland;
- to the east, the site would be seen in the context of existing and consented housing; and
- development would cause no detrimental impact on the High Weald AONB in landscape terms.

2.8 The Council's site selection evidence is consistent with this. The Site Selection Pro Forma for Site 818 [SSP8] records that the site is ''not visible from public vantage points'' and notes the existing

office and car parking, the adjoining Golf House and the modern ''in-depth development'' beyond. Other than at its entrance on Horsham Road (VP 3), where it is seen alongside the Golf House development, the site therefore has no meaningful wider visibility within the High Weald National Landscape.

2.9 Landscape impact did not form a reason for refusal. Having regard to the above, the strong visual enclosure of the site means that the allocation can be delivered without harm to the wider landscape and scenic beauty of the National Landscape.

2.10 Furthermore, the Council's background paper on Major Development in the High Weald National Landscape (July 2026) [ENV22] concludes that MM91, assessed on its nature, scale and setting, does not represent major development. Applying the factors in the NPPF definition: in nature, housing would replace an office and car park on largely previously developed land; in scale, 43 dwellings is modest alongside the adjoining Golf House (25) and Riverdale (95) developments; in setting, the site is enclosed by woodland at the settlement edge; and, given the LVIA findings, it could not have a significant adverse impact on the purposes of designation. Slaugham Parish Council contends that it should be treated as major development in combination with MM89. However, MM91 is a separate allocation on largely previously developed land, and the Parish Council itself acknowledges the ancient woodland located between the two sites. Given the visual containment of the site, MM91 would add little, if anything, to any cumulative change in the character of Pease Pottage as experienced from the wider National Landscape.

Existing urbanising influences

2.11 Much of the site comprises previously developed land, including a two-storey and single-storey office building of circa 371 sqm in lawful employment use, a large circular hard-standing car park for around 50 vehicles, a concrete access drive, an electricity substation screened by Leyland cypress, and perimeter security fencing, gates and signage.

2.12 The surroundings are similarly developed. The Former Golf House site to the south has been developed for 25 dwellings (DM/17/0747) and lies within the settlement boundary, outside the National Landscape, whilst the Riverdale development of 95 dwellings adjoins to the east. There is now a continuous ribbon of built form along the northern side of Horsham Road. The NATS radar tower and Southern Water tower are visible from within the site, and Horsham Road itself has a semi-urban character with traffic calming, lighting columns, telegraph poles and highway signage.

2.13 The Pro Forma also records the twentieth-century clearance of woodland. As such, development would replace existing urbanising features rather than introduce new ones into an undeveloped landscape.

Effect on ancient woodland and protected trees

2.14 The Horsham Corner ancient and semi-natural woodland adjoins the site to the west and north. No development is proposed within the woodland and there would be no loss of irreplaceable habitat. The 2018 layout provided a buffer of at least 15 metres in accordance with Natural England and Forestry Commission Standing Advice, with the nearest dwellings more than 20 metres from the woodland edge and a perimeter road keeping private gardens away from the woodland.

2.15 The woodland is currently dominated by even-aged secondary birch with invasive rhododendron, which presents a clear opportunity for enhancement. Allocation would secure native planting and heathland creation within the buffer as well as a Woodland Management Plan and permanent fencing to prevent unauthorised access, together with a lighting strategy avoiding light spill onto the woodland edge. These measures would further the purpose of conserving and enhancing the natural beauty of the National Landscape, in accordance with section 85 of the Countryside and Rights of Way Act 2000 (as amended).

2.16 None of the trees on the site are subject to a Tree Preservation Order. The 2018 BS 5837 survey proposed the removal of only four trees. The avenue of Norway maples along the drive and the mature beech would be retained, and all dwellings would be located outside root protection areas. The Arboricultural Report concluded that trees should not present a planning constraint and that the woodland is unlikely to be affected.

2.17 The Pro Forma scores trees as ''Neutral'', accepting that mitigation can be achieved. The ''Negative'' landscape score in the same Pro Forma is attributed to potential effects on ancient woodland and the effect of buffers on capacity. In practice however, the 43-dwelling capacity was tested on a layout that already incorporated the full 15-metre buffer.

Effect on water bodies

2.18 There are no ponds or watercourses within the developable area, and the site lies entirely within Flood Zone 1 and is therefore at the lowest risk of flooding. The nearest water bodies are as follows:

- **Pond within the woodland:** a pond within the ancient woodland to the north-west lies beyond the buffer, and eDNA testing confirmed the absence of great crested newts.
- **Ditch:** a seasonally wet ditch crosses the woodland edge and is of low value to water vole.

2.19 Buchan Hill Ponds SSSI lies circa 1 km to the north-west and no pathway to it has been identified.

2.20 The 2018 drainage reason for refusal related to the use of a pump rather than any effect on water bodies. Of note, the Flood Risk Assessment identified an alternative gravity outfall to the existing ditch, which already receives runoff from the site. A gravity-led SuDS scheme incorporating permeable surfaces, swales and attenuation, with discharge restricted to greenfield rates, would maintain the existing drainage pattern to the woodland, improve the quality of water reaching the pond and avoid the need for pumping, in line with the approach recommended by the Council's Drainage Engineer in 2018.

Effect on wildlife

2.21 The site has no statutory or non-statutory wildlife designation and the Pro Forma scores biodiversity as ''Very Positive''. The Preliminary Ecological Appraisal prepared by Applied Ecology (April 2018) found that the development footprint comprises amenity grassland and hard standing of low ecological value, with the habitats of highest value located within the retained woodland. In summary:

- **Bats:** the two buildings are of low roosting suitability and emergence surveys would be required prior to demolition. A wildlife-sensitive lighting strategy would protect bats foraging along the woodland edge.
- **Reptiles:** present on adjoining land, with translocation possible from the small area of suitable habitat on the eastern boundary.
- **Dormice:** may be present in the woodland, which would be retained and protected by the buffer. Dormouse surveys would form part of the updated ecological surveys accompanying any planning application.

2.22 Officers concluded in 2018 that the scheme complied with Policy DP38. Updated ecological surveys and a statutory biodiversity metric assessment would accompany any planning application. Given the low ecological baseline, the mandatory 10% biodiversity net gain can realistically be delivered on site, principally through heathland and acid grassland creation within the buffer along with woodland management.

Proposed land use arrangements including open space and buffering

2.23 The 2018 illustrative masterplan provided for:

- 43 dwellings comprising a mix of 2 to 4-bedroom houses and six apartments;
- 30% affordable housing (13 homes) in three locations across the site, to which the Council's Housing Officer raised no objection;
- a replacement office building of circa 231 sqm served by the existing drive, retaining employment on the site in accordance with Policy SA34;
- a continuous buffer of at least 15 metres to the ancient woodland, separated from the perimeter road by a low native hedge or post and rail fence;
- an arrival green and community open space at the entrance.

2.24 The Council's Urban Designer considered that the open space should be more usable. However, the woodland buffer and arrival green together provide approximately 0.5ha of open space, and its detailed design and usability can be refined at application stage.

3. Access and Transport

Access points and impact on the highway network

3.1 The dwellings would be served by Foresters Way – the existing junction onto Horsham Road serving the built Golf House development (DM/17/0747). Denton Homes owns Foresters Way, such that the access is within its control and free of any third-party constraint. For the avoidance of doubt, the residential access lies within Mid Sussex and only the existing office access is within Horsham District. In their response to the previous application ref. DM/18/1362 Horsham District Council raised no objection, provided that the existing access continues to serve the office only and does not become a secondary access for the proposed dwellings.

3.2 The speed limit along Horsham Road has been reduced from 40mph to 30mph since the Golf House development was approved. The existing junction was approved to serve the Golf House development and, with the reduced speed limit, is considered capable of accommodating

additional vehicular movements, to be confirmed by speed surveys at application stage. That conclusion tallies with the Pro Forma which records that ''safe access to site already exists''. Nonetheless, land to the west of the junction which is within the control of Denton Homes could be provided if further survey work indicates that lengthened visibility splays are required.

3.3 Of note WSCC previously confirmed that traffic from the development, combined with the Golf House Development, would be marginally lower than that generated by the site prior to 2010 when it operated as a driving range and as such there would be no severe residual impact.

Bus connections

3.4 The nearest bus stops, opposite the Black Swan, are circa 630 metres from the site access, an eight-minute walk. These are served by the Metrobus 271 (Crawley – Haywards Heath – Burgess Hill – Brighton), which operates daily at a frequency of approximately one bus every one to two hours and reaches Crawley Bus Station in circa 10 minutes. The Pro Forma rates bus access as ''Fair''.

Cycling and walking arrangements

3.5 The site connects to Horsham Road via the built Golf House development (Foresters Way). There are footways on both sides of Horsham Road alongside traffic calming. As such, the suggestion by Slaugham Parish Council that no footway connects the site to the village is incorrect. Of note, the need for pedestrians to cross Horsham Road was considered by the Inspector in dismissing the earlier Golf House appeal (DM/16/0549), who found it to be a disadvantage but not a reason for refusal. The Council subsequently granted permission for the Golf House scheme (DM/17/0747) on the basis that pedestrians would cross Horsham Road to reach the southern footway into the village. MM91 would share the same route, and there is no reason for a different conclusion to be reached. However, should the Inspector consider that an improvement is required, Denton Homes could provide dropped kerbs and tactile paving at the eastern end of the northern footway to formalise the crossing, within the adopted highway.

3.6 Denton Homes supports the request by Crawley Borough Council that Policy Requirement 9 refers to relevant schemes in neighbouring authority Local Cycling and Walking Infrastructure Plans (LCWIPs), consistent with modified Policy DPT3.

4. Site Location in relation to employment and infrastructure

Connection to employment, retail, social and community facilities

4.1 Pease Pottage benefits from a public house, small shops and a service station providing convenience retail, and the Pro Forma confirms that retail is within a 20-minute walk. Furthermore, Woodgate Primary Academy, located within the Woodgate development at Hardriding Farm (DM/15/4711), provides nursery and primary education, alongside community facilities.

4.2 Crawley town centre is accessible from the site by the 271 bus service and by bicycle, contrary to the Pro Forma's assumption of car-only access to the main service centre.

Impact on Crawley infrastructure

4.3 The Main Modifications include 3,753 dwellings towards the unmet needs of Crawley. The Northern West Sussex Statement of Common Ground (July 2023) makes it clear that allocations on or close to an administrative boundary would most logically assist with housing need arising on the other side of that border. As a site on the southern edge of Crawley, MM91 is entirely consistent with that principle.

4.4 Crawley Borough Council does not object to the principle of MM91 and confirms that it will support housing close to the borough where cumulative infrastructure needs are identified and programmed. Its concern is that the combined effects of planned development in and around Crawley have not been fully tested, which it proposes to address through ongoing joint working under the existing Statements of Common Ground (DC6 and DC6a). That is a plan-wide matter rather than a site-specific constraint.

4.5 At 43 dwellings, MM91 would make only a very limited contribution to those cumulative effects. The new primary school and community facilities at Hardriding Farm will also reduce reliance on Crawley for day-to-day services. Denton Homes accepts that development should be phased in line with water supply and wastewater infrastructure in accordance with modified Policy DPI7, and that planning obligations should fund the infrastructure genuinely required by the scheme.

Denton Homes Ltd

Mid Sussex District Plan 2021-2039 Examination: Week 4 Hearing Statement

MM91: Land north of Former Golf House, Horsham Road, Pease Pottage

Appendix 1: Extracts from Landscape and Visual Impact Assessment

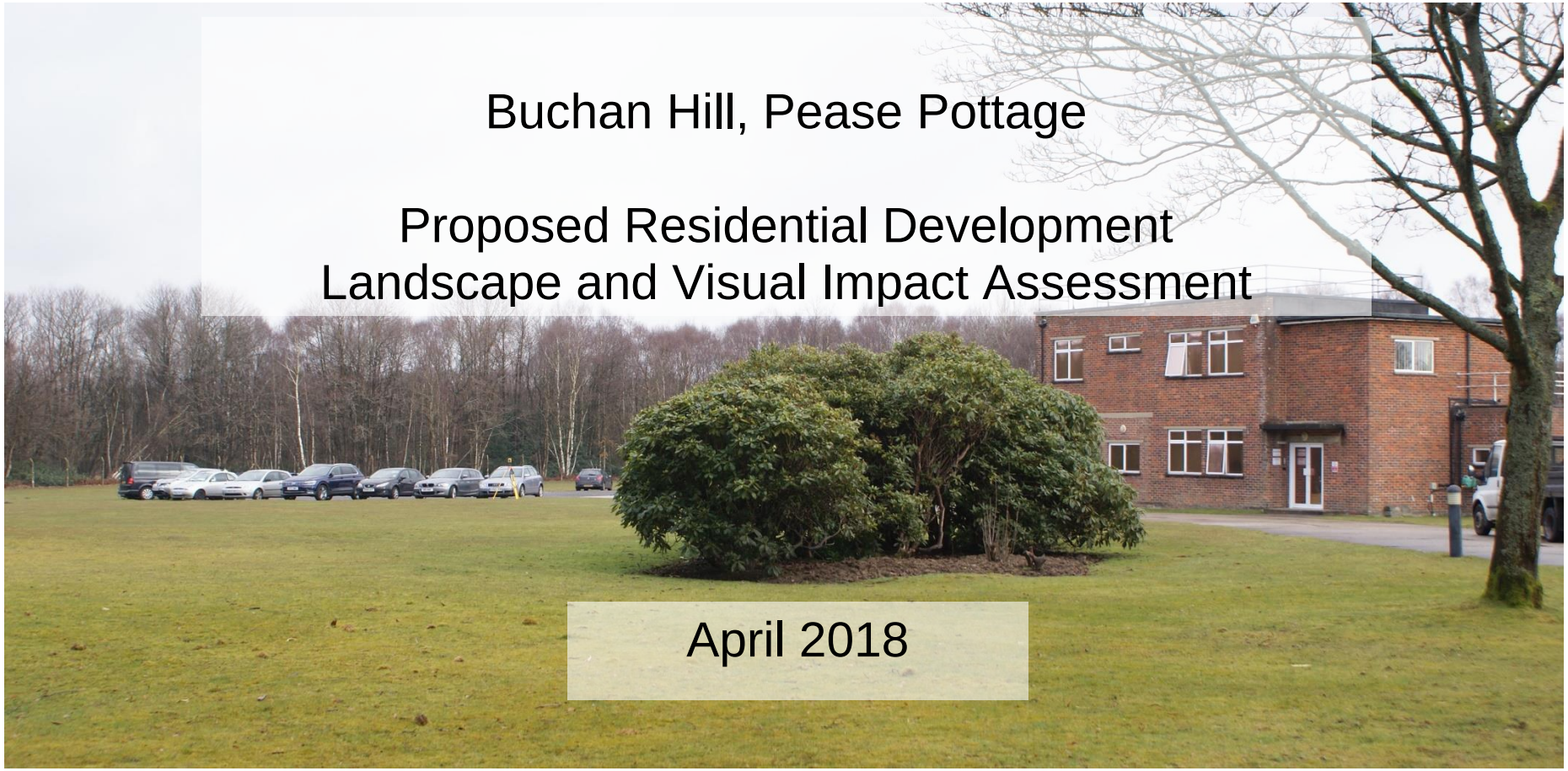
Land Management Services, April 2018 (submitted with application DM/18/1362; site referred to as "Buchan Hill, Pease Pottage")

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Relevance: these extracts support Section 2 of the Hearing Statement, under "Degree of wider visibility / sense of enclosure".

Baseline photographs were taken on 26 February and 11 March 2018. The full LVIA is available on request.



Buchan Hill, Pease Pottage

Proposed Residential Development
Landscape and Visual Impact Assessment

April 2018

Land Management Services

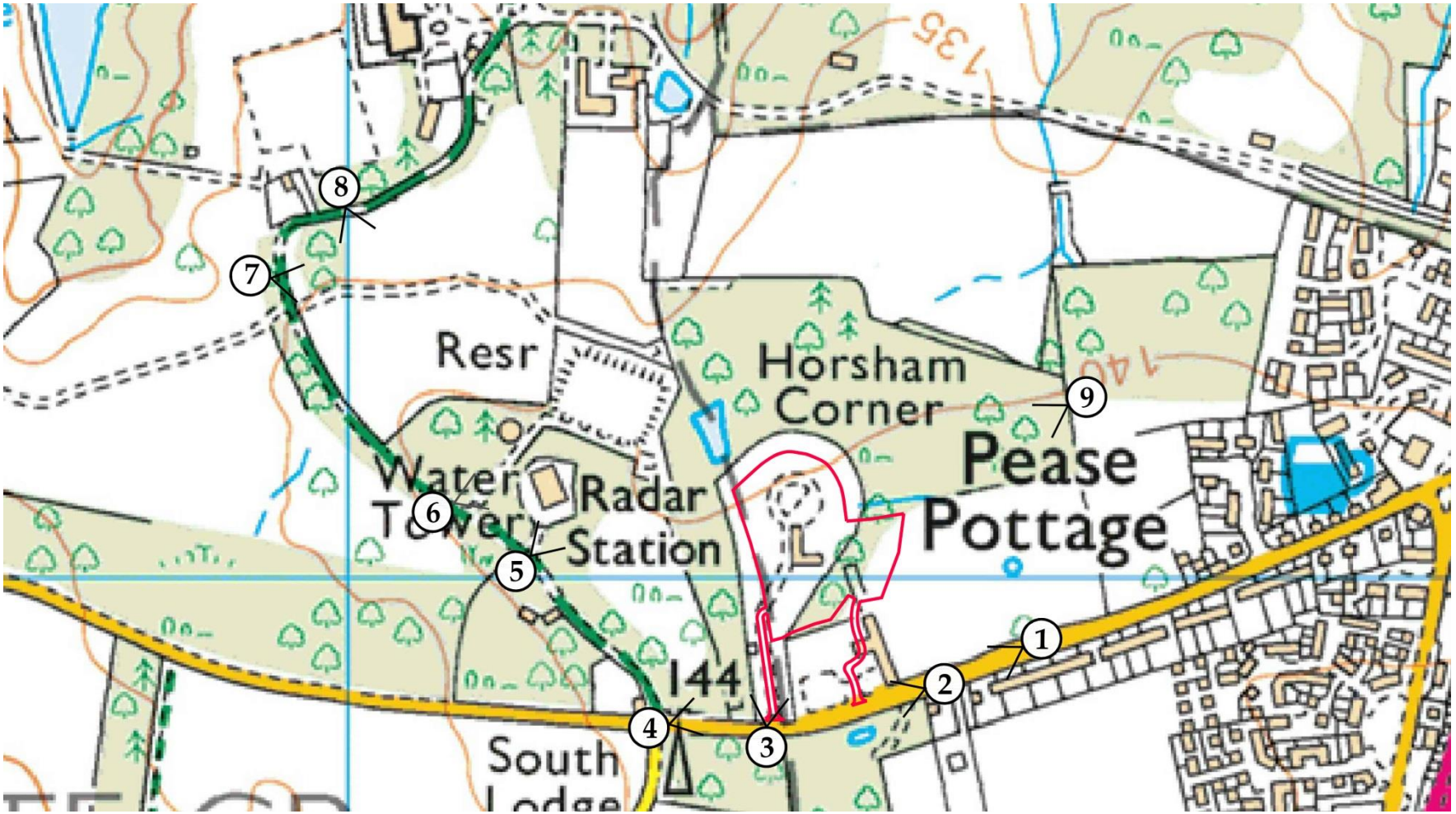


Figure 2: Viewpoint Location Plan

8.0 Visual Impact Assessment

Table 6 below provides an assessment of the visual impact of the proposed development from the representative viewpoints described in the baseline visual assessment in Section 6.

Viewpoint	Location	Sensitivity	Significance of effects
1	Near view west from Horsham Road at a distance of approximately 250m from the Site entrance.	Low. Viewpoint located on a public right of way.	The proposed new access point may just be visible in this viewpoint. However, the existing trees and built form north of Horsham Road screen all views of the Site. **Overall effect: Negligible**
2	Near view west from Horsham Road towards existing Site entrance.	Low. Viewpoint located on a public highway.	It is anticipated that the proposed new access would be visible from this viewpoint. However, the view already contains an existing access into the car park. It is possible that any works to the existing Site access may also be visible. No built form associated with the proposals would be visible. **Overall effect: Negligible**
3	Near view north from Horsham Road towards Site entrance.	Low. Viewpoint located on a public highway.	Two of the conifers associated with the electricity substation would be removed. However, the remaining specimens and other trees lining the access road would be likely to screen all views of the built form in summer, although glimpses may remain in winter. Built form is already visible in this view to the right of the image. It is anticipated that approximately 50% of this image (right hand section), which includes an area approved for development, will change to include new housing. It is anticipated that proposals could include changes to the existing access, for example surface treatments and signage, and there is scope for enhancements to planting. The existing access road and grassland to the west would remain in situ. **Overall effect: Negligible/minor beneficial**
4	Near view east on the western approach to the Site along Horsham Road.	High. Viewpoint located on a public right of way within the High Weald AONB.	Alterations to the existing access point may be visible from this viewpoint. However, the Site is entirely screened by trees in winter as well as in summer. **Overall effect: Negligible**

Viewpoint	Location	Sensitivity	Significance of effects
5	Near view east from public bridleway 1546	High. Viewpoint located on a public right of way within the High Weald AONB.	Access to the NATS radar tower offers views eastwards towards the Site. However, vegetation and built form screen all views of the Site itself. **Overall effect: Neutral**
6	Near view east from public bridleway 1546.	High. Viewpoint located on a public right of way within the High Weald AONB.	The proposals would be entirely screened by vegetation. **Overall effect: Neutral**
7	Near view south east from public bridleway 1546 on the approach to Cottesmore School grounds.	High. Viewpoint located on a public right of way within the High Weald AONB.	Trees in the middle and far distance screen all views of the Site. **Overall effect: Neutral**
8	Near view south east from public bridleway 1546 on the approach to Cottesmore School grounds.	High. Viewpoint located on a public right of way within the High Weald AONB.	A mature tree belt in the centre of the view screens all views towards the Site and the proposals would not be visible. **Overall effect: Neutral**
9	Near view west from the northern fringe of the settlement of Pease Pottage.	Medium. Viewpoint located at the AONB boundary (but not on a PRoW)	There may be glimpses of proposed development, especially in winter. However, recent development is already a feature within the view, suggesting nearby settlement, and existing development on Site, and the radar tower to the west, are partially visible. The tree belt in front of the Site is likely to screen almost all views in summer. **Overall effect: Negligible**

Following the Site visit, the visual envelope (publicly accessible viewpoints) is confirmed as follows:

- Intervisibility between the Site and surrounding areas is generally low and confined to near views within the immediate surrounding area. There are no distant views of the Site.
- From the west and north, views into the Site are entirely screened by the extensive land cover of woodland and trees. Views from public bridleway 1546 are screened entirely by an evergreen hedge along the eastern side of the bridleway route (the access road to Cottesmore School), or by intervening vegetation and landform between the bridleway and the proposed Site.
- From the south (Horsham Road) there are limited and transient views of the existing and proposed Site access roads. There may be glimpses of proposed development on the Site.

- From the east (Horsham Road) there are limited views of the existing and proposed access roads. Existing built form and trees screen all views of the proposed development Site. Glimpses may be possible from publicly accessible land at the northern edge of recent development north of Horsham Road.

The overall effect of the proposed development on identified viewpoints may be summarised as follows:

- 4 viewpoints (nos. 5-8, all west of the Site) are concluded to be neutral;
- 4viewpoints (nos. 1, 2, 9) are concluded to be negligible;
- 1 viewpoint (3) is concluded to be negligible/minor beneficial