PROTECT PEASE POTTAGE & HANDCROSS

Mid Sussex District Plan 2021-2039
Matter 7 continued - Proposed Main Modification sites

Hearing statement of Protect Pease Pottage & Handcross (PPH)

MM88 Land west of Truggers | MM89 Pease Field | MM90 Land west of Woodhurst Farm | MM91 Land north of Former Golf House

FINAL HEARING STATEMENT – SUBMITTED 16 OCTOBER 2026

1. PPH's position and the soundness question

PPH is an independent, volunteer-led group which has listened to affected residents and reviewed Council, promoter and infrastructure-provider evidence. We recognise the need for housing, including unmet need from neighbouring authorities. We do not ask the Inspector to revisit the District's housing requirement or suggest that National Landscape designation prohibits all development.

Our objection is specific: MSDC has not yet demonstrated that these particular allocations, at these housing figures, are justified, effective and consistent with national policy. Matters determining development in principle, realistic capacity and essential infrastructure are repeatedly deferred to planning applications or later masterplanning.

Detailed design can properly follow allocation. But the evidence determining whether to allocate major development, how much the land can reasonably accommodate after safeguards, and whether essential access and social infrastructure can be delivered cannot all be left until later.

Using the site-specific MM91 figure of 43 dwellings, MM88-MM91 total approximately 1,044 homes, including about 939 around Pease Pottage. MM88, MM89 and MM90 are treated by MSDC as major development in the High Weald National Landscape. The Inspector has separately programmed a strategic hearing on exceptional circumstances and the public interest for those three allocations.

PPH asks whether: (1) the National Landscape major-development test has been addressed sufficiently at allocation stage; (2) the housing figures survive the landscape, ecological, access and land-use safeguards; and (3) the infrastructure relied upon has a credible and timely delivery route.

2. National Landscape - exceptional circumstances and public interest

The applicable examination framework is the September 2023 NPPF. Paragraph 176 requires great weight to be given to conserving and enhancing landscape and scenic beauty. Paragraph 177 provides that major development in designated landscapes should be refused other than in exceptional circumstances and where it can be demonstrated to be in the public interest.

MSDC's own ENV22 assessment identifies MM88, MM89 and MM90 as major development. It acknowledges adverse landscape effects and, for MM90, substantial adverse effects together with significant cumulative effects. Yet ENV22 does not conclude that the paragraph 177 test has been demonstrated for the allocations. It records 'No' under other exceptional circumstances and concludes that exceptional circumstances and public interest are capable of being demonstrated at planning-application stage.

ENV22 is an assessment, but its conclusion is the problem. The Plan fixes the principle of major development while leaving the decisive protected-landscape judgement to a later application. An application-level LVIA may refine layout and mitigation; it should not be the first occasion on which the principle and reasonable scale of development are justified.

The High Weald National Landscape Unit's Planning & Design Adviser independently objects to MM88, MM89 and MM90 as unsound; the same objection is not made to every site in the National Landscape. For MM90, the adviser considers that the principle and scale cause harm and that a landscape assessment should inform both allocation and capacity. This is specialist advisory evidence, not necessarily a formal decision of the full Joint Advisory Committee.

For each major allocation, what present finding demonstrates exceptional circumstances and public interest? ENV22 says only 'capable of being demonstrated' at application stage. Thakeham's representation (§3.10), by contrast, describes the test as 'demonstrated'. Which actual allocation-stage conclusion does MSDC rely upon, and where is its supporting analysis?

ENV22's own methodology (paragraph 5.9) says exceptional circumstances need exploring at plan-making stage: alternatives can then be considered, allocation establishes the principle of development, and early assessment reduces the risk of an undeliverable allocation. Its Stage 2 method requires need, alternatives, harm, exceptional circumstances and public interest. The tension between that methodology and its deferred conclusions is therefore internal to ENV22.

Paragraph 177 will also apply to a future planning application, but the allocation-stage justification cannot be assumed. Illustrative examinations show the distinction: Vale of White Horse (2016) and West Oxfordshire (2018) removed AONB allocations where the major-development case was not adequately established; West Berkshire (2025) made an express positive plan-stage finding; and MSDC's 2022 Ardingly SA25 allocation was reduced from 70 to 35 homes when exceptional circumstances for major development were not shown. These examples are not binding precedents.

CPRE Sussex's 2 September representation (§§6.3, 6.7-6.10, 8-9) independently questions developable-area evidence, cumulative effects and the comparative public-interest judgment. PPH asks where MSDC has weighed housing and affordable housing, reasonable alternatives, the public value of conserving the High Weald, and residual harm after mitigation, for each major allocation and cumulatively. School places, roads, drainage and facilities required to serve new residents may be necessary mitigation, but should be distinguished from net additional benefits for existing communities. Biodiversity gain or screening does not necessarily restore historic field patterns, rural character or tranquillity. The Council should explain the weight given to both benefits and harm.

3. MM90 - National Landscape impact and the 700-home quantum

For MM90, the quantum is inseparable from the landscape issue identified in the agenda. The site policy requires landscape-led development, ancient-woodland and habitat safeguards, open space and buffering, water-body and wildlife protection, SuDS/drainage, transport measures, sports and community infrastructure and education mitigation. The evidence should show that those requirements shape the developable capacity; they should not be fitted around a pre-selected housing number.

PPH has not identified a current, definitive gross-to-net/landscape-capacity exercise deriving 700 homes after all requirements are applied together. The High Weald adviser says the LVIA should inform capacity. Thakeham's own landscape note acknowledges ancient woodland, strong hedgerow and field-tree networks and woodland which creates separation despite the A23 and nearby development. CPRE Sussex likewise identifies the absence of clear developable-area and density assumptions for the three major National Landscape allocations (§6.3).

MSDC's November 2023 ENV6 recorded Site 603 at 620 homes; MM90 now proposes 700. This change alone does not prove 700 unsound. It requires a transparent explanation of the boundary, net developable area, density, infrastructure and landscape evidence supporting the increase of 80 dwellings.

The promoter's own March 2026 Landscape Technical Note identifies earlier assessments of the same MM90 land: MSDC's 2007 Landscape Capacity Study (EP48) recorded substantial sensitivity and low capacity; the 2014 study (EP47) recorded substantial sensitivity and low/medium capacity; and the 2015 SHLAA (EP29) recorded medium sensitivity and medium-high value (note §§2.17-2.20). PPH does not assume these studies used identical methods or equate historic categories with a fixed dwelling number. But their findings require explicit reconciliation with a 700-home allocation: what evidence demonstrates that the constraints can now accommodate this scale?

That consultant also says existing residential and employment development, including Woodgate, 'set a precedent' for development in this part of the National Landscape (Landscape Technical Note §4.2). Existing development is a cumulative baseline, not permission for another major allocation. Nor does Woodgate remove the need to demonstrate exceptional circumstances and public interest afresh for MM90. The same note acknowledges woodland, ancient woodland and a sense of separation (§4.5). The question is what the next 700 homes add to the cumulative harm, not whether development has occurred here before.

Thakeham also requests that allocation figures generally become 'at least' minimums. PPH opposes this for MM90: the Plan's evidence tests 700, and PPH has not identified a published sustainability, landscape, transport or infrastructure assessment of a higher capacity.

If 700 is indicative, it must be reducible when evidence demands. Landscape and ecological protection, access and infrastructure must determine the capacity, not be squeezed around a fixed or rising target.

Where is the current combined land-budget and landscape-capacity evidence supporting 700 after mitigation; how have earlier low-capacity findings been reconciled; and what higher number, if any, has been tested?

4. MM90 - access, transport and social infrastructure

Policy MM90 refers to suitable vehicular access from Old Brighton Road South and bus/emergency access from the same road. Promoter/masterplan material relied upon in the evidence base has also indicated a north-west connection via Grouse Road involving land outside Mid Sussex. This is not a semantic difference. The access proposition affects land control, landscape effects, cross-boundary approvals, traffic distribution and the practicality of bus, emergency, walking and cycling arrangements.

Scenario 7/T18a is useful strategic evidence and includes Site 603 at 700 homes, but the new sites were loaded into existing model zones using existing trip distributions. This cannot alone establish that the particular access arrangement is geometrically, environmentally and legally deliverable. PPH accepts the strategic-road-

network conclusions insofar as tested, but policy, promoter material and transport evidence should be testing the same access proposition.

The key access question is therefore: which definitive MM90 access strategy underpins the 700-home allocation, which off-site land and approvals are required, and which access/trip-distribution assumptions were used in the evidence?

Education provides an unusually clear example of the difference between physical possibility and demonstrated delivery. Sussex Learning Trust, which operates Woodgate Primary Academy, confirmed on 5 October that it considers the existing site physically capable of expansion to 2FE. PPH accepts that point.

However, the Trust also confirmed that it has nothing formal in writing about the expansion beyond an informal enquiry as to its position; it has seen no feasibility study, concept plan, accommodation schedule or site plan; and the additional buildings and facilities have not been formally discussed. The Trust says Woodgate's current PAN is 15, expects the school to become 1FE before any of the proposed new housing is delivered, and says the school already receives more first-choice applications than places.

The Trust has not been provided with WSCC's pupil-yield assessment and describes the sufficiency of school places as a local-authority 'basic need' question. It does not know the cost, funding or delivery details and no housing occupation trigger has been discussed.

PPH does not say that this proves 2FE is insufficient. It shows that the evidence presently available does not demonstrate that 2FE will provide sufficient cumulative capacity for the 939 homes proposed around Pease Pottage, taking account of Woodgate's expected existing demand, or that a defined, funded and phased expansion project will be available when required. A developer contribution is a funding mechanism; it is not by itself evidence of sufficient capacity or timely delivery.

The Council should therefore identify WSCC's forecast pupil yield and Woodgate roll, demonstrate whether 2FE is sufficient for the cumulative MM89/MM90/MM91 growth, and identify the feasibility, delivery responsibility, funding route and opening/occupation trigger relied upon by the Plan.

5. MM89 and MM91 - test the coordinated proposition as one

The Inspector is hearing MM89 and MM91 together. That is consistent with the promoters' own delivery propositions. Denton Homes says MM89 and MM91 should operate as 'a single, coordinated development served by a shared point of access', while the A2Dominion/Turley material identifies connectivity through the Foresters Way access.

The consequence is important. The Plan should not rely on 196 dwellings at MM89 plus 43 at MM91 as two independently proven yields while the shared access, ancient-woodland interface, ecological corridors, drainage, walking/cycling and phasing arrangements remain to be resolved later between separate promoters.

PPH therefore seeks one current coordinated masterplan and delivery proposition demonstrating Foresters Way access and land control, woodland buffers, ecological connectivity, drainage, walking/cycling arrangements and the combined realistic capacity. If that exercise reduces the amount of development that can be accommodated without weakening the safeguards, the figures should reduce accordingly.

A2Dominion queries proposed Horsham Road bus stops because there is no current service on that section and the Plan identifies no new service. This is not a standalone deletion argument: it shows why any promised transport benefit should have a realistic service and delivery mechanism.

6. MM88 - National Landscape impact and site-specific soundness

MM88/Handcross requires its own site-specific judgement, rather than being treated as an extension of the Pease Pottage case. The High Weald adviser identifies its historic pastoral field pattern, relationship to Hoadlands Wood and the urbanising effect of up to 105 homes on the rural settlement edge. What assessment demonstrates that the full 105-home figure can be accommodated while preserving appropriate woodland, wildlife and landscape buffers? Hallam itself says 'up to 105'.

The central MM88 question remains whether the paragraph 177 exceptional-circumstances/public-interest case is adequately demonstrated before allocating this acknowledged major development. PPH does not assert that 105 homes are physically impossible.

If retained, 105 must be an indicative maximum reducible where woodland, pastoral character, wildlife, open-space or buffering evidence requires. Site-specific safeguards, not maintaining the full number, should control the design.

7. Crawley and cumulative social/community infrastructure

The MM90 and MM89/MM91 agendas expressly include the impact on Crawley infrastructure. This matters because MSDC has relied on the proximity of the sites to Crawley and existing services as part of the sustainability/public-interest case.

Crawley Borough Council's Main Modifications representation is relevant corroboration. CBC supports housing close to Crawley in principle, but says cumulative infrastructure requirements must be identified and programmed and that the combined effects of Pease Pottage growth, Crabbet Park, growth in Horsham and the Gatwick Northern Runway have not been fully tested or understood in relation to Crawley's infrastructure, services and facilities.

PPH is not asking the Inspector to require a document with a particular title. The issue is the substance: where existing facilities and infrastructure are relied upon to support the allocations, the evidence should identify sufficient capacity or the intervention required, who is responsible for delivery, how it will be funded and the relevant lead time or occupation trigger. Where such infrastructure is relied upon as a public-interest benefit, the Council should distinguish measures needed to offset new demand from demonstrable additional benefits to existing residents.

8. Modifications/remedies sought

- MM90: delete unless the allocation-stage National Landscape case is demonstrated. If retained, require an express reasoned paragraph 177 finding; a landscape-led, indicative and reducible capacity, not an 'at least 700' minimum; transparent reconciliation of earlier capacity assessments; a coherent access/land-budget scheme; and a provider-backed education delivery and occupation-phasing mechanism.
- MM89/MM91: delete or revise if the combined case is unproven. If retained, require a coordinated, enforceable masterplanning/access and delivery framework for the shared 196 + 43-home proposition, with constraint-led figures capable of reduction.
- MM88: delete unless the paragraph 177 test is demonstrated at allocation stage. If retained, cap the indicative figure at 'up to 105' with a landscape-led reduction where needed and explicit safeguards for Hoadlands Wood and the rural settlement edge.
- Across the allocations, require evidence of infrastructure capacity or intervention, the responsible provider, funding, lead time and proportionate occupation triggers. Make access routes, cross-boundary dependencies and land-control assumptions explicit; associated infrastructure must not be treated as pre-approval for additional housing outside these allocations. Identify which community benefits go beyond mitigation, how they are secured, and what weight is given to residual National Landscape harm.
- Where essential mitigation reduces developable land or requires additional space, reduce or rephase housing rather than weakening landscape, woodland or infrastructure safeguards. Any further development outside these allocations would require its own lawful assessment; the present allocations cannot pre-authorise it.

9. Matters PPH accepts

PPH accepts that National Landscape designation is not an absolute development ban; application-stage design can follow allocation; strategic transport modelling is relevant; Woodgate has physical room to expand; and unresolved infrastructure issues do not necessarily make housing impossible. The question is whether the evidence now demonstrates sound allocations at the proposed scales. We also accept that housing, including affordable housing, is a genuine public benefit; our question is the site-specific balance with nationally protected landscape harm and alternatives.

10. Sources relied upon

- IDJB-13 Inspector's Guidance Note (25 September 2026); IDJB-14 Hearing Programme; IDJB-15 Hearing Agenda.
- PPH Final Main Modifications Representation and controlled evidence bundle.
- DP2a Schedule of Main Modifications; ENV22 Major Development in the High Weald National Landscape; ENV6 Assessment of the Impact of SHELAA Sites on the High Weald AONB; T18/T18a Scenario 7 transport modelling.
- High Weald National Landscape Unit representations on MM88, MM89 and MM90 (2 September 2026).
- Thakeham Homes final MM representation (7 September 2026), especially §§3.10, 4.3-4.11 and Appendix B Landscape Technical Note (18 March 2026), §§2.17-2.20, 4.2-4.5 (EP48, EP47, EP29 assessments); Hallam Land final MM88 representation; A2Dominion/Turley MM89 and Denton Homes MM91 representations.
- Crawley Borough Council final Main Modifications representation (September 2026).
- Sussex Learning Trust / Woodgate Primary correspondence, including Jonathan Morris (CEO), 1 July and 5 October 2026; WSCC education evidence.
- Vale of White Horse Local Plan 2031 Part 1 Inspector's Report (2016), paras 113-118; West Oxfordshire Local Plan 2031 Inspector's Report (2018), paras 219-223.

CPRE Sussex, District Plan MM88-MM90 representation (2 September 2026), especially §§6.3, 6.7-6.10, 7.17, 8.1-8.10 and 9.1-9.3; cited as independent third-party analysis, not adopted wholesale.

- West Berkshire Local Plan Review Inspector's Report (8 April 2025), paras 58-60; Mid Sussex Site Allocations DPD Inspector's Main Modification MM1 / SA25 Ardingly (2022).