



Worth Parish Council Position on the Inspectors Main Modifications

Worth Parish Council supports the adoption of an up-to-date Mid Sussex District Plan.

The Parish Council considers that Mid Sussex requires a robust adopted Local Plan to provide certainty for residents, infrastructure providers and businesses, and to protect communities from speculative development arising from the absence of a five-year housing land supply.

Accordingly, the Council does not object to the Plan on the basis of the housing requirement itself, nor does it seek to delay adoption of the Plan. The Council's concerns relate instead to the quality of strategic planning, infrastructure delivery, cumulative impacts of development, local economic benefit, design quality and the long-term sustainability of growth.

The Council believes that development should not simply accommodate housing numbers, but should create stronger, more sustainable and more prosperous communities, encouraging inward investment and local benefit.

In recent years' Worth Parish Council has already experienced substantial expansion through strategic developments such as West of Copthorne, Burleigh Woods, Kings Acre and Hazel Rise. If Crabtree Park proceeds, together with other proposed allocations and neighbouring developments being promoted through the Tandridge District Plan, the cumulative level of growth would exceed 100% of the existing settlement size. Land West of Turners Hill Road, the consented Land North of Burleigh Lane and proposed Land to the rear of the Martins, along with the sites outlined in the Tandridge Regulation 18 proposals will bring a substantial increase in size to the settlement of Crawley Down. By any reasonable assessment this represents exceptional growth for a village community.

WPC considers that the practical implications of accommodating this level of growth should be given significant weight. A strategy which may appear balanced when assessed through district-wide modelling can result in severe local impacts when applied to individual settlements. The Inspector is therefore requested to consider whether the proposed distribution of growth is proportionate and sustainable when viewed from the perspective of the communities expected to accommodate it.

Increasing the Housing Requirement to contribute to the unmet need of Brighton and Hove is not justified

Mid Sussex is a partner in the Northern West Sussex Housing Market Area (NWSHMA) with Crawley and Horsham and should contribute to unmet need in the Market Area. Mid Sussex does not have an equivalent commitment to contribute to the unmet need of Brighton and Hove. Horsham has not been asked to make a similar contribution through an increase in its Housing Requirement.

Given that the Inspector accepts that a 'strategic response' is needed to address the unmet need of Brighton and Hove, it is not justified to increase the Mid Sussex Housing Requirement by 1,075 (or any number) in advance of the development and agreement of that 'strategic response'.

The Housing Requirement in **MM28** should therefore be reduced to 22,996 (24,071 minus 1,075) and the least sustainable additional sites (according to the assessments in the Sustainability Appraisal Main Modifications Report) should be deleted. The deletions should include **MM69** (Courthouse Farm, Common Road) and **MM70** (Land r/o The Martins (south of Hophurst Lane) as both are less sustainable sites as evidenced by the assessments published in the Sustainability Appraisal Main Modifications Report.

Strategic Planning and Deliverability

The Council supports the principle that sites allocated within the District Plan should be deliverable, supported by evidence and capable of being implemented within the plan period. The Council notes that MS-TP4: Housing Post Hearings Update (May 2026) publishes details of the housing requirement and the actual housing delivery over the past 5 years. Mid Sussex has an excellent record of delivery over this period, but it is noteworthy that in no year has the completions met the proposed dpa of 1,300.

	2021/22	2022/23	2023/24	2024/25	2025/26	Total
Requirement	1090	1090	1039	1039	999	5257
Completions	1187	1053	1247	837	889	5213
Under Supply						44

The purpose of the Plan must be to secure sustainable development rather than simply allocate land for future housing numbers. Sites should be capable of delivering homes, infrastructure, community facilities and economic benefits within a realistic timeframe.

The Council also considers that strategic allocations should not be promoted primarily as investment assets or land banking opportunities. Development sites included within the Plan should demonstrate a clear route to delivery and tangible benefits for the communities affected.

The Council accepts that windfall sites will play a role in contributing towards housing delivery. However, sites as large as Cuckfield Road (Cucksty Farm) would have a noticeable effect on Mid Sussex and should be carefully considered before being considered as a windfall provision

More broadly, the Council considers that the adoption of a District Plan remains the most effective mechanism for managing growth and protecting communities across Mid Sussex.

Infrastructure and Community Investment

The Council recognises that recent developments have secured significant infrastructure contributions and community benefits.

However, over the past decade, many developments within Worth Parish Council's boundaries have made insufficient contributions, with planning permission often granted on appeal. This has created resentment among residents, as village assets—such as sports provision and social facilities, have not kept pace with provision elsewhere in Mid Sussex.

The Council believes that new developments brought forward in the district plan should ensure that the benefits of investment are reaped by the existing community with the new homes becoming a cohesive part of the existing settlement and so benefitting as well. Infrastructure provision should be delivered to ensure the new demand is met and delivered seamlessly rather than being added at the end. This will only be achieved with all levels of local government listening to each other and working with developers to establish and meet local needs. The council expects that any new developments/settlements must be delivered respecting the nearby community's needs and not for the benefit of neighbouring towns and authorities.

The Council therefore recognises that development can bring positive outcomes, including:

investment in local services;

investment in training and job opportunities

support for local businesses;

increased public transport usage;

enhanced community facilities;

additional economic activity within village centres; and

improved infrastructure when properly planned and delivered.

The key issue is therefore not whether development occurs, but whether development is accompanied by appropriate investment and whether the community's accommodating growth receive a fair share of the resulting benefits.

The Council requests stronger policy wording requiring major developments to demonstrate how they will contribute positively to the economic, social and environmental wellbeing of Worth Parish and its settlements.

WPC considers it essential that infrastructure delivery precedes, rather than follows, occupation of homes.

Local Employment and Economic Benefits

The Parish Council believes that the Plan should place greater emphasis on retaining the economic benefits of development within the community's accommodating growth.

In particular, the proposed Crabbet Park development represents a substantial strategic allocation with the potential to generate considerable employment opportunities during both construction and occupation.

The proposed southern access arrangements may result in a significant proportion of employment opportunities, visitor spending and economic activity being directed towards Crawley and neighbouring settlements.

The Council therefore requests stronger policy requirements that:

encourage local recruitment and apprenticeships;

promote local procurement and use of local supply chains;

secure employment opportunities accessible to local residents;

support village centres within Copthorne and Crawley Down; and

ensure that strategic developments deliver lasting economic benefits to Worth Parish communities.

Growth should be accompanied by economic enhancement, and opportunities generated by major developments should benefit the communities most directly affected by them.

Transport Access and Design

WPC remains unconvinced that the proposed access arrangements are capable of accommodating a development of between 1,900 and 2,300 dwellings in a safe and efficient manner.

Concern arises from the apparent dependency on Turners Hill Road and surrounding local routes which already experience congestion during peak periods. The scale of development proposed is unprecedented within the parish and the evidence presented does not sufficiently demonstrate how the resulting vehicle movements can be accommodated without significant adverse impacts on local communities.

WPC requests greater transparency regarding trip generation assumptions, junction performance, route distribution and network resilience. Particular attention should be given to circumstances involving network disruption, road closures, incidents or airport-related traffic pressures where reliance on a limited number of routes could create substantial operational difficulties.

This issue extends beyond individual development sites and represents a strategic cross-boundary matter involving Mid Sussex, Tandridge, Crawley and the wider Gatwick area.

Concerns remain regarding:

Wallage Lane;

Turners Hill Road;

Crawley Down Road;

the A264 corridor;

the Star Junction;

the A22/A264 junction; and

wider cross-boundary traffic movements associated with development proposed in Mid Sussex and Tandridge.

WPC believes insufficient weight has been given to evidence highlighting the role of Wallage Lane as an existing rat-run.

Of particular concern is the potential for Crabbett Park construction traffic and future vehicle movements to exacerbate existing problems on Wallage Lane and surrounding roads. The implications for Turners Hill Road, Crawley Down Road and the wider strategic highway network have not, in the Council's view, been comprehensively assessed.

Worth Parish Council believes consideration should also be given to traffic and building management plans during the construction process. The recent experience at Felbridge on the WPC boundary has resulted in mud on the road, inconvenient road closures, dust and great inconvenience and annoyance for the existing residents. This should be studied and learned from before any further development is considered.

Testing in combination fails to take account of the impact of proposed allocations in Tandridge DC

The highways assessment in MS-TP5: In-Combination Testing – Conclusions identifies a number of significant impacts on the A264 corridor between East Grinstead and Crawley and the immediate local road network. The congestion at three junctions within the Worth Parish area are assessed to become 'severe' as a result of the additional sites (MM59 and MM60) and the increased number at Crabbet Park (MM). The junctions concerned are the B2028 Turners Hill Road / Wallage Lane junction in Crawley Down, the B2110 / B2028 Turners Hill crossroads, and the A2220 Copthorne Common Rd / Old Hollow junction in Copthorne. The forecast delay at the latter is assessed to be over 5 minutes.

In addition, WPC has concerns that the transport modelling does not adequately reflect the scale of development now proposed across the wider area. The modelling appears to exclude or under-represent several significant growth pressures, including the proposed expansion of Gatwick Airport, strategic allocations being promoted through the Tandridge District Plan and emerging allocations within Horsham District Council. The cumulative impacts of these developments are likely to place considerably greater pressure on the A264 corridor and local road network than currently forecast.

WPC is also concerned that insufficient weight has been given to active travel limitations affecting the area. The countryside character of the parish, severance caused by major roads and distances to services significantly restrict opportunities for additional routes. Assumptions regarding walking, cycling and public transport uptake should therefore be independently tested to ensure they are realistic and evidence based.

WPC also wishes to draw the Inspector's attention to the failure of the In-Combination Testing – Conclusions (July 2026) to include any options arising from the Joint SCC/WSCC A264/A22 Corridor Study, or the relevant mid- and long-term objectives of the West Sussex Transport Plan (WSTP) for North Mid Sussex. In fact, the Corridor Study has failed to identify any options which will alleviate the congestion at the A22/A264 junction in Felbridge despite the availability of many £Ms of developer contributions for improvements from the SA20, SA21 developments and earlier

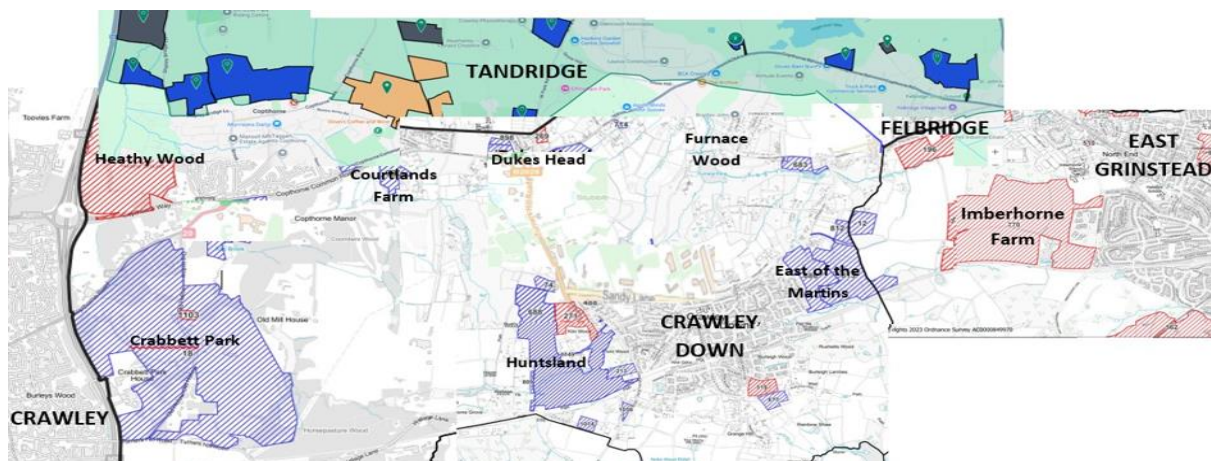
developments on the western side of East Grinstead. In effect, the mid-term objective in the WSTP to alleviate congestion at the A22/A264 junction has been abandoned.

This consultation is proceeding in parallel with a draft Tandridge District Plan consultation on its planned site allocations. These include over 1,700 new homes on the North boundary of Copthorne and along the A264 corridor.



The highways assessment of the In-Combination Testing has not taken the cumulative effects of traffic from these developments on the A264 corridor into account. The conclusions for North Mid Sussex, which already predict three severe junctions in the Worth Parish area, must be dismissed as a significant under-representation of the likely outcomes.

Together, the proposed site allocations by Mid Sussex and Tandridge will see over 5,000 new homes in the green gap between East Grinstead and Crawley. The cumulative effects of this level of development needs significantly more analysis in order to identify the infrastructure needs.



Sport and Community Facilities

The Council remains concerned regarding the ability of existing services to accommodate future population growth.

Future growth should provide opportunities to enhance:

sports facilities;

recreational opportunities;

youth provision;

active travel infrastructure;

community facilities; and

wider health and wellbeing outcomes.

Additional emphasis should be placed on increasing sports participation and improving community health. Opportunities should be explored to expand provision around existing community assets, including facilities associated with the Haven Centre and the pavilion in Copthorne and other locations capable of supporting long-term growth.

The Council would also support provision for a wider range of recreational activities and emerging sports where demand can be demonstrated.

Healthcare Infrastructure

WPC has continuing concerns regarding primary healthcare capacity within the area. Existing practices already serve rapidly growing communities, and WPC has not seen sufficient evidence demonstrating how additional population growth associated with Crabbet Park will be supported.

The Council requests that Mid Sussex District Council engages directly with local healthcare providers and the NHS to ensure that future capacity requirements are fully understood and appropriately planned for.

Infrastructure Phasing

WPC considers it essential that infrastructure delivery precedes, rather than follows, occupation of homes. Experience elsewhere in the parish demonstrates that residents often wait many years for promised facilities, creating pressure on existing schools, healthcare services, highways, community facilities and recreational provision. Given the anticipated build-out period of Crabbet Park, policy wording should explicitly require key infrastructure to be delivered in advance of occupation thresholds, rather than allowing provision to be deferred until late phases of development.

On-Site Sports Provision

Given the scale of the proposed development, WPC is concerned that reliance on financial contributions will not meet future demand for sports provision. There is limited available land within Copthorne and the surrounding area upon which additional facilities can realistically be delivered. WPC therefore believes that a substantial proportion of

sports provision should be delivered within the Crabbet Park allocation itself, ensuring that facilities are available to residents from the outset and reducing pressure on already constrained community assets.

Design, Character and Housing Mix

The Council requests stronger protection for local character within the District Plan. Focus is put on the delivery of high-quality development.

Future development should reflect the established form and identity of Copthorne and Crawley Down one and two storey development rather than adopting urban design approaches more closely associated with Crawley. Careful consideration should be placed upon suitable, thoughtful design.

Particular attention should be paid to:

building height;

scale;

density;

landscape setting;

An appearance replicating village character; and
local architectural distinctiveness.

The Council considers that three and four-storey development that would be out of keeping with the prevailing character of Parish settlements.

The Council also requests stronger policy support for a wider range of housing tenures and accommodation types, enabling residents to remain within the Parish throughout different stages of life. This should include the consideration of

affordable housing;

first homes; enabling those who grow up in a village to make their first home there

accessible and adaptable housing;

downsizing opportunities;

accommodation for older people; and

multigenerational living arrangements.

A broader housing mix would assist in maintaining balanced and sustainable communities whilst better meeting local need.

Community Governance and Long-Term Management

WPC is concerned that the proposal represents a development of such scale that it will materially alter the character of Copthorne, Crawley Down, and Worth Parish. The Main Modifications do not adequately explain how the new community will be integrated into

existing governance arrangements, how community cohesion will be encouraged, or whether local government boundary changes may ultimately be required.

The Council requests that Mid Sussex District Council undertakes a formal assessment of the governance implications of the development, including consideration of parish boundaries, representation arrangements, service delivery responsibilities and long-term asset management.

Where facilities are proposed to be managed by a private management company, the District Council should explain how this model will interact with the functions and responsibilities of WPC. Experience within nearby developments has demonstrated that parallel management arrangements can create confusion for residents, duplication of charges, and barriers to effective community integration.

The proposed development is of a scale that will create a community comparable in size to many existing parishes. The Main Modifications do not explain how democratic accountability, asset stewardship and local representation will operate once the development is occupied.

WPC is concerned that extensive reliance on management companies could create a two-tier system of local governance in which residents contribute both through council taxation and private management charges. The long-term relationship between any management company and WPC should be clearly established at the planning stage to ensure effective service delivery, accountability and community cohesion.

MM20 DPT4 should have regard to the most up to date WSCC EV Charging Strategy. The MM should recognise that WSCC will cease to exist after April 2028.

MM43 Crabbet Park + MM36, MM49

WPC is concerned that education forecasts may fail to reflect the actual demographic profile of recent developments in the parish. Experience at West of Copthorne suggests significantly higher demand for school places than strategic modelling would indicate. Local schools have experienced pressure on Reception places and the need for additional capacity in older year groups despite wider county trends suggesting falling rolls.

The demographic profile of recent developments has included a disproportionately high number of young families. This appears materially different from some of the assumptions used within broader education forecasts. The Council therefore requests that the education evidence supporting Crabbet Park is reviewed against the actual occupation patterns and school-age population generated by recent developments in Copthorne.

MM43 – Land at Crabbet Park

Water Supply and Water Resource Constraints

WPC is extremely concerned about the ability of existing water infrastructure and water resources to support development at Crabbet Park and all new development sites. Southeast Water identifies Sussex as an area of severe water stress and, within its adopted Water Resources Management Plan, forecasts that from 2030 there will be insufficient water available to maintain supplies in a dry year without significant intervention and major infrastructure investment. The same evidence identifies increasing population growth, housing growth, climate change and environmental restrictions on abstraction as significant challenges to future supply.

Southeast Water advises that available water resources in Sussex are forecast to reduce by approximately 56Ml/d through abstraction sustainability requirements and climate change impacts, while demand is expected to continue increasing. The company is therefore planning over £2 billion of investment in demand reduction measures, water recycling projects, transfers and new reservoir infrastructure in order to maintain future water security.

Particularly concerning is Southeast Water's recent evidence that the housing forecasts used within its Water Resources Management Plan are substantially lower than the latest housing requirements now being proposed by local planning authorities. For Mid Sussex, Southeast Water identified a significant discrepancy between its growth assumptions and the housing numbers now being planned. The company is preparing planning position statements which may identify circumstances where sufficient water resources do not currently exist to support accelerated housing growth.

The Inspector should therefore require a robust and independently verified assessment demonstrating that sufficient water resources and distribution capacity exist to serve Crabbet Park throughout all stages of occupation. No phase of development should be occupied until the water undertaker can demonstrate that adequate supply and network capacity are available without adversely affecting existing customers or environmental obligations.

WPC notes increasing examples across the Southeast where water resource constraints have become a material consideration in planning decisions and local plan preparation. It is no longer sufficient to assume that water infrastructure can simply be provided retrospectively once development has commenced.

The Council does not consider water supply issues to be a reason for finding the Plan unsound.

However, stronger mitigation and resilience measures are required.

The Council requests greater policy emphasis on:

- water recycling systems;

- grey-water reuse;

- rainwater harvesting;

- sustainable drainage solutions;

- renewable electricity generation;

- rooftop solar energy;

- battery storage;

local energy resilience measures; and

other innovative approaches capable of reducing demand on existing infrastructure.

Growth should be accompanied by measures that improve environmental sustainability and reduce long-term pressure on water and energy networks.

MM55

The Council maintains its previous view that the proposed location for a community building under MM55 is not the most appropriate location for serving the wider community.

The Council considers that community buildings are most successful when located in central, accessible locations that form part of everyday village life.

The Council would therefore support consideration of alternative uses for the identified land, including allotments while seeking opportunities to locate any future community building in a more central and accessible village location.

MM69 – Courthouse Farm, Copthorne Common Road, Copthorne

WPC objects to MM69 (Courthouse Farm). The site lies on the opposite side of the A264 from the existing built-up area and would create an isolated and inherently unsustainable development disconnected from village services and facilities. Safe and attractive pedestrian access would require substantial intervention to overcome the severance created by the A264. Approval of the site would establish a precedent for ribbon and infill development along an important area of separation between Copthorne and Crawley Down and establish an undesirable precedent for further development beyond the defined built-up area boundary.

WPC also notes that further development potential may remain within or adjacent to the existing West of Copthorne allocation. Given that key elements of the original masterplan, including a school and doctor's surgery, were not delivered, the Council believes that any additional development opportunities associated with that allocation would represent a more sustainable location for growth than Courthouse Farm.

Should further housing be required to meet the District's needs, WPC considers that development associated with the existing settlement edge would be preferable to allocating a site beyond the A264 which is physically separated from the built-up area and reliant upon significant new infrastructure.

MM70 – Land r/o The Martins, Crawley Down

Concerns the development is outside the boundaries of that considered as sustainable development. Concerns about pedestrian access either along the road or through woodland, not properly light or policed with the potential or encouraging anti-social behaviour.

MM98 – DPI6: Community and Cultural Facilities and Local Services

"Proposals that involve the loss of a community or cultural facility (including those facilities and services where the loss would reduce the community's ability to meet its day-to-day needs locally), will not be supported unless:"

Add pub:

"Proposals that involve the loss of a community or cultural facility or a pub (including those facilities and services where the loss would reduce the community's ability to meet its day-to-day needs locally), will not be supported unless:"

Conclusion

Worth Parish Council supports the adoption of the Mid Sussex District Plan and recognises the importance of maintaining a plan-led approach to growth.

The Council's principal concern is not the level of housing proposed, but ensuring that growth is accompanied by the infrastructure, investment, employment opportunities, environmental mitigation and community benefits necessary to support sustainable development.

Particular attention should be given to the cumulative strategic transport impacts affecting Wallage Lane, Turners Hill Road, Crawley Down Road, the A264 corridor and the wider cross-boundary implications of development proposed in Mid Sussex and neighbouring authorities.

The Council requests that the Inspector consider whether the Main Modifications provide sufficient safeguards to ensure that development delivers tangible and lasting benefits for Worth Parish, Copthorne, Crawley Down and the wider Mid Sussex community.